

# NOTICE OF MEETING

## SPECIAL LICENSING SUB COMMITTEE

**Tuesday, 6th October, 2020, 10.00 am - MS Teams meeting**  
(view it [here](#))

**Members:** Councillors Gina Adamou (Chair), Viv Ross and Yvonne Say

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**

### **3. URGENT BUSINESS**

It being a special meeting of the Sub Committee, under Part Four, Section B, Paragraph 17, of the Council's Constitution, no other business shall be considered at the meeting.

### **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. DETERMINATION OF APPLICATION FOR A PREMISES LICENCE FOR AN ADULT GAMING CENTRE LICENCE FOR CITY GAMING LTD, 450-454 HIGH ROAD, TOTTENHAM, LONDON N17 (PAGES 1 - 282)**

Emma Perry, Principal Committee Co-ordinator

Tel – 020 8489 3427

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Email: [emma.perry@haringey.gov.uk](mailto:emma.perry@haringey.gov.uk)

Bernie Ryan

Assistant Director – Corporate Governance and Monitoring Officer

River Park House, 225 High Road, Wood Green, N22 8HQ

Monday, 28 September 2020

**Report for:** Licensing Sub Committee 6<sup>th</sup> October 2020

**Title:** Determination of Application for a Premises Licence for an Adult Gaming Centre Licence for City Gaming Ltd, 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.

**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 application for an Adult Gaming Centre Premises Licence at 450-454 High Road, Tottenham London N17.

A copy of the application for the premises licence and accompanying documentation that the applicant submitted with their application is at **Appendix 1**.

- 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)

- 3.2 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.

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

- 5.6 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.



- 5.7 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

Licensing Team  
Level 1 North - River Park House  
225 High Road  
Wood Green  
N22 8HQ

**By Special Delivery**

Dear Sirs

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

Date: 31 March 2020  
Our ref: IM/IM/P55583-136  
Doc Ref: 2147474764  
Your ref:  
E-mail: i.moss@popall.co.uk  
Direct line: 0115 9349173

We act for City Gaming Limited. We are instructed to submit an application for an AGC Premises Licence for the above premises.

We therefore enclose:-

1. Application form
2. Notice of Application
3. Two copies of the plan of the proposed premises: 18.06.1439
4. Payment in the sum of £2000 – to be made over telephone
5. Certificate of Service

We have arranged for the notice to be displayed on the premises from 1 April 2020 and published within an appropriate local newspaper within 10 working days of 1 April 2020.

This application has been sent to you by special delivery to arrive at your offices by 1<sup>st</sup> April 2020 and the last date for representations will therefore be 28 April 2020.

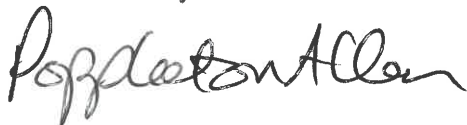
Paragraph 15(2) of the Gambling Act 2005 (Premises Licence and Provisional Statements) Regulations 2007 state that the period for representations shall begin on the date on which you receive the application.

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 Imogen Moss 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



**Partners** • James R D Anderson Ltd • Nick Arron Ltd • Graeme Cushion Ltd • Clare Eames Ltd • Andy Grimsey Ltd • Lisa Inzani Ltd  
Lisa Sharkey Ltd • Jonathan M Smith Ltd • Sarah L Taylor Ltd • **Associates** • Steve Burnett • Hannah Price  
37 Stoney Street, The Lace Market, Nottingham NG1 1LS • T 0115 953 8500 • F 0115 953 8501 • W popall.co.uk • DX 10100 Nottingham  
Office also in London

Authorised and Regulated by the Solicitors Regulation Authority (SRA no. 78244)



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**Application for a premises licence  
under the Gambling Act 2005 (standard form)**

**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.

Where the application is—

- In respect of a vessel, or
- To convert an authorisation granted under the Betting, Gaming and Lotteries Act 1963 or the Gaming Act 1968,

the application should be made on the relevant form for that type of premises or application.

**Part 1 – Type of premises licence applied for**

Regional Casino ☐

Large Casino ☐

Small Casino ☐

Bingo ☐

Adult Gaming Centre ☒

Family Entertainment Centre ☐

Betting (Track) ☐

Betting (Other) ☐

Do you hold a provisional statement in respect of the premises? Yes ☐ No ☒

If the answer is “yes”, please give the unique reference number for the provisional statement (as set out at the top of the first page of the statement):

**Part 2 – 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**

*[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.]*

7. The applicant's registered or principal address:

**91 Wimpole Street  
London**

Postcode: **W1G 0EF**

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

**000-052732-N-329729-002**

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:

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

*[Where there are further applicants, the information required in questions 6 to 8 should be included on additional sheets attached to this form, and those sheets should be clearly marked "Details of further applicants".]*

## Part 3 – Premises Details

10. Proposed trading name to be used at the premises (if known): **Game Nation**

11. Address of the premises (or, if none, give a description of the premises and their location):

**450-454 High Road, Tottenham**

Postcode: **N17 9JN**

12. Telephone number at premises (if known):

13. If the premises are in only a part of a building, please describe the nature of the building (for example, a shopping centre or office block). The description should include the number of floors within the building and the floor(s) on which the premises are located.

**Ground floor commercial property with a rear yard and two rear storage areas.**

14(a) Are the premises situated in more than one licensing authority area?

**No**



14(b). If the answer to question 14(a) is yes, please give the names of all the licensing authorities within whose area the premises are partly located, other than the licensing authority to which this application is made:

#### Part 4 – Times of operation

15(a). Do you want the licensing authority to exclude a default condition so that the premises may be used for longer periods than would otherwise be the case? **No** *[delete as appropriate] [Where the relevant kind of premises licence is not subject to any default conditions, the answer to this question will be no.]*

15(b). If the answer to question 15(a) 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			

16. If you wish to apply for a premises licence with a condition restricting gambling to specific periods in a year, please state the periods below using calendar dates:

### Part 5 – Miscellaneous

17. Proposed commencement date for licence (leave blank if you want the licence to commence as soon as it is issued): **ASAP** (dd/mm/yyyy)

18(a). Does the application relate to premises which are part of a track or other sporting venue which already has a premises licence? **No** [delete as appropriate]

18(b). If the answer to question 18(a) is yes, please confirm by ticking the box that an application to vary the main track premises licence has been submitted with this application. ☐

19(a). Do you hold any other premises licences that have been issued by this licensing authority? **Yes** [delete as appropriate]

19(b). If the answer to question 19(a) is yes, please provide full details:

- Palace Amusements, 49 High Road, London, N22 6BH – AGC Premises Licence number: LN/000015354.

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

### Part 6 – Declarations and Checklist (Please tick)

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 ☒
- 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 7 – Signatures**

21. 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:



Date:

31.3.20

Capacity:

Solicitors for & on behalf of the applicant

22. 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:

Capacity:

*[Where there are more than two applicants, please use an additional sheet clearly marked "Signature(s) of further applicant(s)". The sheet should include all the information requested in paragraphs 21 and 22.]*

*[Where the application is to be submitted in an electronic form, the signature should be generated electronically and should be a copy of the person's written signature.]*

**Part 8 – Contact Details**

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

**Imogen Moss**

23(b) Please give one or more telephone numbers at which the person identified in question 23(a) can be contacted:

**0115 9349173**

24. Postal address for correspondence associated with this application:

**Imogen Moss**

**Poppleston Allen**

**37 Stoney Street**

**The Lace Market**

**Nottingham**

Postcode: **NG1 1LS**

25. 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:

**i.moss@popall.co.uk**



## **NOTICE OF APPLICATION FOR 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 - **91 Wimpole Street, London,**

Postcode **W1G 0EF**

the number of whose operating licence is **052732-N-329729-002**

has made an application for an **Adult Gaming Centre Premises Licence**

The application relates to the following premises **Game Nation, 450-454 High Road, Tottenham, N17 9JN**

The application for a premises licence has been made to the following licensing authority:

London Borough of Haringey, Civic Centre, 255 High Rd, Wood Green, London N22 8LE

Website: [www.haringey.gov.uk](http://www.haringey.gov.uk)

Information about the application is available from the licensing authority, including the arrangements for viewing the details of the application.

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

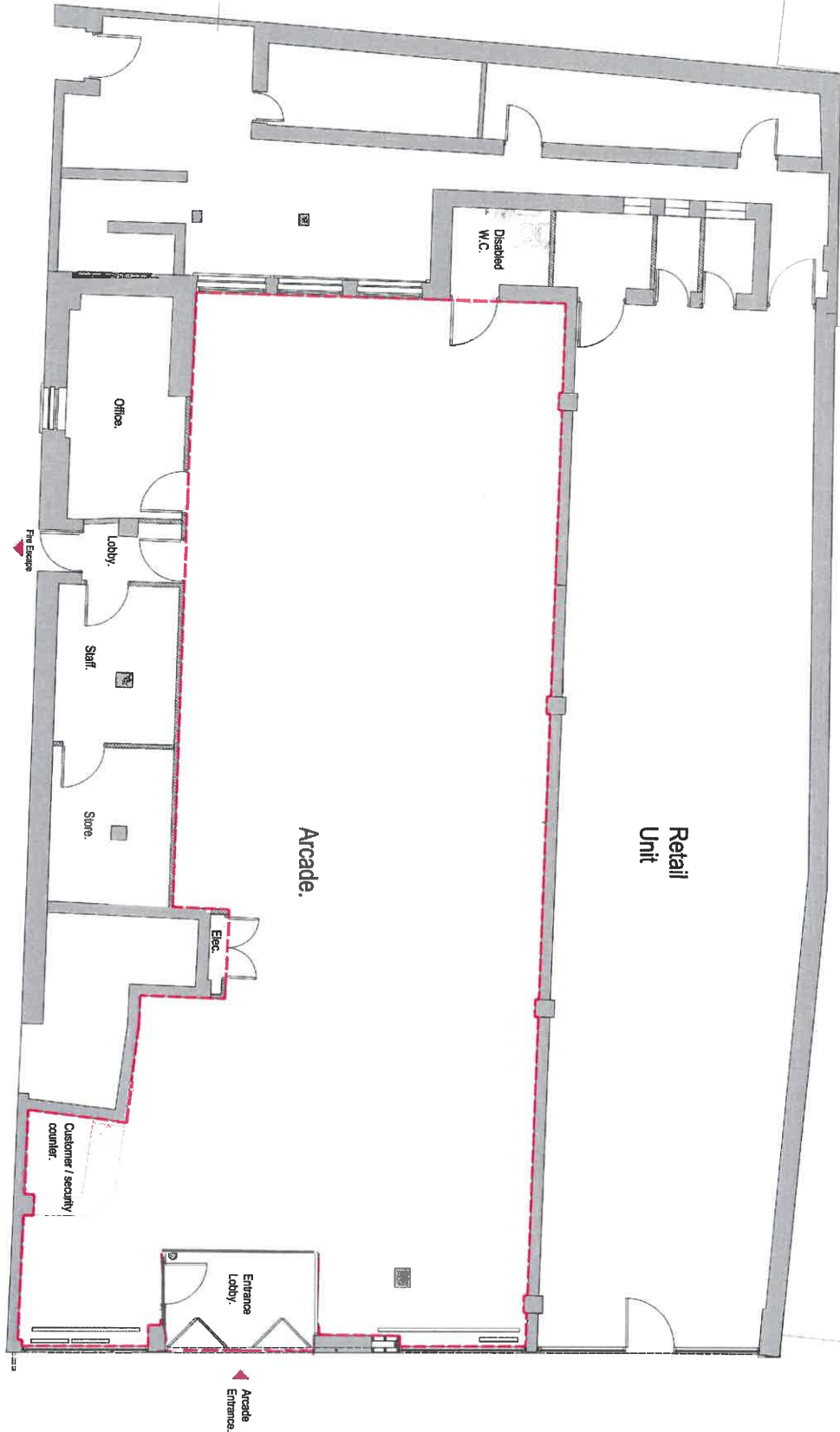
**Imogen Moss  
0115 9349173  
Popleston Allen  
37 Stoney Street  
The Lace Market  
Nottingham  
NG1 1LS**

**Any representations under section 161 of the Gambling Act 2005 must be made no later than the following date 28 April 2020.**

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Proposed GA 1:50

Albert Place



High Road

Key:

--- Area in which gaming machines will be made available

General Note:

Anything shown on this plan, which is not required by The Gambling Act 2005 (Premises Licences and Provisional Statements) Regulation 2007 is for illustrative purposes only, and does not form part of the premises licence.

## Licensing

Address: High Road, Tottenham, N17 3JN

Client: Game Nation

Game: Gambling Act 2005 Licensing Plan

Scale: 1:50 @ A1 Date: April 2000

LC: 2011.100 A

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**TOTTENHAM APPLICATION**  
**City Gaming Limited, trading as Game Nation**  
**450-454 High Road, Tottenham**

**SUGGESTED CONDITIONS (16/042020)**

**Staff**

1. There shall always be a minimum of 2 members of staff on duty when the premises are open.
2. 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 dusk and 6 am on required days.
3. All staff shall be trained in recognizing drug use, conflict management and restricting service to persons under 18 years of age.
4. Training records shall be maintained and made available, within reasonable time, for inspection by the Police or Licensing Authority.
5. Refresher training shall be given every 12 months

**CCTV**

6. A 4K High Definition CCTV System will be provided throughout the building. 12 x 4K High Definition cameras will cover all key locations, as agreed with the Police, within the premises.
7. 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.
8. 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.
9. Ensure that sufficient lighting is installed outside the premises.
10. All CCTV images will be recorded on a Hard Drive and retained for 30 days.
11. All CCTV images to be made available for Police and Licensing Authority inspection, images to be made available in reasonable time.

12. 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.

### **Connection to Conflict Management Centre**

13. 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.
14. The facility to operate 24 hours a day, 7 days a week and 365 days a year.
15. 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.
16. The system must provide 2-way communications which enables the CMC operator to speak to the member of staff and the customer causing concern.

### **Access control**

17. The front door will be locked between 7pm and 7am daily.
18. 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.
19. 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.
20. The toilets will be always locked, and access controlled by staff.
21. 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.

### **Engagement with the local community**

22. 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**

23. A Gang Management Policy will be implemented, in conjunction with the Police.
24. All staff shall receive training on the Gang Management Policy.
25. 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.

## **Under 18s**

26. 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.
27. 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.

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**City Gaming Limited**  
of 91 Wimpole Street, London, W1G 0EF

**LICENCE CONDITIONS AND  
CODES OF PRACTICE  
POLICY & PROCEDURE  
SYSTEMS**

**AGC**

**Trading as City Slots, Palace Amusements and  
Game Nation**

**VERSION 1.2**

Page 24

# City Gaming Limited

**GAMBLING ACT 2005**  
*Licence Conditions and Codes of Practice*

**ACCESS TO GAMBLING BY CHILDREN AND YOUNG PERSONS**

*It is illegal for any person who is under 18 years of age to be permitted entry to an Adult Gaming Centre or Adult Gaming Area.*

Statement

City Gaming Limited recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice, and monitoring of policies and procedures is regularly reviewed and subject to change as part of our ongoing risk assessment.

Policy and Procedures

- Our policies and procedures with regard to age restriction take into account the structure and layout of our gambling premises so as to prevent access to gambling by children and young persons, and that our facilities do not appeal to children and young persons.
- Clear and prominent signage is placed at the entrance(s) to our Adult Gaming Centre(s) and adult area(s) stating that it is illegal for persons under the age of 18 years to enter and for City Gaming Limited to permit entry.
- It is a matter of gross misconduct if a member of staff knowingly allows entry by any person who is under the age of 18 years to our Adult Gaming Centre(s) or Adult Gaming Area(s).
- Any person known to be under 18 years of age is refused entry.
- Any person who appears to be under 18 years of age, and has not previously provided satisfactory proof to the contrary, is asked to provide appropriate identification when it comes to the attention of staff and before an attempt to gamble. *Members of staff are trained to 'think 21' as a minimum.*
- If the person admits to being under the age of 18, they are refused entry.
- Should they claim to be 18 or over and there is still doubt, satisfactory proof of age is requested and has to be provided before entry is allowed. *Incidents involving suspected forged documents will be recorded and reported.*
- Proof of age documents must contain a photograph from which the individual can be identified; state the individual's date of birth; be valid, and legible. It should bear no visible signs of tampering or reproduction. *Acceptable forms of identification include those that carry the PASS logo (e.g. Citizencard); a driving licence (including a provisional licence) with photograph, a passport and military identification cards.*
- Where there is still doubt and the person cannot produce proof of age, they are advised that they will not be permitted to enter until such time as they provide such proof.
- They will be shown, have explained to them, and be given a 'proof of age card' application form or offered an explanation on how to apply for a card.
- Should the person then refuse to leave, they are advised that the age restriction is a legal requirement.

## City Gaming Limited

- If they still will not leave, the Duty Manager is immediately contacted to take over the situation.
- Any attempts by under-18s to enter the premises or designated adult area(s) and gamble are brought to the attention of the Duty Manager immediately and recorded as an entry on a log retained on the premises for this purpose. *Details of entry to include date, time, identity of the individual if known - or detailed description if unknown – member of staff dealing, action taken, the outcome and measures put in place to prevent a re-occurrence. Log to be countersigned by the Duty Manager.*
- Service is refused in all circumstances where any adult is accompanied by a child or young person.
- All gaming machines, other than category 'D' machines, are inscribed with a notice prohibiting play by persons under the age of 18 years.
- Stakes are returned to under-18s where they have been identified as gambling in AGCs or adult-only areas, and are not permitted to retain any monetary prize.
- Members of staff are trained as part of their induction process in the understanding of, and the strict adherence to this policy and accompanying log, and required to sign to this effect retaining a copy for their future reference; the original being retained on the employee's personnel file. Staff training policy covers all relevant prohibitions against inviting children or young persons to gamble or to enter gambling premises, and refresher training is carried out at appropriate intervals.

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# City Gaming Limited

**GAMBLING ACT 2005  
Licence Conditions and Codes of Practice**

**ACCESS TO GAMBLING BY CHILDREN AND YOUNG PERSONS**

**AGE VERIFICATION TESTING**

City Gaming Limited Age Verification Testing Policy

- It is a requirement to conduct ongoing age verification testing or take part in collective age verification testing programs so as to provide reasonable assurance that policies and procedures to prevent underage gambling are effective.
- It is a further requirement that the results of age verification tests carried out by City Gaming Limited are provided to the Gambling Commission.

Age verification tests are carried out by { }, and that the results of testing are shared with the Commission.



## City Gaming Limited

### GAMBLING ACT 2005

#### *Licence Conditions and Codes of Practice*

#### **ACCESS TO PREMISES BY THE GAMBLING COMMISSION'S ENFORCEMENT OFFICERS**

##### Statement

City Gaming Limited recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice, and monitoring of policies and procedures is regularly reviewed and subject to change as part of our ongoing risk assessment.

##### Policy and Procedures:

City Gaming Limited acknowledges its obligation to ensure that staff openly co-operate with the Gambling Commission in the proper performance of their compliance functions and that they are made aware of those officers' rights of entry to premises contained under Part 15 (S.303 to S.326) of the Gambling Act 2005 (refer to page 2 of this document) and that:

- City Gaming Limited must provide the Gambling Commission with any information that the Commission would reasonably need to be aware of in exercising its regulatory functions or suspect may relate to the commission of an offence under the Act, including an offence resulting from a breach of a licence condition or a code of practice provision having the effect of a licence condition. Changes in key circumstances must be reported within five days of their occurrence in accordance with the terms set out in the Operating Licence.
- City Gaming Limited must provide the Gambling Commission with such information as the Commission may require from time to time about the use of facilities provided such as:
  - (i) the numbers of people making use of the facilities and the frequency of such use;
  - (ii) the range of gambling activities provided by the licensee and the number of staff employed in connection with them; and
  - (iii) the licensee's policies in relation to, and experience of, problem gambling.
- City Gaming Limited must submit a Regulatory Return to the Gambling Commission containing such information as the Commission may require from time to time, and provide evidence that the terms on which gambling is offered are not unfair under the Unfair Terms in Consumer Contracts Regulations 1999 and, where applicable, meet the reasonableness test under the Unfair Contract Terms Act 1977.
- The Appointed Manager will be informed immediately a Gambling Commission Enforcement Officer properly identifies himself on the premises, and will attend to the Officer without undue delay. Staff will co-operate at all times with the Commission's Enforcement Officers.
- Members of staff are trained as part of their induction process in the understanding of, and the strict adherence to this policy, and required to sign to this effect retaining a copy for their future reference. The original is retained on the employee's personnel file.

**GAMBLING ACT 2005**

**PART 15**

Members of staff are to co-operate at all times with the Commission's enforcement officers in the proper performance of their compliance functions.

The officers' rights of entry to premises are contained in Part 15 of the Act which deals with inspection (Sections 303 to 326). A constable, enforcement officer or authorised person under the Act may enter premises for the purpose of assessing compliance or assessing whether an offence is being committed. A constable or enforcement officer can enter a premises if he reasonably suspects that an offence may be being committed or is about to be committed (Section 306). Entry may also be for the purpose of discovering whether facilities for gambling are being provided, to determine whether an operating licence or premises licence is held and to determine whether facilities are being provided in accordance with terms and conditions of an operating licence (Section 307).

Entry may also be made to assess the likely effects of activity when application has been made for a premises licence. A constable or enforcement officer may require the holder of an operating licence to produce, within a specified period, a copy of the authorisation (Section 316). Failure to comply without reasonable excuse to a request to produce a copy of the authorisation may result in an offence and be liable on summary conviction to a fine not exceeding level 2. Section 317 sets out powers of the constable, enforcement office or authorised person and include inspection of any part of the premises or any machine on anything on the premises, questioning any person, access to written or electronic records, remove or retain evidence of committing an offence or breach of terms and conditions. Section 20 provides that the power of inspection must be exercised only at a reasonable time. The enforcement officer or authorised person must provide evidence of his identify and authority (Section 321). Section 323 provides that a constable, enforcement officer or authorised person may use reasonable force to enter a premises. Section 326 provides that it is an offence to obstruct a constable, enforcement officer or authorised person in carrying out their duties.

# City Gaming Limited

## **GAMBLING ACT 2005** *Licence Conditions and Codes of Practice* **ADVERTISING STANDARDS AND MARKETING**

### Statement

City Gaming Limited recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice, and monitoring of policies and procedures is regularly reviewed and subject to change as part of our ongoing risk assessment.

### Policy and Procedure

All advertising and marketing by City Gaming Limited complies with standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP). We ensure that our marketing communications, advertisements, and invitations to purchase (within the meaning of the Consumer Protection from Unfair Trading Regulations 2008), including 'free bet' offers, do not amount to or involve misleading actions or misleading omissions within the meaning of those regulations.

We adopt the general principles that our advertising is:

- legal, decent, honest and truthful;
- prepared with a sense of responsibility to consumers and to society;
- respectful to the principles of fair competition generally accepted in business; and
- not intended to bring advertising into disrepute.

Specifically, we ensure that:

- advertising contains nothing that is likely to lead people to adopt styles of gambling that are unwise;
- advertisements and promotions are socially responsible and do not encourage excessive gambling;
- care is taken not to exploit the young, the immature or those who are mentally or socially vulnerable;
- advertising is not directed at people under the age of 18 years through the selection of media, style of presentation, content or context in which they appear. No medium is used to advertise gambling if more than 20% of its audience is under 18 years old;
- persons shown gambling are not, nor do they appear to be, under 25 years of age;
- there is honesty at all times with regard to the chances of winning, the likelihood of a big win, and the odds or payout ratio that applies to the gambling on offer;
- advertising and promotional material carries a reference for the need to keep gambling under control;
- it is never suggested or implied that gambling is a means of getting out of financial difficulty.
- Advertising and marketing material should not appear on any primary web page/screen or micro-site that provides advice or information on responsible gambling

### Marketing and Promotion

Any incentive or reward scheme or other arrangement under which the customer may receive money, goods, services or other advantage (including the discharge in whole or in part of any liability (the benefit)) the scheme is designed to operate, and be operated, in such a way that neither the receipt nor the value or amount of the benefit is:

- (a) dependent on or calculated by reference to the length of time for or the frequency with which the customer gambles or has at any time gambled; or
- (b) dependent on the customer gambling for a pre-determined length of time or with a pre-determined frequency.

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If the value of the benefit increases with the amount the customer spends it does so at a rate no greater than that at which the amount spent increases. Incentives and rewards are proportional to the type and level of the customer's gambling.

Members of staff, as appropriate, are trained as part of their induction process in the understanding of, and the strict adherence to this policy, and required to sign to this effect retaining a copy for their future reference. The original is retained on the employee's personnel file.

## City Gaming Limited

### GAMBLING ACT 2005

#### *Licence Conditions and Codes of Practice*

#### **CUSTOMER INTERACTION IN RELATION TO IDENTIFYING CUSTOMERS WHO MAY BE SUSCEPTIBLE TO GAMBLING HARM**

##### Statement

City Gaming Limited recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice, and monitoring of policies and procedures is regularly reviewed and subject to change as part of our ongoing risk assessment.

##### Policy and Procedures

City Gaming Limited makes use of all relevant sources of information to ensure effective customer interaction and decision making in relation to identifying possible gambling disorders; equally to identify at-risk customers who may not be displaying obvious signs of problem gambling, and in respect of customers designated 'high value' or 'VIP'.

Customer activity and behaviour will be monitored for any behaviour that could indicate problem gambling.

If members of staff have concerns that a customer's behaviour may be related to having problems with gambling, the Duty Manager is to be informed at the earliest available opportunity. Indicative behaviour may include signs of distress, agitation, aggression, intense mood swings, hysteria, remorse and perhaps even damage to property and violence or the threat of violence to staff or other customers. Other indicators may include:

- Increased amount of time spent gambling
- Changes to amount and frequency of spend
- Information or hints from the customer such as complaints about not winning

Notwithstanding any initial urgent action taken to deal with the customer's behaviour, the Duty Manager is required thereafter to observe the individual and make a judgement as to whether it is appropriate to suggest to the customer that they might want to be provided with information regarding where they can seek professional advice about the nature of their gambling activity or have the process of self-exclusion explained for consideration.

If the customer refuses such information and continues to behave in a manner which could reasonably be considered to be disruptive or puts the staff or other customers in potential danger, the Duty Manager will implement City Gaming Limited's procedures for dealing with antisocial situations.

The Duty Manager may give consideration to refusing service or barring the customer from the premises and, in extreme situations, contacting police for assistance. *Whenever police are called to the premises for assistance in handling any incident, a log entry will be made whether police attend or not.*

Notwithstanding any other action that may have to be taken immediately to prevent an incident from worsening, the Duty Manager will log all such reports which may result in future customer interaction or where it has been ruled out where otherwise it would have taken place. The interaction is conducted between the appointed manager and the customer in a confidential and meaningful manner.

Members of staff are aware of the appointed Manager who is specifically designated to deal with requests for self-exclusion, and are aware of where customers can be directed for confidential advice should they be directly approached for assistance.

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Interactions will be evaluated to understand the impact of the interactions on a consumer's behaviour and whether any further action is needed. An evaluation of the effectiveness of the approach will be undertaken to determine which types of interactions and tools work best to help consumers manage their gambling in a way that works for them. City Gaming Limited recognises its responsibilities detailed within the Gambling Commission Formal Guidance for Premises Based Operators.

This policy and procedure is consistent with, and implemented with due regard to City Gaming Limited's duty in respect of the health and safety of members of staff.

Members of staff are trained as part of their induction process in the understanding of, and the strict adherence to this policy and accompanying log, and required to sign to this effect retaining a copy for their future reference. The original is retained on the employee's personnel file.

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### **GAMBLING ACT 2005**

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#### **EMPLOYMENT OF CHILDREN AND YOUNG PERSONS**

##### Statement

City Gaming Limited recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice, and monitoring of policies and procedures is regularly reviewed and subject to change as part of our ongoing risk assessment.

##### Policy and Procedures

It is an offence for children (under-16s) and young persons (those aged 16 and 17) to be engaged, or permitted to be engaged in:

- Providing facilities for gambling.
- Performing any function (including cleaning) in connection with a gaming machine at any time.
- Carrying out any other function on Adult Gaming Centre licensed premises, whether directly employed or not, whilst any gambling activity is being carried on in reliance on the premises licence.

All relevant staff, including children and young persons, employed by this Company have been trained about the laws relating to access to gambling by children and young persons.

It is strict Company policy that:

- Children and young persons are not employed to carry out any work in an adult-only area of family entertainment licensed premises at a time when any gambling is taking place.
- Gaming machines sited in Adult Gaming Centres or adult gaming areas are turned off if children and/or young persons are working on the premises outside the hours when the premises are open for business.
- Due diligence is given to verifying the age of all new members of staff where there is reason to doubt authenticity of birth dates supplied.
- The movement of children and young persons employed on the premises are carefully monitored and supervised so as to ensure compliance.

Members of staff are trained as part of their induction process in the understanding of, and the strict adherence to this policy, and required to sign to this effect retaining a copy for their future reference. The original is retained on the employee's personnel file.

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### **GAMBLING ACT 2005** *Licence Conditions and Codes of Practice*

#### **FAIR AND OPEN PRACTICE ~ COMPLAINT AND DISPUTE RESOLUTION**

##### Statement

City Gaming Limited recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice, and monitoring of policies and procedures is regularly reviewed and subject to change as part of our ongoing risk assessment.

##### Complaints Procedure

City Gaming Limited is committed to providing a high quality, accessible and responsive service to customers and the local community. However, dissatisfied customers may communicate a complaint to us either verbally or in writing. All complaints are taken seriously, investigated thoroughly and handled in a confidential manner. If the complaint cannot be resolved to the satisfaction of both parties on site, a copy of our written procedure for dealing with complaints, together with a complaint form, is supplied to the complainant at the earliest opportunity together with the name and status of City Gaming Limited representative delegated to deal with the complaint.

Complainants should provide us with a comprehensive description and nature of the complaint; whether it is an original complaint, or where the outcome of a previous complaint was found unacceptable, and their name and postal address including a contact telephone number.

A 'complaint' means a complaint about any aspect of City Gaming Limited's conduct of the licensed activities, and a 'dispute' is any complaint which:

- (a) is not resolved at the first stage of the complaints procedure; and
- (b) relates to the outcome of the complainant's gambling transaction.

In the first instance, City Gaming Limited will endeavour to resolve the complaint to the satisfaction of both parties within fifteen working days. Should this not be possible we will explain why and provide a date by which the complainant can expect a full response.

In the event of a complaint relating to the outcome of a customer's gambling is unable to be satisfactorily resolved between City Gaming Limited and the complainant, the complainant will be given contact details of an Alternative Dispute Resolution (ADR) entity. The City Gaming Limited ADR is the Centre for Effective Dispute Resolution (CEDR).

- Complainants also have the means and opportunity of submitting their own version of events.
- The dispute is investigated in full by the ADR entity.
- Both parties are notified in writing of the review outcome with suggestions of a resolution if appropriate.
- This procedure may, but need not, provide for the ADR entity's resolution of the dispute to be binding on both parties.

City Gaming Limited is obliged to keep a record of all complaints and disputes, other than those considered to be trivial, including all disputes referred to the ADR entity that are not resolved at the initial stages of the complaints procedure. There is a requirement to submit reports of the outcome of disputes referred to the ADR entity to the Gambling Commission at intervals determined by the Commission either by the ADR entity or by City Gaming Limited.

City Gaming Limited is satisfied that the terms on which gambling is offered are not unfair within the meaning of the Consumer Rights Acts 2015 and is compliant with those terms.

City Gaming Limited LCCP policies and procedures version 1.2 dated 24 February 2020



An accurate summary of the contractual terms on which gambling is offered is available to customers who are notified of material changes to terms before they come into effect.

# City Gaming Limited

## GAMBLING ACT 2005

### Licence Conditions and Codes of Practice

#### INFORMATION ON HOW TO GAMBLE RESPONSIBLY AND HELP FOR GAMBLERS WITH PROBLEMS

##### Statement

City Gaming Limited recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice, and monitoring of policies and procedures is regularly reviewed and subject to change as part of our ongoing risk assessment.

##### Stay in control advice

*Without breaching the principle that customers are responsible for their own gambling, the nature of the activity suggests that they should be reminded of the need to exercise caution. Accordingly, signage in the form of an appropriate number of posters or other appropriate means is displayed on our premises:*

- Giving clear guidance that in order to keep gambling a fun social activity the customer needs to 'stay in control'.
- Drawing attention to further information, such as leaflets that are available on the premises.
- Indicating sources of help such as the National Gambling Helpline operated by GamCare.
- Large enough and written in language so as to be easily seen and understood.
- Prominently displayed.
- Maintained in a clean and tidy condition, preferably within a glass fronted frame.

##### Advertising sources of help

*At the core of exercising a duty of care is the principle of assisting customers who may wish to express concern about their gambling. This tenet is drawn to the attention of customers on our premises in the following ways:*

- The prominent display of 'Responsible Gambling' or 'Stay in Control' information.
- There are holders or racks containing leaflets in appropriate places that emphasise the need to keep gambling under control and where to seek help should anyone be concerned about their own or a family member's gambling. These leaflets are available to be taken away from the premises without the necessity of having to ask for them.
- The leaflets are available at all times for customers to take discreetly without having to ask a member of staff, and are located in the gambling area either near to exit doors, ATMs or toilets. We endeavour to maintain an effective stock control system to ensure that such leaflets are always available to supply. Signposting Information may also be made available through the use of links for online or smart technology.
- Details of GamCare, giving the National Helpline telephone number is inscribed on all appropriate categories of gaming machines.

##### Protecting those who seek assistance

*Responding to someone who admits to having a problem with their gambling is a delicate matter that has to be timely and needs to be approached sensitively. It is our policy that:*

- rules and procedures relating to a policy of responding to problem gamblers are clearly formulated and incorporated into our day-to-day operation;
- at least one member of staff who has been trained to deal with situations that might require a response is on duty at any one time, or available without undue delay;
- a positive response including communicating sources of help and the possibility of self-exclusion is offered to any customer who admits to having lost control of their gambling;
- the facility of a self-exclusion policy for customers who wish to voluntarily self-exclude themselves from these premises, and other premises offering the same style of gambling in the locality, that

## City Gaming Limited

stipulates a minimum exclusion period of six months - with a further 24-hour 'cooling off' period thereafter;

- we draw to the attention of relatives who express concern about a family member's gambling the options available to that person should they wish to address the extent of their gambling;
- members of staff do not collude with customers when asked to lie on their behalf, and
- where services are marketed in one or more foreign languages, we make available information on how to gamble responsibly, access to help, guides to the playing of any game, and a summary of the contractual terms on which gambling is offered in that, or those, foreign languages.

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*Licence Conditions and Codes of Practice*

#### MONEY LAUNDERING, CASH HANDLING AND SUSPICIOUS TRANSACTIONS

##### Introduction

As part of its procedures for compliance with the requirements in respect of the prevention and detection of money laundering in the Proceeds of Crime Act 2002 and the Terrorism Act 2000, City Gaming Limited takes into account the Commission's advice on the Proceeds of Crime Act 2002, *Duties and responsibilities under the proceeds of Crime Act 2002 – Advice for operators (excluding Casino operators)*.

##### Money Laundering Definition

Money laundering is a process by which the proceeds of crime are converted into assets which appear to have a legitimate origin, so that they can be retained permanently or recycled into further criminal enterprises. This definition of money laundering means that potentially any employee could contravene the Regulations if they were to become aware of or suspect the existence of criminal property and continue to be involved in a matter which relates to that property without reporting their concerns.

##### Policy

- City Gaming Limited is committed to ensuring that all necessary safeguards are in place with regard to the receipt of money in order to avoid it being used to launder money that may originate from the proceeds of crime.
- City Gaming Limited has appointed a Designated Money Laundering Officer (MLO)
- All relevant staff are trained on the requirements of the Regulations and told of the need to report any suspicious cash transactions to the MLO for the purpose of informing the relevant authorities.

##### Disclosure Procedure

- Where it is suspected by a member of staff that money laundering activity is taking/has taken place, a disclosure must be made to the MLO as soon as possible. Because of the importance attached to the process, notification should normally take place immediately by telephone or, where that is not possible, by any other expedient means.
- No discussion will take place with colleagues as confidentiality is paramount.
- The MLO will determine whether or not to submit - online or otherwise - a suspicious activity report (SAR) to the National Crime Agency (NCA) and will maintain records of all notifications received detailing the method of verification used to identify the suspected person.

##### Cash Handling

Operating policies and procedures are in place with regard to accounting practices and record keeping in respect of:

- (i) Monetary stakes introduced to machines (gross takings),
- (ii) Money introduced to re-float machines
- (iii) Token transactions
- (iv) Customer refunds due to machine malfunctions.
- (v) Money removed from machines (net takings)

Members of staff, where appropriate, are trained as part of their induction process in the understanding of, and the strict adherence to this policy, and required to sign to this effect retaining a copy for their future reference. The original is retained on the employee's personnel file.

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## GAMBLING ACT 2005 Licence Conditions and Codes of Practice

### SELF-EXCLUSION

#### Statement

City Gaming Limited recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice, and monitoring of policies and procedures is regularly reviewed and subject to change as part of our ongoing risk assessment.

#### Policy and Procedures

*Whilst most customers are able to enjoy and control their gambling, this Company recognises its duty of care to those who cannot. Accordingly, we provide a self-exclusion process for those customers who seek to prevent their own access to our premises and others in the locality offering a similar style of gambling as defined by the premises licence.*

- When a customer has requested that they be refused entry to our premises, the customer and the appointed manager will formally acknowledge and document the request on a self-exclusion request form, or directly on the web-based AGC national self-exclusion scheme. This will be preceded by a meaningful discussion about the terms and conditions applicable to the scheme and will include other options available to assist a person having a gambling disorder, including being signposted to counselling and support services. A copy of the terms and conditions will be signed by the excluder as acknowledgement of understanding and consent. Customers are given the opportunity of discussing self-exclusion in private where possible.
- Photo identification and signature of the excluder is required for self-exclusion agreements except where an alternative means of identification is at least as effective. Photographs, preferably of the passport style, should be full-faced and a good likeness both initially and throughout the duration of the self-exclusion agreement.
- The Duty Manager will offer the exclusion for a minimum duration of not less than six months, nor more than twelve months; the customer thereafter may request to extend the length of the self-exclusion for one or more further periods of at least six months, reliant on City Gaming Limited's ability to manage longer agreements. City Gaming Limited will not allow the excluder admittance to the premises during the term of the self-exclusion agreement, and will have in place procedures for preventing self-excluded individuals from gambling during the period of the self-exclusion agreement including taking into account the internal structure and layout of the premises.
- It is made clear to the customer that they may not revoke the self-exclusion during the agreed period and that if found either in the gambling area or attempting to gamble they will be asked to leave. Members of staff are trained to be alert to self-excluded individuals attempting to breach agreements and instances of them getting another person to gamble on their behalf. It is a requirement that staff regularly pay heed to self-exclusion agreement records that are currently active (particularly photographs) in order to stay alert to the identity of those excluded in the locality of the premises.
- Self-excluders have the opportunity of also excluding from other premises owned by City Gaming Limited without necessarily having to enter areas licenced for gambling. Where the self-exclusion agreement is extended to other Company's premises we will consider any specific requests made by a customer in setting the bounds of the exclusion area.
- City Gaming Limited will offer customers with whom they enter into a self-exclusion agreement in respect of facilities for any kind of gambling we offer, the ability to exclude from facilities for the same kind of gambling offered in our locality by any other holder of an operating licence to whom this provision applies, by participating in one or more available multi-operator self-exclusion schemes. In addition, City Gaming Limited is participating in the possible development of a multi-operator self-exclusion scheme that will apply to all styles of gambling.

## City Gaming Limited

- A self-exclusion log is maintained on the premises for recording detail of those currently excluded in addition to records stored digitally.
- Those self-excluded will be removed from any marketing databases held by this Company within two days of receiving the completed self-exclusion form, but we will take all reasonable steps to prevent details being knowingly sent as soon as practicable.
- At the end of the self-exclusion period, the exclusion will remain in place for a further six months, unless the customer takes positive action in order to gamble again.
- At the end of the exclusion period, the Duty Manager and customer will, together, review the terms of agreement either by telephone or in person. The review process is recorded on a self-exclusion review form.
- Where a customer chooses not to extend the self-exclusion and makes a positive request to begin gambling again, the customer is offered a 24-hour 'cooling off' period before being allowed access to the gambling facilities.
- Customers are given the opportunity to discuss self-exclusion in private where possible.
- City Gaming Limited retains self-exclusion records for the length of the agreement plus a further 6 months.
- Members of staff are trained both on induction and refresher sessions thereafter in the understanding of, and the strict adherence to this policy and accompanying log, and required to sign to this effect retaining a copy for their future reference. The original is retained on the employee's personnel file.

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### Attempts by Children and Young Persons to enter an Adult Gaming Centre

Note: This log is used where it is established that a person, known to be under the age of 18 years, enters an adult gaming centre, and attempts to gamble therein. Instances where proof of age has been sought by staff, and verified as being over 18 years, may be recorded for other purposes on a 'customer refusal register.'

Date	Time	Circumstances including at what stage the young person was asked for Identification	Identity or Description	Action, outcome & preventative measures adopted	Member of Staff requesting Identification	Duty Manager Informed (signature)

**TO BE RETAINED ON THE PREMISES** To be used in conjunction with City Gaming Limited's policy and procedure concerning 'Access to Gambling by Children & Young Persons'.

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### Customer Interaction in Relation to Identifying Customers who may have a Gambling Disorder or the Potential of Developing Difficulty with their Gambling

To be completed in circumstances when a customer has either requested information on who to contact for help with a gambling disorder, or where a member of staff considers it appropriate to interact with a customer who is showing signs of distress associated with their gambling, or where it is suspected that a customer's gambling style is no longer under control.

It should also be recorded where interaction has been subsequently ruled out, where otherwise it would have taken place.

An entry should also be made where an approach has been made by a relative or friend of a customer considered by them to be experiencing difficulties with their gambling.

Date	Time	Circumstances including signs of distress or where it is suspected that a customer's gambling is no longer in control.	Identity or Description of Customer	Limited Exposure Offered (Y/N)	Referred to GamCare (Y/N)	Self-Exclusion Explained (Y/N)	Notes of outcome including where interaction has been ruled out.	Duty Manager Informed (signature)

**TO BE RETAINED ON THE PREMISES**  
'Customer Interaction'.

To be used in conjunction with City Gaming Limited's policy and procedure concerning



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### Incidents Requiring Police Assistance

Ref	Date	Time	Nature of Incident	Time Police Called	Time Police Arrived	Outcome	Duty Manager
1							
2							
3							
4							
5							
6							
7							

**TO BE RETAINED ON THE PREMISES**  
whether they attend or not.

To be used when police are called to the premises to assist the licensee

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## GAMBLING ACT 2005

*Licence Conditions and Codes of Practice*

### SELF-EXCLUSION LOG FOR RECORDING DETAIL IF NO IMMEDIATE ACCESS TO THE CEDR WEB-BASED SCHEME

Ref	Name	Start Date	Attempts to Enter Date(s)	Attempts to Gamble Date(s)	Preventative Measures Deployed	End Date	'Cooling off' (Y/N)	Resumed Gambling Y/N
1								
2								
3								
4								
5								
6								
7								
8								
9								
10								
11								
12								
13								
14								
15								
16								

# City Gaming Limited

**TO BE RETAINED ON THE PREMISES**  
concerning 'Self-Exclusion'.

To be used in conjunction with City Gaming Limited's policy and procedure

**City Gaming Limited:**

**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                             |   |

**Interval not to exceed 7 days**

**Tick against**

**relevant Policies**

Name	Position	Joining Date	Training Date	Signature	Leave Date	1	2	3	4	5	6	7	8	9

## City Gaming Limited

**TO BE RETAINED ON THE PREMISES**

To be used for recording staff training carried out by City Gaming Limited.

## City Gaming Limited

### GAMBLING ACT 2005

#### *Licence Conditions and Codes of Practice*

#### **ACCESS TO GAMBLING BY CHILDREN AND YOUNG PERSONS**

***It is illegal for any person who is under 18 years of age to be permitted entry to an Adult Gaming Centre***

#### Statement

City Gaming Limited recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice, and monitoring of policies and procedures is regularly reviewed and subject to change as part of our ongoing risk assessment.

#### Policy and Procedures

- Our policies and procedures with regard to age restriction take into account the structure and layout of our gambling premises so as to prevent access to gambling by children and young persons, and that our facilities do not appeal to children and young persons.
- Clear and prominent signage is placed at the entrance(s) to our Adult Gaming Centre(s) and adult area(s) stating that it is illegal for persons under the age of 18 years to enter and for City Gaming Limited to permit entry.
- It is a matter of gross misconduct if a member of staff knowingly allows entry by any person who is under the age of 18 years to our Adult Gaming Centre(s) or Adult Gaming Area(s).
- Any person known to be under 18 years of age is refused entry.
- Any person who appears to be under 18 years of age, and has not previously provided satisfactory proof to the contrary, is asked to provide appropriate identification when it comes to the attention of staff and before an attempt to gamble occurs. *Members of staff are trained to 'think 21' as a minimum.*
- If the person admits to being under the age of 18, they are refused entry.
- Should they claim to be 18 or over and there is still doubt, satisfactory proof of age is requested and has to be provided before entry is allowed. *Incidents involving suspected forged documents will be recorded and reported.*
- Proof of age documents must contain a photograph from which the individual can be identified; state the individual's date of birth; be valid, and legible. It should bear no visible signs of tampering or reproduction. *Acceptable forms of identification include those that carry the PASS logo (e.g. CitizenCard); a driving licence (including a provisional licence) with photograph, a passport and military identification cards.*
- Where there is still doubt and the person cannot produce proof of age, they are advised that they will not be permitted to enter until such time as they provide such proof.
- They will be shown, have explained to them, and be given a 'proof of age card' application form or offered an explanation on how to apply for a card.
- Should the person then refuse to leave, they are advised that the age restriction is a legal requirement.
- If they still will not leave, the Duty Manager is immediately contacted to take over the situation.

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**City Gaming Limited**

- Any attempts by under-18s to enter the premises or designated adult area(s) and gamble are brought to the attention of the Duty Manager immediately and recorded as an entry on a log retained on the premises for this purpose. *Details of entry to include date, time, identity of the individual if known - or detailed description if unknown – member of staff dealing, action taken, the outcome and measures put in place to prevent a re-occurrence. Log to be countersigned by the Duty Manager.*
- Service is refused in all circumstances where any adult is accompanied by a child or young person.
- All gaming machines, other than category 'D' machines, are inscribed with a notice prohibiting play by persons under the age of 18 years.
- Stakes are returned to under-18s where they have been identified as gambling in AGCs or adult-only areas, and under-18s are not allowed to retain any monetary prize.

Members of staff are trained as part of their induction process in the understanding of, and the strict adherence to this policy and accompanying log, and required to sign to this effect retaining a copy for their future reference. The original is retained on the employee's personnel file. Staff training policy covers all relevant prohibitions against inviting children or young persons to gamble or to enter gambling premises, and refresher training is carried out at appropriate intervals.

**I have read, understood and agree to implement the provisions of the above Company Policy and Procedures.**

**Signed:**

.....

**Name: (please print)** .....

**Date:** .....

**Venue:** .....

**Position:** .....

**A copy of this signed document must be given to the employee for on-going reference; the original document to be retained on the employee's personnel file for the duration of his/her employment.**

## City Gaming Limited

### GAMBLING ACT 2005

#### *Licence Conditions and Codes of Practice*

#### **ACCESS TO PREMISES BY THE GAMBLING COMMISSION'S ENFORCEMENT OFFICERS**

##### Statement

City Gaming Limited recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice, and monitoring of policies and procedures is regularly reviewed and subject to change as part of our ongoing risk assessment.

##### Policy and Procedures:

City Gaming Limited acknowledges its obligation to ensure that staff openly co-operate with the Gambling Commission in the proper performance of their compliance functions and that they are made aware of those officers' rights of entry to premises contained under Part 15 (S.303 to S.326) of the Gambling Act 2005 (refer to page 2 of City Gaming Limited policy document) and that:

- City Gaming Limited must provide the Gambling Commission with any information that the Commission would reasonably need to be aware of in exercising its regulatory functions or suspect may relate to the commission of an offence under the Act, including an offence resulting from a breach of a licence condition or a code of practice provision having the effect of a licence condition. Changes in key circumstances must be reported within five days of their occurrence in accordance with the terms set out in the Operating Licence.
- City Gaming Limited must provide the Gambling Commission with such information as the Commission may require from time to time about the use of facilities provided such as:
  - (a) the numbers of people making use of the facilities and the frequency of such use;
  - (b) the range of gambling activities provided by the licensee and the number of staff employed in connection with them; and
  - (c) the licensee's policies in relation to, and experience of, problem gambling.
- City Gaming Limited must submit a Regulatory Return to the Gambling Commission containing such information as the Commission may require from time to time, and provide evidence that the terms on which gambling is offered are not unfair under the Unfair Terms in Consumer Contracts Regulations 1999 and, where applicable, meet the reasonableness test under the Unfair Contract Terms Act 1977.
- The Appointed Manager will be informed immediately a Gambling Commission Enforcement Officer properly identifies himself on the premises, and will attend to the Officer without undue delay. Staff will co-operate at all times with the Commission's Enforcement Officers.
- Members of staff are trained as part of their induction process in the understanding of, and the strict adherence to this policy, and required to sign to this effect retaining a copy for their future reference. The original is retained on the employee's personnel file.

**I have read, understood and agree to implement the provisions of the above City Gaming Limited Policy and Procedures.**

**Signed:** .....

**Name: (please print)** .....

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# City Gaming Limited

Date: .....

Venue: .....

Position: .....

A copy of this signed document must be given to the employee for on-going reference; the original document to be retained on the employee's personnel file for the duration of his/her employment.



## City Gaming Limited

### **GAMBLING ACT 2005** *Licence Conditions and Codes of Practice* **ADVERTISING STANDARDS AND MARKETING**

#### Statement

City Gaming Limited recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice, and monitoring of policies and procedures is regularly reviewed and subject to change as part of our ongoing risk assessment.

#### Policy and Procedure

All advertising and marketing by City Gaming Limited complies with standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP). We ensure that our marketing communications, advertisements, and invitations to purchase (within the meaning of the Consumer Protection from Unfair Trading Regulations 2008), including 'free bet' offers, do not amount to or involve misleading actions or misleading omissions within the meaning of those regulations.

We adopt the general principles that our advertising is:

- legal, decent, honest and truthful;
- prepared with a sense of responsibility to consumers and to society;
- respectful to the principles of fair competition generally accepted in business; and
- not intended to bring advertising into disrepute.

Specifically, we ensure that:

- advertising contains nothing that is likely to lead people to adopt styles of gambling that are unwise;
- advertisements and promotions are socially responsible and do not encourage excessive gambling;
- care is taken not to exploit the young, the immature or those who are mentally or socially vulnerable;
- advertising is not directed at people under the age of 18 years through the selection of media, style of presentation, content or context in which they appear. No medium is used to advertise gambling if more than 20% of its audience is under 18 years old;
- persons shown gambling are not, nor do they appear to be, under 25 years of age;
- there is honesty at all times with regard to the chances of winning, the likelihood of a big win, and the odds or payout ratio that applies to the gambling on offer;
- advertising and promotional material carries a reference for the need to keep gambling under control; and
- it is never suggested or implied that gambling is a means of getting out of financial difficulty.
- Advertising and marketing material should not appear on any primary web page/screen or micro-site that provides advice or information on responsible gambling

#### Marketing and Promotion

Any incentive or reward scheme or other arrangement under which the customer may receive money, goods, services or other advantage (including the discharge in whole or in part of any liability (the benefit)) the scheme is designed to operate, and be operated, in such a way that neither the receipt nor the value or amount of the benefit is:

## City Gaming Limited

- (a) dependent on or calculated by reference to the length of time for or the frequency with which the customer gambles or has at any time gambled; or
- (b) dependent on the customer gambling for a pre-determined length of time or with a pre-determined frequency.

If the value of the benefit increases with the amount the customer spends it does so at a rate no greater than that at which the amount spent increases. Incentives and rewards are proportional to the type and level of the customer's gambling.

Members of staff, as appropriate, are trained as part of their induction process in the understanding of, and the strict adherence to this policy, and required to sign to this effect retaining a copy for their future reference. The original is retained on the employee's personnel file.

**I have read, understood and agree to implement the provisions of the above Company Policy and Procedures.**

**Signed:**

.....

**Name: (please print)** .....

**Date:** .....

**Venue:** .....

**Position:** .....

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## City Gaming Limited

### GAMBLING ACT 2005

#### *Licence Conditions and Codes of Practice*

#### **CUSTOMER INTERACTION IN RELATION TO IDENTIFYING CUSTOMERS WHO MAY BE SUSCEPTIBLE TO GAMBLING HARM**

##### Statement

City Gaming Limited recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice, and monitoring of policies and procedures is regularly reviewed and subject to change as part of our ongoing risk assessment.

##### Policy and Procedures

City Gaming Limited makes use of all relevant sources of information to ensure effective customer interaction and decision making in relation to identifying possible gambling disorders; equally to identify at-risk customers who may not be displaying obvious signs of problem gambling, and in respect of customers designated 'high value' or 'VIP'.

Customer activity and behaviour will be monitored for any behaviour that could indicate problem gambling.

If members of staff have concerns that a customer's behaviour may be related to having problems with gambling, the Duty Manager is to be informed at the earliest available opportunity. Indicative behaviour may include signs of distress, agitation, aggression, intense mood swings, hysteria, remorse and perhaps even damage to property and violence or the threat of violence to staff or other customers. Other indicators may include:

- Increased amount of time spent gambling
- Changes to amount and frequency of spend
- Information or hints from the customer such as complaints about not winning

Notwithstanding any initial urgent action taken to deal with the customer's behaviour, the Duty Manager is required thereafter to observe the individual and make a judgement as to whether it is appropriate to suggest to the customer that they might want to be provided with information regarding where they can seek professional advice about the nature of their gambling activity or have the process of self-exclusion explained for consideration.

If the customer refuses such information and continues to behave in a manner which could reasonably be considered to be disruptive or puts the staff or other customers in potential danger, the Duty Manager will implement City Gaming Limited's procedures for dealing with antisocial situations.

The Duty Manager may give consideration to refusing service or barring the customer from the premises and, in extreme situations, contacting police for assistance. *Whenever police are called to the premises for assistance in handling any incident, a log entry will be made whether police attend or not.*

Notwithstanding any other action that may have to be taken immediately to prevent an incident from worsening, the Duty Manager will log all such reports which may result in future customer interaction or where it has been ruled out where otherwise it would have taken place. The interaction is conducted between the appointed manager and the customer in a confidential and meaningful manner.

Members of staff are aware of the appointed Manager who is specifically designated to deal with requests for self-exclusion, and are aware of where customers can be directed for confidential advice should they be directly approached for assistance.

## City Gaming Limited

Interactions will be evaluated to understand the impact of the interactions on a consumer's behaviour and whether any further action is needed. An evaluation of the effectiveness of the approach will be undertaken to determine which types of interactions and tools work best to help consumers manage their gambling in a way that works for them. City Gaming Limited recognises its responsibilities detailed within the Gambling Commission Formal Guidance for Premises Based Operators.

This policy and procedure is consistent with, and implemented with due regard to City Gaming Limited's duty in respect of the health and safety of members of staff.

Members of staff are trained as part of their induction process in the understanding of, and the strict adherence to this policy and accompanying log, and required to sign to this effect retaining a copy for their future reference. The original is retained on the employee's personnel file.

**I have read, understood and agree to implement the provisions of the above Company Policy and Procedures.**

**Signed:** .....

**Name: (please print)** .....

**Date:** .....

**Venue:** .....

**Position:** .....

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# City Gaming Limited

## GAMBLING ACT 2005 *Licence Conditions and Codes of Practice*

### EMPLOYMENT OF CHILDREN AND YOUNG PERSONS

#### Statement

City Gaming Limited recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice, and monitoring of policies and procedures is regularly reviewed and subject to change as part of our ongoing risk assessment.

#### Policy and Procedures

It is an offence for children (under-16s) and young persons (those aged 16 and 17) to be engaged, or permitted to be engaged in:

- Providing facilities for gambling.
- Performing any function (including cleaning) in connection with a gaming machine at any time.
- Carrying out any other function on Adult Gaming Centre licensed premises, whether directly employed or not, whilst any gambling activity is being carried on in reliance on the premises licence.

All relevant staff, including children and young persons, employed by this Company have been trained about the laws relating to access to gambling by children and young persons.

It is strict Company policy that:

- Children and young persons are not employed to carry out any work in an adult-only area of family entertainment licensed premises at a time when any gambling is taking place.
- Gaming machines sited in Adult Gaming Centres or adult gaming areas are turned off if children and/or young persons are working on the premises outside the hours when the premises are open for business.
- Due diligence is given to verifying the age of all new members of staff where there is reason to doubt authenticity of birth dates supplied.
- The movement of children and young persons employed on the premises are carefully monitored and supervised so as to ensure compliance.

Members of staff are trained as part of their induction process in the understanding of, and the strict adherence to this policy, and required to sign to this effect retaining a copy for their future reference. The original is retained on the employee's personnel file.

**I have read, understood and agree to implement the provisions of the above City Gaming Limited Policy and Procedures.**

**Signed:** .....

**Name: (please print)** .....

**Date:** .....

**Venue:** .....

**Position:** .....

## City Gaming Limited

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# City Gaming Limited

## GAMBLING ACT 2005 *Licence Conditions and Codes of Practice*

### **FAIR AND OPEN PRACTICE ~ COMPLAINT AND DISPUTE RESOLUTION**

#### Statement

City Gaming Limited recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice, and monitoring of policies and procedures is regularly reviewed and subject to change as part of our ongoing risk assessment.

#### Complaints Procedure

City Gaming Limited is committed to providing a high quality, accessible and responsive service to customers and the local community. However, dissatisfied customers may communicate a complaint to us either verbally or in writing. All complaints are taken seriously, investigated thoroughly and handled in a confidential manner. If the complaint cannot be resolved to the satisfaction of both parties on site, a copy of our written procedure for dealing with complaints, together with a complaint form is supplied to the complainant at the earliest opportunity together with the name and status of City Gaming Limited representative delegated to deal with the complaint.

Complainants should provide us with a comprehensive description and nature of the complaint; whether it is an original complaint, or where the outcome of a previous complaint was found unacceptable, and their name and postal address including a contact telephone number.

A 'complaint' means a complaint about any aspect of City Gaming Limited's conduct of the licensed activities, and a 'dispute' is any complaint which:

- is not resolved at the first stage of the complaints procedure; and
- relates to the outcome of the complainant's gambling transaction.

In the first instance, City Gaming Limited will endeavour to resolve the complaint to the satisfaction of both parties within fifteen working days. Should this not be possible we will explain why and provide a date by which the complainant can expect a full response.

In the event of a complaint relating to the outcome of a customer's gambling is unable to be satisfactorily resolved between City Gaming Limited and the complainant, the complainant will be given contact details of an Alternative Dispute Resolution (ADR) entity.

- Complainants have the means and opportunity of submitting their own version of events.
- The dispute is reviewed in full by the ADR entity.
- Both parties are notified in writing of the review outcome with suggestions of a resolution if appropriate.
- This procedure may, but need not, provide for the ADR entity's resolution of the dispute to be binding on both parties.

City Gaming Limited is obliged to keep a record of all complaints and disputes, other than those considered to be trivial, including all disputes referred to the ADR entity that are not resolved at the initial stages of the complaints procedure. There is a requirement to submit reports of the outcome of disputes referred to the ADR entity to the Gambling Commission at intervals determined by the Commission either by the ADR entity or by City Gaming Limited.

City Gaming Limited is satisfied that the terms on which gambling is offered are not unfair within the meaning of the Consumer Rights Act 2015 and is compliant with those terms

An accurate summary of the contractual terms on which gambling is offered is available to customers who are notified of material changes to terms before they come into effect.

**I have read, understood and agree to implement the provisions of the above City Gaming Limited Policy and Procedures.**

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**City Gaming Limited**

**Signed:** .....

**Name: (please print)** .....

**Date:** .....

**Venue:** .....

**Position:** .....

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# City Gaming Limited

## GAMBLING ACT 2005

*Licence Conditions and Codes of Practice*

### INFORMATION ON HOW TO GAMBLE RESPONSIBLY AND HELP FOR GAMBLERS WITH PROBLEMS

#### Statement

City Gaming Limited recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice, and monitoring of policies and procedures is regularly reviewed and subject to change as part of our ongoing risk assessment.

#### Stay in control advice

*Without breaching the principle that customers are responsible for their own gambling, the nature of the activity suggests that they should be reminded of the need to exercise caution. Accordingly, signage in the form of an appropriate number of posters or other appropriate means is displayed on our premises:*

- Giving clear guidance that in order to keep gambling a fun social activity the customer needs to 'stay in control'.
- Drawing attention to further information, such as leaflets that are available on the premises.
- Indicating sources of help such as the National Gambling Helpline operated by GamCare.
- Large enough and written in language so as to be easily seen and understood.
- Prominently displayed.
- Maintained in a clean and tidy condition, preferably within a glass fronted frame.

#### Advertising sources of help

*At the core of exercising a duty of care is the principle of assisting customers who may wish to express concern about their gambling. This tenet is drawn to the attention of customers on our premises in the following ways:*

- The prominent display of 'Responsible Gambling' or 'Stay in Control' information.
- There are holders or racks containing leaflets in appropriate places that emphasise the need to keep gambling under control and where to seek help should anyone be concerned about their own or a family member's gambling. These leaflets are available to be taken away from the premises without the necessity of having to ask for them.
- The leaflets are available at all times for customers to take discreetly without having to ask a member of staff, and are located in the gambling area either near to exit doors, ATMs or toilets. We endeavour to maintain an effective stock control system to ensure that such leaflets are always available to supply. Signposting Information may also be made available through the use of links for online or smart technology.
- Details of GamCare, giving the National Helpline telephone number is inscribed on all appropriate categories of gaming machines.

#### Protecting those who seek assistance

*Responding to someone who admits to having a problem with their gambling is a delicate matter that has to be timely and needs to be approached sensitively. It is our policy that:*

- rules and procedures relating to a policy of responding to problem gamblers are clearly formulated and incorporated into our day-to-day operation;
- at least one member of staff who has been trained to deal with situations that might require a response is on duty at any one time, or available without undue delay;

## City Gaming Limited

- a positive response including communicating sources of help and the possibility of self-exclusion is offered to any customer who admits to having lost control of their gambling;
- the facility of a self-exclusion policy for customers who wish to voluntarily self-exclude themselves from these premises, and other premises offering the same style of gambling in the locality, that stipulates a minimum exclusion period of six months - with a further 24-hour 'cooling off' period thereafter;
- we draw to the attention of relatives who express concern about a family member's gambling the options available to that person should they wish to address the extent of their gambling;
- members of staff do not collude with customers when asked to lie on their behalf, and
- where services are marketed in one or more foreign languages, we make available information on how to gamble responsibly, access to help, guides to the playing of any game, and a summary of the contractual terms on which gambling is offered in that, or those, foreign languages.

**I have read, understood and agree to implement the provisions of the City Gaming Limited Policy and Procedures.**

**Signed:** .....

**Name: (please print)** .....

**Date:** .....

**Venue:** .....

**Position:** .....

**A copy of this signed document must be given to the employee for on-going reference; the original document to be retained on the employee's personnel file for the duration of his/her employment.**

## City Gaming Limited

### GAMBLING ACT 2005

*Licence Conditions and Codes of Practice*

#### MONEY LAUNDERING, CASH HANDLING AND SUSPICIOUS TRANSACTIONS

##### Introduction

As part of its procedures for compliance with the requirements in respect of the prevention and detection of money laundering in the Proceeds of Crime Act 2002 and the Terrorism Act 2000, City Gaming Limited takes into account the Commission's advice on the Proceeds of Crime Act 2002, *Duties and responsibilities under the proceeds of Crime Act 2002 – Advice for operators (excluding Casino operators)*.

##### Money Laundering Definition

Money laundering is a process by which the proceeds of crime are converted into assets which appear to have a legitimate origin, so that they can be retained permanently or recycled into further criminal enterprises. This definition of money laundering means that potentially any employee could contravene the Regulations if they were to become aware of or suspect the existence of criminal property and continue to be involved in a matter which relates to that property without reporting their concerns.

##### Policy

- City Gaming Limited is committed to ensuring that all necessary safeguards are in place with regard to the receipt of money in order to avoid it being used to launder money that may originate from the proceeds of crime.
- City Gaming Limited has appointed a Designated Money Laundering Officer (MLO)
- All relevant staff are trained on the requirements of the Regulations and told of the need to report any suspicious cash transactions to the MLO for the purpose of informing the relevant authorities.

##### Disclosure Procedure

- Where it is suspected by a member of staff that money laundering activity is taking/has taken place, a disclosure must be made to the MLO as soon as possible. Because of the importance attached to the process, notification should normally take place immediately by telephone or, where that is not possible, by any other expedient means.
- No discussion will take place with colleagues as confidentiality is paramount.
- The MLO will determine whether or not to submit - online or otherwise - a suspicious activity report (SAR) to the National Crime Agency (NCA) and will maintain records of all notifications received detailing the method of verification used to identify the suspected person.

##### Cash Handling

Operating policies and procedures are in place with regard to accounting practices and record keeping in respect of:

- Monetary stakes introduced to machines (gross takings),
- Money introduced to refloat machines
- Token transactions
- Customer refunds due to machine malfunctions.
- Money removed from machines (net takings)

Members of staff, where appropriate, are trained as part of their induction process in the understanding of, and the strict adherence to this policy, and required to sign to this effect retaining a copy for their future reference. The original is retained on the employee's personnel file.

**I have read, understood and agree to implement the provisions of the above City Gaming Limited Policy and Procedures.**

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**City Gaming Limited**

**Signed:** .....

**Name: (please print)** .....

**Date:** .....

**Venue:** .....

**Position:** .....

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# City Gaming Limited

## GAMBLING ACT 2005 Licence Conditions and Codes of Practice

### SELF-EXCLUSION

#### Statement

City Gaming Limited recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice, and monitoring of policies and procedures is regularly reviewed and subject to change as part of our ongoing risk assessment.

#### Policy and Procedures

*Whilst most customers are able to enjoy and control their gambling, this Company recognises its duty of care to those who cannot. Accordingly, we provide a self-exclusion process for those customers who seek to prevent their own access to our premises and others in the locality offering a similar style of gambling as defined by the premises licence.*

- When a customer has requested that they be refused entry to our premises, the customer and the appointed manager will formally acknowledge and document the request on a self-exclusion request form, or directly on the web-based AGC national self-exclusion scheme. This will be preceded by a meaningful discussion about the terms and conditions applicable to the scheme and will include other options available to assist a person having a gambling disorder, including being signposted to counselling and support services. A copy of the terms and conditions will be signed by the excluder as acknowledgement of understanding and consent. Customers are given the opportunity of discussing self-exclusion in private where possible.
- Photo identification and signature of the excluder is required for self-exclusion agreements except where an alternative means of identification is at least as effective. Photographs, preferably of the passport style, should be full-faced and a good likeness both initially and throughout the duration of the self-exclusion agreement.
- The Duty Manager will offer the exclusion for a minimum duration of not less than six months, nor more than twelve months; the customer thereafter may request to extend the length of the self-exclusion for one or more further periods of at least six months, reliant on City Gaming Limited's ability to manage longer agreements. City Gaming Limited will not allow the excluder admittance to the premises during the term of the self-exclusion agreement, and will have in place procedures for preventing self-excluded individuals from gambling during the period of the self-exclusion agreement including taking into account the internal structure and layout of the premises.
- It is made clear to the customer that they may not revoke the self-exclusion during the agreed period and that if found either in the gambling area or attempting to gamble they will be asked to leave. Members of staff are trained to be alert to self-excluded individuals attempting to breach agreements and instances of them getting another person to gamble on their behalf. It is a requirement that staff regularly pay heed to self-exclusion agreement records that are currently active (particularly photographs) in order to stay alert to the identity of those excluded in the locality of the premises.
- Self-excluders have the opportunity of also excluding from other premises owned by City Gaming Limited without necessarily having to enter areas licenced for gambling. Where the self-exclusion agreement is extended to other Company's premises we will consider any specific requests made by a customer in setting the bounds of the exclusion area.
- City Gaming Limited will offer customers with whom they enter into a self-exclusion agreement in respect of facilities for any kind of gambling we offer, the ability to exclude from facilities for the same kind of gambling offered in our locality by any other holder of an operating licence to whom this provision applies, by participating in one or more available multi-operator self-exclusion schemes. In addition, City Gaming Limited is participating in the possible development of a multi-operator self-exclusion scheme that will apply to all styles of gambling.

## City Gaming Limited

- A self-exclusion log is maintained on the premises for recording detail of those currently excluded in addition to records stored digitally.
- Those self-excluded will be removed from any marketing databases held by this Company within two days of receiving the completed self-exclusion form, but we will take all reasonable steps to prevent details being knowingly sent as soon as practicable.
- At the end of the self-exclusion period, the exclusion will remain in place for a further six months, unless the customer takes positive action in order to gamble again.
- At the end of the exclusion period, the Duty Manager and customer will, together, review the terms of agreement either by telephone or in person. The review process is recorded on a self-exclusion review form.
- Where a customer chooses not to extend the self-exclusion and makes a positive request to begin gambling again, the customer is offered a 24-hour 'cooling off' period before being allowed access to the gambling facilities.
- Customers are given the opportunity to discuss self-exclusion in private where possible.
- City Gaming Limited retains self-exclusion records for the length of the agreement plus a further 6 months.
- Members of staff are trained both on induction and refresher sessions thereafter in the understanding of, and the strict adherence to this policy and accompanying log, and required to sign to this effect retaining a copy for their future reference. The original is retained on the employee's personnel file.

**I have read, understood and agree to implement the provisions of the above Company Policy and Procedures.**

**Signed:** .....

**Name: (please print)** .....

**Date:**.....

**Venue:** .....

**Position:** .....

**A copy of this signed document must be given to the employee for on-going reference; the original document to be retained on the employee's personnel file for the duration of his/her employment.**

## **City Gaming Limited**

### **GAMBLING ACT 2005**

#### **The Licensing Objectives**

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

# City Gaming Limited

## **GAMBLING ACT 2005** *Licence Conditions and Codes of Practice* **PRINCIPAL CONCEPTS**

### Statement

City Gaming Limited recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice, and monitoring of policies and procedures is regularly reviewed and subject to change as part of our ongoing risk assessment.

### Licensing Objectives

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

### Policy and Procedures

We put into effect policies and procedures intended to promote socially responsible gambling that includes making an annual financial contribution for education and research into the prevention and treatment of gambling-related harm, the development of harm prevention measures and the treatment of those with gambling related disorders.

- We operate an on-going training program for staff to ensure awareness and compliance of our social responsibility and other statutory requirements. Individual written policies and procedures are in place and adhered to in respect of:
  - (a) Access to Gambling by Children and Young Persons
  - (b) Access to Premises by the Gambling Commission's Enforcement Officers
  - (c) Advertising Standards and Marketing
  - (d) Customer Interaction
  - (e) Employment of Children and Young Persons
  - (f) Fair and Open Practice and Dispute Resolution
  - (g) Information on how to Gamble Responsibly and Help for Problem Gamblers
  - (h) Suspicious Monetary Transactions and Cash Handling
  - (i) Self-Exclusion
- We operate our business with integrity, due care and diligence with necessary systems in place to combat crime and disorder. Written policies and procedures are in place concerning the handling of cash and cash equivalents designed to minimise the risk of crime, such as money laundering and the avoidance of illicit credit.
- Conflicts of interest between City Gaming Limited and our customers are managed transparently and fairly, and, where complaints related to the outcome of gambling are not resolved to the satisfaction of both parties, we will refer the complainant to an approved alternative dispute resolution (ADR) entity.
- Gaming machines comply with the Gambling Commission's technical standards; exhibit the applicable maximum stake and monetary prize levels, and the chances of winning. Gambling general terms and conditions are displayed.
- We do not provide credit in connection with gambling nor participate in, arrange, permit or knowingly facilitate the giving of credit in connection with gambling.
- We seek to prevent systematic or organised money lending between customers on the premises, and staff are trained to be alert to such practice, and to report any instances of substantial money lending to the Duty Manager should they become aware of such instances.
- It is prohibited to consume alcohol on our premises.



## City Gaming Limited

### GAMBLING ACT 2005

Licence Conditions and Codes of Practice

#### Customer Complaints

##### Terms & Conditions

##### Policy & Procedure

These are City Gaming Limited's Terms and Conditions by which customer complaints are dealt with. Also included is City Gaming Limited's policy and procedure document and complaint form. Copies of the complaint procedure and form are available on site for the benefit of customers making a complaint about the outcome of their gambling where the complaint has not been resolved on-site in the initial stages.

A 'complaint' means a grievance about any aspect of the licensee's conduct of the licensed gambling activities, and should be raised with City Gaming Limited as follows:

- The complaint should initially be raised with an available member of staff at the venue at the time of the incident giving cause for complaint. **Stage 1**
- If the member of staff approached is unable to deal with the complaint or the matter is not resolved to the customer's satisfaction, then it should be directed to the duty manager at the venue at the earliest opportunity. **Stage 2**
- Should the matter still not be resolved, the customer will be provided with a copy of the policy & procedure document, together with a complaint form that should be completed by the customer and submitted to City Gaming Limited for consideration by a director or appointed senior manager. **Stage 3**
- If the matter remains unresolved, the customer should be referred to an alternative dispute resolution (ADR) entity with whom City Gaming Limited has registered. The complaint will not be considered by the ADR entity unless:
  - the matter relates to the outcome of the complainant's gambling transaction; and
  - it is not resolved during the three-stage complaint procedure as outlined above.

It is permissible for an ADR entity to have terms enabling it to reject complaints referred for dispute resolution if the complaint is frivolous or vexatious, but City Gaming Limited will not refuse to refer disputes on those grounds.

##### City Gaming Limited will ensure that:

1. information about the complaint procedure is set out in these terms and conditions;
2. such information is readily accessible on our gambling premises to be taken away;
3. information includes details of how to make a complaint to City Gaming Limited and the identity and contact details of the person deputed to handle the complaint;
4. the information names the ADR entity to whom disputes can normally be referred and, where necessary, details of any limitation on the nature and subject matter of disputes with which a particular ADR entity deals.
5. customers are given a copy of the complaint policy and procedure document on request or on making a complaint; and

## City Gaming Limited

6. all complaints are handled in accordance with the procedure.

Should City Gaming Limited refer a complaint to ADR entity other than one in respect of which contact details were given in accordance with 1 to 6 above it will, at the same time as making the reference, inform the Commission of the reference and reason for selection of the ADR entity concerned.

City Gaming Limited keeps a record of all complaints that are not resolved at the initial three-stage complaint procedure.

City Gaming Limited arranges for a copy of the decision on, or a note of the outcome of, each dispute referred to an ADR entity to be provided to the Commission, either by the ADR entity or by City Gaming Limited. This information is provided in such format and within such timescale as the Commission may from time to time specify.

City Gaming Limited also arranges for any outcome adverse to City Gaming Limited of any proceedings taken against the licensee (in whatever jurisdiction) by a customer in relation to a gambling transaction to be notified to the Commission as a key event; but excluding proceedings allocated to the County Court small claims track or equivalent in jurisdictions outside England and Wales.

**Under no circumstances are members of staff put in physical danger** nor will they be subjected to abuse. If a customer is threatening, then that person will be offered the complaint policy & procedure document together with a complaint form, and be referred to City Gaming Limited's strict policy of 'No Abuse'. If the customer continues to be threatening the circumstances will be treated in accordance with a disturbance on the premises, and the person will be asked to leave, and the police contacted to assist if necessary.

### Which complaints are covered?

A complaint, in the context of the LCCP, means a complaint solely about the conduct of City Gaming Limited's activities. A dispute means a complaint which has not been resolved by the operator's complaints procedure to the satisfaction of both parties, and relates to the outcome of a gambling transaction.

### Responsibility of the Employer.

City Gaming Limited has a written procedure in place to:

- advise employees of the name of the appointed person who is to be contacted about complaints;
- ensure that all complaints are handled in accordance with the procedure throughout the investigative process;
- have arrangements in place for reference by a customer of a dispute to an alternative dispute resolution service for disputes (an 'ADR entity'); and
- maintain a record of all complaints, and those that evolve into disputes. All instances where the complaint is referred to an ADR entity will also be recorded together with the outcome.

### Responsibility of the Employee

Members of staff not authorised to deal with complaints, or where the customer is not satisfied with the initial outcome, will ensure that:

- the complainant is informed of the name of the appointed Company representative who will deal with the complaint, together with the appropriate contact details of that person;
- the complainant is issued with City Gaming Limited's complaint policy & procedure document and complaint form;

## City Gaming Limited

- the circumstances are recorded as contemporaneous notes as soon as possible following the incident and the notes are signed, dated and timed by the member of staff dealing. The notes are to be comprehensive and a true record of events, and
- members of staff, unless properly authorised by City Gaming Limited, are not allowed to voice their own opinion as to the merits or otherwise of a complaint. Procedure is strictly adhered to.

## City Gaming Limited

### Complaint Procedure

City Gaming Limited endeavours to provide a high quality service to its customers and members of staff are trained how to deal with complaints at the initial stage. However, if you believe that things have gone wrong and your complaint was not resolved to your satisfaction at our premises, then please inform us as we take such reports seriously.

City Gaming Limited will review your complaint and will be dealt with by:

(name).....

who is (job title) .....

at (address).....

.....

Email Address: .....

#### How to make a complaint

- Complaints, which we will deal with confidentially, should be submitted in writing, by letter or e-mail.
- The attached form should be used to record and submit complaints.
- Give as much detail as possible including details of independent witnesses and any other relevant information in order to assist City Gaming Limited in the investigative process.

#### What happens next?

City Gaming Limited will investigate and provide a full explanation of what we have done within **15 working days** of receiving a complaint. If this is not possible we will explain why and give a date by which a full response can be expected.

#### If you are not satisfied with our response

If you are still not satisfied with our response to the complaint, you may consider writing to an alternative dispute resolution (ADR) entity requesting that the matter be reviewed, enclosing all previous correspondence relating to the complaint including the original complaint form. The ADR entity will acknowledge receipt of your correspondence without undue delay and, after review, inform you of its findings and recommendations, usually within **60 days**. The review process is thorough and based upon the information that both parties and other independent sources provide.

#### This Company is registered with the following ADR entity:

**Name of ADR Entity:** Centre for Effective Dispute Resolution (CEDR)

**Email Address:** [XXXXXXX@cedr.com](mailto:XXXXXXX@cedr.com)

**Website:** <https://www.cedr.com/>

**Postal Address:** 70 Fleet Street, London, EC4Y 1EU, United Kingdom

It is highly recommended that you visit the ADR entity's website (as above) so that you are fully aware of the procedural rules and other related information.

## Complaint Form

### CUSTOMER

Name:

.....

Address:

.....

.....

Postcode .....

Daytime Telephone No .:

.....

E-mail address:

.....

Signature: .....

Date: .....

Is this an initial complaint or a follow up to a previous incident?

.....

.....

### VENUE WHERE COMPLAINT OCCURRED

Reference (if  
known):.....

Name of Premises:

.....

Address:

.....

.....

Name(s) of staff member(s) that you initially raised your complaint with:

.....

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**City Gaming Limited**

.....

.....

Date of Incident:

.....

Time of Incident:

.....

Names & Addresses or contact telephone numbers of any **independent** witnesses.

.....

.....

.....

.....

**Name and Category of Gambling Machine subject of complaint:**

.....

**A clear and comprehensive account of the complaint and what you are seeking as redress to resolve the matter:**

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....

.....*Please use continuation sheet(s)*  
*if required.*

Signed..... (Complainant)  
..... (date)

.....

**For Office Use Only**

Appointed Manager dealing: .....  
.....(Mobile Number)

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**City Gaming Limited**

Complaint Acknowledged (Y/N): .....

(date) .....

Details of action to resolve taken by Company:

.....

.....

.....

**If complaint still unresolved by Company**

Complainant referred to ADR Entity (Y/N); .....

(date).....

Name of ADR Entity:

.....

Company Complaint Policy & Procedure Document given to Complainant(Y/N): .....

(date).....

Serial No. /



## City Gaming Limited

### Record of Suspicious Monetary Transactions

TIME	LOCATION	CIRCUMSTANCES	REPORTED TO MLO	SAR SENT TO NCA	OUTCOME
Day:	Site:	Notes:	Day:	Day:	Notes:
Date:	Address:		Date:	Date:	
Time:	Ref:	Photographs/CCTV Y/N  Identity, if known, or description:	Time:	Time:	
Day:	Site:	Notes:	Day:	Day:	Notes:
Date:	Address:		Date:	Date:	
Time:	Ref:	Photographs/CCTV Y/N  Identity, if known or description:	Time:	Time:	

**To be retained on Site**

**Site Reference:**

**Serial No.**    /

# City Gaming Limited

## SELF-EXCLUSION REQUEST FORM FOR RECORDING DETAIL IF NO IMMEDIATE ACCESS TO WEB-BASED CEDR SCHEME

Site Name:	.....	<div style="border: 1px solid black; width: 200px; height: 150px; display: flex; align-items: center; justify-content: center;">             PHOTOGRAPH           </div>
Site Address:	.....	
Customer Name:	.....	
Customer Date of Birth:	.....	
Customer Address:	.....	
	.....	
Customer Postcode:	.....	
Customer Email Address:	.....	
Customer Mobile Number:	.....	

I request that I be refused entry to .....  
 for **\*an initial period of 6 months (minimum) or \*a period of \*..... months (no more than 12 months)** from the date of signing, and acknowledge that I am not allowed to rescind my self-exclusion during this period. The arrangement will be reviewed by both parties thereafter. *\*Delete as applicable*

If I attend the premises set out in this agreement during the term of this exclusion and am identified by staff, I will be requested to leave the premises forthwith.

I acknowledge my responsibility in ensuring adherence to this agreement and hereby sign to the effect that I have read, understood and agree to City Gaming Limited's Terms & Conditions.

I acknowledge City Gaming Limited, its employees and agents have no liability or claims arising from my voluntary use of the gambling facilities provided.

I have provided a photograph of myself to assist in the application of this request.

Signed: ..... (Customer)

Witnessed: ..... (Appointed Manager)

Date:.....

SELF-EXCLUSION	LOG	REFERENCE	No.
.....			

**Note for Customer:** If you would like further advice or assistance, you may like to consider contacting the confidential National Gambling Helpline, operated by GamCare on **0808 8020 133**.

This form must be retained on site for the duration of the self-exclusion period and a copy given to the customer. Members of staff interfacing with customers should reacquaint themselves with the details of this self-exclusion, especially the photograph, on a regular and frequent basis.

# City Gaming Limited

## GAMBLING ACT 2005

### SELF-EXCLUSION REVIEW FORM FOR RECORDING DETAIL IF NO IMMEDIATE ACCESS TO THE CEDR WEB-BASED SCHEME

City Gaming Limited:.....

Site Name: .....

Site Address: .....

.....

Post Code:.....

Customer Name:.....

Customer Date of Birth:.....

Customer Address:.....

.....

Post Code:.....

Review of self-exclusion agreement on: ..... (date)

Signature: ..... (Customer) Date: .....

Signature: ..... (Appointed Manager) Date: .....

### **Request to resume access and gambling following the self-exclusion period.**

I confirm that I voluntarily no longer wish to be self-excluded from this site and other venues in the locality to which the agreement applies; that all options have been explained to me by City Gaming Limited, and that I have experienced a cooling off period of at least 24 hours.

Signature: ..... (Customer)  
Date: .....

Signature: ..... (Appointed Manager)  
Date: .....

### **To be retained on Site**

APPENDIX A

## Customer Notice

### Gaming General Terms & Conditions

These Terms and Conditions (the “Generic Terms”) apply to all gaming transactions entered into on these premises (the “Premises”) *except for Promotions which are covered by separate terms and conditions available on the premises.*

Any gaming transactions entered into on the premises shall be between the customer taking part in the particular transaction (the “Customer”) (1) and City Gaming Limited (the “Company”) (2)

In these General Terms, the terms/conditions/rules displayed on the particular gaming machine are referred to as the “Specific Terms”.

Customers are strongly advised to read the Specific Terms. By entering into any gaming transaction by use of the particular gaming machine, the Customer shall be deemed to have read and accepted the Specific Terms applying.

Minimum and maximum stakes and maximum prizes/wins are those displayed on the gaming machine in the Specific Terms.

Members of staff have no authority to vary or amend the General Terms or the Specific Terms and any assistance or advice offered by them in relation to any gaming transaction shall be without prejudice to that position.

In the event of a disputed outcome to any game, City Gaming Limited complaint procedure will apply, a copy of which is available from a member of staff or from City Gaming Limited at the address below:

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

## **APPENDIX B – GUIDE TO THE BACTA SELF-EXCLUSION SERVICES SCHEME**

### **INTRODUCTION**

~~In 2015, the Gambling Commission revised the Licence Conditions and Codes of Practice. As part of that revision, the way in which the gambling industry is expected to handle those customers who wished to self-exclude was changed.~~

~~Whereas previously operators simply self-excluded a customer in ways dependent upon the gambling premises, the change requires operators to offer self-excluders the opportunity to self-exclude from other premises offering similar gambling facilities in the locality. Self-exclusion lasts between six and twelve months but can be extended by the self-excluder.~~

~~The relevant section of the LCCP can be found at: <http://www.gamblingcommission.gov.uk/pdf/Latest-LCCP-and-Extracts/Licence-conditions-and-codes-of-practice.pdf>~~

~~What this means in practice is that an AGC has to allow someone to also self-exclude from other AGCs nearby without the excluder having to visit them.~~

~~Bacta has worked with a software company to build a web-based application that will allow this process to be automated. The scheme is administered via a separate company called Bacta Self-Exclusion Services Ltd (BSESL).~~

~~This software allows operators to input details of a self-excluder and then tell other operators nearby that a particular person has self-excluded and that they will need to stop them entering the premises should they try. Attempted breaches of a self-exclusion can also be recorded on the system. The system uses a radius from the post code of the AGC to determine which other AGCs are notified.~~

~~The scheme is for use by those operators who possess an Adult Gaming Centre premises licence. A separate scheme is available for those using a bingo licence. Details of that scheme are available from the Bingo Association.~~

~~Motorway Service Areas (MSAs) that operate AGCs use this scheme but self-excluders will be able to select individual service areas or multiple service areas on particular motorways or A roads, rather than using a radius from a postcode.~~

~~A self-excluder wishing to exclude themselves from High Street AGCs and from AGCs on Motorway Service Areas, need to do so separately.~~

~~A separate guide to the software package has been produced and is available from BACTA.~~

~~It is important to emphasise that self-exclusion is a last resort for an individual who wishes to stop gambling. It is one of the tools available to them to help. Operators have a duty of care towards those who wish to self-exclude and should seek to point those individuals to other self-exclusion schemes operated by other gambling sectors, as well as to care agencies and helplines such as GamCare or GambleAware.~~

### **BRIEF DESCRIPTION OF THE SCHEME**

- a. ~~In order to offer the scheme to customers, operators need to register with BSESL by signing a contract that sets out the nature of the service BSESL is providing and the obligations BSESL and operators must fulfil.~~

## City Gaming Limited

- b. ~~A login and password to the system is provided and operators need to upload details of their company and their sites onto the system.~~
- c. ~~Operators need to give relevant members of staff their own login and password.~~
- d. ~~Operators are able to customize the software to suit their businesses.~~
- e. ~~Once the registration process is complete the operator is able to upload details of any self-excluder using a screen for that purpose.~~
- f. ~~The screen requires key information to be provided.~~
- g. ~~It is necessary to upload a copy of a photograph of the self-excluder.~~
- h. ~~It is also necessary to obtain consent from the self-excluder to their details being used for the purposes of ensuring they are self-excluded from the premises from which they choose to be excluded.<sup>1</sup>~~
- i. ~~Once the details of the self-excluder have been uploaded, namely their photograph and details of from where they wish to be excluded (either using a radius from a post code in the case of AGCs or individually in the case of MSAs), the system alerts the operators of those other premises that someone has excluded themselves from the source premises.~~
- j. ~~Those operators then have to access the system and implement whatever procedures they have in place to ensure that person cannot enter the premises. For example, at an MSA vehicle number plate recognition can in some circumstances alert staff that a person who has self-excluded is coming on site. AGCs may simply use staff recognition.~~
- k. ~~For people who do not wish to visit an AGC or MSA operators should provide a contact telephone number to the relevant person within their organization who can then fill in the details of the self-excluder remotely. Acceptance of the Terms and Conditions needs to be given by the self-excluder in writing, either by post or by hand.~~
- l. ~~All records can be printed off and stored securely by the operator.~~
- m. ~~When a self-exclusion period comes to an end, the person who has self-excluded has to visit the AGC from which they originally excluded themselves either to extend their self-exclusion or to notify the operator that they wish to start gambling again. A screen needs to be completed and an alert to other operators is generated so everyone is aware that the self-exclusion agreement has come to an end. There is a 24-hour cooling-off period before this can become active.~~
- n. ~~A self-excluder that does not notify the operator that they either wish to gamble again or that they wish to extend their self-exclusion period will automatically be deleted from the system after six months from the end of the self-exclusion period they originally selected. Again, an alert is generated at that time by the system to all relevant operators advising that the particular self-excluder is no longer on the database and staff no longer need to be aware of their potential to enter the premises.~~

---

<sup>1</sup> The information about a self-excluder is likely to be regarded as “sensitive personal data” under the Data Protection Act. As a result the Act requires additional safeguards in the processing and securing of that data, which would extend to a person’s photograph. Policies and procedures within City Gaming Limited to do this should be written down and understood by members of staff. Further advice is given under the FAQ Section of this Guide but please note that it is ultimately your responsibility to ensure that you are complying with the Data Protection Act.

## City Gaming Limited

### THE ROLE OF STAFF

The role of members of staff interfacing with customers is crucial in the successful implementation of the self-exclusion scheme. It is expected therefore that staff will be well versed in the necessary conversations that need to be had with those wishing to exclude and the way to have them.

It is nevertheless important to remember that in all cases a safety-first policy must be adopted; staff members should never put themselves, customers or colleagues at risk.

This might be when a particular customer has become agitated or potentially violent. Staff members should not put themselves in a position where they are alone with an individual whether on site or off site. If necessary, they should ensure another member of staff is present to witness that no inappropriate behaviour occurs.

Staff must be told that it is imperative that they behave at all times in a way that does not jeopardize the confidentiality of the information about an individual that they have been given either as the member of staff handling the self-exclusion or as a member of staff policing the system.

Here are some do's and don'ts around sensitive personal information of this kind:

- Limit staff access to the data to those who need to enforce the self-exclusion scheme.
- Do not allow anyone to remove self-exclusion data from the premises or to refer to any individuals opting into the scheme outside of an immediate and necessary work context.
- If staff members attach a photograph of a self-excluder to the wall in the office, make sure it cannot be seen by any members of the public (e.g. if the door is opened).
- Treat as gross misconduct the sharing of any personal data with any third party.
- Obtain independent verification that your business is operating in compliance with data protection and privacy laws.
- Members of staff should never use their own mobile devices to take photographs of self-excluders.

### TERMS AND CONDITIONS

The terms and conditions, to which every self-excluder needs to understand and agree to, is provided to operators separately. These T&Cs are designed to minimise liability in the event that someone who has self-excluded successfully enters your premises undetected and gambles, and claims damages from you for not properly exercising your duty of care to keep them from the premises and any damages they may be seeking as a result.

This does not mean that operators can ignore the need for robust and proper policies and procedures to enforce a self-exclusion. That is a key requirement of the LCCP and is contained in the terms and conditions BSESL has with operators. If policies and procedures are not sufficiently robust, an excluder could be successful in an action irrespective of the fact they have signed a copy of the standard terms and conditions.

Some scheme members may wish to amend the self-excluder terms and conditions. They do so at their own risk. Whatever BSESL's contract with you requires, should you amend the standard terms then you must include what we regard as certain minimum or mandatory conditions. BSESL cannot warrant that the

## City Gaming Limited

~~self-excluder terms and conditions will meet the Gambling Commission's requirements nor that they will protect you from all claims. You need to obtain your own legal advice before using the self-excluder terms and conditions.~~

~~Operators are recommended to keep and store signed copies of the terms and conditions.~~

### **~~FREQUENTLY ASKED QUESTIONS~~**

#### **~~Do High Street bingo operators have to join the BSESL scheme?~~**

~~Operators that have a bingo licence have to use the Bingo Association self-exclusion scheme. That scheme does not exclude someone from AGCs. To do that they will need to initiate a separate self-exclusion using the BSESL self-exclusion scheme for AGCs~~

#### **~~Why are the details of people deemed sensitive information?~~**

~~The processing of personal data is both defined and regulated by the Data Protection Act. You will need a registration in any case with the Information Commissioner ([www.ico.org.uk](http://www.ico.org.uk)) if you process any personal data. Most companies will be registered already.~~

~~In addition there is another category of personal data which is called sensitive personal data and is defined as any data fulfilling certain requirements, such as data relating to medical conditions. Given that self-exclusion potentially relates to problem gambling it should be treated as sensitive data. This means operators must ensure that they have robust policies and procedures in place to ensure that data relating to self-excluders is not used for any other purpose than ensuring the self-exclusion is effective. Also, the data must not be disclosed to those that are not involved in making the self-exclusion effective. All members of staff must understand this.~~

~~Operators must make sure that they remove access to the system by any member of staff that leaves their employ.~~

#### **~~How do Holiday Parks deal with self-exclusions?~~**

~~If a self-excluder is going on holiday to a holiday park and wishes to self-exclude from the AGC(s) on the Holiday Park whilst there, they should contact the Park direct to ensure that for the duration of their holiday they are prevented from entering the AGC. Each Holiday Park will have to devise appropriate arrangements to give effect to the self-exclusion in light of their unique circumstances.~~

#### **~~I am having trouble registering a self-exclusion. Is there anyone I can call?~~**

~~In the first instance please call 0207 730 6444.~~

#### **~~What should I do if I notice someone attempting to breach their self-exclusion?~~**

~~Firstly, the person attempting to breach should be approached to remind them that they have self-excluded from the premises and you are bound to ask them to leave the premises. Again, safety must come first and if a situation escalates then company procedures should be followed.~~

~~All attempted breaches should be recorded on the BSESL system. A form is available on the system for this purpose. You will also need to record this on your self-exclusion incident log.~~



**~~What if someone won't agree to sign the terms and conditions or have their photograph taken?~~**

~~Simply put, the system cannot be used and they cannot be self-excluded from premises in the locality. You can continue to self-exclude them from your premises in the usual way if that can be arranged under your existing system.~~

**~~What if someone comes to an MSA in a friend's car~~**

~~Whilst number plate recognition can be used by MSA's to identify a self-excluder's car if that information has been provided, it clearly will not identify a friend's car. The use of number plate recognition technology is not part of the BSESL scheme but provides a potential tool MSA operators can use to help them, alongside other procedures, to prevent a self-excluder from entering the AGC located at the MSA.~~

## City Gaming Limited

## APPENDIX C – SYSTEM CHECKLIST

## Premises Signage

	Yes (tick)	No (tick)	N/A (tick)	Notes
No Under 18s				
No Alcohol				
No Smoking				
BACTA Membership				

<b>Machine Signage</b>				
Under 18s				
GamCare				
Category Labels				
Legacy Labels				

## Posters (P) &amp; Leaflets (L)

Stay in Control (P)				
Stay in Control (L)				
Proof of Age Scheme				
Think 21/25 Material				

## Licences

Premises Licence				
Operating Licence				
Personal Licence				
Link Licence				

## Forms

Self-Exclusion				
Complaints & Dispute				

## Policy &amp; Procedure Documents

Access by C & YP				
Access by G C				
Advertising				
Employment of C & YP				
Customer Interaction				

## City Gaming Limited

Fair & Open				
Signposting Information				
Money Laundering				
Self-Exclusion				

### Logs

	Yes (tick)	No (tick)	N/A tick)	Notes
Attempts to Gamble C & YP				
Customer Interaction				
Police Assistance				
Self-Exclusion				
Staff Training				

### Entitlement

B3 Numbers				
Stakes & Prizes				

### Misc.

Age Verification Tests				
Contribution to RET				
Notifying Key Events				
Regulatory Return				
Knowledge of MLO				
Advertising Practice				
Payment of MGD				
ADR Entity				
Licensing Objectives				
Attractive to Children				
Supervision				
Self-Exclusion Scheme				
Return to Player (%)				
Responsibility for 3 <sup>rd</sup> Parties				
Register of Machines				

### Risk Assessment Documents

Local Risk				
Money Laundering				

**City Gaming Limited**

Guide to CEDR SE Scheme				
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**Registrations**

ADR Entity				
Self-Exclusion Scheme				
Age Verification Testing				
Primary Authority				

**OPERATOR NOTES:**

## External 4k Quality CCTV

### Ease of Access to Cameras and Remote Recording / Monitoring

The City of London Police Public Space Surveillance Camera System is one of the many tools used to tackle crime and anti-social behaviour (ASB) across the City of London. We are very supportive of this and would to enhance the internal and external security of our venue by providing high quality CCTV equipment inside and out. With the addition of "Spotter Screens" located with 2 Mtr of the entrance.

All footage would be available for 30 days for Police inspection or recovery if required.

Hikvision's camera installations provides Dynamic Domain Name Service (DDNS) for users to access the IP cameras when their laptops or smart phones are not in the local area network (LAN) of the cameras.



External Camera

#### 4K Vandal Fixed Dome Camera

- 8 MP high performance dome camera
- Strong night performance, capturing images in ultra-low light down to 0.003 lux
- Clear imaging even against strong back lighting due to 120 dB true WDR technology
- 3D DNR technology delivers clean and sharp images
- EXIR 2.0; advanced infrared technology with 40 m IR distance
- Water and dust resistant (IP67) and vandal proof (IK10)
- Dual outputs (HDMI and CVBS signals output simultaneously);



## Internal 4 Meg

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positioned to cover al



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## **Conflict Resolution**

### **What is Conflict Resolution?**

There is no one-size-fits all solution to difficult or angry customers. Nevertheless, you should prepare in advance before one of these situations arrives.

You can't control whether a customer leaves the encounter happy or not, but there are subtle ways to influence how a customer responds to your actions.

## **Customer Interaction**

### **Prepare – Have a Plan**

Don't "wing it" when you run into an angry customer. Have a plan in place. Practice responding to different concerns. It might even help to have a script prepared but realise that the customer will hear it in your voice if you're giving him or her a "scripted" response. Keep your replies real and genuine, or the customer will notice and probably won't like it.

What's worse than an exchange with one emotionally charged participant? An exchange with two emotionally charged participants. It's important that you stay calm throughout the conversation. Don't let the customer bait you into retaliating. Always watch your tone. Speak slowly and softly. Remember that the customer isn't attacking you personally. Any anger or abuse is caused by a core problem, which you'll need to uncover before you can start on a solution.

### **Listen – Let the Customer Talk**

The best way to find the core problem is let your customers have their say. Don't interrupt, don't ask for clarification.

Take notes if you need to follow up on anything. Let them get it all out. But never make the mistake of tuning them out.

The stories your customers tell you drove them to reach out to you. To them, these are the issues that provoked them to take action. They're expecting a similar reaction from you. If they feel like you're dismissive or not paying attention, that's all it takes to lose them as a customer.

It isn't always clear what made your customers so angry. What the customer complains about isn't always the actual problem. This is where you have the chance to play detective. In many cases, the customer started out with certain expectations for your product or service, and that expectation wasn't met.



## **Sympathise – Find a Solution**

Besides a fix to their problem, most customers are also looking for someone to tell them, “No, you’re right. This shouldn’t have happened. Your reaction is entirely reasonable.”

What they don’t want is someone asking them, “What’s the big deal? Why are you so upset?”

Be sincere when you express sympathy. Make sure you don’t use empty phrases that could backfire, like, “I know how you feel.” Odds are, that won’t go over too well. Instead, try something along the lines of, “That sounds like a terrible experience. Let’s figure out a way to make this right.”

In many cases, the solution may seem pretty obvious. The customer may want a refund, a replacement product, or an apology. But don’t just assume the solution you see immediately is everything.

Never lie to the customer. You may be tempted to tell them whatever you have to de-escalate the situation. Don’t do it. You’ll get found out eventually. And don’t make promises that you cannot deliver.





## External Conflict

### Verbal De-Escalation

- Verbal De-escalation is what we use during a potentially dangerous, or threatening, situation in an attempt to prevent a person from causing harm to us, themselves or others.
- Without specialized training, we should never consider the use of physical force.
- Verbal De-escalation consists of tactics to help limit the number of staff who might be injured on the job

### Non-Physical Skills

Verbal De-escalation tactics that are non-physical skills used to prevent a potentially dangerous situation from escalating into a physical confrontation or injury. Some tactics are:

- Simply listening
- Distracting the other person
- Re-focusing the other person on something positive
- Changing the subject
- Motivating the other person
- Empathising with the other person
- Giving choices

### De-escalating effectively

- To verbally de-escalate another person, you must open as many clear lines of communication as possible.
- Both you and the other person must listen to each other and have no barriers.
- Barriers to Communication are the things that keep the meaning of what is being said from being heard.

- Communication Barriers:
  - Pre-judging
  - Not Listening
  - Criticising
  - Name-calling
  - Engaging in power struggles
  - Ordering
  - Threatening
  - Arguing



## Listening

There are Three Main Listening Skills:

Attending: Giving your physical (and mental) attention to another person.

Following: Making sure you are engaged by using eye contact. Use un-intrusive gestures (such as nodding of your head, saying okay or asking infrequent questions.)

Reflecting: Paraphrasing and reflecting, using the feelings of the other person (Empathy).

- Be an empathetic listener
  - Do NOT be judgmental.
  - Do NOT ignore the person or pretend to be paying attention.
  - Listen to what the person is really saying.
  - Re-state the message.
  - Clarify the message.
  - Repeat the message.
  - Be empathetic!
  - Validate – “I understand why...”
  - Try to establish rapport with the other person.

## Body Language

80% - 90% of our communication is non-verbal. It is very important to be able to identify exactly what we are communicating to others non-verbally. You may be trying to de-escalate the situation by talking to the other person, but your body language may be showing a willingness to get physical. It is also important that we recognize and understand the non-verbal cues from another person who has the potential of escalating.

When people are angry, they sometimes do not “listen” to the words that are being said. Remember the difference between “hearing” and “listening”. Often, they do “see” and react to what you are “saying” with your body language. You must always be very careful with the message you are sending!

Never point your finger this may seem accusing or threatening. You should also avoid shoulder shrugging this may seem uncaring or unknowing. A natural smile is good, a fake smile can aggravate the situation. Use slow and deliberate movements – quick actions may surprise or scare the other person.



## Personal Space

Invasion or encroachment of personal space tends to heighten or escalate anxiety. Note: Personal space is usually 1 ½ to 3 feet (Far enough away so you cannot be hit or kicked)

- Do not touch a hostile person – they might interpret that as an aggressive action.
- Keep your hands visible at all times – you do not want the other person to misinterpret your physical actions.

Challenging postures that tend to threaten another person and escalate any situation include:

- Face to face
- Nose to nose
- Toe to toe
- Eyeball to eyeball
- Touching
- Finger pointing

## Protecting Yourself

Protect yourself at all times

- While de-escalating another person, you want to be in a non-threatening, non-challenging and self-protecting position.
- Slightly more than a leg's length away, on an angle and off to the side of the other person.
- Stay far enough away that the other person cannot hit, kick or grab you
- Use of physical force is NEVER recommended.
- Physical force would only be used as a last resort to prevent injury to yourself or to another person.
- Use of physical force usually results in someone (you?) getting hurt.

## Tone of Voice

Always think about your tone of voice

- A lowered voice level may set a tone of anger which could create fear or challenges.
- A raised voice may set a tone of anticipation or uncertainty which may promote excitement or disruption.
- Speak slowly – This is usually interpreted as soothing.
- A controlled voice is one of calm and firmness which promotes confidence in both parties.
- Humor may unintentionally offend someone and escalate the situation.
- Always be respectful to the other person.
- Using “please” and “thank you” or “Mr” or “Ms” indicates respect.



## **Ask for help!**

- Bring in another trained person to assist whenever possible. (No help will arrive until someone else knows your situation. Until then, you are all alone).
- There is less chance of aggressive behaviour if two people are talking to one person.
- It will be beneficial to have a witness, if the situation deteriorates and someone is injured.
- Use the panic button if available
- Remain calm – Listen – really listen!
- Avoid overreaction.
- Validate! “I understand why you might be upset.” (This does not indicate that you agree with them).
- Remove onlookers – or relocate to a safer place. (Onlookers can become either “cheerleaders” or additional victims). Send an onlooker for help.
- Watch for non-verbal clues or threats.

## **Notification & Follow Up**

Always record and follow-up even if it was a minor situation, minor situations can lead to major situations. Records will help all parties when evaluating re- occurring events.

After your personal safety is secured, there are other steps that must be taken:

- Intervention must occur to end the situation, if that has not yet occurred. This may be accomplished by supervisors, security or police, depending on the circumstances. Make sure your appropriate chain of command has all of the facts.
- Document and record the incident on the IHL hub
- You should receive medical treatment for any physical injuries.
- Counselling for post-traumatic stress and fear resulting from the incident may be appropriate.
- Look at steps to be taken to prevent other similar situations from occurring in the future.



## **Safeguarding Adults Policy Statement**

This policy will enable Game-Nation to demonstrate its commitment to keeping safe the vulnerable adults with whom it works alongside. Game Nation acknowledges its duty to act appropriately to any allegations, reports or suspicions of abuse.

It is important to have the policy and procedures in place so that staff, volunteers, service users and carers, and management committee can work to prevent abuse and know what to do in the event of abuse.

The Policy Statement and Procedures have been drawn up in order to enable Game Nation to:

- promote good practice and work in a way that can prevent harm, abuse and coercion occurring.
- to ensure that any allegations of abuse or suspicions are dealt with appropriately and the person experiencing abuse is supported.
- and to stop that abuse occurring.

The Policy and Procedures relate to the safeguarding of vulnerable adults.

Vulnerable adults are defined as:

- People aged 18 or over
- Who are receiving or may need community care services because of learning, physical or mental disability, age, or illness
- Who are or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

The policy applies to all staff, including senior managers, management committee members, trustees, paid staff, agency staff, and anyone working on behalf of Game Nation.

It is acknowledged that significant numbers of vulnerable children and adults are abused, and it is important that Game Nation has a Safeguarding Adults Policy, a set of procedures to follow and puts in place preventative measures to try and reduce those numbers.

In order to implement the policy, the Game Nation will work:

- To promote the freedom and dignity of the person who has or is experiencing abuse
- To promote the rights of all people to live free from abuse and coercion
- To ensure the safety and well being of people who do not have the capacity to decide how they want to respond to abuse that they are experiencing
- To manage services in a way which promotes safety and prevents abuse
- Recruit staff and volunteers safely, ensuring all necessary checks are made
- Provide effective management for staff and volunteers through supervision, support and training

## **GAME NATION**

- Will ensure that all management committee members, staff are familiar with this policy and procedures
- Will work with other agencies within the framework of the National Safeguarding Adults Board Policy and Procedures, issued under The Care Act (Department of Health, 2014)
- Will act within its confidentiality policy and will usually gain permission from service users before sharing information about them with another agency
- Will pass information to Adult and Culture Services when more than one person is at risk. For example: if the concern relates to a worker, volunteer or organisation who provides a service to vulnerable adults or children
- Will inform service users that where a person is in danger, or a crime has been committed then a decision may be taken to pass information to another agency without the service user's consent
- Will make a referral to the Adult Social Care Direct team as appropriate
- Will endeavor to keep up to date with national developments relating to preventing abuse and welfare of adults
- Will ensure that the designated named department understands his/her responsibility to refer incidents of adult abuse to the relevant statutory agencies (Police/Adult and Culture Services Directorate)

The Designated department for Safeguarding Adults in Game Nation is Human Resources working closely with the Operation sector.

They should be contacted for support and advice on implementing this policy and procedures.

This policy should be read in conjunction with other related Game Nation safety policies including the employee welfare scheme.

These SHOULD BE HELD IN A TRAINING PORTAL

## Introduction

Procedures have been designed to ensure the welfare and protection of any adult who accesses services provided by Game Nation. The procedures recognize that abuse can be a difficult subject for workers to deal with. Game Nation is committed to the belief that the protection of vulnerable adults from harm and abuse is everybody's responsibility and the aim of these procedures is to ensure that all managers, trustees of the organisation, management committee members, staff and volunteers act appropriately in response to any concern around adult abuse.

### **1. Preventing abuse**

Game Nation is committed to putting in place safeguards and measures to reduce the likelihood of abuse taking place within the services it offers and that all those involved within Game Nation will be treated with respect.

Therefore, this policy needs to be read in conjunction with the following policies:

- Equal Rights and Diversity
- Complaints
- Whistle Blowing
- Confidentiality
- Disciplinary and Grievance
- Data Protection
- Recruitment and Selection
- Any other policies which are relevant that the organisation has in place

Game Nation is committed to safer recruitment policies and practices for paid staff. This may include DBS disclosures for staff and volunteers, ensuring references are taken up and adequate training on Safeguarding Adults is provided for staff.

The organisation will work within the current legal framework for reporting staff that are abusers.

Information will be available about abuse and the complaints policy and Safeguarding Adults policy statement will be available to service users.

### **2. Recognising the signs and symptoms of abuse, grooming and exploitation**

Game Nation is committed to ensuring that all staff, the management committee undertake training to gain a basic awareness of signs and symptoms of abuse, grooming and exploitation. Game Nation will ensure that the Designated Named Person and other members of staff have access to training around Safeguarding Adults.

"Abuse is a violation of an individual's human and civil rights by any other person or persons" (The Care Act, 2014)

**Abuse includes:**

- Physical abuse: including hitting, slapping, punching, burning, misuse of medication, inappropriate restraint
- Sexual abuse: including rape, indecent assault, inappropriate touching, exposure to pornographic material
- Psychological or emotional abuse: including belittling, name calling, threats of harm, intimidation, isolation
- Financial or material abuse: including stealing, selling assets, fraud, misuse or misappropriation of property, possessions or benefits
- Neglect and acts of omission: including withholding the necessities of life such as medication, food or warmth, ignoring medical or physical care needs
- Discriminatory abuse: including racist, sexist, that based on a person's disability and other forms of harassment, slurs or similar treatment
- Institutional or organisational: including regimented routines and cultures, unsafe practices, lack of person-centred care or treatment

Abuse may be carried out deliberately or unknowingly. Abuse may be a single act or repeated acts.

People who behave abusively come from all backgrounds and walks of life. They may be doctors, nurses, social workers, advocates, staff members, volunteers or others in a position of trust. They may also be relatives, friends, neighbours or people who use the same services as the person experiencing abuse.

## **Grooming**

Grooming happens both online and in person. Groomers will hide their true intentions and may spend a long time gaining trust. Groomers may try to gain the trust of a whole family to allow them to be left alone with the vulnerable and if they work with the vulnerable, they may use similar tactics with their colleagues.

Below are some of the signs of grooming, many of these are common behaviours however increased instances of changes in behaviour may indicate the child is being groomed

- Sudden changes in their appearance and wearing more revealing clothes
- Becoming involved in drugs or alcohol, particularly if you suspect they are being supplied by older or influential men or women
- Becoming emotionally volatile (mood swings are common in all younger people, but more severe changes could indicate that something is wrong)
- Using sexual language that you would not expect them to know
- Appearing controlled by their phone
- Possessing items that they may not be able to afford themselves



### **3. Designated Named Department for safeguarding adults**

Game Nation has an appointed a department who is responsible for dealing with any Safeguarding Adults concerns. The Designated department for Safeguarding Adults within Game Nation is Human Resources

Human Resource Department  
City Gaming  
Game Nation  
91 Wimpole Street,  
London  
W1G 0EF  
+44 203 908 5927

The roles and responsibilities of the named department are:

- To ensure that all staff are aware of what they should do and who they should go to if they have concerns that a vulnerable adult may be experiencing or has experienced abuse, grooming or neglect.
- To ensure that concerns are acted on, clearly recorded and referred to an Adult Social Care Direct team
- To follow up any referrals and ensure the issues have been addressed.
- Consider any recommendations from the Safeguarding Adults process
- To reinforce the utmost need for confidentiality and to ensure that staff are adhering to good practice with regard to confidentiality and security. This is because it is around the time that a person starts to challenge abuse that the risks of increasing intensity of abuse are greatest.
- To ensure that staff working directly with service users who have experienced abuse, or who are experiencing abuse, are well supported and receive appropriate supervision.
- If appropriate staff will be given support and afforded protection if necessary, under the Public Interest Disclosure Act 1998: they will be dealt with in a fair and equitable manner and they will be kept informed of any action that has been taken and it's outcome

### **4. Responding to people who have experienced or are experiencing abuse**

Game Nation recognises that it has a duty to act on reports, or suspicions of abuse, neglect. It also acknowledges that taking action in cases of adult abuse is never easy.

How to respond if you receive an allegation:

- Reassure the person concerned
- Listen to what they are saying
- Record what you have been told/witnessed as soon as possible
- Remain calm and do not show shock or disbelief
- Tell them that the information will be treated seriously

- Don't start to investigate or ask detailed or probing questions
- Don't promise to keep it a secret

If you witness abuse or abuse has just taken place the priorities will be:

- To call an ambulance if required
- To call the police if a crime has been committed
- To preserve evidence
- To keep yourself, staff and service users safe
- To inform the Designated Named Department in your organisation
- To record what happened in the safeguarding incident log (IHL hub)

All situations of abuse, alleged abuse will be discussed with the Designated Named Department. If a member of the management committee, staff member feels unable to raise this concern with the Designated Named Department then concerns can be raised directly with Adult Social Care Direct. The alleged victim will be told that this will happen. This stage is called the alert.

If it is appropriate and there is consent from the individual, or there is a good reason to override consent, such as risk to others, a referral (alert) will be made to Adult Social Care Direct team

If the individual experiencing abuse does not have capacity to consent a referral will be made without that person's consent, in their best interests.

The Designated Named Department may take advice at the above stage from Adult Social Care Direct and/or the Safeguarding Adults Unit and/or other advice giving organisations such as Police.

## Adult Social Care Direct

Contact the local authority where the incident happened

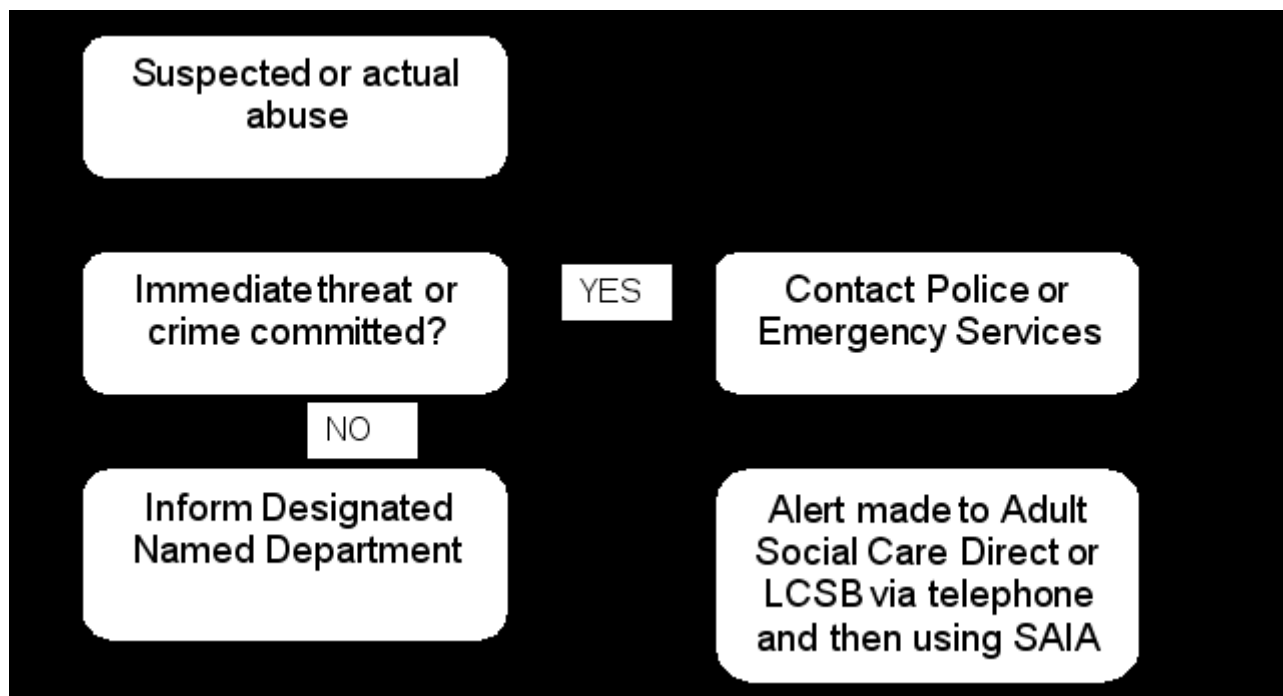
## Police

Phone: 101

Emergency: 999

You should ask to make a safeguarding adults alert.

The telephone call should be followed up in writing to the Adult Social Care Direct team outlining concerns using a Safeguarding Adults Incident Alert form (SAIA)



Adult and cultural services will then decide if the safeguarding process should be instigated or if other support/services are appropriate. Feedback will be given to the person who raised the safeguarding adults alert.

The Designated Named Department will have an overview of this process so they can explain it to the person concerned and offer all relevant support to the person and process. This could be practical support e.g. providing a venue, or information and reports and emotional support.

Information should be provided to the individual. This could be about other sources of help or information that could enable them to decide what to do about their experience, enable them to recover from their experience and enable them to seek justice.

## 5. Managing allegation made against member of staff

Game Nation will ensure that any allegations made against members or member of staff will be dealt with swiftly.

Where a member of staff is thought to have committed a criminal offence the police will be informed. If a crime has been witnessed the police should be contacted immediately.

The safety of the individual(s) concerned is paramount. A risk assessment must be undertaken immediately to assess the level of risk to all service users posed by the alleged perpetrator. This will include whether it is safe for them to continue in their role or any other role within the service whilst the investigation is undertaken.

The Designated Named Department will liaise with Adult Social Care Direct to discuss the best course of action and to ensure that the Game Nation disciplinary procedures are coordinated with any other enquiries taking place as part of the ongoing management of the allegation.

Game Nation has a whistle blowing policy and staff are aware of this policy. Staff will be supported to use this policy.

## **6. Recording and managing confidential information**

Game Nation is committed to maintaining confidentiality wherever possible and information around Safeguarding adults' issues should be shared only with those who need to know. For further information, please see Game Nation confidentiality policy.

All allegations/concerns should be recorded on the IHL Hub incident alert form. The information should be factual and not based on opinions, record what the person tells you, what you have seen and witnesses if appropriate.

The information that is recorded will be kept secure and will comply with data protection.

This information will be secured in a locked filing cabinet/ or computer system. Access to this information will be restricted to the Designated Named Department

## **7. Disseminating/Reviewing policy and procedures**

This Safeguarding Adults Policy and Procedure will be clearly communicated to staff, service users. The Designated Named Department will be responsible for ensuring that this is done.

The Safeguarding adults Policy and Procedures will be reviewed annually by Game Nation. The Designated Named Department for Safeguarding adults will be involved in this process and can recommend any changes. The Designated Named Department will also ensure that any changes are clearly communicated to staff.

**Appendix 1**
**Safeguarding Adults Incident Alert Form**  
**Reference: SAIA**

This form is to be used to notify Adult Social Care Direct Team of any suspected or actual instances of abuse.

**Person completing the form:**

**Organisation Name:**

**Phone contact details:**

**Date of Notification to Adult Social Care Direct:**

**Details of incident/suspected or actual abuse**

To be completed by the manager or lead officer within the organisation responsible for safeguarding adults

**Date of alleged incident/harm:** **Area where incident/harm took place:**

**Time of alleged incident/harm:** **Who reported the alert:**

**Date:**

**Who was involved:**

**Details of Alleged Victim**  
**Name:**

**Name and address of GP:**

**Address:**

**Ethnic Origin:**

**Date of Birth:**

**Nature of alleged victims' vulnerability:**

**Phone :**

**Any other details (e.g. communication needs):**

**Details of Alleged Perpetrator**  
**Name :**

**Ethnic Origin:**

**Address:**

**Relationship to victim:**

**Are they a vulnerable adult? Yes/No**

**Date of Birth:**

**Alleged perpetrators vulnerability (if applicable):**

**Phone Contact:**

<b>If the alleged perpetrator is a staff member please provide staff details</b> (E.g. job role, employer, address of place of work)	<b>Any other details:</b>																								
<b>Have you made the victim aware that details of the incident are being recorded and will be investigated?</b>																									
<b>Yes/No</b>																									
<b>If not, why not?</b>																									
<b>Type of Abuse</b> (Please tick one or more)																									
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td colspan="2" style="text-align: center; padding: 5px;">✓</td> <td colspan="2"></td> </tr> <tr> <td style="width: 33%; padding: 5px;"><b>Sexual</b></td> <td style="width: 10%;"></td> <td style="width: 33%; padding: 5px;"><b>Physical</b></td> <td style="width: 10%;"></td> </tr> <tr> <td style="padding: 5px;"><b>Emotional</b></td> <td></td> <td style="padding: 5px;"><b>Neglect or omission</b></td> <td></td> </tr> <tr> <td style="padding: 5px;"><b>Psychological</b></td> <td></td> <td style="padding: 5px;"><b>Financial/Material</b></td> <td></td> </tr> <tr> <td style="padding: 5px;"><b>Discriminatory Abuse</b></td> <td></td> <td style="padding: 5px;"><b>Institutional</b></td> <td></td> </tr> <tr> <td style="padding: 5px;"><b>Other i.e. suspicious death of a service user</b></td> <td></td> <td colspan="2"></td> </tr> </table>		✓				<b>Sexual</b>		<b>Physical</b>		<b>Emotional</b>		<b>Neglect or omission</b>		<b>Psychological</b>		<b>Financial/Material</b>		<b>Discriminatory Abuse</b>		<b>Institutional</b>		<b>Other i.e. suspicious death of a service user</b>			
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<b>Psychological</b>		<b>Financial/Material</b>																							
<b>Discriminatory Abuse</b>		<b>Institutional</b>																							
<b>Other i.e. suspicious death of a service user</b>																									
<b>Description of alleged incident / alleged harm, detailing all people involved including witnesses</b> On this page please give a detailed description of the incident (please include times) and any other comments you feel are relevant. If necessary, attach further pages.																									

<b>What action did you take immediately after the incident/allegation of harm</b> (E.g. administered first aid, asked perpetrator to leave, took victim to secure area)	
<b>Were the Police called: Yes / No</b>	<b>Were any other emergency services called:</b> If yes, which service(s)? <b>Yes / No</b>
<b>Names and badge numbers of Police:</b>	<b>Outcome:</b> (Response time, taken to hospital etc)
<b>Are there any other Agencies involved? Yes/No</b>	<b>Please provide details of agencies:</b>
<b>Are there any capacity issues? Yes/ No</b>	<b>Please provide details:</b>
<b>Has the victim made any previous referrals/alerts? Yes/No</b>	<b>Please provide details</b> (e.g. dates, type of abuse):
<b>Is the victim in immediate danger of further abuse? Yes/No</b>	<b>Have any immediate actions been identified to reduce the potential for further abuse? Yes/No</b>
<b>Has an initial assessment been made to determine further potential risk to the victim? Yes/No</b>	<b>What actions have been taken to reduce the potential for further abuse?</b>
<b>Are there any risks to others? Yes/No</b> (Vulnerable adults, c)	<b>Please provide details</b> (include who this information has been shared with)
<b>Signed:</b>	<b>Date:</b>  <b>Time:</b>
<b>This form must be sent to the Adult Social Care Direct team within 24 hours of the suspected or actual abuse, or as soon as possible after being made aware.</b>	

**This form can be emailed to the HR department**

This is a confidential document and should be stored securely according to your own organisation's procedures. It is your responsibility to ensure that this is done.

**Decision by Safeguarding Manager (Adult and Culture Services Directorate Only)**  
**Safeguarding Alert Yes / No**

**If No – please give reasons for decision**



# Smart Hub Background



## SmartHUB – The Support Hub for the Gaming Industry

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

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

# Smart Hub – Overview

A digital log has numerous advantages of a paper log

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

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



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

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

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

# Smart Hub – Player Protection Systems

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

## Self Exclusion

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

## Self Exclusion Breaches

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

## Age Verification Challenges

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

## Customer Interactions

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

# IHL Smart hub – Dash Board

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

Total Records	
Total Venues	35
Total Exclusions	97
Total Breaches	146

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

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

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

# IHL Smart hub – Dash Board

**IHL Hub** [Dashboard](#) [Profile](#)

**Dashboard**

**Total Records**

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

**Since Last Sign In**

Total Venues	0
Total Exclusions	0
Total Breaches	0

**SmartExclusion** ▶

**Age Verification Log** ▶

**SmartINCIDENT** ▶

**SmartALERT** ▶

**Anti-Money Laundering** ▶

**SmartINTERACTION** ▶

**ADR** ▶

**AvTestPurchase** ▶

**Compliance** ▶

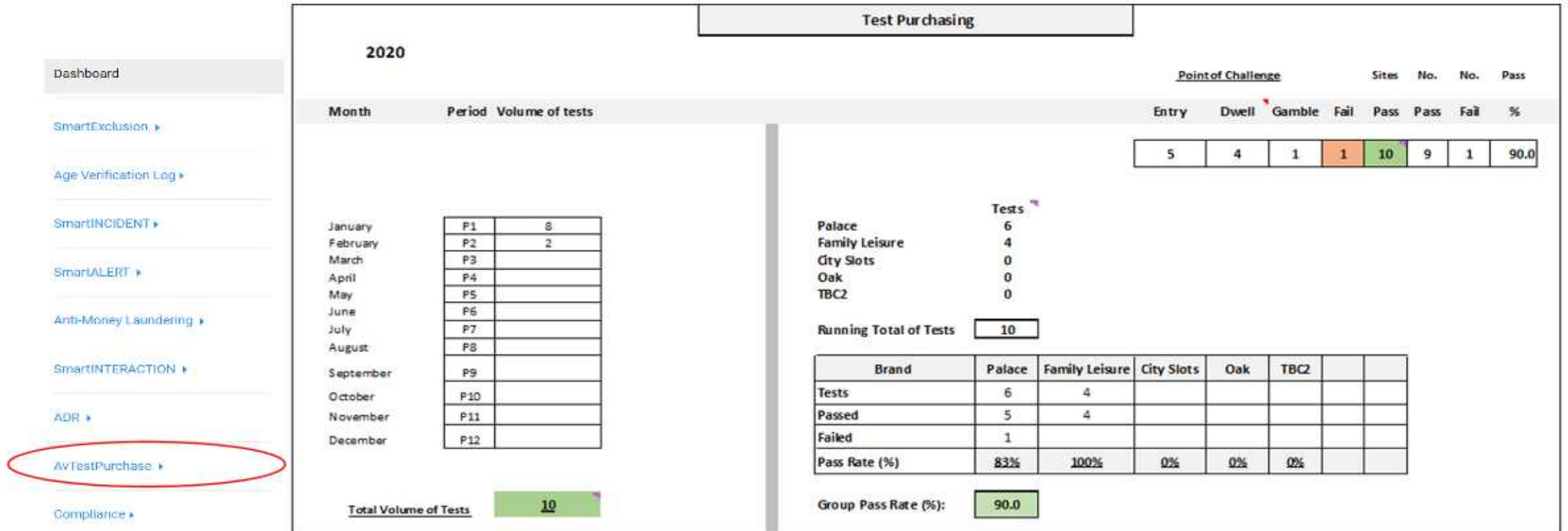
**Feature Activation** ▶

**IHL Hub** ▶

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




# Age Verification



- City Gaming employ a third party test purchase provider to carry out regular Age Verification testing across all venues. This is carried out by CheckPolicy who also carry out AV testing on behalf of Bacta.
- All tests are monitored and reported on a weekly basis. Test failures are investigated within 48 hours of the test report being received and remedial action/disciplinary action taken.
- The following chart shows the 2019 results from the businesses within the City Gaming group.
- We are tested independently every week across our business
- Are results exceed the national average consistently
- Our test results prove we are exceptionally proactive in this Area
  - Any failure occurs, the entire venue undergo retraining

# Self Exclusions reporting

 IHL Hub

Dashboard

Profile >

Dashboard

SmartExclusion >

Exclusions

Reported Breaches

Reports

Age Verification Log >

SmartINCIDENT >

SmartALERT >

Anti Money Laundering >

SmartINTERACTION >

ADR >


AvTestPurchase >

Compliance >


Feature Activation >

Exclusions


Filter exclusions >




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




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




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




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




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



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




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



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

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

# Interaction – Smart Incidents example

 IHL Hub

DashboardProfile ▾

Dashboard

SmartExclusion ▸

Age Verification Log ▸

SmartINCIDENT ▾

Incidents






Reports

SmartALERT ▸

Anti-Money Laundering ▸


SmartINCIDENTS

Filter Incidents ▸

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



# Incident detail Example

 IHL Hub

Dashboard

Profile

Dashboard

SmartExclusion

Age Verification Log

SmartINCIDENT

Incidents

Reports

SmartALERT

Anti-Money Laundering

SmartINTERACTION

ADR

AvTestPurchase

Compliance

Incident Details

REVIEW INCIDENT

Incident Details

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

Other Details

Police Assistance Details

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

Incident Injury Details

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

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


## SmartINCIDENTS

Filter Incidents



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

# Incident Detail -

 IHL Hub

[Dashboard](#)

[SmartExclusion](#)

[Age Verification Log](#)

[SmartINCIDENT](#)

[Incidents](#)

[Reports](#)

[SmartALERT](#)

[Anti-Money Laundering](#)

[SmartINTERACTION](#)

[ADR](#)

[AvTestPurchase](#)

Incident Details

Venue Name

Islington Palace

Occurred at

March 19, 2020 - 07:14PM

Type of incident

Incident relating to aggressive behaviour

Incident Description

a male walked into the shop looks at me and started shouting I asked for ID started shouting and calling me names, at this time I told him he's got to LEAVE THE SHOP, he asked why, i then told him I do not accept that behaviour shouting and swearing

Device name

samsung

Submitted by

Lincoln

People involved

1 (more info)

Known to venue?

No

Was incident violent?

No

Is stake returned?

No

Returned stake amount

N/A

Left premises?

Yes

Other Details

Police Assistance Details

Reported to police?

No

Crime reference number

N/A

Police called time

N/A

Police arrived time

N/A

Area manager informed?

Yes

Night manager informed?

Yes

CCTV footage captured?

Yes

Alarm initiated?

No

Incident Injury Details

Is anyone injured?

No

Injury details

N/A

Called ambulance?

No

Any property damage?


No

Damage details

N/A

[REVIEW INCIDENT](#)

# Area Managers Review Process

 IHL Hub

DashboardProfile ▾

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

Incident Details

**Incident Details**

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

**Other Details**

**Police Assistance Details**

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

**Incident Injury Details**

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

REVIEW INCIDENT

# Area Managers Review Process

The screenshot shows the 'Review Incident' modal in the IHL Hub application. The modal is centered over the 'Incident Details' page. The background page shows a sidebar with navigation links like 'Dashboard', 'SmartExclusion', 'Age Verification Log', 'SmartINCIDENT', 'Reports', 'SmartALERT', 'Anti-Money Laundering', 'SmartINTERACTION', 'ADR', 'AvTestPurchase', 'Compliance', 'Feature Activation', and 'IHL Hub'. The main content area displays 'Incident Details' with fields for Venue Name, Occurred, Type of incident, Incident Description, Device name (samsung), Submitted by (Lincoln), People involved (1), Known to venue? (No), Was incident violent? (No), Is stake returned? (No), Returned stake amount (N/A), and Left premises? (Yes). To the right, there are sections for 'Assistance Details' and 'Incident Injury Details'. The 'Assistance Details' section includes fields for Reported to police?, Reference number, Police called time, Police arrived time, Manager informed?, CCTV footage captured?, and Alarm initiated?. The 'Incident Injury Details' section includes fields for Is anyone injured?, Injury details, Called ambulance?, Any property damage?, and Damage details. The 'Review Incident' modal contains four questions with radio button options: 'Was the incident reported timely and effectively?' (Yes selected), 'Is the venue CCTV coverage accurate?' (Yes selected), 'Is any further training required?' (No selected), and 'Do we need to update the venue risk assessment?' (No selected). At the bottom of the modal are 'REVIEWED' and 'CANCEL' buttons. Below the modal, the 'Incident Updated Log' table is partially visible, with columns for Incident Type, From Venue, Staff Name, Known to venue, and Log created at.

**Review Incident**

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

Is the venue CCTV coverage accurate?  
☒ Yes ☐ No

Is any further training required?  
☐ Yes ☒ No

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

**REVIEWED** **CANCEL**

**Incident Updated Log**

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

Area Manager to review regular with subsequent actions taken accordingly

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## LOCAL AREA RISK ASSESSMENT

### Premises

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

### Company

Operating Company: (the "Company")	City Gaming Limited
Operating Licence Reference Number:	000-052732-N-329729-003
Registered Office Address:	City Gaming Limited, 91 Wimpole Street, London W1G 0EF

### Assessment Completion

Original Assessment completed by (Signature):		Updated Assessment completed by (Signature):	
Original Assessment completed by (Print):		Updated Assessment completed by (Print):	
Position within the Company:		Position within the Company:	
Date of completion of Original Assessment:		Date of completion of Updated Assessment:	





## LOCAL AREA RISK ASSESSMENT

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### **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.

### **Local Area Profile**



## LOCAL AREA RISK ASSESSMENT



Current frontage of property

Proposed frontage of property

## LOCAL AREA RISK ASSESSMENT



**The proposed** Adult Gaming Centre is located on Tottenham High Road within a primary shopping area. To one side of the unit is a 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.



## LOCAL AREA RISK ASSESSMENT

---

There are an extensive range of retail outlets in the close vicinity.

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

Betting Shops – Ladbrokes, William Hill and Betfred in close proximity with a number of further betting shops on the High Road

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.



## LOCAL AREA RISK ASSESSMENT

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### **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.



## LOCAL AREA RISK ASSESSMENT

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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

Tottenham Town Hall Food Bank – Town Hall Approach Road

Home Start Children's Home – Tower Gardens Road

CARIS Haringey Homeless Shelter – Philip Lane

Mulberry Junction Centre for the homeless – 332 High Road, Tottenham

St Mungo's Homeless Shelter – Tottenham High Road



## LOCAL AREA RISK ASSESSMENT

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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**

CCTV system specification is detailed in Appendix 1



## LOCAL AREA RISK ASSESSMENT

---

### **Customer signage will be in place**

Our CCTV policy/coverage will be regularly reviewed, and additional cameras/equipment will be installed as and when required.

### **Door Control**

City Gaming Ltd have extensive experience of operating AGCs in areas of London that experience high levels of drug dealing and general crime such as Islington, Lewisham and Camden. 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.

- Mag lock door control
- Minimum of two members of staff on duty at all times
- Night Security staff on duty from Thursday to Sunday
- 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.

### **Local Factors**

Crime statistics – (Source Police.uk)

Police crime statistics to June 2019 show Haringey as having a crime rate of 117.3 crimes per 1000 residents compared to the force average of 98.65.

Whilst this is high, the crime growth rate appears to be consistent with the metropolitan force average and that of similar areas within the metropolitan force area.

Types of crime are dominated by Anti-social behaviour at 29.44%, Violence and sexual offences at 17.91% followed by vehicle crime at 11.58% and burglary at 8.70%.

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 Appendix 1 which are in addition to the door control process as detailed in the previous section.

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

### **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)



The most recent indices of multiple deprivation published in 2019 shows Haringey to be the 49 most deprived area of the UK with IMD average score of 27.95

### **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 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%.



## LOCAL AREA RISK ASSESSMENT

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.

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	✓ 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 2020

## LOCAL AREA RISK ASSESSMENT

				Exterior Design	<ul style="list-style-type: none"> <li>✓ Front of the Venue is designed not to be attractive to children and challenge 25 posters clearly visible from street.</li> <li>✓ Frontage and doors designed so that children cannot see gambling taking place from the footpath or passing vehicles</li> </ul>	March 2020
				Physical	<ul style="list-style-type: none"> <li>✓ Think 25 Policies in place and implemented</li> <li>✓ Regular independent (by Check Policy) age verification testing</li> <li>✓ Regular staff training in-house and through e learning with 6 monthly refresher courses</li> <li>✓ The City Gaming Limited/Game Nation policies and procedures relating to the LCCP</li> <li>✓ the E Learning program</li> <li>✓ Clear &amp; Prominent premises signage and machine labelling</li> <li>✓ Thank 25 material displayed</li> <li>✓ Regulatory Return data collected through IHL tablet process and reviewed weekly with weekly reporting up to CEO level by Commercial team</li> <li>✓ Policy of preventing the wearing of hoods</li> <li>✓ Health and Safety Policies &amp; procedures in place</li> </ul>	March 2020
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"> <li>✓ Machine maintenance carried out by qualified engineer</li> <li>✓ Machine turned off immediately should fault be identified</li> <li>✓ Machine only acquired from licensed suppliers.</li> </ul>	March 2020
				Systems	<ul style="list-style-type: none"> <li>✓ Complaints Procedure &amp; Forms available on premises</li> <li>✓ Staff training through E Learning with 6 monthly refresher courses</li> </ul>	March 2020

## LOCAL AREA RISK ASSESSMENT

					<ul style="list-style-type: none"> <li>✓ Registered with ADR Entity – CEDR. Centre for Effective Dispute Resolution</li> <li>✓ Compliant with Company Procedures</li> </ul>	
Failure to provide information to players on responsible gambling.	3	Low	Severe to Business Sever to Customers	Physical	<ul style="list-style-type: none"> <li>✓ Sufficient quantity of posters and leaflets. “Playing the machines” posters displayed prominently (with QR code)</li> <li>✓ All machines labelled displaying National Gambling Helpline number and website address.</li> </ul>	March 2020
				Systems	<ul style="list-style-type: none"> <li>✓ Stock control system in place for leaflets and is monitored daily.</li> <li>✓ Adhere to Company Procedures and Policies</li> <li>✓ Regular audit to ensure system is in place</li> </ul>	March 2020
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"> <li>✓ Players behaviour and positions are closely and effectively monitored. Clear lines of sight to all machines and effective CCTV systems</li> </ul>	March 2020
				Systems	<ul style="list-style-type: none"> <li>✓ Staffed trained in customer interaction via E Learning with 6 monthly refresher training</li> <li>✓ 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.</li> </ul>	March 2020
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"> <li>✓ Safeguarding Adults Policy and Training</li> </ul>	March 2020
Failure to properly administer the self-exclusion process and	3	Low	Severe to Business Sever to Customers	Physical	<ul style="list-style-type: none"> <li>✓ CCTV effectively positioned at entrance to benefit identification of knowns excluders.</li> <li>✓ Use of VeriGuard system to automatically alert staff</li> </ul>	March 2020

## LOCAL AREA RISK ASSESSMENT

maintain its effectiveness thereafter, including breaches and reinstatements.					of any known Excluded customer and prevent access	
				Interior Design	✓ 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 2020
				System	<ul style="list-style-type: none"> <li>✓ IHL Multi Operator Self Exclusion System in place</li> <li>✓ All exclusion and breach data subject to weekly review by Commercial team and reported to senior management.</li> <li>✓ IHL tablet always available to ensure that customers wishing to exclude can do so</li> <li>✓ Details of Self Excluded customers distributed to other sites and operators via IHL/Bacta MOSES systems</li> </ul>	March 2020
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	✓ Effective monitoring of customers' behaviour by good lines of sight from floor staff and Managers, and well positioned CCTV cameras.	March 2020
				Physical	<ul style="list-style-type: none"> <li>✓ 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</li> <li>✓ The majority of larger wins are paid by hand which forces interaction with staff</li> </ul>	March 2020

## LOCAL AREA RISK ASSESSMENT

				Training	<ul style="list-style-type: none"> <li>✓ Red Flag indicators trained.</li> <li>✓ 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</li> </ul>	March 2020
				System	<ul style="list-style-type: none"> <li>✓ 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.</li> </ul>	March 2020
Poor security increasing vulnerability to crime	1	Low	Sever to business Sever to customers	Physical	<ul style="list-style-type: none"> <li>✓ StaffGuard system incorporating Panic Alarms that connect to an independent Conflict Management Centre</li> <li>✓ Intruder alarm installed and regularly serviced</li> <li>✓ Effective CCTV coverage with data stored for a minimum of 30 days</li> </ul>	March 2020
				Exterior Design	<ul style="list-style-type: none"> <li>✓ Toughed glass windows and door to limit criminal damage</li> <li>✓ Outdoor CCTV with full coverage of all entrances</li> </ul>	March 2020
				Systems	<ul style="list-style-type: none"> <li>✓ Limited cash desk and personal floats</li> <li>✓ Regular liaison with local law enforcement agencies</li> <li>✓ Log maintained should Police be called to assist. All incidents reviewed weekly by Commercial Team and reported to senior management</li> <li>✓ Keep abreast of local crime trends</li> </ul>	March 2020

## LOCAL AREA RISK ASSESSMENT

Awareness of heightened local crime in the local area.	1			Systems	Higher than average crime statistics although an increase in the level is not higher than similar areas or the Metropolitan Police Area in total <a href="https://www.police.uk">https://www.police.uk</a>	March 2020
Awareness of students learning facilities (schools & colleges) in the local area	3			Systems	<ul style="list-style-type: none"> <li>✓ Local research identified schools as listed earlier in the assessment</li> <li>✓ Challenge 25 process and systems</li> <li>✓ No gaming visible to children or your persons from outside of the venue</li> </ul>	March 2020
Awareness of residential facilities for the vulnerable in the local area	3			Systems	<ul style="list-style-type: none"> <li>✓ Care homes as listed earlier in the assessment</li> <li>✓ Door controls, CCTV and training in place</li> </ul>	March 2020
Awareness of gambling care agencies in the local area	3			Systems	No physical facilities for problem gambling in the vicinity <a href="http://www.gamecare.org.uk">http://www.gamecare.org.uk</a> <a href="http://www.gordenmoody.org.uk">http://www.gordenmoody.org.uk</a>	March 2020



## LOCAL AREA RISK ASSESSMENT

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Customers are the lifeblood of our retail business and everything from store design to staff training we centre around satisfying our customers. Our strategy provides a framework and outlines a set of capabilities which are designed to be fully deliver against our clear aim and objectives.

We believe stopping the problem at source, identifying, and supporting those at risk of engaging in criminality or harm. We will use the full reach of our capabilities and processes to tackle our objectives head on by putting data and intelligence, systems at the heart of our approach.

Too often, capabilities and process can be developed in silos, therefore its imperative we utilise our industry guidelines and influence to drive improvements across the board at every level. We learn adapt, providing an environment that is safe, fun, friendly and inclusive. We use the highest integrity to provide the best controlled licenced premises.

**Examples of our operations are as follows;**

### **CCTV**

#### **4K High Definition CCTV System**

We will be provided High Definition cameras throughout the building with “spotter” screens visible on entry with live images from across the venue proving reassurance we are a safe environment.

3 x 4K Cameras. Specifically focused on the High Street. One on each corner of the premises and the third focused over the doorway. We will also install a large “spotter Screen” inside the entrance showing the live CCTV Images. In conjunction with the external Camera’s.

Circa 12 X 4K High Definition cameras covering all the key locations within the location. All camera feeds will be recorded on a 12 Tb Hard Drive. All recorded Images to be made available for Police inspection in accordance with London Policing Policy.





## LOCAL AREA RISK ASSESSMENT

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All CCTV cameras shall record onto a system and be retained for 30 days. The system will be made available to the Police and licensing authority to inspect or recover required Images / Videos.

### **Door Entry Controls**

We intend to utilise experienced security guards within the venue. We have worked extensively with Incognito (our security advisor and agent) the following policies have been established in order to ensure provide the very best advice and practical solutions, for the benefit to deliver high quality engagement and effective problem resolution.

To implement and maintain a formal Quality Management System based upon the requirements of ISO 9001:2015. We comply with applicable requirements and to maintain the effectiveness of the Quality Management System, to operate to the recognised Codes of Practice, as applicable, BS7960:2016 (Code of Conduct for Door Supervisors), BS 7858:2019, Actively screening individuals working in our secure environment. Code of practice

Each one of our venues are connected to the Conflict Management Centre which is staffed by SIA licenced conflict Management Operators.

This facility operates 24 hours a day, 7 days a week and 365 days a year.

Each member of our venue staff carries a remote-control key fob or keyring.

Should a member of staff feel threatened or vulnerable to attack they can press the remote fob or keyring which immediately alerts the Conflict Management Centre. Colour coded lights reassure the member of staff that they are connected to the CMC centre.



## LOCAL AREA RISK ASSESSMENT

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The system also allows a member of staff to connect to the CMC centre which may require emergency services assistance but hasn't escalated to that point. The CMC operator will confirm a "Standby" situation and continue listening should assistance be required.

From that point the CMC staff will be able to both see and listen to what is happening on site. The CMC operator will then announce "Security, which service do you require?" - This intervention is normally sufficient to deter further conflict or potential conflict and at that point the person causing concern normally leaves the premises.

The system provided 2-way communications which enables the CMC operator to speak to the member of staff and the person causing concern

Should this not be the case the CMC operator will immediately inform the police of the situation.

The front door will be locked between 7pm and 7am daily. Access between those hours is available at the discretion of the staff with a buzzer being provided at the front door to seek access.

## LOCAL AREA RISK ASSESSMENT

### Door Entry System



Front Door Entry System provides additional Security.

Buzz to Enter

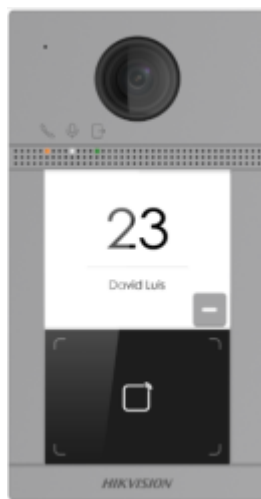
Video Image presented to Internal screen

Allows venue staff to assess

Who is requesting to enter?

Are there multiple people

Voice over control to engage directly



The system can be used for any circumstance that requires assistance



### Recruitment

We have at our disposal within our team already, a senior member of the management team who has worked locally to our venue and will head the complete day to day running of our functions. The manager has previously managed the Admiral Gaming Centre opposite who understands the environment the local people and the extra due diligence required to deliver a safe, fun environment. Who subsequently worked with the local enforcement team to drive our safe, environment.



## LOCAL AREA RISK ASSESSMENT

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### **Training**

We utilise an online training portal to deliver the best training a) to ensure our teams are highly proficient with all the local authority compliance. b) to ensure we deal with real life situations therefore an example of the training we issue for Conflict Management and resolution. Dealing with the ability to defuse negative experiences.

See Document named: Conflict Resolution

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## APPENDIX 2 – Summary of Machine Provisions by premises

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## Summary of Machine Provisions by Premises

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

\* 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.

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

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## APPENDIX 3

### Part 9: Premises licence conditions

**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.

### 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<sup>21</sup>.

**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 (PSIA) to hold a licence, s. 178 of the Gambling Act 2005 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'.

<sup>21</sup> Part 1(5) of The Gambling Act 2005 (Mandatory and Default Conditions) Regulations

### **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. In the case of horse racing, pool betting can only be made available at racetracks by Betfred following their purchase of the Tote. As part of the sale process Betfred received an exclusive seven year licence (until July 2018) to operate pool betting operations on UK racecourses.

### **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.

#### **Type of premises licence**

#### **Section of the Act**

s.172 s.173 s.174 s.176 s.177 s.178 s.179 s.182 s.183

All premises licences **X X X**

Bingo premises licence **X**

Casino premises licence **X X X**

Small casinos **X**

Large casinos **X**

Betting premises licence **X**

Betting premises licence

in respect of a track

**X X**

### **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 and the Gambling Act 2005 (Mandatory and Default Conditions) (Scotland) Regulations 2007.<sup>22</sup>

**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.

<sup>22</sup> SI 2007/1409: Gambling Act 2005 (Mandatory and Default Conditions) (England and Wales) Regulations 2007  
SSI 2007/266: Gambling Act 2005 (Mandatory and Default Conditions)(Scotland) Regulations 2007

**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 17-22 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 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 17-22 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 of 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.

### **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.

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APPENDIX 4 - Part 21 from the Gambling Commission  
Guidance

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# GAMBLING COMMISSION

## **Conditions and codes of practice applicable to**

**Gaming machine general: Adult gaming centre  
licences**

**Gaming machine general: Family entertainment centre  
licences**

Including sector-specific extract of  
LCCP January 2020

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If using an electronic version of this document, please click on the headings to move to the relevant section or provision.

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## General introduction

- 1 This document sets out the Gambling Commission's general licence conditions and associated code of practice provisions (LCCP) under the Gambling Act 2005 (the Act) which are applicable to the specified sector(s).

- 2 The LCCP document sets out:

**Part I:** (in black) statutory conditions attached by virtue of the Act

**Part II:** (in orange) the suite of general conditions attached to operating licences

**Part III:** (in blue) the principal code of practice, distinguishing between 'social responsibility' provisions and 'ordinary' provisions (the social responsibility provisions are in shaded boxes within the text).

- 3 An [index](#) to the provisions is provided at the end of this document, and if using an electronic version of this document, links are provided from both the contents and index pages to aid navigation.

- 4 Copies of LCCP can be obtained from the Commission's website: [www.gamblingcommission.gov.uk](http://www.gamblingcommission.gov.uk) or by writing to:

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- 5 The Commission also produces sector-specific extracts of LCCP and these will be made available on the website. Further information about the history of LCCP (such as the results of completed consultations) and potential future amendments to LCCP can also be found on the website.
- 6 This extract of LCCP comes into force on **1 January 2020**.
- 7 Relevant requirements of the conditions and code provisions were notified in draft to the European Commission in accordance with Directive (EU) 2015/1535.



## Part I: Statutory conditions attached by virtue of the Act

### Social responsibility

This licence is subject to a condition that the licensee ensures compliance with any relevant social responsibility provision of a code of practice issued by the Commission. The social responsibility provisions that are relevant to the activities authorised by this licence are set out in the section entitled Codes of Practice (Part III).

**(Sections 24 and 82(1) Gambling Act 2005)**

### Return of stakes to children: AGC

#### **The following condition applies to gaming machine general: adult gaming centre operating licences only**

This licence is subject to a condition that if the licensee (or anyone employed by the licensee to perform an operational function within the meaning of section 80 of the Act) becomes aware that a child or young person is using or has used facilities for gambling provided in reliance on the licence, the licensee:

- (a) must return any money paid in respect of the use of those facilities (whether by way of fee, stake or otherwise) by the child or young person as soon as is reasonably practicable; and
- (b) may not give a prize to the child or young person.

This condition does not apply to use of a Category D gaming machine.

**(Section 83(1))**

### Return of stakes to children: FEC

#### **The following condition applies to gaming machine general: family entertainment centre operating licences only**

This licence is subject to a condition that if the licensee (or anyone employed by the licensee to perform an operational function within the meaning of section 80 of the Act) becomes aware that a child or young person is using or has used facilities for gambling provided in reliance on the licence, the licensee:

- (a) must return any money paid in respect of the use of those facilities (whether by way of fee, stake or otherwise) by the child or young person as soon as is reasonably practicable; and
- (b) may not give a prize to the child or young person.

This condition does not apply to use of a Category D gaming machine, or equal chance gaming.

**(Section 83(1))**

## Part 1: Suite of general condition to operating licences under Section 75 of the Gambling Act 2005 (the Act)

### 1 Qualified persons and personal licences

#### 1.1 Qualified persons

##### **Licence condition 1.1.1**

##### **Qualified persons – qualifying position**

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

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

<sup>1</sup> The schedules mentioned here will be attached to individual licences.

## 1.2 Personal licences

### Licence condition 1.2.1

#### Specified management offices – personal management licences

**All casino, bingo, general and pool betting, betting intermediary, gaming machine general, gaming machine technical, gambling software and lottery managers licences, except ancillary remote licences**

- 1** Subject to **6** and **7** below, licensees must ensure:
  - a** that each individual who occupies one of the management offices specified in 2 below in respect of the licensee or in connection with the licensed activities holds a personal licence authorising the performance of the functions of that office (hereafter ‘a personal management licence’); and
  - b** that at least one person occupies at least one of those offices
- 2** The specified management offices are those offices (whether or not held by a director in the case of a licensee which is a company, a partner in the case of a licensee which is a partnership or an officer of the association in the case of a licensee which is an unincorporated association) the occupier of which is by virtue of the terms of their appointment responsible for:
  - a** the overall management and direction of the licensee’s business or affairs
  - b** the licensee’s finance function as head of that function
  - c** the licensee’s gambling regulatory compliance function as head of that function
  - d** the licensee’s marketing function as head of that function
  - e** the licensee’s information technology function as head of that function in so far as it relates to gambling-related information technology and software
  - f** oversight of the day to day management of the licensed activities at an identified number of premises licensed under Part 8 of the Act or across an identified geographical area
  - g** in the case of casino and bingo licences only, oversight of the day to day management of a single set of premises licensed under Part 8 of the Act.
- 3** The person responsible for the licensee’s gambling regulatory compliance function as head of that function shall not, except with the Commission’s express approval, occupy any other specified management office.
- 4** Licensees must take all reasonable steps to ensure that anything done in the performance of the functions of a specified management office is done in accordance with the terms and conditions of the holder’s personal management licence.
- 5** Where an individual is authorised by a personal licence and that licence comes under review under section 116(2) of the Act, the operating licensee must comply with any conditions subsequently imposed on that licence by the Commission about redeployment, supervision, or monitoring of the individual’s work and any requirements of the Commission in respect of such matters applicable during the period of the review.
- 6** Paragraphs **1** to **5** above shall not apply to a licensee for so long as the licensee is a ‘small-scale operator’ as defined in the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006 (‘the Regulations’).
- 7** During the period of 3 years commencing with the date on which a licensee ceases to be a small-scale operator paragraphs **1** to **6** above shall apply subject to the proviso that the phrase ‘each individual’ in paragraph **1a** shall not include any individual who was a ‘qualified person’ (as defined in the Regulations) in relation to the licensee 28 days immediately prior to the licensee ceasing to be a small-scale operator.

## 4 Protection of customer funds

### 4.2 Disclosure to customers

#### Licence condition 4.2.1

##### Disclosure to customers

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

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

## 5 Payment

### 5.1 Cash and cash equivalents, payment methods and services

#### Licence condition 5.1.1

##### Cash and cash equivalents

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

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

## 6 Provision of credit by licensees and the use of credit cards

### 6.1 Provision of credit

#### **Licence condition 6.1.1**

##### **Provision of credit**

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

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

## 7 General 'fair and open' provisions

### 7.1 Fair and transparent terms and practices

#### **Licence condition 7.1.1**

##### **Fair and transparent terms and practices**

##### **All operating licences except gaming machine technical and gambling software licences**

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

## 12 Anti-money laundering

### 12.1 Prevention of money laundering and terrorist financing

#### **Licence condition 12.1.1**

##### **Anti-money laundering**

##### **Prevention of money laundering and terrorist financing**

##### **All operating licences except gaming machine technical and gambling software licences**

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

## 14 Access to premises

### 14.1 Access to premises

#### **Licence condition 14.1.1**

##### **Access to premises**

##### **All operating licences**

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

## 15 Information requirements

### 15.1 Reporting suspicion of offences

#### **Licence condition 15.1.1**

##### **Reporting suspicion of offences etc - non-betting licences**

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

- 1** Licensees must as soon as reasonably practicable provide the Commission or ensure that the Commission is provided with any information that they know relates to or suspect may relate to the commission of an offence under the Act, including an offence resulting from a breach of a licence condition or a code provision having the effect of a licence condition.

## 15.2 Reporting key events and other reportable events

### Licence condition 15.2.1

#### Reporting key events

##### All operating licences

A key event is an event that could have a significant impact on the nature or structure of a licensee's business. Licensees must notify the Commission, or ensure the Commission is notified, in such form or manner as the Commission may from time to time specify, of the occurrence of any of the following key events as soon as reasonably practicable and in any event within five working days of the licensee becoming aware of the event's occurrence<sup>1</sup>.

#### Operator status

In the case of licensees which are companies, a petition being presented for their winding up or the winding up of any group company of theirs, or they or any group company being placed in administration or receivership or their directors proposing to creditors a composition in satisfaction of its debts or a scheme of arrangement of its affairs.

In the case of licensees which are bodies corporate, but not companies, any event substantially equivalent to those listed at 1 above.

In the case of a licensee who is an individual (or a partner in a partnership licensee) their being presented with a petition for their bankruptcy or sequestration or their entering into an individual voluntary arrangement.

#### Relevant persons and positions

In the case of licensees who are companies or other bodies corporate having a share capital, the name and address of any person who (whether or not already a shareholder or member) becomes a shareholder or member holding 3% or more of the issued share capital of the licensee or its holding company.

Any investment in a licensee which is not by way of subscription for shares.

The taking of any loan by the licensee, or by a group company who then makes an equivalent loan to the licensee, from any person not authorised by the Financial Conduct Authority: a copy of the loan agreement must be supplied.

The entering into an arrangement whereby a third party provides services to, or grants any licence concession or permission to, the licensee other than for full value: full details of the arrangements must be supplied.

The appointment of a person to, or a person ceasing to occupy, a 'key position': a 'key position' in relation to a licensee is:

- a** in the case of a small-scale operator, a 'qualifying position' as defined in the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006
- b** in the case of an operator which is not a small-scale operator, a 'specified management office' as set out in (current) LCCP licence condition 1.2
- c** a position the holder of which is responsible for the licensee's anti-money laundering procedures, including suspicious activity reporting
- d** any other position for the time being designated by the Commission as a 'key position'. (Notification is required whether or not the person concerned is required to hold a personal management licence and whether or not the event notified requires the licensee to apply for a variation to amend a detail of their licence.)

- 9** Any change to the structure or organisation of the licensee's business which affects a 'key position' or the responsibilities of its holder.

**Financial events**

- 10** Any material change in the licensee's banking arrangements, in particular the termination of such arrangements or a particular facility and whether by the licensee or the provider of the arrangements.
- 11** Any breach of a covenant given to a bank or other lender.
- 12** Any default by the licensee or, where the licensee is a body corporate, by a group company in making repayment of the whole or any part of a loan on its due date.
- 13** Any court judgments (in whatever jurisdiction) against the licensee or, where the licensee is a body corporate, a group company, remaining unpaid 14 days after the date of judgment.
- 14** Where the licensee is required to have their accounts independently audited, any qualification to an auditors' report; and any unplanned change of auditor including a change prompted by a dispute or resulting from auditors being unable or unwilling to sign an unqualified audit report.
- 15** Any change in the licensee's arrangements for the protection of customer funds in accordance with the general licence condition 4 relating to the protection of customer funds (where applicable).
- 16** Where the licensee holds customer funds in a separate bank account, any deficit on reconciliation of such bank account.
- 17** Any change in the licensee's arrangements as to the methods by which, and/or the payment processors through which, the licensee accepts payment from customers using their gambling facilities (this key event applies to remote casino, bingo and betting operating licences, except ancillary and remote betting intermediary (trading room only) licences).

**Legal or regulatory proceedings or reports**

- 18** The grant, withdrawal or refusal of any application for a licence or other permission made by the licensee, or in the case of a licensee which is a body corporate, any group company of theirs, to a gambling regulator in another jurisdiction. In the case of a withdrawal or refusal of the application, the licensee must also notify the reasons for such withdrawal or refusal. (This condition does not apply to applications for licences or other permissions to carry on activities which would fall outside the scope of a Gambling Commission operating licence if carried out in Britain or with customers in Great Britain.)
- 19a** Any investigation by a professional, statutory, regulatory or government body (in whatever jurisdiction) into the licensee's activities, or the activities in relation to the licensed entity of a personal licence holder or a person occupying a qualifying position employed by them, where such an investigation could result in the imposition of a sanction or penalty which, if imposed, could reasonably be expected to raise doubts about the licensee's continued suitability to hold a Gambling Commission licence.
- 19b** Any criminal investigation by a law enforcement agency in any jurisdiction in relation to which:
  - the licensee is involved (including, but not limited to investigations of crimes allegedly committed against the licensee or involving the gambling facilities provided under the licence), AND
  - the circumstances are such that the Commission might reasonably be expected to question whether the licensee's measures to keep crime out of gambling had failed.
 Notification of the event must occur as soon as practicable after the licensee becomes aware of any such investigation in which the licensee is involved and measures may have failed.
- 20** The receipt of any report from a professional, statutory or other regulatory or government body (in whatever jurisdiction) of the outcome of a compliance assessment in relation to the gambling activity of the licensee or, where the licensee is a body corporate, of any group company in which at least one person who holds a key position in or in respect of the licensee holds a key position: a copy of the report should be provided where available to the licensee.



- 21** The referral to the licensee's Board, or persons performing the function of an audit or risk committee, of material concerns raised by a third party (such as an auditor) about the provision of facilities for gambling which are expressed (in whatever terms) as requiring attention as a high priority: a summary of the nature of the concerns must be provided.
- 22** The imposition by the licensee of a disciplinary sanction, including dismissal, against the holder of a personal licence or a person occupying a qualifying position for gross misconduct; or the resignation of a personal licence holder or person occupying a qualifying position following commencement of disciplinary proceedings in respect of gross misconduct against that person.
- 23** The commencement (in whatever jurisdiction) of any material litigation against the licensee or, where the licensee is a body corporate, a group company: the licensee must also notify the outcome of such litigation.
- 24** The making of a disclosure pursuant to section 330, 331, 332 or 338 of the Proceeds of Crime Act 2002 or section 19, 20, 21, 21ZA, 21ZB or 21A of the Terrorism Act 2000 (a suspicious activity report): the licensee should inform the Commission of the unique reference number issued by the United Kingdom Financial Intelligence Unit of the National Crime Agency in respect of each disclosure and for the purposes of this key event the five working day period referred to above runs from the licensee's receipt of the unique reference number. The licensee should also indicate whether the customer relationship has been discontinued at the time of the submission.

### **Gambling facilities**

- 25a** Any breach in the licensee's information security that adversely affects the confidentiality of customer data or prevents customers from accessing their accounts for longer than 24 hours.
- 25b** Where a gaming system fault has resulted in under or overpayments to a player (this includes instances where a fault causes an incorrect prize/win value to be displayed).
- 26** Any change in the identity of the ADR entity or entities for the handling of customer disputes, as required by the social responsibility code provision on complaints and disputes.
- 27** The reference of a dispute to an ADR entity other than one in respect of which contact details were given in accordance with the social responsibility code provision on complaints and disputes; the reason for selection of that ADR entity should be given.
- 28** In the case of remote gambling, the commencement or cessation of trading on website domains (*including mobile sites or mobile device applications*) or broadcast media through which the licensee provides gambling facilities.

In this condition:

'body corporate' has the meaning ascribed to that term by section 1173 of the Companies Act 2006 or any statutory modification or re-enactment thereof

- a** in respect of a company, 'holding company' and 'subsidiary' have the meaning ascribed to that term by section 1159 of the Companies Act 2006 or any statutory modification or re-enactment thereof
- b** a 'group company' is any subsidiary or holding company of the licensee and any subsidiary of such holding company.

<sup>1</sup> Key events can be reported securely online at the Commission's website through our eServices system [www.gamblingcommission.gov.uk](http://www.gamblingcommission.gov.uk) Alternatively, for operators unable to access this system, you can report a key event by email to: [key.events@gamblingcommission.gov.uk](mailto:key.events@gamblingcommission.gov.uk) Alternatively, for operators unable to access this system, you can report a key event by email to: [key.events@gamblingcommission.gov.uk](mailto:key.events@gamblingcommission.gov.uk)

**Licence condition 15.2.2****Other reportable events****All operating licences**

- 1** Licensees must also notify the Commission in such form or manner as the Commission may from time to time specify, or ensure that the Commission is so notified, as soon as reasonably practicable of the occurrence of any of the following events<sup>1</sup>:
  - a** the conclusion of a dispute referred to an ADR entity and in such case providing the Commission with a copy of the decision or note of the outcome<sup>2</sup>.
  - b** any outcome adverse to the licensee of any proceedings taken against the licensee (in whatever jurisdiction) by a customer in relation to a gambling transaction; but excluding proceedings allocated to the County Court small claims track or equivalent in jurisdictions outside England and Wales.
  - c** their becoming aware that a group company which is not a Commission licensee is advertising remote gambling facilities to those residing in a jurisdiction in or to which it has not previously advertised or their becoming aware of a sustained or meaningful generation of the 3% / 10% threshold being exceeded by the group.

In this condition:

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

<sup>1</sup> Events required to be notified to the Commission by 15.2.1 or 15.2.2 may be reported securely online at the Commission's website through our eServices system [www.gamblingcommission.gov.uk](http://www.gamblingcommission.gov.uk) or by email to: [key.events@gamblingcommission.gov.uk](mailto:key.events@gamblingcommission.gov.uk)

<sup>2</sup> In respect of the referral of disputes to an ADR entity the licensee's attention is drawn to social responsibility code provision 6.

## 15.3 General and regulatory returns

**Licence condition 15.3.1****General and regulatory returns****All operating licences**

- 1** On request, licensees must provide the Commission with such information as the Commission may require about the use made of facilities provided in accordance with this licence, and the manner in which gambling authorised by this licence and the licensee's business in relation to that gambling are carried on, including in particular information about:
  - a** the numbers of people making use of the facilities and the frequency of such use
  - b** the range of gambling activities provided by the licensee and the numbers of staff employed in connection with them
  - c** the licensee's policies in relation to, and experiences of, problem gambling.
- 2** In particular within 28 days of the end of each quarterly period or, for those only submitting annual returns, within 42 days of the end of each annual period, licensees must submit a Regulatory Return to the Commission containing such information as the Commission may from time to time require<sup>1</sup>.

<sup>1</sup> Regulatory returns can be submitted securely online at the Commission's website through our eServices system available at [www.gamblingcommission.gov.uk](http://www.gamblingcommission.gov.uk)

## 16 Responsible placement of digital adverts

### 16.1 Responsible placement of digital adverts

#### **Licence condition 16.1.1**

#### **Responsible placement of digital adverts**

#### **All licences**

**1** Licences must:

- a** Ensure that they do not place digital advertisements on websites providing unauthorised access to copyrighted content;
- b** take all reasonable steps to ensure that third parties with whom they contract for the provision of any aspect of their business related to the licensed activities do not place digital advertisements on websites providing unauthorised access to copyrighted content; and
- c** ensure that the terms upon which they contract with such third parties enable them, subject to compliance with any dispute resolution provisions, to terminate the third party's contract promptly if, in the Licensee's reasonable opinion, the third party has been responsible for placing digital advertisements for the licensed activities on such websites.

## Part III: Code of practice

### Introduction

This is the Commission's principal code of practice, issued under section 24 of the Gambling Act 2005.

There are two types of code provisions in this document:

- social responsibility code provisions: compliance with these is a condition of licences; therefore any breach of them by an operator may lead the Commission to review the operator's licence with a view to suspension, revocation or the imposition of a financial penalty and would also expose the operator to the risk of prosecution; these provisions are set out in shaded boxes
- ordinary code provisions: these do not have the status of operator licence conditions but set out good practice. Operators may adopt alternative approaches to those set out in ordinary code provisions if they have actively taken account of the ordinary code provision and can demonstrate that an alternative approach is reasonable in the operator's particular circumstances; or that to take an alternative approach would be acting in a similarly effective manner. Ordinary codes of practice are admissible in evidence in criminal or civil proceedings and must be taken into account in any case in which the court or tribunal think them relevant, and by the Commission in the exercise of its functions; any departure from ordinary code provisions by an operator may be taken into account by the Commission on a licence review, but cannot lead to imposition of a financial penalty; these code provisions are in the unshaded boxes in this section.

## Code provisions

### 1 General

#### 1.1 Cooperation and responsibility

**Ordinary Code Provision 1.1.1**  
**Cooperation with the Commission**  
**All licences**

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

**Social responsibility code provision 1.1.2**  
**Responsibility for third parties – all licences**  
**All licences**

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

## 2 Financial requirements

### 2.1 Anti-money laundering

#### **Ordinary code provision 2.1.2**

#### **Anti-money laundering – other than casino**

#### **All licences except casino licences**

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

## 3 Protection of children and other vulnerable persons

### 3.1 Combatting problem gambling

#### **Social responsibility code provision 3.1.1**

#### **Combating problem gambling**

#### **All licences**

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

## 3.2 Access to gambling by children and young persons

### Social responsibility code provision 3.2.3

#### Access to gambling by children and young persons – AGC SR code

##### All adult gaming centre licences

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

**Ordinary code provision 3.2.4**

**Access to gambling by children and young persons – AGC ordinary code**

**All adult gaming centre licences**

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



**Social responsibility code provision 3.2.5****Access to gambling by children and young persons – bingo and FEC SR code****All non-remote bingo and family entertainment centre licences**

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

**Ordinary code provision 3.2.6****Access to gambling by children and young persons – bingo and FEC ordinary code****All non-remote bingo and family entertainment centre licences**

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

### 3.3 Gambling management tools and responsible gambling management information

#### **Social responsibility code provision 3.3.1**

##### **Responsible gambling information**

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

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

#### **Ordinary code provision 3.3.2**

##### **Responsible gambling information – foreign languages**

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

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

### 3.4 Customer interaction

#### **Social responsibility code provision 3.4.1**

##### **Customer interaction**

**All licences, except non-remote lottery, gaming machine technical, gambling software and host licences**

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

### 3.5 Self-exclusion

#### **Social responsibility code provision 3.5.1**

#### **Self-exclusion – non-remote and trading rooms SR code**

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

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

**Ordinary code provision 3.5.2****Self-exclusion – non-remote ordinary code****All non-remote licences and remote betting intermediary (trading rooms only) licences, but not gaming machine technical and gambling software licences**

- 1 Self-exclusion procedures should require individuals to take positive action in order to self-exclude. This can be a signature on a self-exclusion form.
- 2 Individuals should be able to self-exclude without having to enter gambling premises.
- 3 Before an individual self-excludes, licensees should provide or make available sufficient information about what the consequences of self-exclusion are.
- 4 Licensees should take all reasonable steps to extend the self-exclusion to premises of the same type owned by the operator in the customer's local area. In setting the bounds of that area licensees may take into account the customer's address (if known to them), anything else known to them about the distance the customer ordinarily travels to gamble and any specific request the customer may make.
- 5 Licensees should encourage the customer to consider extending their self-exclusion to other licensees' gambling premises in the customer's local area.
- 6 Customers should be given the opportunity to discuss self-exclusion in private, where possible.
- 7 Licensees should take steps to ensure that:
  - a the minimum self-exclusion period offered is of a duration of not less than 6 nor more than 12 months
  - b any self-exclusion may, on request, be extended for one or more further periods of at least 6 months each
  - c a customer who has decided to enter a self-exclusion agreement is given the opportunity to do so immediately without any cooling-off period. However, if the customer wishes to consider the self-exclusion further (for example to discuss with problem gambling groups), the customer may return at a later date to enter into self-exclusion
  - d at the end of the period chosen by the customer, the self-exclusion remains in place for a further 6 months, unless the customer takes positive action in order to gamble again
  - e where a customer chooses not to renew the self-exclusion, and makes a positive request to begin gambling again during the 6 month period following the end of their initial self-exclusion, the customer is given one day to cool off before being allowed access to gambling facilities. The contact must be made via telephone or in person
  - f notwithstanding the expiry of the period of self-exclusion chosen by a customer, no marketing material should be sent to them unless and until they have asked for or agreed to accept such material.
- 8 The licensee should retain the records relating to a self-exclusion agreement at least for the length of the self-exclusion agreement plus a further 6 months.
- 9 Please note that the Commission does not require the licensee to carry out any particular assessment or make any judgement as to whether the previously self-excluded individual should again be permitted access to gambling. The requirement to take positive action in person or over the phone is purely to a) check that the customer has considered the decision to access gambling again and allow them to consider the implications; and b) implement the one day cooling-off period and explain why this has been put in place.
- 10 Licensees should have, and put into effect, policies and procedures which recognise, seek to guard against and otherwise address, the fact that some individuals who have self-excluded might attempt to breach their exclusion without entering a gambling premises, for example, by getting another to gamble on their behalf.
- 11 Licensees should have effective systems in place to inform all venue staff of self-excluded individuals who have recently attempted to breach a self-exclusion in that venue, and the licensees neighbouring venues.
- 12 In providing training to staff on their responsibilities for self-exclusion, licensees should have, as a minimum, policies for induction training and refresher training.

**Social responsibility code provision 3.5.6****Self-exclusion – multi-operator non-remote SR code**

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

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

**Ordinary code provision 3.5.7****Self-exclusion – multi-operator non-remote ordinary code**

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

- 1 Licensees should contribute to and participate in the development and effective implementation of multi-operator self-exclusions schemes with the aim of making available to customers the ability to self-exclude from facilities for gambling provided by other licensed operators within their local area(s).

## 3.6 Employment of children and young persons

**Ordinary code provision 3.6.5****Employment of children and young people – AGCs****All adult gaming centre licences**

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



**Ordinary code provision 3.6.6****Employment of children and young people – FECs****All family entertainment centre licences**

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

### 3.8 Money lending between customers

**Ordinary code provision 3.8.2****Money-lending – other than casinos****All non-remote bingo, general betting, adult gaming centre, family entertainment centre and remote betting intermediary (trading rooms only) licences**

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

## 4 'Fair and open' provisions

### 4.1 Fair terms

**Social responsibility code provision 4.1.1****Fair terms****All licences, except gaming machine technical and gambling software licences**

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



## 5 Marketing

### 5.1 Rewards and bonuses

#### **Social responsibility code provision 5.1.1**

##### **Rewards and bonuses – SR code**

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

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

#### **Ordinary code provision 5.1.2**

##### **Proportionate rewards**

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

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

#### **Social responsibility code provision 5.1.6**

##### **Compliance with advertising codes**

**All licences, except lottery licences**

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

**Ordinary code provision 5.1.8**

**Compliance with industry advertising codes**

**All licences**

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

**Social responsibility code provision 5.1.9**

**Other marketing requirements**

**All licences**

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

**Ordinary code provision 5.1.10**

**Online marketing in proximity to information on responsible gambling**

**All licences**

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

**Social Responsibility code provision 5.1.11**

**Direct electronic marketing consent**

**All licences**

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

## 6 Complaints and disputes

### 6.1 Complaints and disputes

#### **Social responsibility code provision 6.1.1**

#### **Complaints and disputes**

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

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

In this code, 'ADR entity' means

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

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

## 7 Gambling licensees' staff

### 7.1 Gambling licensees' staff

#### Social responsibility code provision 7.1.2

##### Responsible gambling information for staff

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

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

## 8 Information requirements

### 8.1 Information requirements

#### Ordinary code provision 8.1.1

##### Information requirements – ordinary code

**All licences**

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

<sup>1</sup> These matters can be reported securely online at the Commission's website through our eServices system [www.gamblingcommission.gov.uk](http://www.gamblingcommission.gov.uk)

Alternatively, for operators unable to access this system, you can these events by email to: [key.events@gamblingcommission.gov.uk](mailto:key.events@gamblingcommission.gov.uk)

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

## 10 Assessing local risk

### 10.1 Assessing local risk

#### Social responsibility code provision 10.1.1

##### Assessing local risk

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

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

<sup>1</sup>This is the statement of licensing policy under the Gambling Act 2005.

#### Ordinary code provision 10.1.2

##### Sharing local risk assessments

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

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

**making gambling fairer and safer**

[www.gamblingcommission.gov.uk](http://www.gamblingcommission.gov.uk)

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## APPENDIX 5 – Council's Statement of Gambling Policy & Local risk assessment

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**HARINGEY STATEMENT  
OF GAMBLING POLICY  
2019-2022**



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### Foreword – Cllr Amin (Cabinet Member)

Haringey is the Future of London, 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 safe, controlled way, free from harm. This is only possible if the specific risks associated with gambling in Haringey are understood by all, if the Council takes a strong approach to licensing, and if gambling operators show genuine responsibility in the steps they take to respond to risks.

This Gambling Policy lays out the risks associated with gambling that we face in Haringey, and what the Council expects of gambling operators in terms of their response to those risks. 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. In particular there are significantly higher risks associated with category B Fixed Odds Betting Terminals (FOBTs) in gambling addictions and the associated harm to health and wellbeing.

We welcome the requirement of the Gambling Commission's Licence Conditions and Codes of Practice, for licensees to assess and respond to the local risks to the licensing objectives posed by the provision of gambling facilities at their premises. We will ensure that the local risks assessments produced by gambling operators are meaningful and reflective of the real risks in Haringey. This policy lays out the evidence for what those local risks are, identifies the particular borough wards in which risks are most manifest, and crucially, clearly defines what sorts of policies, procedures or control measures we expect gambling operators to put in place to mitigate the risks.

Considering local risks is only part of the overall approach needed to control gambling we are still reliant on gambling operators demonstrating genuine social responsibility and responding to the spirit, not just the letter, of their responsibilities around local risk assessments. We work with operators to strive to meet expectations in full and put in place policies, procedures and control measures that make a genuine difference in reducing the risk of gambling related harms. In particular, we call on operators to respond to our concerns about FOBTs, through policies that promote verified accounts and enable problem gambling to be identified early in a way that triggers effective interventions.

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 sets out to offer adequate protections to our local community.

The clarity of our expectations and our commitment to constructive partnership working with operators, means there is no excuse for inadequate risk assessments or policy proposals from operators. 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 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.

Integral to this has been the analysis of gambling related harm which informs this policy. The analysis explored local area based vulnerability to gambling related harm and, as such,

provided both context to this policy and a ‘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.

## Part A Statement of Gambling Policy

### 1. Introduction

The London Borough of Haringey (the Council) became a “Licensing Authority” under the Gambling Act 2005 (the Act), which came into force in 2007 and established a new regime for the regulation of commercial gambling whilst repealing a number of pieces of older law.

- 1.1. The policy opens with a more general introduction to Haringey (Section A), followed by detail on the objectives this Authority will rely on in fulfilling its licensing responsibilities (section B). Section C of this policy sets out the principles and considerations this Authority will go through in determining gambling premises licences. All new and current operators must have regard to this section when compiling local risk assessments and should make this section their starting point when absorbing the content of this policy alongside the Local Area Profile supplementary guidance. The steps that this and other responsible authorities would wish to see given appropriate consideration within risk assessments and operating schedules. It is intended to reflect and enhance industry good practice. This section is also intended to make clear certain aspects of the applications process for the benefit of all. This includes information on consultation, responsible authorities, interested parties and relevant objections. Sections D (permits etc) sets out in some detail the various permits, Section E deals with enforcement matters, establishing how this Authority and partner service and external agencies intend to work collaboratively together, in a fair, transparent, open and consistent manner, to provide intelligent directed regulation.
- 1.2. The Act requires the Council, along with all other licensing authorities, to publish a statement of Gambling Policy that will be applied when carrying out its licensing functions. This statement of Licensing Policy (the statement) fulfils that statutory requirement and details the Council's general approach to the making of decisions under the Act. Where updates are required due to changes in national legislation, statutory guidance or contact details the council reserves the right to amend this policy without consultation where it is necessary to ensure policy reflects national legislation or statutory guidance.
- 1.3. 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.
- 1.4. 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.
- 1.5. 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.

- 1.1 The Gambling Commission is also 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.

## 2. Consultation

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 residents association

- 2.1. Our consultation took place between XXXXX and XXXXX and we followed the HM Government Code of Practice on Consultation (published July 2012).
- 2.2. 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](mailto:Licensing@haringey.gov.uk) / via the Council’s website at: [www.haringey.gov.uk/licensing](http://www.haringey.gov.uk/licensing)
- 2.3. The policy was approved at a meeting of the Full Council on (TBC) and was published via our website on. Copies were placed in the public libraries of the area as well as being available in the Civic Centre.
- 2.4. 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](mailto:licensing@haringey.gov.uk)

2.5. 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.

### 3. Objectives

In exercising most of its functions under the Gambling Act 2005 the Council as the Licensing Authority must have regard to the following licensing objectives:

- **Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or 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.**

3.1. It should be noted that the Gambling Commission has stated: "The requirement in relation to children is explicitly to protect them from being harmed or exploited by gambling".

3.2. The Council is aware that, as per Section 153, in making decisions about premises licences and temporary use notices it should aim to permit the use of premises for gambling insofar as it thinks it is:

- **In accordance with any relevant code of practice issued by the Gambling Commission;**
- **In accordance with any relevant guidance issued by the Gambling Commission;**
- **Reasonably consistent with the licensing objectives;**
- **In accordance with the Council's Statement of Licensing Policy. In particular, the Council requires operators to take account of the local area profile of the borough contained within this policy.**

The Council is required under the Act to:

- Be responsible for the licensing of premises where gambling activities are to take place by issuing Premises Licences;
- Issue Provisional Statements;
- Regulate members' clubs who wish to undertake certain gaming activities via issuing Club Gaming Permits and/or Club Machine Permits; Issue Club Machine Permits to Commercial Clubs;
- Grant permits for the use of certain lower stake gaming machines at unlicensed family entertainment centres;
- Receive notification from alcohol licensed premises (under the Licensing Act 2003) of the use of two or fewer gaming machines;
- Issue Licensed Premises Gaming Machine Permits for premises licensed to sell/supply alcohol for consumption on the licensed premises, under the Licensing Act 2003, where there are more than two machines;
- Register small society lotteries below prescribed thresholds;
- Issue Prize Gaming Permits; Receive and endorse Temporary Use Notices;



- Receive Occasional Use Notices;
- Provide information to the Gambling Commission regarding details of licences issued (see section below on information exchange);
- Maintain registers of the permits and licences that are issued under these functions.

3.3. It should be noted that local licensing authorities are not involved in licensing remote gambling at all, which is regulated by the Gambling Commission via Operator Licences.

3.4. The Council recognises that the licensing function is only one means of promoting delivery of the three objectives and should not therefore be seen as a means for solving all problems within the community. The Council will therefore work in partnership with neighbouring authorities, Metropolitan Police Service, the Community Safety Partnership, local businesses, local people and those involved in child protection to promote the licensing objectives as outlined. In addition, the Council recognises its duty under Section 17 of the Crime and Disorder Act 1998, with regard to the prevention of crime and disorder.

3.5. The scheme of delegation is set out at Appendix 1.

#### 4. Declaration

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.

4.1. In producing this document, the council declares that it has had regard to the licensing objectives of the Gambling Act 2005, the guidance issued by the Gambling Commission, and any responses from those consulted on the policy statement.

#### 5. Responsible Authorities

The Act empowers certain agencies to act as responsible authorities so that they can employ their particular area of expertise to help promote the licensing objectives. Responsible authorities are able to make representations about licence applications, or apply for a review of an existing licence. Responsible authorities will also offer advice and guidance to applicants.

5.1. The council is required by regulations to state the principles it will apply to designate, in writing, a body which is competent to advise the authority about the protection of children from harm. The principles are:

- The need for the body to be responsible for an area covering the whole of the licensing authority's area and the need for the body to be answerable to democratically elected persons, rather than any particular vested interest group etc.
- Answerable to democratically elected Councillors and not to any particular interest group.

5.2. In accordance with the regulations the Council designates the Director of Children Services for this purpose.

5.3. The following are Responsible Authorities:

- The Gambling Commission
- Her Majesty's Commissioners of Customs and Excise (now known as Her Majesty's Revenue & Customs)
- The Metropolitan Police Service
- The London Fire and Emergency Planning Authority
- The Council, as Licensing Authority
- The Council, as Planning Authority
- The Council's Director of Children's Services
- The Council's Environmental Health Service
- The Council's Public Health Service
- Any other person or body who may be prescribed by regulations made by the Secretary of State for Culture, Media and Sport ('the Secretary of State')

5.4. Contact details of all the Responsible Authorities under the Gambling Act 2005 are available on the Council's web site. Contact details of all the responsible authorities under the Gambling Act 2005 are available on the council's website within the guidance documents at Appendix 5.

## 6. Interested parties

Interested parties are certain types of people or organisations that have the right to make representations about licence applications, or apply for a review of an existing licence. These parties are defined in the Gambling Act 2005 as follows:

"For the purposes of this Part a person is an interested party in relation to an application for or in respect of a premises licence if, in the opinion of the licensing authority which issues the licence or to which the applications is made, the person-

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, or

represents persons who satisfy paragraph (a) or (b)"

6.1. The Council is required by regulations to state the principles it will apply to determine whether a person is an interested party. The principles are:

- Each case will be decided upon its merits. The council will not apply a rigid rule to its decision making. It will consider the examples of considerations provided in the Gambling Commission's Guidance to local authorities.
- Within this framework the Council will accept representations made on behalf of residents and tenants associations.
- In order to determine if an interested party lives or has business interests, sufficiently close to the premises to be likely to be affected by the gambling activities, the council will consider factors such as the size of the premises and the nature of the activities taking place.

6.2. The following are not valid reasons to reject applications for premises licences:

- a) Moral objections to gambling
- b) The 'saturation' of gambling premises unless there is evidence that the premises poses a risk to the licensing objectives in that locality

- c) A lack of 'demand'
- d) Whether the proposal is likely to receive planning or building regulations consent

6.3. The council will provide more detailed information on the making of representations in a separate guidance note. The guidance note has been prepared in accordance with relevant Statutory Instruments and Gambling Commission guidance.

## 7. Exchange of information

Licensing authorities are required to include in their policy statement the principles to be applied by the authority with regards to the exchange of information between it and the Gambling Commission, as well as other persons listed in Schedule 6 to the Act.

7.1. The principle that the council applies is that it 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 council will also have regard to any guidance issued by the Gambling Commission to local authorities on this matter, as well as any relevant regulations issued by the Secretary of State under the powers provided in the Gambling Act 2005.

## 8. Gambling Prevalence and Problem Gambling

In 2015 the Gambling Commission commissioned research by NatGen to study gambling behaviour in the UK. The research aim was to:

- Describe the prevalence of gambling participation, at-risk gambling and problem gambling and;
- Explore characteristics associated with gambling participation, at-risk gambling, and problem gambling.

8.1. It found that 63% of adults (16+) in Great Britain had gambled in the previous year, with men (66%) being more likely than women (59%) to do so. Previous year gambling participation varied by age with participation rates being highest among the middle age groups and lowest among the very young or very old. This pattern was the same for men and women. Rates of previous year gambling are heavily influenced by the popularity of the National Lottery. Overall, 45% of British adults had gambled on other activities in the past year. When National Lottery only gamblers are excluded, gambling participation was highest among younger adults. Among both men and women the most popular forms of gambling were: purchase of tickets for the National lottery (46%); purchase of scratch cards (23%), and participation in other lotteries (15%).

8.2. At-risk gambling was measured using the Problem Gambling Severity Index (PGSI). This identifies people who have experienced some difficulty with their gambling behaviour but who are not classified as problem gamblers. Two groups are identified: gamblers at 'low risk of harm' (a PGSI score of 1-2) and gamblers at 'moderate risk' of harm (a PGSI score of 3-7). Overall, 2.8% of adults were low risk gamblers (a PGSI score of 1-2) and a further 1.1% were moderate risk gamblers (a PGSI score of 3-7), meaning that overall 3.9% of adults had a PGSI score which categorised them as 'at-risk' gamblers. Rates of low risk and moderate risk gambling were higher among men than women and were higher among younger age groups.

8.3. The highest rates of problem gambling were among those who had participated in spread betting (20.1%), betting via a betting exchange (16.2%), playing poker in pubs or

clubs (15.9%), betting offline on events other than sports or horse or dog racing (15.5%) and playing machines in bookmakers (11.5%).

8.4. Problem gambling was more prevalent among people who had participated in a number of gambling activities in the past year (prevalence was 11.9% for those who participated in seven or more activities compared to 0.3% of those who had taken part in just one gambling activity in the last year).

8.5. The GamCare annual review (2016-2017)<sup>2</sup> reported the following:

- 43,367 calls/webchats were answered by Help Line in 16/17 compared to 34,198 the year before – a 23% in calls.
- An even split of calls made in relation to online and offline gambling.
- 77% of calls were made by the gambler, 20% were made by an affected other.
- The greatest impact of problem gambling reported is anxiety/stress, financial difficulties and family/relationship difficulties.
- 2 million unique visitors to the website, which was double to last year.
- 1,200 more clients treated this year compared to last year.

## 9. Gambling in Haringey

In Haringey we currently have 64 Betting shops, 5 AGCs, 1 Bingo premises and 2 track betting premises.

9.1 In April 2011 a Haringey scrutiny report noted that betting shops were located disproportionately within the east of the borough (85%), and that there was a correlation between the location of betting shops and social deprivation with 43% of betting shops are located in the most deprived super output areas (10%) of the borough.

9.2 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 worked to understand how gambling can affect its residents and visitors. The Council has also sought to identify individuals who live in the local area who are potentially vulnerable to gambling related harm. Haringey has considered the evidence gathered on the health/social impacts of gambling through our partners such as Public Health and Citizens advice Centres to bring together the local area profile. We expect license applicants/holders to take account of that information to mitigate those impacts effectively through their risk assessments and thereby have meaningful dialogue with the Council, Police and other partners in addressing the concerns identified.

## Part B Promotion of the licensing objectives

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

10.1. 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 ASB related complaints.

10.2. Applicants are advised to examine crime and ASB statistics that relate to the vicinity of their application. This will allow for the application to be tailored to the specific locality and to include any additional measures potentially required to support the objective to be set out in the application. This may also reduce the likelihood of objections being made to the application. Advice about accessing such data can be provided by the Licensing Authority.

10.3. 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.

10.4. Issues of nuisance cannot be addressed by the Gambling Act provisions however problems of this nature can be addressed through other legislation as appropriate.

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

11.1. The council is aware that except in the case of tracks (see section 21) generally the Gambling Commission does not expect licensing authorities to become concerned with ensuring that gambling is conducted in a fair and open way as this will be addressed via operating and personal licences.

11.2. However the council will familiarise itself with operator licence conditions and will communicate any concerns to the Gambling Commission about misleading advertising or any absence of required game rules or other matters as set out in the Gambling Commission's Licence Conditions and Code of Practice.

11.3. Examples of the specific steps the council may take to address this area can be found in the various sections covering specific premises types in Part C of this document and also in Part D which covers permits and notices.

## **12. Protecting children and other vulnerable persons from being harmed or exploited by gambling**

### **12.1 Protection of children**

This licensing objective means preventing children from taking part in most types of gambling. The council will therefore consider whether specific measures are required at particular premises, with regard to this licensing objective. Appropriate measures may include supervision of entrances / machines, segregation of areas etc.

12.2 In premises that may attract children this Authority expects licence holders to train staff to recognise child sexual exploitation, and for staff to be able to demonstrate an understanding of the steps they should take if their suspicions are aroused.

12.3 The Act provides the following definition for child and young adult in Section 45:  
Meaning of “child” and “young person”

- (1) In this Act “child” means an individual who is less than 16 years old.
- (2) In this Act “young person” means an individual who is not a child but who is less than 18 years old.

For the purpose of this section protection of children will encompass both child and young person as defined by the Act.

12.4 The council will pay particular attention to any codes of practice which the Gambling Commission issues as regards this licensing objective in relation to specific premises.

12.5 Examples of the specific steps the council may take to address this area can be found in the various sections covering specific premises types in Part C of this document and also in Part D which covers permits and notices.

## **13 Protection of vulnerable people**

The council is aware of the difficulty in defining the term “vulnerable person”.

13.1 The Gambling Commission, in its Guidance to Local Authorities, does not seek to offer a definition for the term “vulnerable people” but will, for regulatory purposes assume that this group includes people:

“who gamble more than they want to, people who gamble beyond their means, elderly persons, and people who may not be able to make informed or balanced decisions about gambling due to a mental impairment, or because of the influence of alcohol or drugs.”

13.2 The Department of Health document “No Secrets” offers a definition of a vulnerable adult as a person:

“who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.”

13.3 In the case of premises licences the council is aware of the extensive requirements set out for operators in the Gambling Commissions Code of Practice. In this document the

Gambling Commission clearly describe the policies and procedures that operators should put in place regarding:

- Combating problem gambling;
- Access to gambling by children and young persons;
- Information on how to gambling responsibly and help for problem gamblers;
- Customer interaction;
- Self-exclusion;
- Employment of children and young persons.

13.4 All applicants should familiarise themselves with the operator licence conditions and codes of practice relating to this objective and determine if these policies and procedures are appropriate in their circumstances. The council will communicate any concerns to the Gambling Commission about any absence of this required information.

13.5 Applicants should consider the following proposed measures for protecting and supporting vulnerable persons, for example:

- leaflets offering assistance to problem gamblers should be available on gambling premises in a location that is both prominent and discreet, such as toilets;
- training for staff members which focuses on building an employee's ability to maintain a sense of awareness of how much (e.g. how long) customers are gambling, as part of measures to detect persons who may be vulnerable;
- trained personnel for the purpose of identifying and providing support to vulnerable persons;
- self-exclusion schemes;
- operators should demonstrate their understanding of best practice issued by organisations that represent the interests of vulnerable people;
- posters with GamCare Helpline and website in prominent locations;
- windows, entrances and advertisements to be positioned or designed not to entice passers-by.

13.6 It should be noted that some of these measures form part of the mandatory conditions placed on premises licences.

13.7 The council may consider any of the above or similar measures as licence conditions should these not be adequately addressed by any mandatory conditions, default conditions or proposed conditions by the applicant.

### Part C Types of Gambling Premises licences

14. Premises licences are subject to the requirements set-out in the Gambling Act 2005 and regulations, as well as specific mandatory and default conditions which are detailed in regulations issued by the Secretary of State. Licensing authorities are able to exclude default conditions and also attach others, where it is believed to be appropriate.

14.1 The Council is aware that in making decisions about premises licences it should aim to permit the use of premises for gambling in so far as it thinks it is :

- in accordance with any relevant code of practice issued by the Gambling Commission;
  - in accordance with any relevant guidance issued by the Gambling Commission;
  - reasonably consistent with the licensing objectives; and
  - in accordance with the authority's statement of licensing policy.
- 14.2 It is appreciated that as per the Gambling Commission's Guidance for local authorities "moral objections to gambling are not a valid reason to reject applications for premises licences" (except as regards any 'no casino resolution') and also that unmet demand is not a criterion for a licensing authority.
- 14.3 The council will issue premises licences to allow those premises to be used for certain types of gambling. For example premises licences will be issued to amusement arcades, bingo halls, bookmakers and casinos.
- 14.4 Applicants should also be aware that the Gambling Commission has issued Codes of Practice for each interest area for which they must have regard. The council will also have regard to these Codes of Practice.
- 15 Definition of “premises”**  
Premises are defined in the Act as “any place”. Different premises licences cannot apply in respect of a single premises at different times. However, it is possible for a single building to 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. Whether different parts of a building can properly be regarded as being separate premises will always be a question of fact in the circumstances.
- 15.1 The council will 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 the council will assess entrances and exits from parts of a building covered by one or more licences to satisfy itself that they are separate and identifiable so that the separation of different premises is not compromised and that people do not ‘drift’ into a gambling area.
- 15.2 The council will pay particular attention to applications where access to the licensed premises is through other premises (which themselves may be licensed or unlicensed). Issues that the council will consider before granting such applications include whether children can gain access, compatibility of the two establishments; and the ability to comply with the requirements of the Act. In addition, an overriding consideration will be whether, taken as a whole, the co-location of the licensed premises with other facilities has the effect of creating an arrangement that otherwise would, or should, be prohibited under the Act.
- 15.3 The Gambling Commission’s relevant access provisions for each premises type are reproduced below**

Type of Premises	Access Provisions
Casinos	<ul style="list-style-type: none"><li>• the principal entrance to the premises must be from a ‘street’</li></ul>



	<ul style="list-style-type: none"><li>• no entrance to a casino must be from premises that are used wholly or mainly by children and/or young persons</li><li>• no customer must be able to enter a casino directly from any other premises which holds a gambling premises licence.</li></ul>
AGCs	<ul style="list-style-type: none"><li>• no customer must be able to access the premises directly from any other licensed gambling premises.</li></ul>
Betting shops	<ul style="list-style-type: none"><li>• access must be from a 'street' or from other premises with a betting premises licence</li><li>• no direct access from a betting shop to another premises used for the retail sale of merchandise or services. In effect there cannot be an entrance to a betting shop from a shop of any kind unless that shop is itself a licensed betting premises.</li></ul>
Tracks	no customer must be able to access the premises directly from a casino or AGC
Bingo premises	<ul style="list-style-type: none"><li>• no customer must be able to access the premises directly from a casino, an AGC or a betting premises, other than a track</li></ul>
FECs	<ul style="list-style-type: none"><li>• no customer must be able to access the premises directly from a casino, an AGC or a betting premises, other than a track.</li></ul>

15.4 An applicant cannot obtain a full premises licence until they have the right to occupy the premises to which the application relates.

16. Licence Conditions Code of Practice (LCCP) - Application of Social Responsibility Codes.

Commented [BD1]: Updating wording on Social responsibility

- 16.1 The Gambling Commission has issued 'Licence Conditions and Codes of Practice (LCCP) under the Gambling Act 2005 which came into effect on 6<sup>th</sup> May 2018. These were a significant update on previous LCCP and are in three parts:
- General Conditions attached to operating licences
  - Principal Code of Practice: Social Responsibility provisions and Ordinary provisions
  - General Conditions attached to Personal Licences.
- 16.2 Haringey will expect all applicants to have considered the LCCP and included relevant parts within their application.
- 16.3 In particular, all non-remote 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' (Social responsibility (SR) code

10.1.1); and 11.4 Local risk assessments must be reviewed when there are significant changes in local circumstances (including those identified in a licensing authority's statement of licensing policy) or at the premises, or when applying for a new licence or variation of a licence (SR code 10.1.2).

- 16.4 Haringey may, at its discretion, add conditions from the Gambling Commission LCCPs to any applicants licence as it sees fit.

## 17 Local Area Profile and Risk Assessments

Haringey is an improving progressive borough, however, as can be seen from the analysis provided under the local area profile, the east of the borough compares poorly with the west and carry's high levels of deprivation that potentially puts people in those areas at risk to gambling related harm. From 6 April 2016, it is a requirement of the Gambling Commission's Licence Conditions and Codes of Practice (LCCP), under section 10 for licensees to assess the local risks to the licensing objectives posed by the provision of gambling facilities at 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 this policy.

- 17.1 This position gives rise to serious concerns of the impact of any further increase in the number of gambling premises in those most vulnerable and 'at risk' areas of the borough. This Authority considers that it is necessary to seek to control the number of facilities for gambling in areas where its most vulnerable residents may be placed at increasing risk, and in line with the duty, to aim to permit gambling insofar as it is reasonably consistent with the pursuit of the licensing objectives. 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 would tend to 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. Wherever the facilities are proposed, operators should consider, having regard to the individual mapping provided, each of the specific characteristics of their local area. Each premises' specific risk-assessment should recognise these and provide appropriate proactive mitigation or control measures.

- 17.2 The council is aware that demand issues (e.g. the likely demand or need for gambling facilities in an area) cannot be considered with regard to the location of premises but that considerations in terms of the licensing objectives can. The council will pay particular attention to the protection of children and vulnerable persons from being harmed or exploited by gambling, as well as issues of crime and disorder. With regards to these objectives it is the council's policy, upon receipt of any relevant representations to look at specific location issues including:

- the possible impact a gambling premises may have on any premises that provide services to children or young people, i.e. a school, or vulnerable adult centres in the area;
- the possible impact a gambling premises may have on residential areas where there may be a high concentration of families with children;
- the size of the premises and the nature of the activities taking place;
- any levels of organised crime in the area.

- 17.3 It is a requirement of the code that such risk assessments should be shared with the Council when applying for a new licence, making a variation or when there is a significant change in local circumstances (including any update of the Gambling Policy). Where there are significant changes at a licensee's premises that may affect the mitigation of local risk, or otherwise on request from the Authority. The LB Haringey expects that such risk assessments will automatically be shared for all premises and to take into account the following:
- 17.4 Any special risks created by geographic location. To include schools, colleges or establishments frequented by children and young people, residential areas where there may be a high concentration of children and young persons, and the measures proposed to reduce any specific risk of children and young people from these premises accessing gambling facilities at the licensee's premises and to identify any potential risks to vulnerable persons. Assessment of risk covers the following:
- a. Identify risk factors
  - b. Who can be harmed and how
  - c. Evaluate the risk
  - d. Record and score findings
  - e. Monitor and review
- 17.5 Other matters that the assessment may include:
- local area crime statistics;
  - whether the premises is in an area of deprivation;
  - whether the premises is in an area subject to high levels of crime and/or disorder;
  - the ethnic profile of residents in the area;
  - the demographics of the area in relation to vulnerable groups;
  - the location of services for children such as schools, playgrounds, toy shops, leisure centres and other areas where children will gather;
  - the training of staff to recognise child sexual exploitation and the steps to be taken if it is suspected;
  - details as to the location and coverage of working CCTV cameras, and how the system will be monitored;
  - the layout of the premises so that staff have an unobstructed view of persons using the premises;
  - the number of staff that will be available on the premises at any one time. If at any time that number is one, confirm the supervisory and monitoring arrangements when that person is absent from the licensed area or distracted from supervising the premises and observing those persons using the premises;
  - arrangements for monitoring and dealing with under age persons and vulnerable, which may include dedicated and trained personnel, leaflets, posters, self-exclusion schemes, window displays and advertisements not to entice passers-by etc;
  - the provision of signage and documents relating to games rules, gambling care providers and other relevant information be provided in both English and the other prominent first language for that locality;
  - where the application is for a betting premises licence, other than in respect of a track, the location and extent of any part of the premises

which will be used to provide facilities for gambling in reliance on the licence;

- the training of staff in brief intervention when customers show signs of excessive gambling, the ability of staff to offer brief intervention and how the manning of premises affects this.

17.6 Such information may be used to inform the decision the council makes about whether to grant the licence, to grant the licence with special conditions or to refuse the application.

17.7 A good risk assessment accompanying an application will:

- Enable the licensing authority to see that the applicant has considered the community and the risks within it;
- Provide greater clarity for operators leading to improved premises licence applications, with the operator already incorporating controls and measures to mitigate risk in their application;
- Enable the licensing authority to make robust but fair decisions, based on a clear, published set of factors and risks, which are therefore less susceptible to challenge;
- Encourage a proactive approach to risk that is likely to result in reduced compliance and enforcement action.

17.8 In any case the local risk assessment should show how vulnerable people, including people with gambling dependencies, are protected.

17.9 There is evidence that some groups in the population may be more vulnerable to gambling related harm. This does not only apply to people on low incomes but also people who are less able to make reasoned decisions because of poor mental health or addiction. Children and young people may be particularly susceptible, as their youth and inexperience may make them more inclined to risk-taking behaviour and less able to manage the consequences of those decisions.

17.10 To help support applicants and licence holders to better understand their local environment, an analysis of gambling related harm has been prepared as a 'local area profile'. A copy of the document is provided at Appendix 2. By drawing on relevant and reliable published socio-economic and public health data sets together with local police data concerning anti-social behaviour, the local area profile uses special analysis techniques to provide a model of area-based vulnerability to gambling related harm across the borough. Both current operators and potential new operators to the borough are asked to consider the detail provided carefully, and should have regard to both the overall summary map and the individual mapping provided in respect of each relevant data set.

17.11 This policy does not preclude any application being made and each application will be decided on its merits, with the onus being upon the applicant to show how the concerns can be overcome. Assessing local risk should therefore provide a means for licensees to address local concerns about gambling premises; and for licensing authorities and gambling licensees to work collaboratively with a view to minimising risks, within the framework of aiming to permit gambling where reasonably consistent with licensing objectives.

**18. Duplication with other regulatory regimes**

The council will seek to avoid any duplication with other statutory/regulatory systems where possible, including planning. The council will not consider whether a licence application is likely to be awarded planning permission or building regulations approval, in its consideration of it. It will though, listen to, and consider carefully, any concerns about proposed conditions which are not able to be met by the applicant due to planning restrictions, should such a situation arise, this may include consideration of the proposed hours of operation. The Council will consider the hours proposed in accordance to the risk assessment and area profile.

**19 Conditions**

The Council is aware that the Secretary of State has set mandatory conditions and default conditions. The Gambling Commission has set Licence Conditions and Codes of Practice which are necessary for the general good conduct of gambling premises. The Council will not seek to impose further individual conditions in relation to matters that have already been dealt with.

- 19.1 Where there are specific risks or problems associated with a particular locality, or specific premises, or class of premises, the council will attach individual conditions to address this.
- 19.2 Any conditions attached to a licence issued by the council 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, and/or related to
  - the area where the premises is based;
  - fairly and reasonably related to the scale, type and location of premises;
  - consistent with the licensing objectives, and
  - reasonable in all other respects.
- 19.3 Decisions about individual conditions will be made on a case by case basis, although there will be a number of control measures the council will consider using, such as supervision of entrances, supervision of adult gaming machines, appropriate signage for adult only areas etc. There are specific comments made in this regard under each of the licence types in this policy. The council will also expect the applicant to offer his/her own suggestions as to the way in which the licensing objectives can be met effectively.
- 19.4 Where certain measures are not already addressed by the mandatory/default conditions or by the applicant, the council may consider licence conditions to cover issues such as:
- proof of age schemes;
  - CCTV;
  - supervision of entrances;
  - supervision of machine areas;
  - a reduction in the number of betting machines (betting premises);
  - the staffing of premises;
  - physical separation of areas;

- location of entrance points;
- notices / signage;
- specific opening hours;
- a requirement that children must be accompanied by an adult;
- enhanced CRB checks of the applicant and/or staff;
- support to persons with gambling addiction;
- policies to address seasonal periods where children may more frequently attempt to gain access to premises and gamble such as pre and post school hours, half terms and summer holidays;
- policies to address the problems associated with truant children who may attempt to gain access to premises and gamble;
- any one or a combination of these measures.

19.5 This list is not mandatory or exhaustive and is merely indicative of examples of certain measures which may satisfy the requirements of the licensing authority and the responsible authorities, depending on the nature and location of the premises and the gambling facilities to be provided.

19.6 There are conditions which the council cannot attach to premises licences which are:

- any condition on the premises licence which makes it impossible for the applicant to comply with an operating licence condition;
- conditions relating to gaming machine categories, numbers, or method of operation;
- conditions which provide that membership of a club or body be required (the Gambling Act 2005 specifically removes the membership requirement for casino and bingo clubs and this provision prevents it being reinstated) and
- conditions in relation to stakes, fees, winnings or prizes.

## 20. Door supervision

The council will consider whether there is a need for door supervision in terms of the licensing objectives of protection of children and vulnerable persons from being harmed or exploited by gambling, and also in terms of preventing premises becoming a source of crime. It is noted though that the Gambling Act 2005 has amended the Private Security Industry Act 2001 and that door supervisors at casinos or bingo premises are not required to be licensed by the Security Industry Authority. Where door supervisors are provided at these premises the operator should ensure that any persons employed in this capacity are fit and proper to carry out such duties. Possible ways to achieve this could be to carry out a criminal records (CRB) check on potential staff and for such personnel to have attended industry recognised training.

## 21. Adult gaming centres

Under the Act a premises holding an adult gaming centre licence will be able to make category B, C and D gaming machines available and no one under 18 will be permitted to enter such premises.

21.1 The council will specifically have regard to the need to protect children and vulnerable persons from harm or being exploited by gambling in these premises. The council will expect applicants to satisfy the authority that there will be sufficient measures to ensure that under 18 year olds do not have access to the premises.

21.2 Where certain measures are not already addressed by the mandatory and default conditions and the Gambling Commission Codes of Practice or by the applicant, the council may consider licence conditions to address such issues, examples of which are provided at paragraph 16.16.

## 22. Licensed family entertainment centres (FECs)

22.1 Licensed family entertainment centres are those premises which usually provide a range of amusements such as computer games, penny pushers and may have a separate section set aside for adult only gaming machines with higher stakes and prizes. Licensed family entertainment centres will be able to make available unlimited category C and D machines where there is clear segregation in place so children do not access the areas where the category C machines are located.

22.2 Where category C or above machines are available in premises to which children are admitted then the council will ensure that:

- all such machines are located in an area of the premises separate from the remainder of the premises by a physical barrier which is effective to prevent access other than through a designated entrance. For this purpose a rope, floor markings or similar provision will not suffice and the council may insist on a permanent barrier of at least 1 meter high;
- only adults are admitted to the area where the machines (category C) are located;
- access to the area where the machines are located is supervised at all times;
- the area where the machines are located is arranged so that it can be observed by staff; 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.

22.3 The council will specifically have regard to the need to protect children and vulnerable persons from harm or being exploited by gambling in these premises. The council will expect applicants 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 machine areas.

22.4 The council will expect the applicant 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.

22.5 The efficiency of such policies and procedures will each be considered on their merits, however, they may include:

- appropriate measures and training for staff as regards suspected truant children on the premises;
- measures and training covering how staff would deal with unsupervised very young children being on the premises;
- measures and training covering how staff would deal with children causing perceived problems on or around the premises;
- the arrangements for supervision of premises either by staff or the use of CCTV.

- 22.6 Any CCTV system installed should both the interior and the entrance working to the latest Home Office and ACPO standards and to the satisfaction of Metropolitan Police and the local authority. The system must record images clearly and these recordings be retained for a minimum of 31 days. If the equipment is inoperative the police and local authority must be informed as soon as possible and immediate steps taken to make the system operative. Notices must be displayed at the entrances advising that CCTV is in operation.
- 22.7 Due to the nature of these premises, which are attractive to children, applicants who employ staff to supervise the premises should consult with the Independent Safeguarding Authority to determine if their staff need to be CRB checked.
- 22.8 The council will refer to the Commission's website to familiarise itself with any conditions that apply to operating licences covering the way in which the area containing the category C machines should be delineated. The council will also make itself aware of the mandatory or default conditions and any Gambling Commission Codes of Practice on these premises licences.
- 23. Casinos**  
The London Borough of Haringey has not passed a resolution in relation to casinos, but it is noted that the Government has not awarded a casino licence to Haringey.
- 24. Bingo premises**  
There is no official definition for bingo in the Gambling Act 2005 however from a licensing point of view there is a category of premises licence specifically for bingo premises which is used by traditional commercial bingo halls for both cash and prize bingo. In addition this premises licence will authorise the provision of a limited number of gaming machines in line with the provisions of the Act.
- 24.1 The council is aware that it is important that if children are allowed to enter premises licensed for bingo that they do not participate in gambling, other than on category D machines. Where category C or above machines are available in premises to which children are admitted then the council will ensure that:
- all such machines are located in an area of the premises separate from the remainder of the premises by a physical barrier which is effective to prevent access other than through a designated entrance. For this purpose a rope, floor markings or similar provision will not suffice and the council may insist on a permanent barrier of at least one meter high;
  - only adults are admitted to the area where the machines are located;
  - access to the area where the machines are located is supervised at all times;
  - the area where the machines are located is arranged so that it can be observed by staff;
  - 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;
  - children will not be admitted to bingo premises unless accompanied by an adult.
- 24.2 The Gambling Commission has provided Guidance for Licensing Authorities and



Licence Conditions and Code of Practice which are applied to Operator’s Licences. The council will take this into consideration when determining licence applications for bingo premises.

- 24.3 Where certain measures are not already addressed by the mandatory/default conditions, the Gambling Commission Code of Practice or the applicant, the council may consider licence conditions to address such issues, examples of which are provided at paragraph 13.15.

## 25. Betting premises

Betting premises are premises such as bookmakers where various types of gambling are authorised to take place. The Act contains a single class of licence for betting premises however within this single class there are different types of premises which require licensing such as high street bookmakers, bookmakers located in self-contained facilities at race courses as well as the general betting premises licences that track operators will require.

### 25.1 Betting machines

The council is aware that Section 181 of the Act contains an express power for licensing authorities to restrict the number of betting machines, their nature and the circumstances in which they are made available by attaching a licence condition to a betting premises licence. When considering whether to impose a condition to restrict number of betting machines in particular premises, the council, amongst other things, will 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 the machines.

- 25.2 Where an applicant for a betting premises licence intends to offer higher stake category B gaming machines (categories B2-B4) including any Fixed Odds Betting Terminals (FOBTs), then applicants should consider the control measures related to the protection of vulnerable persons, highlighted in section 13.

- 25.3 Where certain measures are not already addressed by the mandatory/default

conditions, Gambling Commission Code of Practice or the applicant, the council may consider licence conditions to address such issues.

## 26. Tracks

Tracks are sites (including racecourses and dog tracks) where races or other sporting events take place. Betting is a major gambling activity on tracks, both in the form of pool betting (often known as the “totaliser” or “tote”), and also general betting, often known as “fixed-odds” betting. Multiple betting outlets are usually located on tracks such as ‘on-course’ betting operators who come onto the track just on race days to provide betting for the races taking place on that track. There can also be ‘off-course’ betting operators who may operate self-contained facilities at the tracks which offer customers the chance to bet on other events, not just those taking place on the track.

- 27.1 All tracks will require a primary ‘general betting premises licence’ that the track operator will hold. It should be noted that track operators do not require an operating licence from the Gambling Commission although they may apply for one. This is because the various other gambling operators offering betting at the track will each hold an operating licence.

- 27.2 Tracks may also be subject to one or more premises licences, provided each licence relates to a specified area of the track. This may be preferable for any self-contained premises providing off-course betting facilities at the track. The council will however assess each individual case on its merits before deciding if this is necessary. Where possible the council will be happy for the track operator to decide if any particular off-course operators should apply for a separate premises licence.
- 27.3 If any off-course operators are permitted to provide betting facilities under the authorisation of the track operator's premises licence, then it will be the responsibility of the premises licence holder to ensure the proper conduct of such betting within the premises boundary.
- 27.4 Gambling Commission guidance also indicates that it would be possible for other types of gambling premises to be located at a track under the authorisation of separate premises licences, e.g. a casino premises licence or adult gaming centre premises licence. If you require further guidance on this provision please contact the Licensing Team.
- 27.5 Children and persons will be permitted to enter track areas where facilities for betting are provided on days when dog-racing and/or horse racing takes place, although they are still prevented from entering areas where gaming machines and betting machines (other than category D machines) are provided.
- 27.6 The council will consider the impact upon the protection of children licensing objective and the need to ensure that entrances to each type of betting premises are distinct and that children are excluded from gambling areas where they are not permitted to enter.
- 28. Travelling fairs**  
Travelling fairs have traditionally been able to provide various types of low stake gambling without the need for a licence or permit provided that certain conditions are met and this provision continues in similar fashion under the new Act.
- 28.1 Travelling fairs have the right to provide an unlimited number of category D gaming machines and/or equal chance prize gaming (without the need for a permit) as long as the gambling amounts to no more than an ancillary amusement at the fair.
- 28.2 The council will consider whether any fairs which take up the above entitlement fall within the statutory definition of a travelling fair.
- 28.3 The council is aware 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. The council will work with its neighbouring authorities to ensure that land which crosses the council boundary is monitored so that the statutory limits are not exceeded.
- 29. Provisional statements**  
A provisional statement application is a process which allows a developer to examine the likelihood of whether a building which he expects to be constructed, to be altered or to acquire a right to occupy would be granted a premises licence. A provisional statement is not a licence and merely gives the holder some form of guarantee that a premises licence would be granted so the developer can judge whether a development

is worth taking forward in light of the need to obtain a premises licence. An applicant may also apply for a provisional statement for premises which already hold a premises licence (either for a different type of gambling or the same type).

29.1 In terms of representations about premises licence applications, following the grant of a provisional statement, no further representations from responsible 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. In addition, the council may refuse the premises licence (or grant it on terms different to those attached to the provisional statement) only by reference to matters:

- a) which could not have been raised by objectors at the provisional licence stage; or
- b) which in the authority's opinion reflect a change in the operator's circumstances.

29.2 When determining a provisional statement application the council will operate in accordance with the Act and will not have regard to any issues related to planning consent or building regulations, e.g. the likelihood that planning consent will be granted.

## Part D - Permits, notices and lottery registrations.

### 30. Unlicensed family entertainment centre gaming machine permits (UFECs)

The term 'unlicensed family entertainment centre' is one defined in the Act and refers to a premises which provides category D gaming machines along with various other amusements such as computer games and penny pushers. The premises is 'unlicensed' in that it does not require a premises licence but does require a permit to be able to provide category D machines. It should not be confused with a 'licensed family entertainment centre' which requires a premises licence because it contains both category C and D gaming machines.

30.1 The council will expect the applicant 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.

30.2 The efficiency of such policies and procedures will each be considered on their merits, however, they may include:

- appropriate measures and training for staff as regards suspected truant children on the premises;
- measures and training covering how staff would deal with unsupervised very young children being on the premises;

- measures and training covering how staff would deal with children causing perceived problems on or around the premises;
- the arrangements for supervision of premises either by staff or the use of CCTV.

30.3 Any CCTV system installed should both the interior and the entrance working to the latest Home Office and ACPO standards and to the satisfaction of The Metropolitan Police and the local authority. The system must record images clearly and these recordings be retained for a minimum of 31 days. If the equipment is in-operative the Police and Local Authority must be informed as soon as possible and immediate steps taken to make the system operative. Notices must be displayed at the entrances advising that CCTV is in operation.

30.4 Due to the nature of these premises, which are attractive to children, applicants who employ staff to supervise the premises should consult with the Independent Safeguarding Authority to determine if their staff need to be CRB checked.

30.6 The council will also expect, as per the 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 has no relevant conviction (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.

30.7 In line with the Act, while the council cannot attach conditions to this type of permit, the council can refuse applications if they are not satisfied that the issues raised in the “Gambling Policy” have been addressed through the application.

30.8 Applicants only need to address the “Gambling Policy” when making their initial application ns and not at renewal time.

### **31 Gaming machine permits in premises licensed for the sale of alcohol**

There is provision in the Act for premises licensed to sell alcohol for consumption on the premises, to automatically have two gaming machines, of categories C and/or D. The premises merely need to notify the council. The council 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 Gambling 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 has been committed on the premises.

31.1 If a premises wishes to have more than two machines, then it needs to apply for a permit and the council must consider that application based upon the licensing objectives, any guidance issued by the Gambling Commission issued under Section 25 of the Gambling

Act 2005, and “*such matters as they think relevant*.” The council considers that “such matters” will be decided on a case by case basis but generally there will be regard to the need to protect children and vulnerable persons from harm or being exploited by gambling. The council will also expect the applicant to satisfy the authority that there will be sufficient measures to ensure that children and young people under the age of 18 do not have access to the adult only gaming machines.

- 31.2 All alcohol licensed premises with gaming machines must have regard to the need to protect children and vulnerable persons from harm or being exploited by gambling and provide sufficient measures to ensure that under 18 year olds do not use the adult only gaming machines.
- 31.3 Measures which may satisfy the council that persons under 18 years will be prevented from using the machines may include the machines being in close proximity to the bar, or in any other area where they are capable of being adequately supervised. Notices and signage may also help. As regards the protection of vulnerable persons, applicants may wish to consider the provision of information leaflets and or helpline numbers for organisations such as GamCare.
- 31.4 The council can decide to grant the permit with a smaller number of machines and/or a different category of machines than that applied for. Conditions other than these cannot be attached.
- 31.5 The holder of a permit must comply with any Code of Practice issued by the Gambling Commission about the location and operation of the machine(s).
- 31.6 It is recognised that some alcohol licensed premises may apply for a premises licence for their non-alcohol licensed areas. Any such application would need to be dealt with under the relevant provisions of the Act.
- 31.7 Alcohol licensed premises are able to provide some limited equal chance gaming. Licensees are referred to the advice provided by the Gambling Commission on the website.
- 32. Prize gaming permits**

Section 288 defines gaming as prize gaming if the nature and size of the prize is not determined by the number of people playing or the amount paid for or raised by the gaming. The prizes will be determined by the operator before play commences. Prize gaming can often be seen at seaside resorts in amusement arcades where a form of bingo is offered and the prizes are displayed on the walls.
- 32.1 A prize gaming permit is a permit issued by the licensing authority to authorise the provision of facilities for gaming with prizes on specified premises.
- 32.2 The council will expect the applicant 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.
- 32.3 The efficiency of such policies and procedures will each be considered on their merits, however, they may include:
  - appropriate measures and training for staff as regards suspected truant children on the premises;

- measures and training covering how staff would deal with unsupervised very young children being on the premises;
- measures and training covering how staff would deal with children causing perceived problems on or around the premises.
- the arrangements for supervision of premises either by staff or the use of CCTV.

32.4 Any CCTV system installed should both the interior and the entrance working to the Home Office and ACPO standards and to the satisfaction of The Metropolitan Police and the local authority. The system must record images clearly and these recordings be retained for a minimum of 31 days. If the equipment is inoperative, the police and local authority must be informed as soon as possible and immediate steps taken to make the system operative. Notices must be displayed at the entrances advising that CCTV is in operation.

32.5 Due to the nature of these premises, which are attractive to children, applicants who employ staff to supervise the premises should consult with the Independent Safeguarding Authority to determine if their staff need to be CRB checked.

32.6 The council will also expect, as per the Gambling Commission Guidance, that applicants demonstrate:

- A full understanding of the maximum stakes and prizes of the gambling that is permissible;
- That the gaming offered is within the law.

32.7 In line with the Act, while the council cannot attach conditions to this type of permit, the council can refuse applications if they are not satisfied that the issues raised in the “Gambling Policy” have been addressed through the application.

32.8 There are conditions in the Gambling Act 2005 by which the permit holder must comply. 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.

### 33. Club gaming and club machine permits

Members clubs and miners’ welfare institutes may apply for a ‘club gaming permit’ or a ‘club machine permit’. The ‘club gaming permit’ will enable the premises to provide gaming machines (three machines of categories B4, C or D), equal chance gaming. i.e. poker, bingo etc. A ‘club machine permit’ will enable the premises to provide gaming machines (three machines of categories B4, C or D). Commercial clubs may apply for a

'club machine permit' only.

33.1 To qualify for these special club permits a members club must have at least 25 members and be established and conducted "wholly or mainly" for purposes other than gaming. A members' club must be permanent in nature, not established to make commercial profit, and controlled by its members equally. Examples include working men's clubs, branches of the Royal British Legion and clubs with political affiliations.

33.2 Clubs must have regard to the protection of children and vulnerable persons from harm or being exploited by gambling. They must provide sufficient measures to ensure that under 18 year olds do not use the adult only gaming machines. These measures may include:

- the machines being in close proximity to the bar, or in any other area where they are capable of being adequately supervised;
- notices and signage;
- the provision of information leaflets / helpline numbers for organisations such as GamCare.

33.3 Before granting the permit the council will need to satisfy itself that the premises meets the requirements of a members' club and that the majority of members are over 18.

33.4 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 they have 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; or
- (e) an objection has been lodged by the Commission or the police.

33.5 There is also a 'fast-track' procedure available for premises which hold a club premises certificate under the Licensing Act 2003. Under the fast-track procedure there is no opportunity for objections to be made by the Commission or the police, and the ground upon which the council can refuse a permit is reduced. The grounds on which an application under the process may be refused are:

- (a) that the club is established primarily for gaming,
- (b) that in addition to the prescribed gaming, the applicant provides facilities for other gaming; or
- (c) that a club gaming permit or club machine permit issued to the applicant in the last ten years has been cancelled.

#### 34. Temporary use notices

Temporary use notices allow the use of premises on not more than 21 days in any 12 month period 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 useful for a temporary use notice would include hotels, conference centres and sporting venues.

34.1 Temporary Use Notices allow the use of premises for any form of equal chance gambling where those participating in the gaming are taking part in a competition which is intended to produce a single, overall winner.

34.2 Only persons or companies holding a relevant operating licence can apply for a temporary use notice to authorise the particular class of gambling permitted by their operating licence.

34.3 A temporary use notice must be lodged with the licensing authority not less than three months and one day before the day on which the gambling is due to take place. Detailed information about how to serve a temporary use notice will be available in a separate guidance note.

34.4 The Act makes a special reference, in the context of temporary use notices, to a “set of premises” to try and ensure that large premises which cannot reasonably be viewed as separate are not used for more temporary use notices than permitted under the Act. The council considers that the determination of what constitutes “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 council will look at, amongst other things, the ownership/occupation and control of the premises. The council will be ready 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.

### 35. Occasional use notices (for tracks)

There is a special provision in the Act which provides that where there is betting on a track on eight days or less in a calendar year, betting may be permitted by an occasional use notice without the need for a full premises licence. An Occasional Use Notice is different to that for a temporary use notice. The application may be made in writing, to the council by the person responsible for the administration of the events on a track or by an occupier of the track.

35.1 The council has very little discretion as regards these notices aside from ensuring that the statutory limit of 8 days in a calendar year is not exceeded. The council will however consider the definition of a ‘track’ and whether the applicant is entitled to benefit from such notice.

### 36. Small society lottery registrations

36.1 A lottery generally refers to schemes under which prizes are distributed by chance among entrants who have given some form of value for their chance to take part.

36.2 The Act creates two principal classes of lotteries: Licensed lotteries and exempt lotteries. Licensed lotteries are large society lotteries and lotteries run for the benefit of local authorities. These will be regulated by the Gambling Commission. Within the class of exempt lotteries there are four sub classes, one of which is small society lotteries.

36.3 A small society lottery is a lottery promoted on behalf of a non-commercial society as defined in the Act which also meets specific financial requirements set out in the Act.



These will be administered by the council for small societies who have a principal office in Haringey and want to run such lottery.

36.4 A lottery is small if the total value of tickets put on sale in a single lottery is £20,000 or less and the aggregate value of the tickets put on sale in a calendar year is £250,000 or less.

36.5 To be 'non-commercial' a society must be established and conducted:

- for charitable purposes;
- for the purpose of enabling participation in, or supporting, sport, athletics or a cultural activity; or
- for any other non-commercial purpose other than that of private gain.

36.6 The other types of exempt lotteries are 'incidental non-commercial lotteries', 'private lotteries' and 'customer lotteries'. If you require guidance on the different categories of lotteries please contact the council.

36.7 The National lottery is not licensed by the Gambling Act 2005 and continues to be regulated by the National Lottery Commission under the National Lottery Act 1993.

## Part E

### 37. Enforcement

The council will work closely with the responsible authorities in accordance with a locally established joint enforcement protocol and will aim to promote the licensing objectives by targeting known high risk premises following government guidance around better regulation.

37.1 In carrying out its enforcement duties with regards to the inspection of premises; and the powers to institute criminal proceedings in respect of certain offences under the Act the council 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; and
- **targeted:** regulation should be focused on the problem, and minimise side effects

37.2 The council will endeavour to avoid duplication with other regulatory regimes so far as possible.

37.3 Where there is a Primary Authority scheme in place, the council will seek guidance from the Primary Authority before taking any action involving test purchasing operations, unless these arise as a result of a complaint.

- 37.4 Further information, including an index of all Primary Authority arrangements can be found at <https://primaryauthorityregister.info/par/index.php/home>
- 37.5 The council will also adopt a risk-based inspection programme in line with government recommendations around better regulation and the principles of the Hampton Review.
- 37.6 The main enforcement and compliance role for the council in terms of the Gambling Act 2005 will be to ensure compliance with the premises licences and other permissions which it authorises. The Gambling Commission will be the enforcement body for the operator and personal licences. Concerns about the manufacture, supply or repair of gaming machines will not be dealt with by the council but will be notified to the Gambling Commission. In circumstances where the council believes a premises requires a premises licence for gambling activities and no such licence is in force, the council will alert the Gambling Commission.
- 37.7 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.
- 37.8 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.
- 37.9 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.
- 38. 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 2003;

6. The Race Relations Act 1976 (as amended);

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

### 38.1 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.

### 38.2 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.

### 38.3 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.

### 38.4 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.

### 38.5 Safer Communities 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 Safer Communities 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 race relations legislation to have due regard to the need to eliminate unlawful discrimination and to promote equality of opportunity and good relations between persons of different racial groups. The impact on these issues of the Gambling Policy will be monitored and amendments will be made as necessary.

- 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.

### 39. Decision Making

#### Committee Terms of Reference

A 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.

#### 39.1 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.

#### 39.2 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. The Licensing Committee will refer to the Full Council 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.

39.3 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.

39.6 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.

#### 39.7 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 and 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.

The table shown at Appendix A sets out the agreed delegation of decisions and functions to Licensing Committee, Sub-Committee and 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.

## 40 Reviews

40.1 A review is a process defined in the legislation which ultimately leads to a licence being reassessed by the Licensing Committee with the possibility that the licence may be revoked, suspended or that conditions may amended or new conditions added.

40.2 Requests for a review of a premises licence can be made by interested parties or responsible authorities; however, it is for the council to decide whether the review is to be carried-out. This will be on the basis of whether the request for the review is:

- i) in accordance with any relevant code of practice issued by the Gambling Commission
- ii) in accordance with any relevant guidance issued by the Gambling Commission
- iii) reasonably consistent with the licensing objectives and
- iv) in accordance with this authority's Gambling Act 2005 – Statement of Licensing Policy.

In addition the council may also reject the application on the grounds that the request is

frivolous, vexatious, will certainly not cause this authority to wish to alter, revoke or suspend the licence, or is substantially the same as previous representations or requests for review.

40.3 The council can also initiate a review of a licence on the basis of any reason which it thinks is appropriate. 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. This period begins 7 days after the application was received by the licensing authority, who will publish notice of the application within 7 days of receipt.

40.4 The licensing authority must carry out the review as soon as possible after the 28 day period for making representation has passed.

40.5 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:-

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

40.6 In determining what action, if any, should be taken following a review, the licensing authority must have regard to the principles set out in section 153 of the Act, as well as any relevant representations.

40.7 In particular, the licensing authority may also 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.

40.8 Once the review has been completed, the licensing authority must, as soon as possible, notify its decision to:

- the licence holder
- the applicant for review (if any)
- the Commission
- any person who made representations
- the chief officer of police or chief constable; and
- Her Majesty's Commissioners for Revenue and Customs

#### **41. Diversity and Equality**

Subject to the general requirements of the Act, the Licensing Authority will promote equality of opportunity. In such respects, nothing within this statement of licensing principles shall undermine the right of any individual to apply for any of the licences and/or authorisations provided under the terms of the Act. The Council is aware that some applications may have greater impact on groups, organisations or associations in respect of their race, gender, age, disability, sexuality or religious beliefs. With a view to eliminating unlawful discrimination, applicants will be expected (where appropriate) to address these concerns.

Where applications made by these groups or organisations representing them highlight special needs or customs that may affect their application, the Council, in recognising its duty to promote good relations between persons of different groups, will give consideration to supporting those needs or customs whilst seeking to promote the three licensing objectives.

#### 42. Human Rights

The Human Rights Act 1998 incorporates the European Convention on Human Rights and makes it unlawful for a local authority to act in a way that is incompatible with a Convention Right. The Council will have particular regard to its rights and responsibilities under the Human Rights Act 1998 when determining applications, considering enforcement and reviewing this policy.

42.1 The Council will have particular regard to:

- Article 6 – that in determination of civil rights everyone is entitled to a fair and public hearing within a reasonable time by an independent and impartial tribunal established by law;
- Article 8 – that everyone has the right to respect for his home and private life (removal or restriction of a licence may effect a persons private life); and
- Article 1 of the First Protocol – that every person is entitled to peaceful enjoyment of his or her possessions (a licence is considered a possession in law);

TABLE OF DELEGATIONS OF LICENSING FUNCTIONS                      APPENDIX 1

MATTER TO BE DEALT WITH	FULL COUNCIL	SUB-COMMITTEE	OFFICERS
Three year licensing policy	X		
Policy not to permit casinos	X		
Fee Setting - when appropriate		Can only be delegated to a sub-committee, not officers	
Application for premises licences		Where representations have been received and not withdrawn	Where no representations received/ representations have been withdrawn
Application for a variation to a licence		Where representations have been received and not withdrawn	Where no representations received/ representations have been withdrawn
Application for a transfer of a licence		Where representations have been received from the Commission	Where no representations received from the Commission
Application for a provisional statement		Where representations have been received and not withdrawn	Where no representations received/ representations have been withdrawn



Review of a premises licence			The initial grounds for review will be for officers to validate. Licensing Sub Committee will then hear the review if the grounds are valid under s.198
Application for club gaming /club machine permits		Where representations have been received and not withdrawn	Where no representations received/ representations have been withdrawn
Cancellation of club gaming/ club machine permits			Cancellation of club gaming /machine permits and other permits decisions would be appropriate for officers.
Applications for other permits			Dealt with by officers
Cancellation of licensed premises gaming machine permits			Dealt with by officers
Consideration of temporary use notice		X	
Decision to give a counter notice to a temporary use notice			

Definitions

**NOTE:** In this Policy, the following definitions are included to provide an explanation to certain terms included in the Act and, therefore, in the Statement of Gambling Policy. In some cases, they are an abbreviation of what is stated in the Gambling Act 2005 or an interpretation of those terms. For a full definition of the terms used, the reader must refer to the Gambling Act 2005.

‘The Council’ means London Borough of Haringey, acting as the Licensing Authority as defined by the Gambling Act 2005.

‘The Act’ means the Gambling Act 2005.

‘The Licensing Authority’ the authority in whose area the premises is wholly/partly situated. The Licensing Authority (as in the issuing authority) is also a responsible authority.

‘The Gambling Commission’ a body set up by the Government as the unified regulator for gambling, replacing the Gaming Board.

‘Responsible Authority’ means a public body that must be notified of certain applications for premises licences and permits, and are entitled to make representations on any of the licensing objectives.

‘Children’ means individuals who are less than 16 years old.

‘Young person’ means individuals who are aged less than 18 years old and 16 years and over.

‘Mandatory Conditions’ means a specified condition provided by regulations to be attached to premises licences.

‘Default Conditions’ means a specified condition provided for by regulations to be attached to a licence unless excluded by the Council.

‘Premises’ means any place, including a vessel or moveable structure.

‘LCCP’ Licensing Conditions Code of Practice issued by the Gambling Commission

**GAMBLING ACT 2005**  
**GAMBLING LOCAL AREA PROFILE**  
**JANUARY 2019**

## 1. Introduction

1.1 This profile has been drafted by the Council as an associate document to the Council's Statement Gambling Policy following the recommendations of the Gambling Commission and the Local Government Association. Data has been used from a number of published sources together with information from the responsible authorities. It is intended to assist local Gambling Operators prepare their local assessments.

At this time the Council does not have any evidence to indicate Gambling activities in the Borough are a problem. However potential risks are always present and the Council encourages operators and all others involved to work together to address such issues or concerns.

1.2 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. Licensees 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 benefits listed are:

- it enables licensing authorities to better serve their local community, by better reflecting the community and the risks within it
- greater clarity for operators as to the relevant factors in licensing authority decision making, will lead to improved premises licence applications, with the operator already incorporating controls and measures to mitigate risk in their application
- it enables 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
- it encourages a proactive approach to risk that is likely to result in reduced compliance and enforcement action.

## 2. Haringey approach to local area profile

2.1 The Local Area Profile Supplementary document establishes that the Council has serious concerns of the impact from on street gambling premises particularly those in the most vulnerable and 'at risk' areas of the borough. The Council considers that it is necessary to seek to control the number of facilities for gambling in areas where its most vulnerable residents may be placed at increasing risk, and in line with the duty, to aim to permit gambling insofar as it is reasonably consistent with the pursuit of the licensing objectives. The document provides an overview of the geographical areas in the borough identified as currently being of greater risk to gambling related harm.

2.2 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.

2.3 This begins with the Gambling Act 2005 and the objective of the protection of children from harm and other vulnerable persons from being harmed or exploited by gambling. Within the Haringey Statement of Gambling Policy we state that the East of the borough carries higher deprivation and social economic imbalances and therefore should have special consideration given to it in relation to the proximity of gambling premises to

- an educational establishment, including colleges and universities, youth clubs, recreational establishments;
- close to a centre dealing with vulnerable people, including housing, clinics, recovery centre, food banks;
- situated in an area of high crime;
- situated in an area of deprivation;
- close to the location of services for children such as libraries and leisure centres;
- Places of worship, community facilities or public buildings
- Areas where there is considered to be an over concentration of similar existing licensed operations.
- close to the location of businesses providing instant access to cash such as payday loans, pawn shops.

2.4 In this context and in response to the changes in the GLA, we have completed an assessment of the key characteristics of the Borough to identify areas of higher risk of vulnerability to gambling-related harm. This assessment is Haringey's local area profile.

Our 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.

2.5 This Authority 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 vulnerable people;
- situated in an area of high crime;
- situated in an area of deprivation;
- close to the location of services for children such as libraries and leisure centres;
- close to the location of businesses providing instant access to cash such as payday loans, pawn shops.

2.6. This Authority will expect applicants for a new licence 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; the character of the area, for example is it predominantly residential or commercial, is it a family orientated area; transport links; educational facilities; centres for vulnerable people; ethnicity, age, economic makeup of the local community; high crime area; high unemployment area; pawn broker/pay day loan businesses in the vicinity; footfall in the vicinity; recorded incidents of attempted underage gambling; 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 e.g. 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

**Commented [WM(1):** This list should be expanded to include restricting access signage  
DB- DONE

2.7 Other issues that may be considered such as:

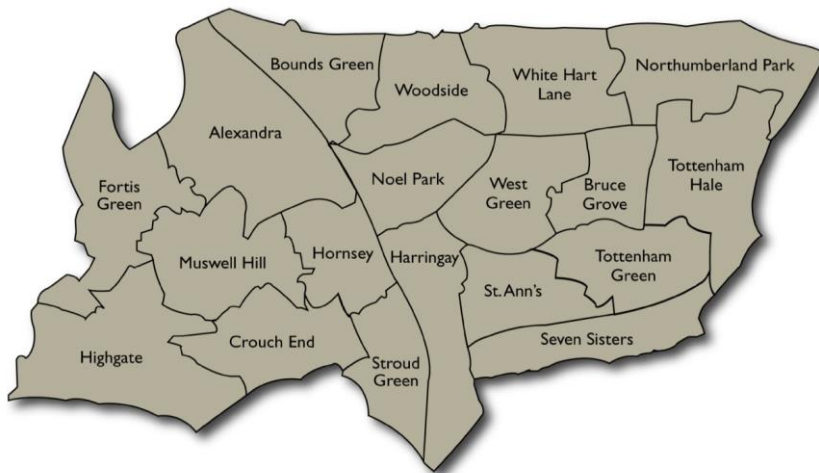
- Matters of faith, including all religious or faith denominations including proximity to churches, mosques, temples or any other place of worship.

2.8 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.

2.9 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.

### 3 The Profile of The London Borough of Haringey

Map of the London borough of Haringey



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3.1 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 2001 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.

3.2 As a gateway to central London we are determined to be a well-connected hub of activity rather than a Dormitory Borough. Our Growth Strategy lays out ambitious objectives for achieving full employment and establishing Haringey

at the epicentre of London's small and medium sized innovation economy. 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.

- 3.3 There are approximately 100,000 dwellings and approximately 8,200 businesses employing 64,700 people. The most recent indices of multiple deprivation (IMD) (2010) show that Haringey is one of the most deprived authorities in the country, ranking 13<sup>th</sup> out of 326 authorities, and it is ranked 4<sup>th</sup> in London, yet it is also a borough of contrasts, with great prosperity and affluence in some communities.
- 3.4 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.
- 3.5 **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 economies at their doorstep. It remains our priority to make all of our schools outstanding and, through our new STEM commission, to ensure our young people are accessing the skills needed for the jobs of the future.
- 3.6 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. Working with central and local Government, developers and major local businesses like Tottenham Hotspur, the Council has secured £1bn of public and private investment in Tottenham's physical environment. Wood Green is another community that will be the focus of major regeneration that will look to build more homes, create better connections to Alexandra Palace and maximise the impact of new transport links provided by Crossrail 2. We are determined that regeneration will be shaped by the views of residents and are pioneering new governance structures to embed the residents voice in the key decisions.
- 3.7 We are also determined that regeneration has a transformative effect on the health and wellbeing of residents. Regeneration has the potential to promote health and wellbeing through the built environment in a number of ways, including designing infrastructure to increase ease of walking and cycling, increasing the accessibility and perceived safety of green space, and shaping



the retail offer in our town centres. The local area profiles will enable us to better manage the expectations of the betting operator.

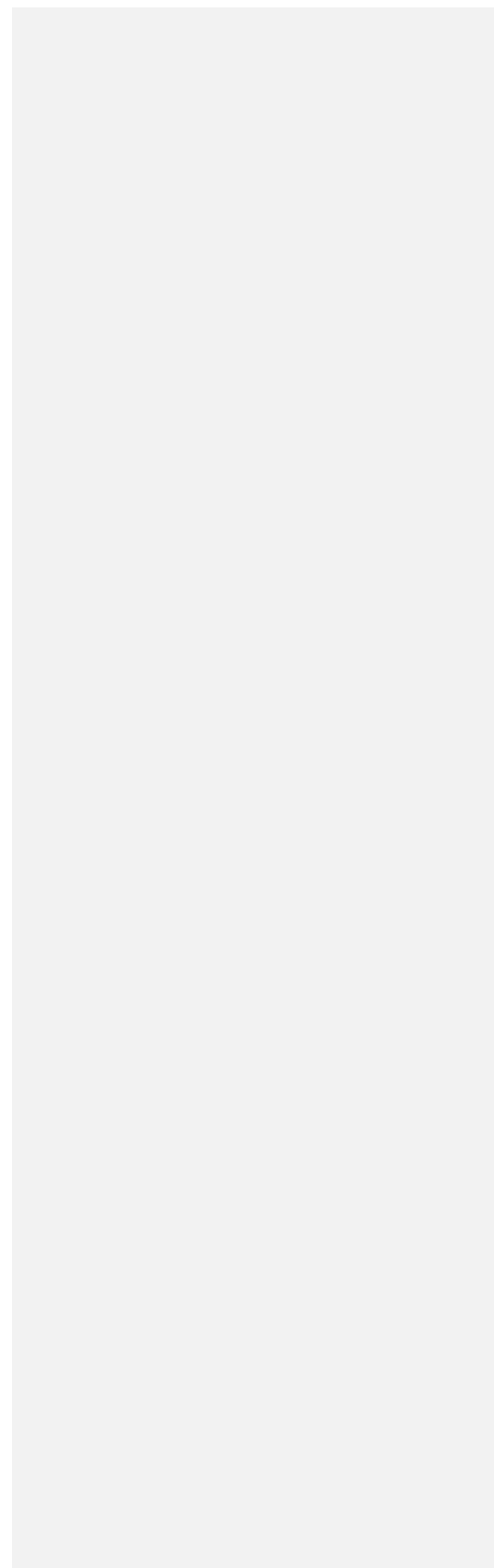
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#### 4. Local Area Profile/Social Responsibility

- 4.1 Haringey is concerned with the impact on the vulnerable who are at risk from betting in the borough. The nature of the risk cuts across a number of themes such as health impact, mental health, drug and alcohol addiction, bad debt, crime and anti-social behaviour as well as risk from violence within the home.
- 4.2 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 operation plans, sufficient measures to minimise the impact of the premises operation on the residential, and other economic based activities.
- In order to protect its community's well being 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.
- 4.3 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. The Council has also sought to identify individuals who live in the local area who are potentially vulnerable to gambling related harm through work carried out by the ASBAT Team and information from the Citizen Advice Team.
- 4.4 In order to protect its community and family life, the borough will require risk assessments and control methods to be available with any application for a premises licence.

1. 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. This guidance provides a framework for the local risk assessment process that will provide a uniform approach across all non-remote gambling sectors. This will benefit the Council as Licensing Authority under the Gambling Act 2005 (the Act), as well as responsible authorities and interested parties when considering new and variation applications.
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 application
  - significant changes in local circumstances
  - Variation of the premises licence
3. This Authority considers that these local risk assessments are a key component of the overall assessment and management of the local risks. Each locality has its own challenges and in order to assist applicants this Authority has produced maps of the area containing the location of existing gambling premises, and centres dealing with vulnerable persons. In addition, the Authority has produced local profiles for each Ward which contains demographic, economic and crime information. This information will be available on the Council's website and will be reviewed and updated.
4. Haringey is concerned with the impact on the vulnerable who are at risk from betting in their areas, we have therefore made an assessment of the pattern of gambling and associated risks to the licensing objectives in wards across the borough.

The policy is reflective of local issues, local data, local risk and the expectations that a licensing authority has of operators who either currently offer gambling facilities or wish to do so in the future. 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.



## 5. Methodology – Datasets used

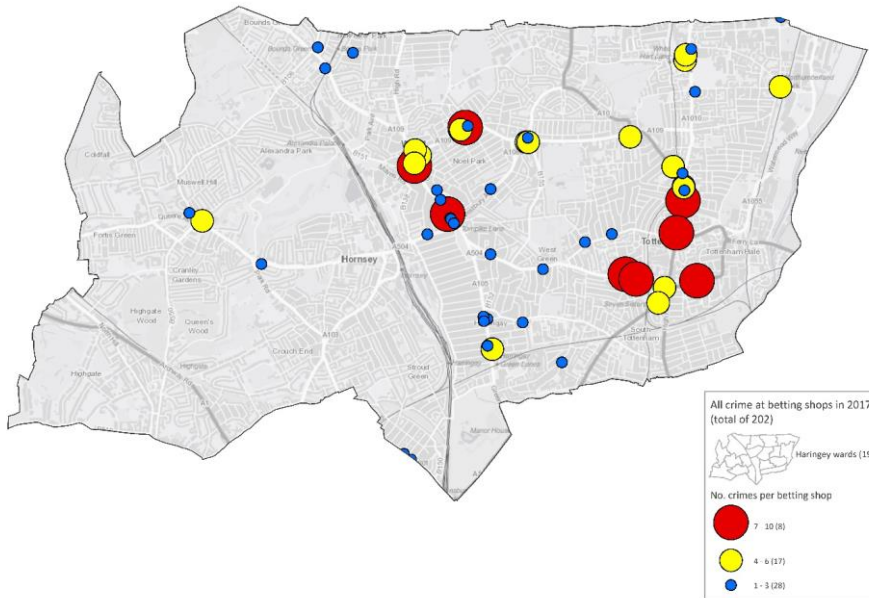
Table 1. Special consideration is given in relation to the proximity of gambling premises to the following locations;

Criteria	Datasets	Source	Access to data
Local schools	All secondary schools in Haringey	Corporate GIS	
Youth clubs	Youth clubs registered in Haringey	LBH	
Shops used by families & children	Shopping centres, supermarkets & shops relevant to children & families in Haringey	LBH	
Parks & open spaces	Parks, open spaces, play areas/adventure playgrounds & basketball courts in Haringey	Corporate GIS	
Leisure & recreational establishments used by families	List of leisure centres, cinemas, theatres, cultural events, museums, galleries & community organisations in Haringey	LBH	
Area with high level of organised crime	Suspected & convicted CSE offences, human trafficking, modern day slavery & drug offences in Haringey	Haringey police	
Places of worship	List of faith premises in Haringey	Corporate GIS	
Community facilities & public buildings	List of community centres, tenant halls, libraries & other public buildings in Haringey		
Areas with an over-concentration of similar existing licensed operation	List of current licensed gambling establishments in Haringey		

Table 2. Special consideration is given in relation to the proximity of gambling premises to the following vulnerable groups:

Criteria	Description	Source	Access to data
Children (<18) & young people (students in higher education)	No. residents under 18, educational establishments (colleges) & student accommodation	LBH	
Problem gamblers seeking treatment	Gamblers anonymous		
Living in deprived areas	IMD 2015		
Financial difficulties / debt	List of food banks, pawnbrokers & payday loan shops	LBH	
Substance abuse / misuse	List of drug & alcohol treatment services, narcotics & alcohol anonymous meetings & needle exchange services	Public health	
Poor mental health	List of GPs treating patients for schizophrenia, bipolar affective disorder, depression & other psychoses	Public health	
Unemployed	List of Job centres & economically active unemployed residents	2011 Census	
Homeless	List of hostels, supported housing, registered care & temporary accommodation in Haringey.	Public Health	
Minority ethnic groups	No. of Asian / African / Caribbean / Black British & Arab or other ethnic groups	Nomis	

Map showing crime in betting shops in Haringey for 2017:

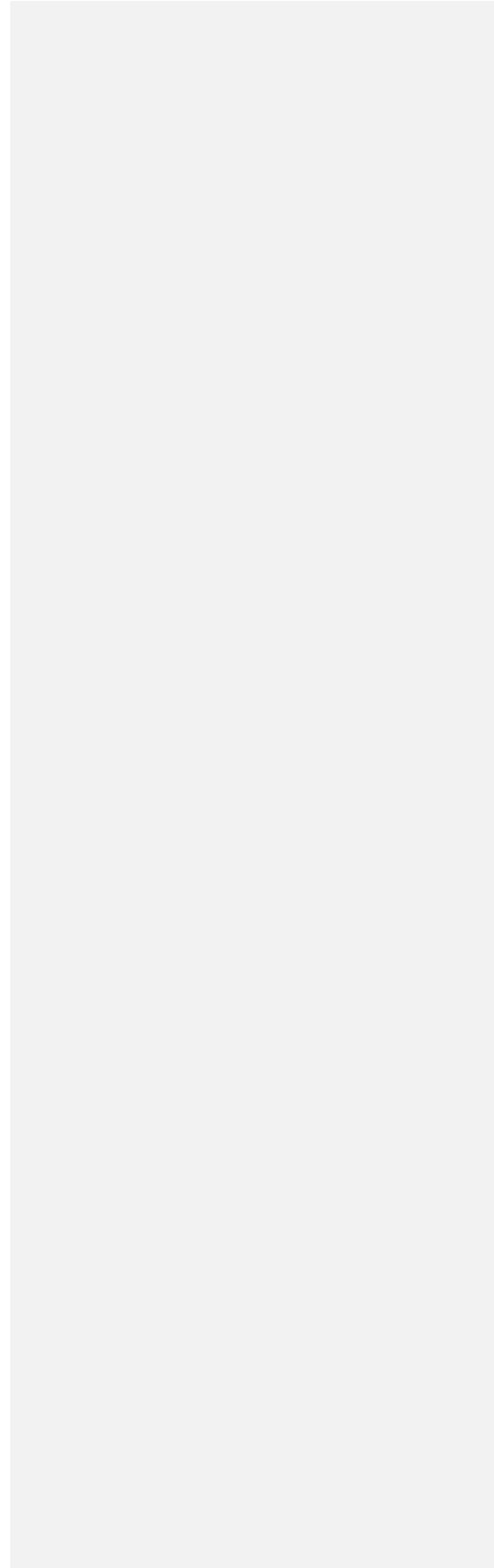


6. The above map illustrates the wards with the highest crimes relating to betting shops within Haringey that will require additional consideration from operators wishing to operate in these areas:

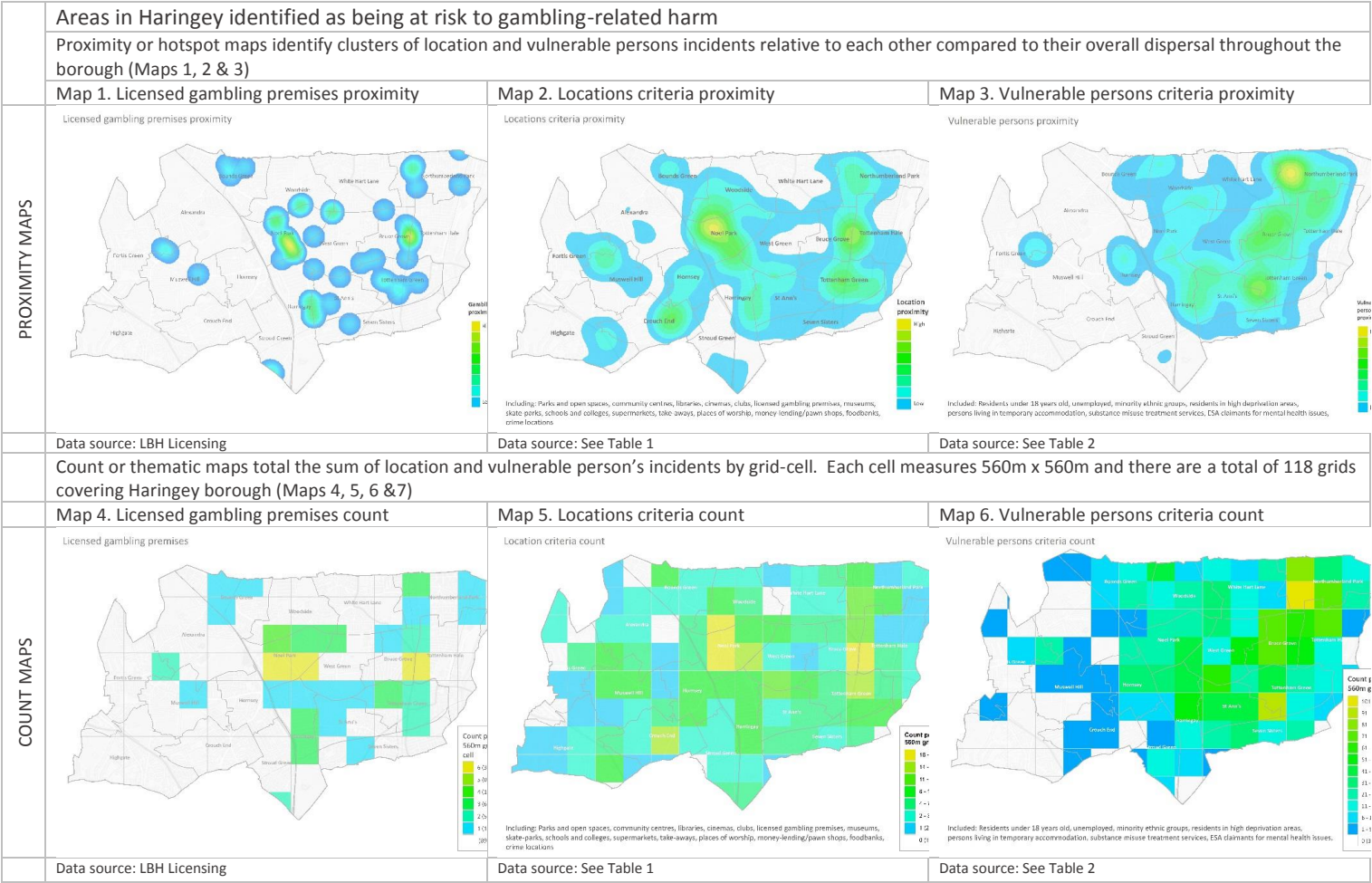
- Noel Park Ward
- Woodside Ward
- Bruce Grove Ward
- Tottenham Hale Ward
- West Green Ward
- Tottenham Green Ward
- Tottenham Hale Ward
- Northumberland Park ward
- White Hart Lane.

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

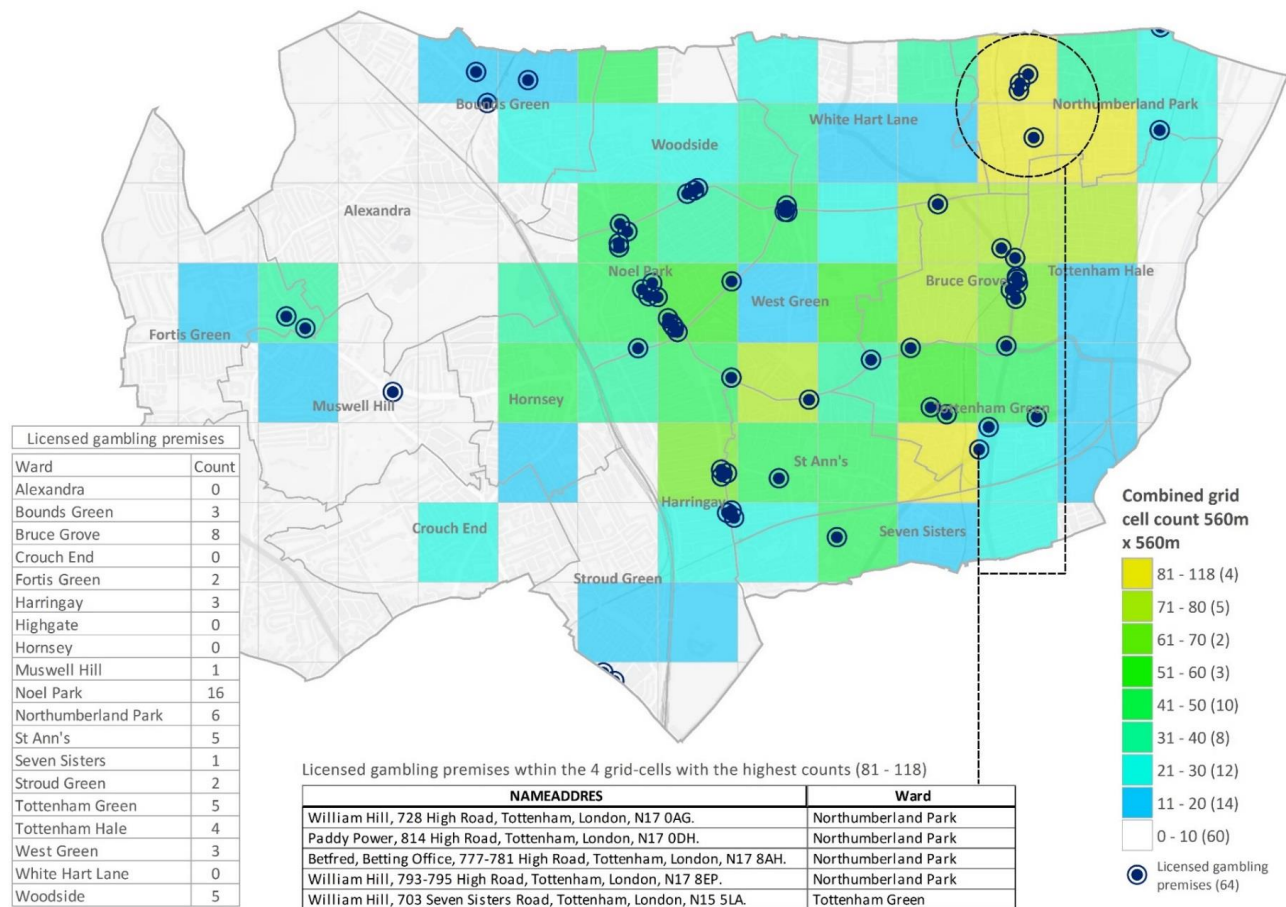








Map 7. Combined locations and vulnerable persons incident count per grid-cell overlaid with current licensed gambling premises (64 in total)



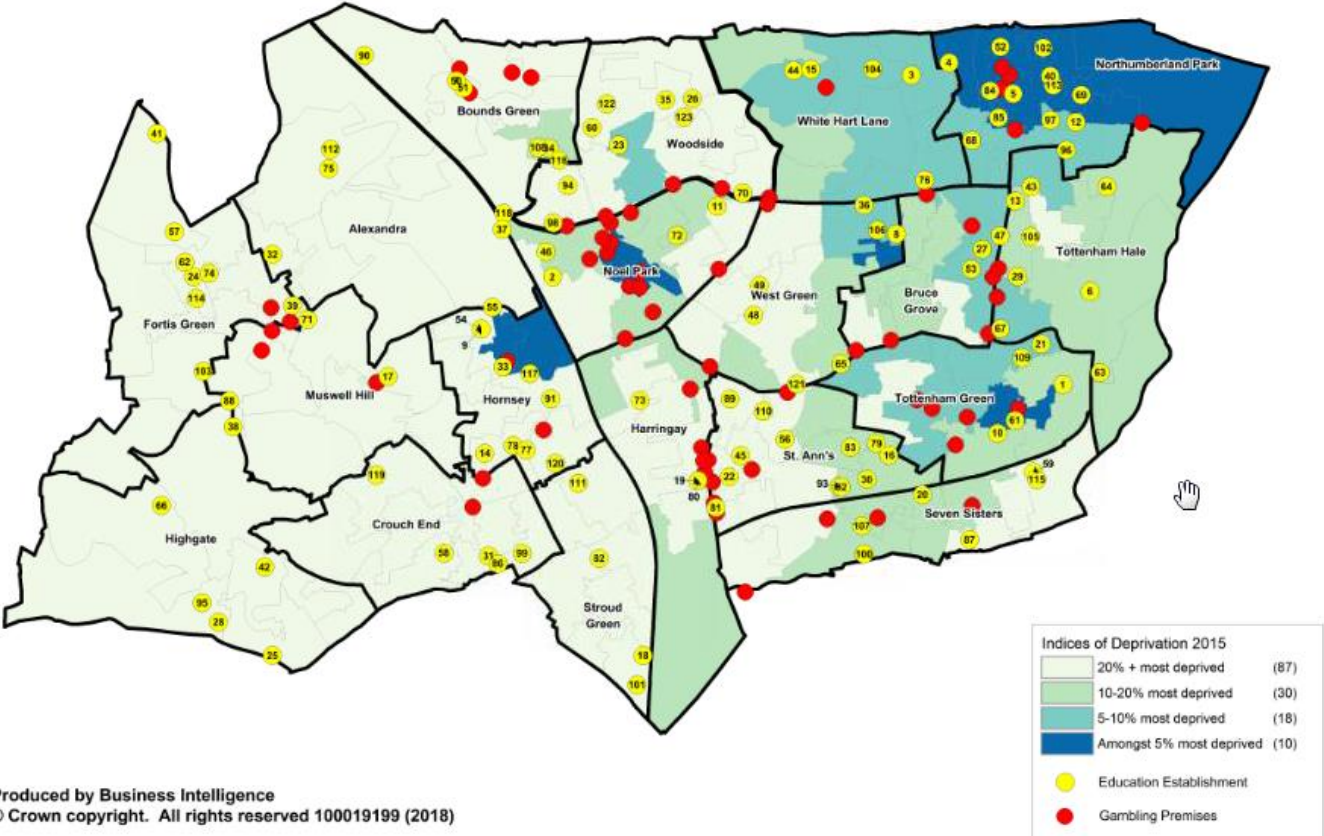
The Gambling Act 2005 prescribes in its licensing objectives the “protection of children and other vulnerable persons from being harmed or exploited by gambling”. Data shown in Table 1 and Table 2 below was collated and used to determine risk areas vulnerable to gambling related harm

Table 1. Location criteria data				
Description	Datasets	Geography	Source	
Area with high levels of organised crime	Suspected & convicted Child Sexual Exploitation (CSE) incidents, human trafficking, modern day slavery & drug offences	Ward	Haringey police	
Areas with an over-concentration of similar existing licensed operation	Licensed gambling establishments in Haringey i.e. betting shops & adult gaming centres (AGC)	Building	LBH , Licensing	
Community facilities & public buildings	Community centres, tenant halls, libraries & other public buildings	Building	Valuations Office	
Leisure & recreational establishments used by families	Leisure centres, cinemas, theatres, cultural events, museums, galleries & community organisations	Building	LBH, Licensing, Planning	
Education	Secondary schools and further education establishments	Building	LBH, Environments & Neighbourhood	
Recreational grounds	Parks, open spaces, play areas/adventure playgrounds	Polygon	LBH, Environments & Neighbourhood	
Places of worship	Churches and faith based premises	Building	LBH, Environments & Neighbourhood	
Shops used by families & children	Shopping centres, supermarkets and take-away/chicken shops	Building	LBH, Licensing, Planning	
Youth clubs	Youth clubs	Building	LBH, YJS	

Table 2. Vulnerable persons criteria data				
Description	Datasets	Geography level	Source	
Young people	No. residents under 18	LSOA	Census 2011	
Financial difficulties / debt	Food banks, pawnbrokers & payday loan shops	Building	LBH, Licensing	
Homeless	Temporary accommodation	Building	LBH, Housing	
Living in deprived areas	Index of Multiple Deprivation (IMD) 2015	LSOA	Dept. Communities & Local Government	
Minority ethnic groups	Non- white ethnic groups i.e. Asian / African / Caribbean / Black British & Arab or other ethnic groups	LSOA	Census 2011	
Poor mental health	Employment Support Allowance (ESA) claimants for mental health conditions	LSOA	Nomis	
Problem gamblers seeking treatment	No data found for Haringey	NA	NA	
Substance abuse / misuse	Drug & alcohol treatment services & needle exchange pharmacies	Building	LBH, Public health	
Unemployed	Job Seekers Allowance (JSA) claimants	LSOA	Nomis	

Methodology: Datasets were mapped using their Easting and Northing co-ordinates. Address-point level co-ordinates were created from building address information in datasets where co-ordinates were not provided. Datasets relating to areas such as parks/open spaces and deprivation data aggregated to LSOA - used their polygon centroid as co-ordinates. The distance used for measuring proximity and grid-cell size is 560m. This distance is based on the average of distances measured between residents homes and local facilities (post office, primary school, general store or supermarket and GP surgery) in Haringey as published by the Department for Communities and Local Government

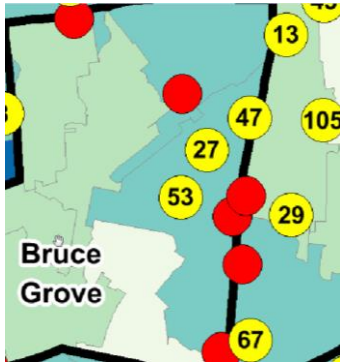
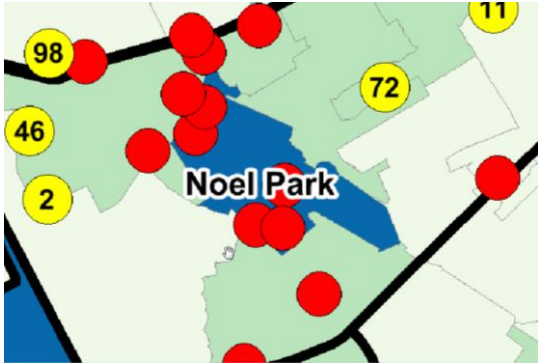
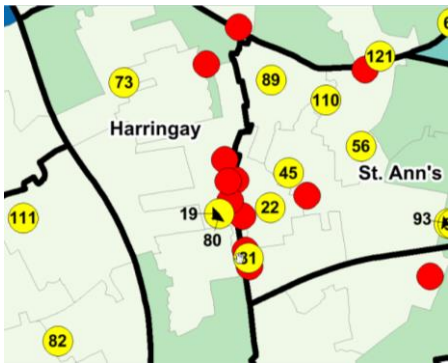
**Gambling Premises & All Educational Establishments with Indices of Multiple Deprivation (IMD 2015)**



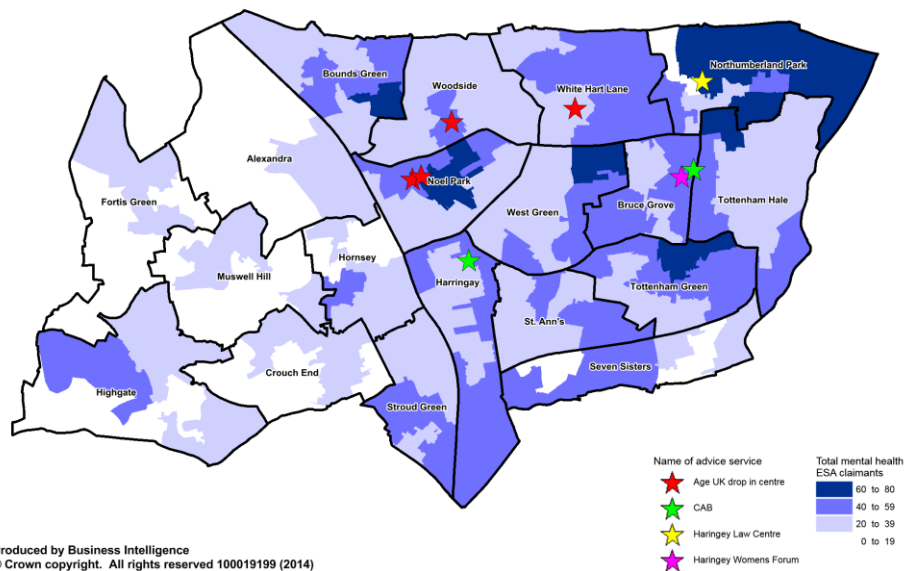
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Schools with the highest number of gambling premises within the 400m radius

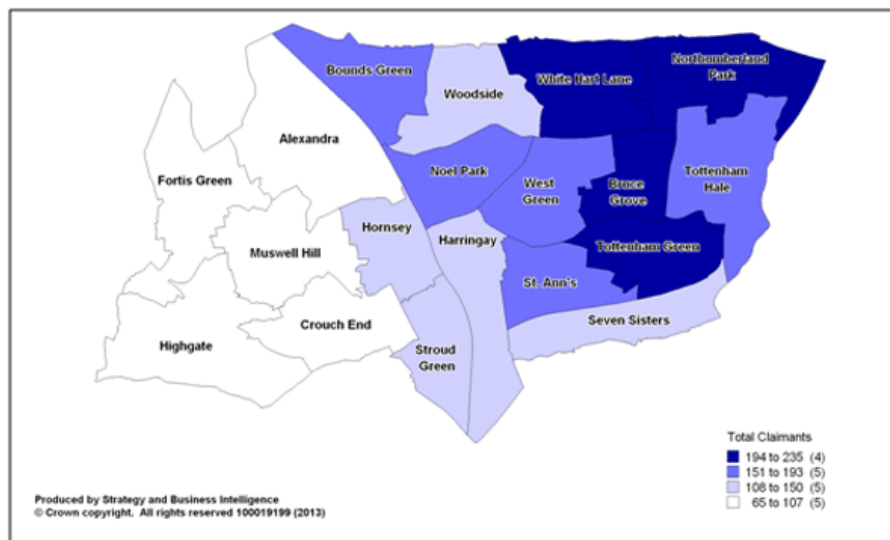
School Name	Number of Gambling Premises
(80,81) South Harringay Junior and Infant School	8
(53) Bruce Grove Primary School	7
(72) Noel Park Primary School	6



Total number of Employment Support Allowance (ESA) claimants for Mental Health  
May 2014



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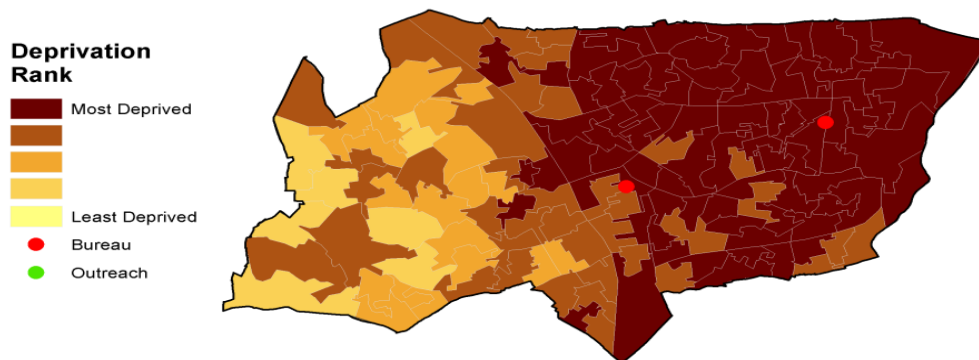
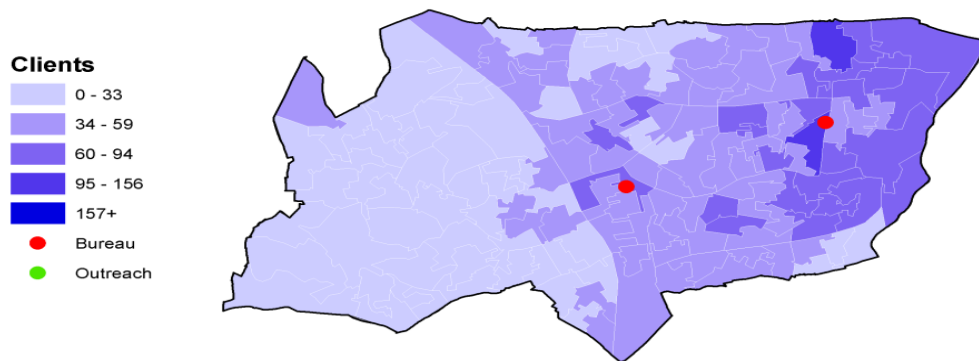
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### Risk factors in Haringey

Haringey has high level of factors that increase the risk to mental health, such as deprivation, unemployment and homelessness, all of which are more concentrated in the east of the borough. 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

- Risk factors associated with poor mental health and wellbeing, such as unemployment, economic deprivation and poor quality housing, are high in Haringey compared to London and England. These issues are more prevalent in the east of the borough.
- Haringey has high levels of severe and enduring mental illness compared to London and England (Source: [Community mental health profile 2013 - external link](#)). The rate of psychotic disorder is more prevalent in the east of Haringey (Source MH First – QOF).
- Patients from black or black British ethnic groups account for less than fifth (18.8%, Census 2011) of Haringey population but represent over a quarter (28%) of hospital admissions for mental health issues and further 44 per cent of admissions under the Mental Health Act (1983) Section (Source: BEH Mental Health Trust 2012/13).
- Haringey's suicide rate is higher than in London and England. On average 26 Haringey residents, of whom the majority are men, commit suicide each year. Only one in four are known to mental health services and one in twenty to a GP. (Source: Coroners Suicide Audit data Produced by Public Health Directorate).
- Nearly one in three (32%) offenders on probation report having a mental health issue. For one in five (20%) this is compounded by problems with drug or alcohol misuse. (Source: Community Safety Strategic Assessment: Annual audit of crime and disorder in Haringey 2012/13).
- 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.

Map showing clients attending Citizens Advice in relation to debt matters. The map below relates to areas of deprivation across the borough.





## 9. Local risks and control measures

- 9.1 There are two specific parts to the risk assessment process, the assessment of the local risks and the determination of appropriate mitigation to reduce those risks.
- 9.2. Operators may be familiar with identifying risks in relation to health and safety and food hygiene legislation. Risk assessments are also used for security and crime purposes, for example for money laundering and as part of trade association best practice, such as the Safe Bet Alliance.
- 9.3 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.
- 9.4 The control measures that operators will put in place to mitigate any risk associated with the gambling operation will be dependent on the type of gambling activities provided, how the company operates and the size of the organisation.
- 9.5 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, spit kits, window shutters, fogging systems, UV lights in toilets.
- 9.6 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 21 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 Licence conditions

As set out in the code provisions, applications for new premises licences and for variations to existing licences will require a local risk assessment. The control measures specified in these risk assessments may be incorporated into the new or varied premises licences through the imposition of appropriate conditions.

## 11 Specific considerations for Fixed Odds Betting Terminals:

Fixed odds betting terminals (FOBTs) are electronic machines, sited in betting shops, which contain a variety of games, including roulette. Each machine accepts bets for amounts up to a pre-set maximum and pays out according to fixed odds on the simulated outcomes of games.



11.1 The *Gambling Act 2005* classified FOBTs as B2 gaming machines. Up to four machines can be sited on betting premises. Betting Operators are required to show in their risk assessments how they will show responsible management to customers at risk of harm from this form of gambling. The operator's approach to social responsibility focusing particularly on how staff are trained to engage with customers to monitor their frequency, duration and spend of their gambling behavior at the FOBT. Operators should demonstrate their escalation process for interaction with customers.

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## APPENDIX 6 – Relevant Representations

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**Rep 1**

**From:**

**Sent:** 07 April 2020 14:52

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

**Subject:** Objection

I would like to place on record my objection to the application for a new adult gaming centre premises licence at 450-454 Tottenham High Road.

My objections are based on concerns that such a premises will:

1. Increase the likelihood of crime and antisocial behaviour in an area already blighted by groups congregating around premises offering gambling opportunities and taking part in street drinking, smoking and exchanging drugs and using gambling premises as a place to meet to deal drugs.
2. The premises is on a part of the High Road frequented by children and families and will serve to normalise the behaviour of gambling, which could lead to further harms of vulnerable and young people being led into addictive habits.
3. The premises is on a route frequented by school children and close to Bruce Grove Youth Centre, sufficient that the addition of a gaming centre would most likely act as a pole of attraction for young adults who would be at risk of harm and exploitation through gambling.
4. The premises falls within the Council's Schools Super zone. The school super zone policy aims to create healthier and safer places for children and young people to live, learn and play. The zones cover areas within a 10 minute walk of a school (i.e. it would include the site for the premises under consideration) and are designed to protect children's health and encourage healthy behaviour in more deprived communities such as exists in the Tottenham Hale and Bruce Grove ward areas. Within each zone the Council is, among other aims, looking to reduce: Unhealthy food and drink sales, Advertisements and Alcohol, smoking and gambling. I believe the siting of the adult gaming centre would contravene the aims and objectives of the Council's School Superzone policy, designed to protect children from harm.
5. As the application seeks to gain 24-hour operation, this is likely to place further strain on already depleted resources of policing and enforcement to keep anti-social behaviour, noise nuisance and criminal activity already prevalent in the area under control.
6. We already have too many gambling establishments on the highroad and we do not need any more to blight the local area.

I would be grateful if my objections could be placed before the licensing committee.

**Rep 2**

**From:**

**Sent:** 08 April 2020 12:34

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

**Subject:** Objection - Application a New Adult Gaming Centre Premises Licence - Game Nation, 450-454 High Road, Tottenham, N17 9JD

VERY STRONG OBJECTION

**Application for a New Adult Gaming Centre Premises Licence -  
Game Nation, 450-454 High Road, Tottenham, London, N17 9JD  
Ward - Tottenham Hale  
Seeking 24 hours operation**

I live in Bruce Grove and I shop on our High Road as much as possible I have seen the negative impacts that gaming and gambling shops have on the neighbourhood.

I object on the grounds that, if granted, such a licence will lead to an increase in crime and disorder, late-night noise and nuisance and affect public safety and cause harm to children in our community.

You can go just a bit further north of 450/454 and see the people hanging around the existing gaming establishments. Ask the nearby shop owners about the effect that the existing gambling/gaming shops have on the neighbourhood i.e a very negative one.

Gaming places are contributing to the destruction of the community life by drawing a clientèle that congregates around the entrances of these places and causes many problems with their anti-social behaviour.

It is intimidating for young people, children and lone females. We have had the local police and council working for years now to reduce the problems with the existing "adult gaming places" just next to the Holcombe market. These have a serious negative impact on the "attractiveness" of the High Road as a place to come and shop - a destination. Adding another one of these will counter all the efforts being made by the council to improve our High Road - with the ongoing scarcity resources and soon to get worse reduced availability of money.

How will the Council convince an investor to build a new Bruce Grove station? And other investors, be they corporate or independent small start ups, why would they want to come to place with a High road lined with gambling houses? ASK THE POLICE about residents complaints re the antisocial behaviour that they bring. If you do a proper poll on the Bruce Grove High Road you will find very few residents who want another gambling shop on the High Rd.

Gaming shops also have very negative impact on the shop frontages. They block up of their shop windows reducing the number of active frontages. They also promote gambling in a neighbourhood which already sits a very high up in the "deprivation charts".  
NO MORE GAMING HOUSES IN BRUCE GROVE HIGH ROAD - ENOUGH IS ENOUGH!

**Rep 3**

**From:**

**Sent:** 08 April 2020 16:59

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

**Subject:** Objection to Game Nation licence application

Game Nation has applied for a Premises Licence under the Gambling Act 2005 to open an outlet at 450-454 High Road, Tottenham seeking 24-hours operation. I

*Our objections are based on concerns that such a premises will:*

- 1. Increase the likelihood of crime and antisocial behaviour in an area already blighted by groups congregating around premises offering gambling opportunities and taking part in street drinking, smoking and exchanging drugs and using gambling premises as a place to meet to deal drugs.*
- 2. The premises is on a part of the High Road frequented by children and families and will serve to normalise the behaviour of gambling, which could lead to further harms of vulnerable and young people being led into addictive habits.*
- 3. The premises is on a route frequented by school children and close to Bruce Grove Youth Centre, sufficient that the addition of a gaming centre would most likely act as a pole of attraction for young adults who would be at risk of harm and exploitation through gambling.*
- 4. The premises falls within the Council's Schools Super zone. The school super zone policy aims to create healthier and safer places for children and young people to live, learn and play. The zones cover areas within a 10 minute walk of a school (i.e. it would include the site for the premises under consideration) and are designed to protect children's health and encourage healthy behaviour in more deprived communities such as exists in the Tottenham Hale and Bruce Grove ward areas. Within each zone the Council is, among other aims, looking to reduce: Unhealthy food and drink sales, Advertisements and Alcohol, smoking and gambling. I believe the siting of the adult gaming centre would contravene the aims and objectives of the Council's School Superzone policy, designed to protect children from harm.*
- 5. As the application seeks to gain 24-hour operation, this is likely to place further strain on already depleted resources of policing and enforcement to keep anti-social behaviour, noise nuisance and criminal activity already prevalent in the area under control.*

*Thanks,*

**Rep 4**

From:  
Sent: 12 April 2020 08:58  
To: Licensing <Licensing.Licensing@haringey.gov.uk>  
Subject: Opposition to licensing application by City Gaming Limited - for the adult gambling centre "Game Nation" N17 9JD

Dear Sir, Madam.

My name is residing on. (Tottenham Hale ward). Interested party.

I am writing to register my objection to the application for a premises licence by City Gaming Limited for the adult gambling centre "Game Nation" on 450-454 High Road, Tottenham, London N17 9JD  
Ward:Tottenham Hale

The basis for this opposition is that granting a licence for these premises will not promote the licensing objectives, particularly the prevention of crime, disorder and antisocial behaviour, and will pose a risk to vulnerable people and minors in the area.

450-454 High Road, Tottenham lies within the Council's identified Area, and enabling the premises to provide gaming facilities would be totally detrimental to the Council's aims and objectives and its STATEMENT OF GAMBLING POLICY 2019-2022  
[https://www.haringey.gov.uk/sites/haringeygovuk/files/haringey\\_statement\\_of\\_gambling\\_policy\\_2019\\_web.pdf](https://www.haringey.gov.uk/sites/haringeygovuk/files/haringey_statement_of_gambling_policy_2019_web.pdf).

Furthermore the "GAMBLING ACT 2005 GAMBLING LOCAL AREA PROFILE established in JANUARY 2019  
[https://www.haringey.gov.uk/sites/haringeygovuk/files/local\\_area\\_profile\\_-\\_gambling\\_web.pdf](https://www.haringey.gov.uk/sites/haringeygovuk/files/local_area_profile_-_gambling_web.pdf) has already established that the location of the premises is suffering from a high level of crime, disorder and public nuisance related to gambling premises and which have already reached problem levels for the local police.

The area is significantly impacted upon 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 • The vulnerable persons incident count where gambling premises are located is high.

There are Mental health support accommodations in the vicinity, people with mental health issues are more likely to suffer from gambling addiction.

The local authority is supposed to offer "protection of children and other vulnerable persons from being harmed or exploited by gambling. There are primary schools in less than 400 meters (eg: Mulberry Primary school) as well as Parks, open spaces, play areas/adventure playgrounds, Places of worship Churches and faith based premises, in the vicinity of the proposed application location.

In view of the above, I would urge the Licensing Authority to refuse the application.

Yours faithfully,



**Rep 5**

**From:**

**Sent:** 12 April 2020 15:58

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

**Subject:** Objection to gambling shop - Game Nation

To whom it may concern,

I am writing to add my voice to local concerns at the prospect of another gambling shop on the Tottenham Highstreet.

Gambling shops contribute nothing to the community, only take away. And they create far more problems than solutions for an already impoverished area.

In addition it would be far better to use that space for a local start up or small business rather than large one.

There is already a huge issue of people hanging around betting shops, drinking and using drugs and adding another space for people to do this is a shocking idea.

I understand that this building was applied for previously for a gambling outlet - I am shocked that the council are considering this again when the original application was rejected amongst so much local campaigning.

Yours sincerely

**Rep 6**

**From:**

**Sent:** 21 April 2020 12:53

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

**Subject:** Objection to Game Nation application for a new adult gaming centre premises licence at 450-454 Tottenham High Road.

Hi,

*I would like to place on record my objection to the application for a new adult gaming centre premises licence at 450-454 Tottenham High Road.*

My objections are based on concerns that such a premises will:

- 1. Increase the likelihood of crime and antisocial behaviour in an area already blighted by groups congregating around premises offering gambling opportunities and taking part in street drinking, smoking and exchanging drugs and using gambling premises as a place to meet to deal drugs.*
- 2. The premises is on a part of the High Road frequented by children and families and will serve to normalise the behaviour of gambling, which could lead to further harms of vulnerable and young people being led into addictive habits.*
- 3. The premises is on a route frequented by school children and close to Bruce Grove Youth Centre, sufficient that the addition of a gaming centre would most likely act as a pole of attraction for young adults who would be at risk of harm and exploitation through gambling.*
- 4. The premises falls within the Council's Schools Super zone. The school super zone policy aims to create healthier and safer places for children and young people to live, learn and play. The zones cover areas within a 10 minute walk of a school (i.e. it would include the site for the premises under consideration) and are designed to protect children's health and encourage healthy behaviour in more deprived communities such as exists in the Tottenham Hale and Bruce Grove ward areas. Within each zone the Council is, among other aims, looking to reduce: Unhealthy food and drink sales, Advertisements and Alcohol, smoking and gambling. I believe the siting of the adult gaming centre would contravene the aims and objectives of the Council's School Superzone policy, designed to protect children from harm.*
- 5. As the application seeks to gain 24-hour operation, this is likely to place further strain on already depleted resources of policing and enforcement to keep anti-social behaviour, noise nuisance and criminal activity already prevalent in the area under control.*

*I would be grateful if my objections could be placed before the licensing committee.*

Thanks,

**Rep 7**

**From:**

**Sent:** 23 April 2020 21:04

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

**Subject:** 450-454 High Rd, N17 9JN representation

Dear Haringey Licensing,

I am writing to object to the application to open an 'adult gaming centre' at 450-454 High Rd, N17 9JN. I have listed the reasons for my objection below.

1. There are already several betting shops/gambling establishments in the immediate vicinity. Between 486 & 440 High Rd there are 5 betting shops/adult gaming centres. That's 5 in 160 yards! Not to mention all the others within a mile radius.
2. Gambling establishments exploit vulnerable people. Research shows that areas with highest unemployment have the highest density of gambling establishments. Therefore it's people who already do not have enough money who use these businesses and lose money they don't have.
3. Such establishments employ very few people. It will not provide sufficient jobs for local people to justify the social & financial cost to the area.
4. I think the organisation who is making this application has cynically chosen this vacant unit because as a former bank it won't need planning permission for a change of use.
5. It will bring an increase in crime & anti-social behaviour.
6. The building in which this particular unit sits is very attractive. Both the units at the bottom of this building are currently vacant. From an aesthetic point of view, it would be desirable for one shop or restaurant to fill the entire space and enhance the building & area as a whole.
7. Haringey council want to develop & encourage a 'night time economy' in the area. Another bookie/arcade will not help fulfil that aim.
8. A lot of work has been done to this stretch of High Rd to improve it (widening pavements, moving crossings, Holcombe market refurb etc). It seems counterproductive to do this work & spend money improving the High Rd if every other shop is a betting shop.

I look forward to your response.

Yours sincerely,

**Rep 8**

**From:**

**Sent:** 27 April 2020 16:53

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

**Cc:** >; Barrett Daliah <Daliah.Barrett@haringey.gov.uk>

**Subject:** The Gambling Act 2005: AGC Application 450-454 High Road Tottenham N17 9JN.

**Importance:** High

Dear Sirs

I am a solicitor and represent Talarius Limited, which operates a business at 475 Tottenham High Road, London, i.e. across the road from the applicant site. As such, it has business interests that might be affected by the above mentioned application and the company is an "interested party" pursuant to section 158 of the Gambling Act 2005. The fact that we operate the same nature of business as the applicant, does not alter this fact.

In its capacity of interested party it wishes to make the following representations.

1. Have notices been given to the Responsible Authorities by the applicant (as it is expressly required to do regardless of whether the Authority itself provides copies to the Responsible Authorities)?
2. I note that the applicant has confirmed that it has the right to occupy the building – i.e. a legal right. While that may be the case, it is often the case that applications are made prior to the acquisition of the site – i.e. before a right to occupy has been acquired. In such circumstances, the appropriate application could be for a provisional statement as is confirmed in the Licensing Authority's Statement of Policy (3.18). Without a right to occupy, an application for a premises licence cannot be made.
3. Has the applicant provided the Local Risk Assessment (LRA) to the Responsible authorities as required by the LCCP?
4. The LRA contains a great deal of information in the Local Area Profile that serves to highlight substantial categories of perceived risk. However, it does not specifically identify them as risks in the "Risk Identification" column in the table at the bottom of the document and therefore does not offer any measures to mitigate them. Some general mitigating measures are described within the Local Area Profile itself (which additionally makes it confusing to read) such as CCTV coverage, door supervision and controlled entry through use of a Mag. Lock, but these are general considerations and not necessarily specific to the location or the perceived risks set out in the Local Area Profile.
5. Also on Page 1, there is no record of who completed the LRA, their position within the company or date when it was completed.
6. In the accompanying LCCP Policy and procedure document, there is a gap to fill in on page 4 to identify who completes the company's Test Purchasing. Indeed this seems to indicate that the document, a common template in the AGC sector, has not been tailored specifically for the applicant's business and therefore has received little true consideration.
7. The plan accompanying the application is a very important part of the application and there are real issues with it. Firstly, it appears defective as, in relation to the exits at the rear and side of the premises as shown on the plan, it does not describe the place/s from which entry and exit leads.
8. Is there a yard at the rear and if so, is it part of the proposed premises and where do the stairs in it lead? The application form suggests that the yard is indeed included within the premises boundary but it is not possible to tell from the plan. This is a key issue as the LRA must deal with the premises which forms the basis of the application.

9. The address written on the plan at the front entrance to the site refers to "Unit 1" 450-454 High Road, but "Unit 1" is not mentioned in the application or in the plan key. It did seem to be included in a previous but unsuccessful application. What is the correct address?

10. Finally in relation to the plan, it is not clear where the boundary of the actual premises lies. The key refers only to the area in which gaming machines will be made available.

Please accept the above serious issues as representations in relation to the application.

If you have any questions, please let us know, but in the meantime, we should be grateful if you would please confirm receipt.

Yours faithfully,

**Rep 9**

**From:** Cllr Gordon Ruth

**Sent:** 06 April 2020 14:00

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

**Subject:** Objection to application for a new adult gaming centre premises licence, 450-454 Tottenham High Road.

Dear Licensing team,

I would like to place on record my objection to the application for a new adult gaming centre premises licence at 450-454 Tottenham High Road.

My objections are based on concerns that such a premises will:

1. Increase the likelihood of crime and antisocial behaviour in an area already blighted by groups congregating around premises offering gambling opportunities and taking part in street drinking, smoking and exchanging drugs and using gambling premises as a place to meet to deal drugs.
2. The premises is on a part of the High Road frequented by children and families and will serve to normalise the behaviour of gambling, which could lead to further harms of vulnerable and young people being led into addictive habits.
3. The premises is on a route frequented by school children and close to Bruce Grove Youth Centre, sufficient that the addition of a gaming centre would most likely act as a pole of attraction for young adults who would be at risk of harm and exploitation through gambling.
4. The premises falls within the Council's Schools Super zone. The school super zone policy aims to create healthier and safer places for children and young people to live, learn and play. The zones cover areas within a 10 minute walk of a school (i.e. it would include the site for the premises under consideration) and are designed to protect children's health and encourage healthy behaviour in more deprived communities such as exists in the Tottenham Hale and Bruce Grove ward areas. Within each zone the Council is, among other aims, looking to reduce: Unhealthy food and drink sales, Advertisements and Alcohol, smoking and gambling. I believe the siting of the adult gaming centre would contravene the aims and objectives of the Council's School Superzone policy, designed to protect children from harm.
5. As the application seeks to gain 24-hour operation, this is likely to place further strain on already depleted resources of policing and enforcement to keep anti-social behaviour, noise nuisance and criminal activity already prevalent in the area under control.

I would be grateful if my objections could be placed before the licensing committee.

**Cllr Ruth Gordon**

**Labour Member for Tottenham Hale Ward**

**Rep 10**

**From:** Cllr Opoku Felicia

**Sent:** 28 April 2020 08:30

**To:** Licensing <Licensing.Licensing@haringey.gov.uk>; Barrett Daliah <Daliah.Barrett@haringey.gov.uk>

**Cc:**

**Subject:** Objection to granting of licence for Adult Gaming Centre at Unit 1, 450-454 High Road, Tottenham

Dear All,

**RE:** Objection to granting of licence for Adult Gaming Centre at Unit 1, 450-454 High Road, Tottenham

Myself and fellow Bruce Grove Ward councillors (Cllr Joe Ejiofor and Cllr Matt White) would like to raise a joint objection to the licensing application for an 'adult gaming centre' at Unit 1, 450-454 High Road London N17 7JN. We will be objecting to the proposal based on matters related to the prevention of crime and disorder, public safety and the prevention of public nuisance and public health, particularly the protection of children from harm.

There is a proliferation of betting shops along the High Road; there are at least 5 gambling premises on the short stretch of the High Road between the Police Station and Bruce Grove Station. Crime in the area is high particularly around the area of the existing betting shops. In fact as part of the TfL Bruce Grove public realm scheme bicycle stands had to be removed and placed in strategic areas to reduce the incidence of crime. Upon hearing about this application we contacted the Bruce Grove Safer Neighbourhood Team and they have informed us that they regularly receive calls to various betting shops along the High Road due to anti-social behaviour and drinkers causing issues and in their professional opinion another one will create further problems. Given the number of vulnerable young people and adults there are in the area we believe that insufficient safeguards can be put in place to prevent a surge in gambling addiction as a result of the opening of this establishment.

On this basis we are objecting on the following grounds under the Gambling Act 2005:

- • Under the Guidance to Local Authority from Gambling Commission
- Objective 1 : Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime sections 5.3, 5.5, 5.7, 5.8, 6.38 and 6.42
  - • Under the Council's policy
- Sections 3.4 and 3.7

**Signed:** Cllr Joseph Ejiofor, Cllr Felicia Opoku & Cllr Matt White – Bruce Grove Ward

Kind regards, - Felicia - Cllr Felicia Opoku Chair of Standards Committee Labour Councillor for Bruce Grove ward

**Rep 11**

**From:** Cllr Brabazon Zena

**Sent:** 13 April 2020 19:35

**To:** Licensing <Licensing.Licensing@haringey.gov.uk> **Cc:** Barrett Daliah

<Daliah.Barrett@haringey.gov.uk>

**Subject:** Objection to granting of license for Adult Gaming Centre 450-454 High Road, Tottenham

Dear Licensing

I am writing to you regarding the application for an Adult Gaming Centre by Game Nation at 450-454 High Road Tottenham. I am Deputy Leader of the Council and Cabinet Member for Children and Families. I am also a local resident living some five minutes from Tottenham High Road. I also chair our local Residents' Association – Dowsett Estate RA.

Gaming Nation have applied for a premises license under the Licensing Act 2003 and also for an **Adult Gaming Centre Premises Licence under the Gambling Act 2005.**

I would assume from this that their application must be tested against the four licensing objectives in the 2003 legislation, and the additional three objectives as set out in the Gambling Act 2005.

I have very serious concerns about this application and wish to register my objection to both the granting of a premises license and also the Adult Gaming Centre license.

The first section of my representation is in response to three licensing objectives (as below) in the Licensing Act 2003. It is my view that granting a license to this centre would be in breach of those objectives.

- • The prevention of crime and disorder
- • Prevention of Public Nuisance
- • Public Safety

As a local resident I have a detailed knowledge of the immediate area where this premises is located. Almost directly opposite this premises is an already functioning 24hr gaming centre/slot machine centre. A few metres away on the same side of the road are four betting shops. Further along there are at least three further betting shops on Tottenham High Road – one near Bruce Grove Station and a further two near Northumberland Park. These establishments, and in particular the number of betting shops form a cluster of gambling venues which already cause anti-social behaviour in the area, including street drinking, drug dealing and drug taking. The adult gaming centre already operating on the High Road has also had anti-social behaviour and, with the betting shops acts as a magnet for vulnerable people, including those with mental ill health. I do not believe an additional gambling centre on the High Road would contribute to the health, well-being or regeneration of Tottenham High Road. Indeed, it is reasonable to assume that changes to gaming machines in betting shops – with the £2 limit imposed – could lead to people going to the gaming centre instead.

Turning to the application being made under the Gambling Act 2005, the three 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



In addition, the Licensing Act 2003 has a fourth objective:

- • Protection of children from harm

My comments below relate to those objectives and I refer to the Council's Statement of Gambling Policy which discusses the issues related to gambling premises. I also refer to the Gambling Act Local Area Profile 2019.

*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.*

- • Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or used to support crime;
- • Protecting children and other vulnerable persons from being harmed or exploited by gambling

The policy further states :

*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 ASB related complaints.

Linked to the policy is the Gambling Act Local Area Profile 2019.

This makes clear that Bruce Grove and Tottenham Hale wards score highly on the Index of Multiple Deprivation in relation to crime, anti-social behaviour with very high levels of people living in the vicinity who would be considered vulnerable. This includes people who suffer from mental ill-health, have drug problems, are homeless, in debt etc., These circumstances place people at great risk and there is a significant concentration of people with such problems in the area where this gaming centre is proposed. It would seem to be against Council policy to encourage additional gambling facilities in the area because of the high risk profile. Many people live in houses in multiple occupation; incomes are low; there is the main food bank at Tottenham Town Hall , and the centre for the homeless (Mulberry Junction) is a short walk along Tottenham High Road, a local church which offers help to the homeless and street drinkers is very nearby, with a church opposite offering advice and also a soup kitchen. These are facilities which are there *because* people locally are at risk and many are poor. This makes people vulnerable. Turning to children and young people, as Cabinet Member for Children and Families this is a particular area of worry in relation to having yet another gambling facility on Tottenham High Road. We are always concerned about children and young people being exploited. There are three under-fives facilities in the immediate vicinity; at minimum six primary schools; and the borough's principal youth centre is a short walk away. This centre works with some of the most vulnerable young people in Haringey, including those already known to the criminal justice system. In the light of this, I would draw your attention to the licensing objective to 'protect children and other vulnerable persons from being harmed or exploited by gambling' and the objective 'to protect children from harm'.

For these reasons I am opposing this application and would ask that this is brought before the Licensing Committee to consider.

Thank you

**Rep 12**

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

**Sent:** 27 April 2020 14:15

**To:** 'Nick Arron'

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

**Subject:** FW: UNIT1 450 HIGH ROAD TOTTENHAM LONDON N17

Dear Mr Aaron,

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. An officer of the Licensing Authority, in whose area the premises are situated, who is authorised for the purposes of exercising its statutory function as a 'Responsible Authority' under the Gambling Act 2005

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 have examined the area of where the AGC will be sited. Tottenham High Road in particular this section 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 is a busy town centre consisting of numerous problematic social issues, pubs, betting

offices and late night refreshment premises, drug outreach centre and drug dealers throughout the day and night.

It is recognised that the location of the proposed premises is an important consideration. The unit is based along a busy section of the High Road and is a main thoroughfare for children and young people travelling to and from school or other activities, as well as for vulnerable persons seeking the addiction centre in Bruce Grove and the local soup kitchen as well as the local post office and market area at Holcombe Road.

Special consideration should be given to the close proximity of the drug service and the vulnerable people in the immediate locality.

The area has an existing AGC which has itself seen crime in terms of criminal damage to the machines from frustrated customers and also staff being attacked by customers who have lost money. The premises operates with security guards in place in order to offer some protection for its staff members.

The location of the betting establishments in this regard provides for an environment in which gambling activity may be closely and prominently observed. Whilst we do not suggest that the applicant proposes to advertise in such a way as to make betting attractive to children, the LSC is asked to consider whether the location of this particular premises acts to normalise and thereby inadvertently promote gambling to children and young persons. And other vulnerable persons.

The close proximity of the drug outreach centre means that persons with substance misuse issues will be put to the test in making balanced and informed decisions and could potentially be drawn to gamble more in the hope of obtaining money to fund their addiction.

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 living in this area. Operators are asked to consider very carefully whether seeking to locate new premises within this area would be consistent with the licensing objectives and the local risks identified.

**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.**

If the LSC does not agree with this representation then we suggest that consideration be given to:

- Reduced operating hours to ensure the premises operates between 8am and 10pm Monday – Saturday and 8am- 5pm –Sundays.
- That an SIA security guard is stationed at the premises each day from noon until closing time.
- That no lone working is done from noon until closing time each day.

1. A comprehensive CCTV system shall be installed and maintained on the premises as required by the Metropolitan Police Licensing Team. CCTV should cover the following:  
a) All entry and exit points to and from the premises enabling frontal identification of every person entering under any light conditions  
b) The areas of the premises to which the public have access (excluding toilets)  
c) Gaming machines and the counter area

2. The CCTV shall continue to record activities 24 hour a day for 31 days.

3. CCTV shall be made available for the police viewing at any time with minimum delays when requested.

4. The premises shall display notices near the entrance of the venue stating that CCTV is in operation.

5. A monitor shall be placed inside the premises above the front door showing CCTV images of customers entering exiting the premises.

#### **Children and Young People**

6. The Licensee shall maintain a bound and paginated 'Challenge 25 Refusals' register at the premises. The register shall be produced to the police or licensing authority forthwith on request.

7. Prominent signage and notices advertising the Challenge 25 will be displayed showing the operation of such policy.

8. Third party testing on age restricted sales systems purchasing shall take at least twice a year and the results shall be provided to the Licensing Authority upon request.

9. A Challenge 25 proof of age scheme shall be operated at the premises where the only acceptable forms of identification are recognised photographic identification cards, such as a driving licence, passport or proof of age card with the PASS Hologram.

#### **Entrances and Doors**

10. 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 from the ground floor cashier counter by staff.

#### **Staffing levels**

11. There shall be no pre-planned single staffing at any time.

12. There will be a minimum of 2 staff present at all times when the premises is open.

#### **Identification of Offenders or Problem Persons**

13. The Licensee shall implement a policy of banning any customers who engage in crime or disorder within or outside the premises.

14. The licensee will refuse entry to customers who appear to be under the influence of alcohol or drugs.

**Seating**

15. The licensee shall ensure that all seating within the premises are either secured to the floor or are weighted to prevent lifting.

**Alarms**

16. The licensee shall install and maintain an intruder alarm on the premises.

17. The premises shall install and maintain a panic button behind the cashiers counter.

**Toilets**

18. 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.

**Signage, Promotional Material and Notices**

19. Prominent GamCare documentation will be displayed at the premises.

**Staff Training**

20. The licensee shall: provide training on the specific local risks to the licensing objectives that have been identified for these premises as part of the staff induction training programme. periodically provide refresher training to all of its staff working at these premises on the specific local risks to the licensing objectives. Participation in this training shall be formally recorded on each member of staffs training records which, if requested will be presented to the Licensing Authority as soon as practicable.

21. 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.

22. New and seasonal staff must attend induction training and receive refresher training every six months.

**Homeless and Street Drinking**

23. 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.

24. The Licensee shall place a notice visible from the exterior of the premises stating that customers drinking alcohol outside the premises is not permitted and those who do so will be banned from the premises.

**Recording of Incidents and Visits**

25. An incident log shall be kept for the premises and made available on request to an authorised officer of the City Council or the Police which will record the following;

- a) All crimes reported to the venue;
- b) Any complaints received regarding crime and disorder;
- c) Any incidents of disorder;
- d) Any faults in the CCTV system; and
- e) Any visit by a relevant authority or emergency service.

**ATMs**

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

Yours sincerely,

Daliah Barrett (Licensing Team Leader)

Haringey Council - Licensing Authority

**Responsible retailing is actively encouraged in Haringey London.**

Commercial and Operations

River Park House, level 1

High Road

Wood Green

London N22 7TR

**T 0208 489 8232**

**E [daliah.barrett@haringey.gov.uk](mailto:daliah.barrett@haringey.gov.uk) [/licensing@haringey.gov.uk](mailto:/licensing@haringey.gov.uk)**

**Rep 13**

**Public Health objection to Game Nation, 450-454 High Road, Tottenham, N17 9JN**

Marlene D'Aguilar and Maria Ahmad  
Health in All Policies Officer, Public Health  
28th April 2020

**Crime and Disorder, Public Nuisance and Public Safety**

There are six schools and a children's centre located within 500-meter radius of the premises including Bruce Grove Primary, Holy Trinity Primary, Mulberry Primary, Welbourne Primary and Children's Centre, Assunnah Islamic School and Hyland House School,

There are already clusters of 5 betting shops on Tottenham High road within 500 meters.

Harriet Harman (2011) references Haringey Residents and Traders associations who highlight a vast divide in the borough of Haringey, where the 66 betting shops are split 85%/ 5% in an East / West divide, with the claim that betting shops are located in key geographic areas so as to deliberately target the poor.

The location of the proposed premises targets the poorer communities and it becomes harder for the health inequalities gap to close. If the application is to be granted it will not align with the Borough Plan to reduce health inequalities, create healthy spaces and neighbourhoods for children and give children the best start in life and will not demonstrate our preventative efforts to support families and enhance mental wellbeing.

Anti-social behaviour is particularly high in this ward. On the high road, near to the premises there were 549 crimes in the past year (March to April 2020), of which 280 (51%) were anti-social behaviour.

According to Gambling Commission (2018) briefing paper related to gambling-related harms on the community, it was pointed out the disastrous impacts of gambling on family relationships, and psychological and social development of children. Given the range of co-morbidities, it is highly likely that a percentage of those presenting with other conditions (e.g. mental ill health and addictions) are also either experiencing or are vulnerable to gambling-related harm. Evidence shows that certain people are more vulnerable to gambling-related harm, including those with substance misuse problems, poor mental health, and those living in deprived areas (Wardle et al., 2016). The location of the proposed gambling premise is situated within one of the most deprived area there is a commitment from the council to improve the lives and reduce health inequalities. The median household income in Tottenham Hale's is £27,340 a year. This is below the Haringey (£37,696) and London (£39,264) averages. Furthermore, 11.8% of St Ann's residents are unemployed. This is slightly higher than both the Haringey (8.6%) and London (7.3%) averages.

The premises are within close proximity to a drug treatment service (The Grove) which provided treatment services for 2,400 people approx., which has doubled in the previous year. Those individuals were at an increased risk of problem gambling and gambling related harm. Dr Pardeep Grewal, psychiatrist working at The Grove has previously highlighted concern of a gambling premise located near the treatment services and raised objection due to the potential negative impact on the vulnerable individuals suffering substance and alcohol addiction.

Research has proved that people living in areas with a higher number of bookies are more likely to be problem gamblers. London is seeing a 68% rise in violent crime associated with betting shops since 2010, according to the Metropolitan police. 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).

### Protecting Children from Harm

The premises fall within two of the school Superzone areas (Holy Trinity CofE and Earlsmead Primary School). This is a health and wellbeing zone around a school tackling issues such as gambling and its negative impact on children. Furthermore, The Bruce Grove Youth Centre located near the premises has previously raised concern on a proposed gambling premises at the same location and the negative impacts on young children and other vulnerable individuals accessing their centre.

Increased number of gambling shops in the concerned area not only severely undermines the objectives of the licensing, but it also normalises the harmful culture of gambling amongst children. Almost half a million children in England and Wales are gambling regularly, with about 55,000 estimated to have a serious problem. Suicide rates for gambling addicts are high, and gambling-related problems cause stress for individuals and families.

Between late 2019 to February 2020 focus groups of the three Superzone schools and one children's centre (<https://www.haringey.gov.uk/social-care-and-health/health/public-health/schools-superzones>) was conducted with children and parents about the local area. Parents and the children from year 1 to year 6 from Holy Trinity, Earlsmead and Welbourne primary schools and Children's Centre expressed concerns on an abundance of gambling shops on Tottenham High Street, which already attracts increasing anti-social behaviour, street drinking, drug dealing and loitering outside of these shops. They all want to see fewer gambling shops on the high street and felt that the gambling shops were exacerbating the problem of antisocial behaviour in the area. This concern finds sufficient backing in the researches which suggest that there is a link between gambling and alcohol/ drug abuse. (Griffiths, Parke & Wood, 2002); there were concerns regarding the number of gambling shops in Tottenham High Road and Broad Lane (Located off Tottenham High Rd) by primary school children from Year 1 – Year 6 parents.

The parents commented on the large volume of gambling shops in close proximity to each other and one parent expressed concern about the influence this would have on children and their development, with concerns raised about the possibility of enabling gambling addictions in the future.

*"On Tottenham High Road, which we pass a lot there's like 10 betting shops, and there's 5 shops in between, so there is about 5 shops you get to a betting shop, another 5 you get to a betting shop" – Parent, Earlsmead Primary School*

*"I'm not going to lie I've seen a lot of young children outside these betting shops with these young guys that are selling drugs and constantly drinking" – Parent, Earlsmead Primary School*  
*"And kids get desensitised, if they're 5 or 6 seeing that, so when they get older they just put a bet on, but if its away from your eye sight or vision, you can think about it. maybe go speak to mum and dad about it, but if you see it daily you're like you know what... Let me just put £10 on and see what happens, then the next day is £20, then you invite your friends' round and you've got a whole group of young kids doing it" -Parent, Earlsmead Primary School*

The parents thought there are too many gambling shops in Tottenham, think more should be done regarding licensing and planning applications.

*"The betting shops need to go" – Parent, Earlsmead Primary School*

*"Too many bookies, too many off-licenses, too many chicken shops in Haringey...you need to reduce the bookies, the off licenses and also the chicken shops because our children are growing up in this cycle, like a merry go round, not getting off it" – Parent, Holy Trinity*

In summary, this undermines our key objective in the current borough plan *"A Haringey where strong families, strong networks and strong communities nurture all residents to live well and achieve their potential"*. The effects of proposed gambling premises should be seen in the wider context of the well-being and overall health of the society, and as such, it is essential to take into account the legitimate objectives of licensing, concerns of the parents and the community's wellbeing. It is, therefore, strongly recommended that the Planning Committee refuse this application.

**Rep 14****20.04.20****Regeneration Objection to licensing application for 24-hour adult gaming centre at 450-454 Tottenham High Road.**

The Regeneration Service object to licensing application. The reasons for our objection is detailed underneath:

The Gambling Act 2005 sets out the objective to protect children from harm and other vulnerable persons from being harmed or exploited by gambling. Within the Haringey Statement of Gambling Policy, it states that the East of the borough carries higher deprivation and social economic imbalances and therefore should have special consideration given to it in relation to the proximity of gambling premises. Those special considerations listed in the Haringey statement are set out underneath along with our assessment for each as to why this licensing application fails to protect children and other venerable people from being harmed or exploited from gambling:

**Close to an educational establishment, including colleges and universities, youth clubs, recreational establishments;**

The applicant site is located in close proximity to a number of educational establishments that are all within 400 metres, these include Bruce Grove Primary School, Holy Trinity Church of England Primary School, Bruce Grove Youth centre. The proposals for 450-454 High Road are in direct conflict with the Public Health's new 'Super zone' around the Holy Trinity School, aimed at tackling gambling and other factors that could have a detrimental impact on health. The Super zone setup by Public Health is in recognition of the vulnerability of young people in the locality of the applicant site being susceptible to undue influences that would include gambling and especially gambling that is represented in format of games that is attractive young persons.

**Close to a centre dealing with vulnerable people, including housing, clinics, recovery centre, food banks;**

The applicant site is located within 400m of the Mulberry Junction. The launch of this new centre in Tottenham aims to reduce the number of people sleeping rough and is being delivered in partnership between Homes for Haringey and St Mungo's Housing Association. This centre is specifically targeted at single adults who experience homelessness or rough sleeping and offers a resource centre which provides holistic housing, health and skills support, as well as access to supported housing to help start their recovery and eventual move to suitable accommodation in the borough. The proximity of the applicant site to Mulberry Junction will pose a threat to the recovery of young person's staying at the Mulberry Junction by being directly exposed to the harms of gambling.

**Situated in an area of high crime;**

The local area profile for the Bruce Grove ward and specifically within the confines of the High Road from where the applicant site resides is identified as an area of high crime. Crime within betting shops is highest within the Borough for this location with 8 crimes recorded per betting shop in 2017. Due to Covid-19, the Metropolitan Police currently are unable to provide geographical mapping datasets for crime within the immediate locale of the applicant site. We are aware as a Regeneration Service through our regular liaisons with the Police, businesses and residents for Bruce Grove that there is a high volume of crime that happens within close proximity of the gambling premises. An example of where such issues already exist is Brook Street which is located within 200 metres of the applicant site and immediately adjacent to a cluster of betting shops along Bruce Grove High Road. Currently, Brook Street experiences frequent complaints from the Public as a

location for drug dealing and ASB. There is a correlation between those crime/ASB issues experienced on Brook Road and the proximity of betting shops, whereby often people will meet within the betting shops to negotiate and then move outside the premises to conduct crime that is out of sight from CCTV surveillance and from direct oversight by the Police. There is a greater risk from this application proceeding, in that, there is a narrow alleyway known as Albert Place that is more hidden and discrete than Brook Street and has no CCTV surveillance of the alleyway that is located directly outside the applicant site and providing a means of escape away from the High Road. Albert Place would provide an ideal haven for crime and ASB issues to take place away from any CCTV coverage on the High Road or within the applicants premises and would present a hostile environment for the Police and Enforcement Officers to manage and patrol.

**Situated in an area of deprivation;**

The Bruce Grove ward is listed in the highest ranks of deprivation indices when compared to other wards in the Borough and nationally. Bruce Grove has one of the highest number of Employment Support Allowance (ESA) claimants for Mental Health, it ranks highest in the borough for residents attending Citizens Advice in relation to debt matters and given this, the ward is in the highest quartile for deprivation indices when compared across the Borough.

**In proximity to places of worship, community facilities or public buildings**

The applicant site is located in close proximity to two large church congregations, these being: Christ Apostolic Church Outreach DDC HQ and St Marks Methodist church.

**Areas where there is considered to be an over concentration of similar existing licensed operations.**

There is already an oversaturation of gambling premises in close proximity to the application site at 450—454 High Road, namely: William Hill 438-444 High Road, Admiral Casino 475 High Road; BetFred 474 High Road, Ladbrokes 480 High Road and Paddy Power 486 High Road.

**Close to the location of businesses providing instant access to cash such as payday loans, pawn shops.**

There is cluster of pawn shops and payday loan centres within close proximity, one such example is the H&T pawnshop at No. 518 High Road.

In addition to the above, the Mayor London's Town Centres SPG Policy 4.8 states: 'Over-concentrations of betting shops ... can give rise to particular concerns.' And seeks to: 'prevent the loss of retail and related facilities that provide essential convenience, ... manage clusters of uses having regard to their positive and negative impacts' in particular to encourage: 'broader vitality and viability; diversity of offer; sense of place and local identity; community safety and security; promoting health and well-being'

The Regeneration Team therefore considers that granting a gambling premises licence would adversely affect the vitality and viability of the District Centre, as well as community safety, health and wellbeing. The proposed gambling premises is located in an area of high deprivation and would undermine the several improvement policies that the council and others are seeking to make to the area.'