

**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

2.7 Other issues that may be considered such as:

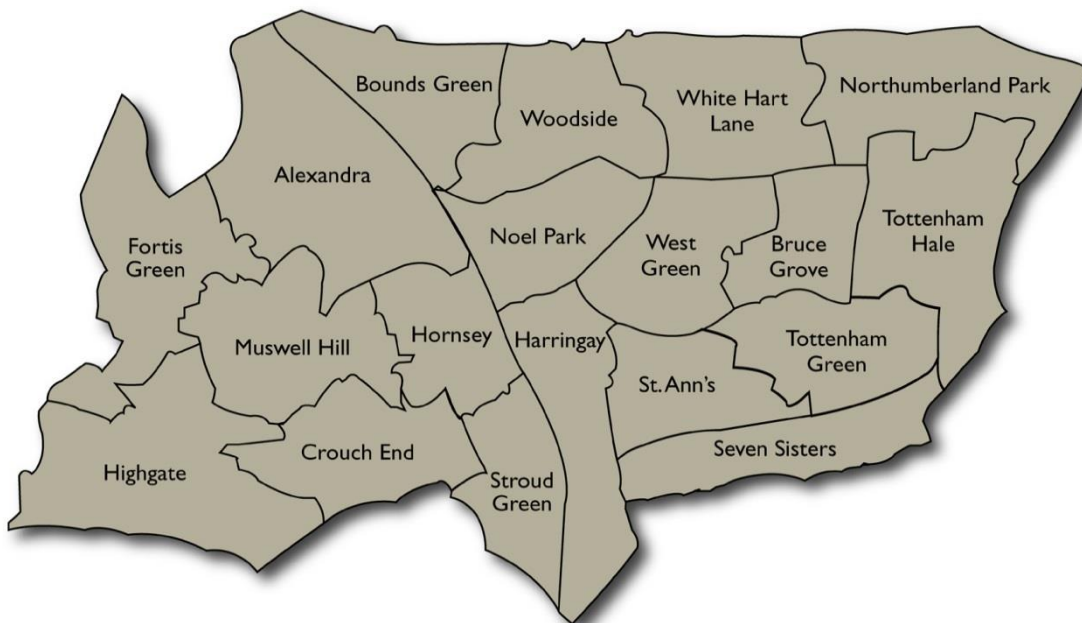
- Matters of faith, including all religious or faith denominations including proximity to churches, mosques, temples or any other place of worship.

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 13th out of 326 authorities, and it is ranked 4th in London, yet it is also a borough of contrasts, with great prosperity and affluence in some communities.
- 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 economics 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.

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

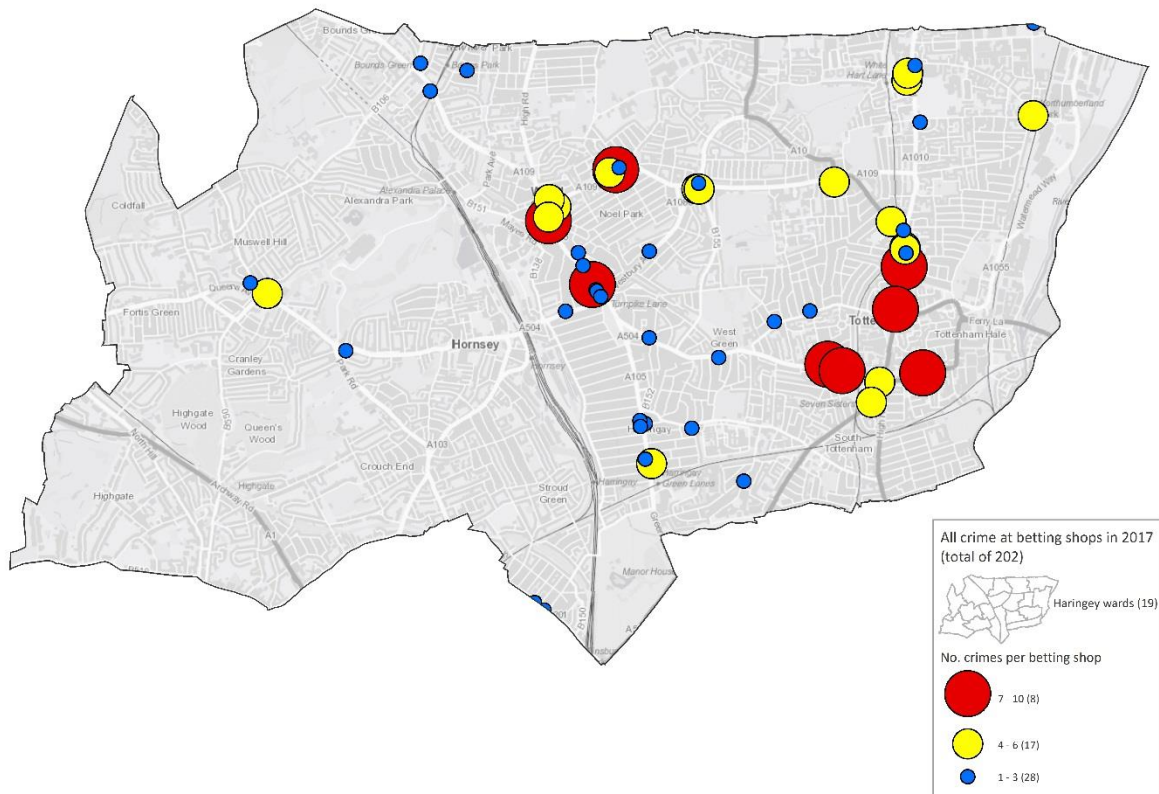
Table 1. Special consideration is given in relation to the proximity of gambling premises to the following locations;

Criteria	Datasets	Source	Access to data
Local schools	All secondary schools in Haringey	Corporate GIS	Green
Youth clubs	Youth clubs registered in Haringey	LBH	Red
Shops used by families & children	Shopping centres, supermarkets & shops relevant to children & families in Haringey	LBH	Red
Parks & open spaces	Parks, open spaces, play areas/adventure playgrounds & basketball courts in Haringey	Corporate GIS	Green
Leisure & recreational establishments used by families	List of leisure centres, cinemas, theatres, cultural events, museums, galleries & community organisations in Haringey	LBH	Yellow
Area with high level of organised crime	Suspected & convicted CSE offences, human trafficking, modern day slavery & drug offences in Haringey	Haringey police	Red
Places of worship	List of faith premises in Haringey	Corporate GIS	Green
Community facilities & public buildings	List of community centres, tenant halls, libraries & other public buildings in Haringey		Red
Areas with an over-concentration of similar existing licensed operation	List of current licensed gambling establishments in Haringey		Green

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	Green
Problem gamblers seeking treatment	Gamblers anonymous		Red
Living in deprived areas	IMD 2015		Green
Financial difficulties / debt	List of food banks, pawnbrokers & payday loan shops	LBH	Yellow
Substance abuse / misuse	List of drug & alcohol treatment services, narcotics & alcohol anonymous meetings & needle exchange services	Public health	Yellow
Poor mental health	List of GPs treating patients for schizophrenia, bipolar affective disorder, depression & other psychoses	Public health	Green
Unemployed	List of Job centres & economically active unemployed residents	2011 Census	Green
Homeless	List of hostels, supported housing, registered care & temporary accommodation in Haringey.	Public Health	Red
Minority ethnic groups	No. of Asian / African / Caribbean / Black British & Arab or other ethnic groups	Nomis	Green

Map showing crime in betting shops in Haringey for 2017:

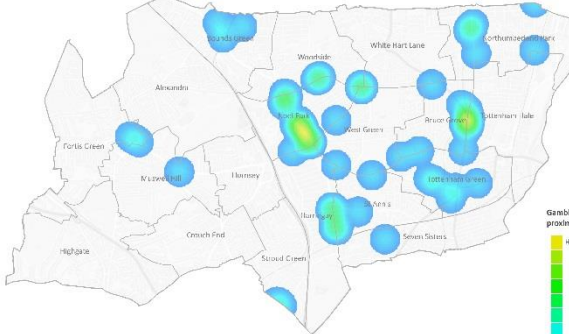
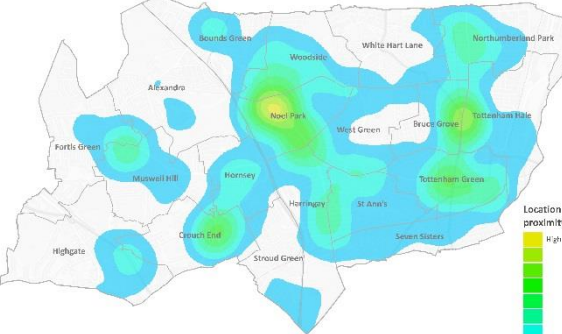
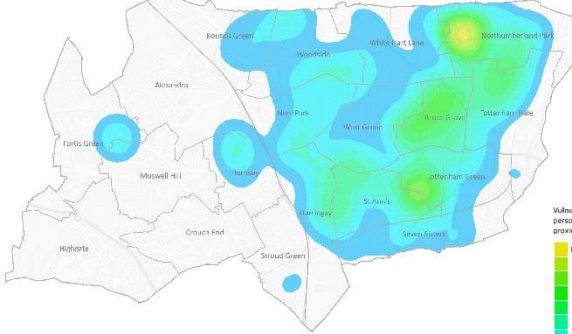
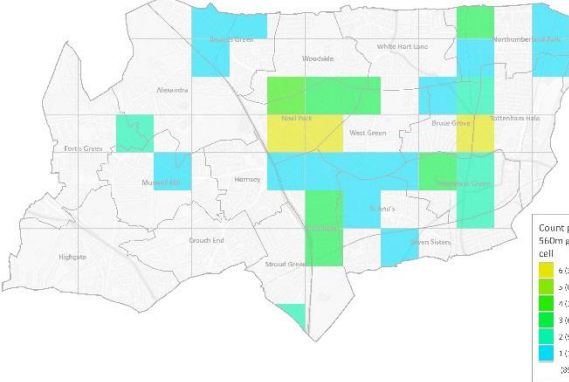

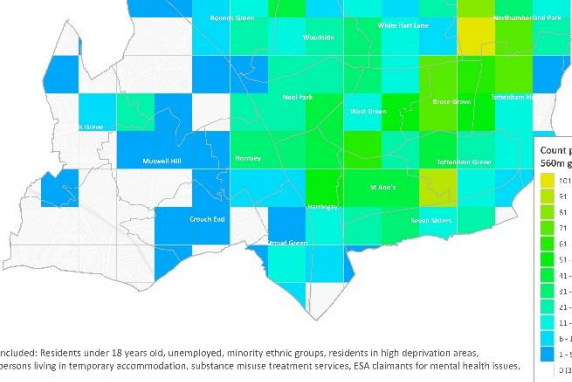


6. The above map illustrates the wards with the highest crimes relating to betting shops within Haringey that will require additional consideration from operators wishing to operate in these areas:

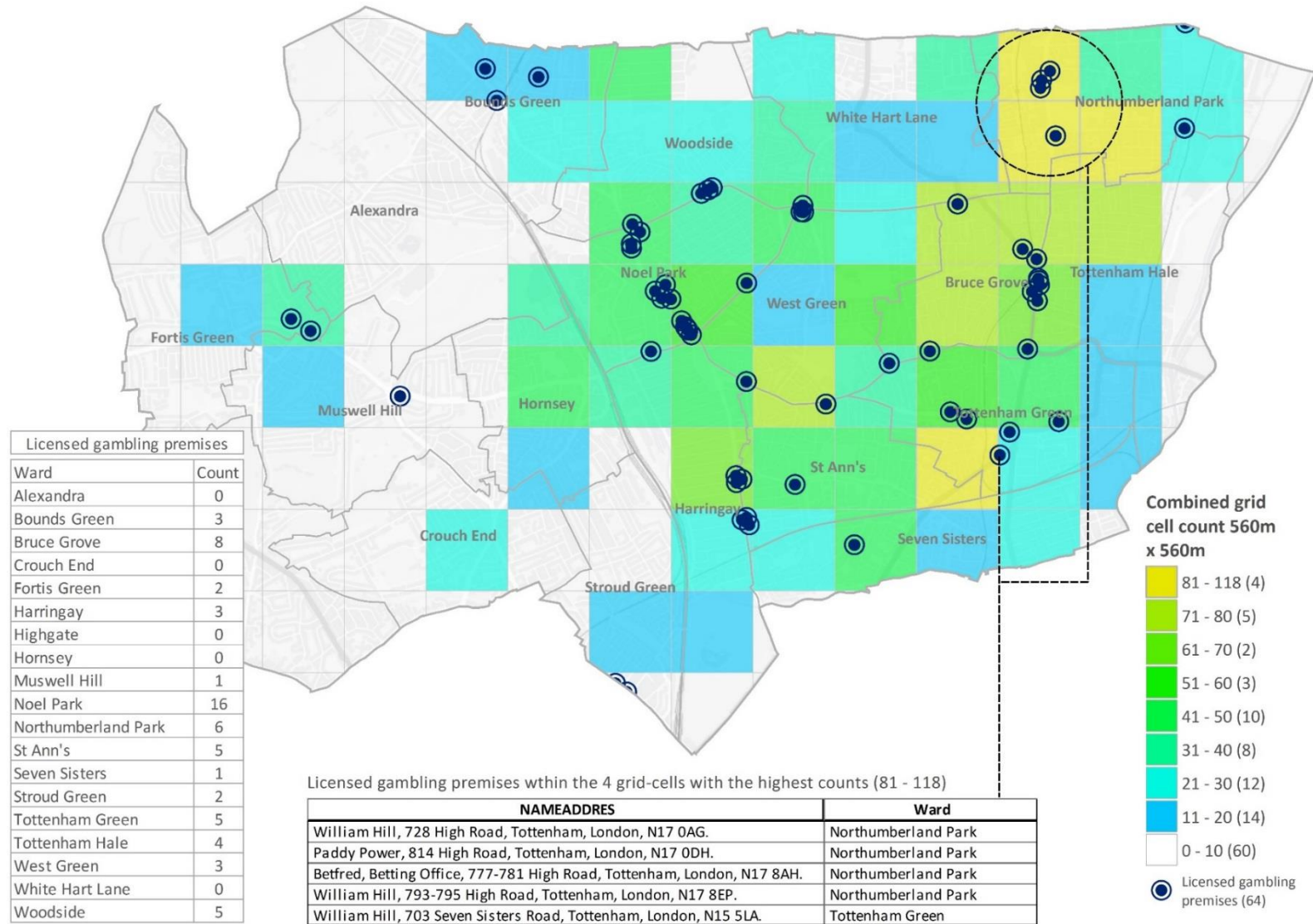
- Noel Park Ward
- Bruce Grove Ward
- West Green Ward
- Tottenham Green Ward
- Tottenham Hale Ward
- Northumberland Park ward
- White Hart Lane.

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

Areas in Haringey identified as being at risk to gambling-related harm		
Proximity or hotspot maps identify clusters of location and vulnerable persons incidents relative to each other compared to their overall dispersal throughout the borough (Maps 1, 2 & 3)		
Map 1. Licensed gambling premises proximity	Map 2. Locations criteria proximity	Map 3. Vulnerable persons criteria proximity
<p style="writing-mode: vertical-rl; transform: rotate(180deg);">PROXIMITY MAPS</p> <p>Licensed gambling premises proximity</p>  <p>Data source: LBH Licensing</p>	<p>Locations criteria proximity</p>  <p>Including: Parks and open spaces, community centres, libraries, cinemas, clubs, licensed gambling premises, museums, skate-parks, schools and colleges, supermarkets, take-aways, places of worship, money lending/pawn shops, foodbanks, crime locations</p> <p>Data source: See Table 1</p>	<p>Vulnerable persons proximity</p>  <p>Including: Residents under 18 years old, unemployed, minority ethnic groups, residents in high deprivation areas, persons living in temporary accommodation, substance misuse treatment services, ESA claimants for mental health issues</p> <p>Data source: See Table 2</p>
Count or thematic maps total the sum of location and vulnerable person's incidents by grid-cell. Each cell measures 560m x 560m and there are a total of 118 grids covering Haringey borough (Maps 4, 5, 6 & 7)		
Map 4. Licensed gambling premises count	Map 5. Locations criteria count	Map 6. Vulnerable persons criteria count
<p style="writing-mode: vertical-rl; transform: rotate(180deg);">COUNT MAPS</p> <p>Licensed gambling premises</p>  <p>Data source: LBH Licensing</p>	<p>Location criteria count</p>  <p>Including: Parks and open spaces, community centres, libraries, cinemas, clubs, licensed gambling premises, museums, skate-parks, schools and colleges, supermarkets, take-aways, places of worship, money-lending/pawn shops, foodbanks, crime locations</p> <p>Data source: See Table 1</p>	<p>Vulnerable persons criteria count</p>  <p>Including: Residents under 18 years old, unemployed, minority ethnic groups, residents in high deprivation areas, persons living in temporary accommodation, substance misuse treatment services, ESA claimants for mental health issues</p> <p>Data source: See Table 2</p>

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

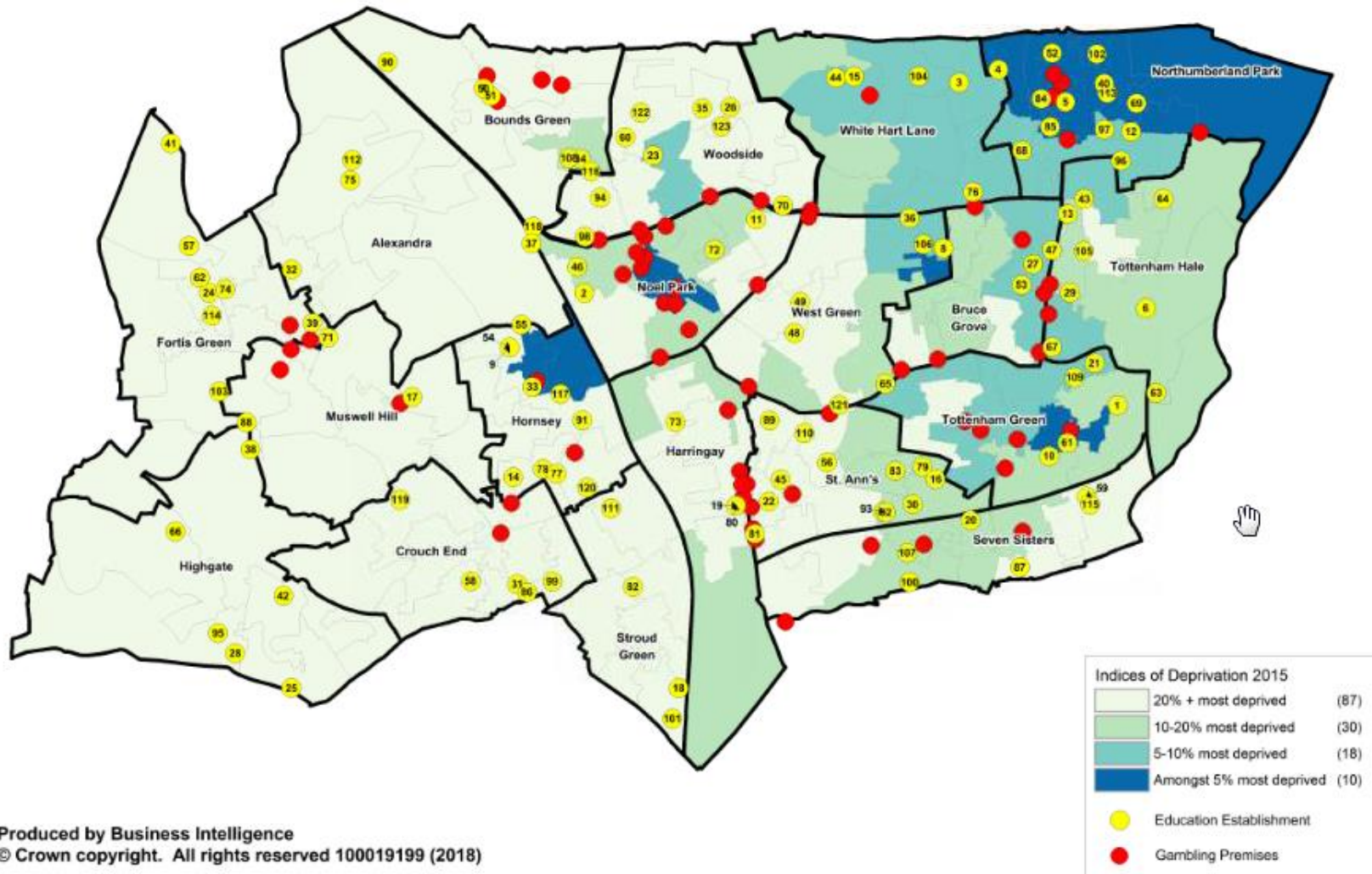
Description	Datasets	Geography	Source
Area with high levels of organised crime	Suspected & convicted Child Sexual Exploitation (CSE) incidents, human trafficking, modern day slavery & drug offences	Ward	Haringey police
Areas with an over-concentration of similar existing licensed operation	Licensed gambling 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

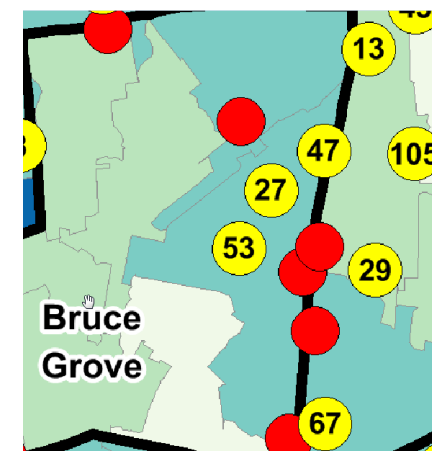
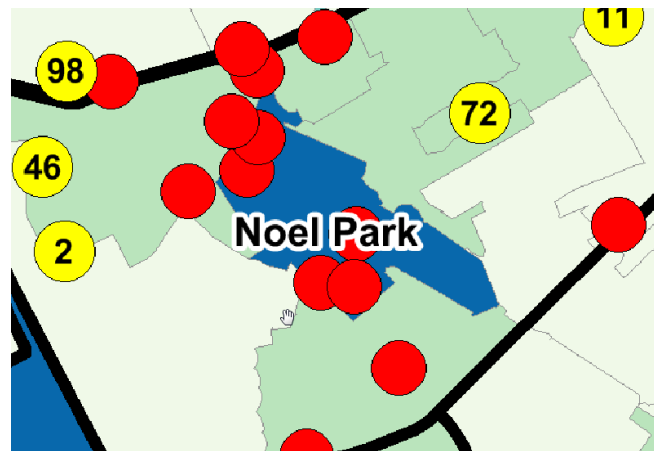
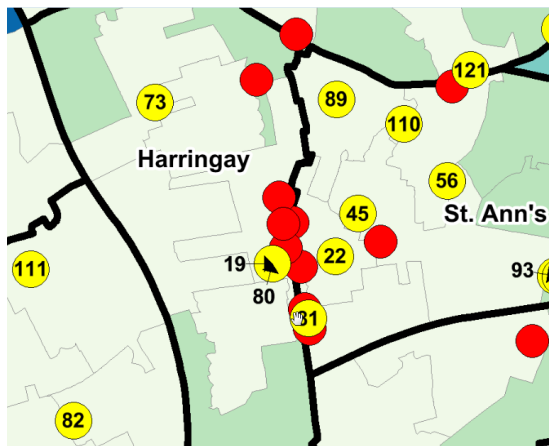
Gambling Premises & All Educational Establishments with Indices of Multiple Deprivation (IMD 2015)



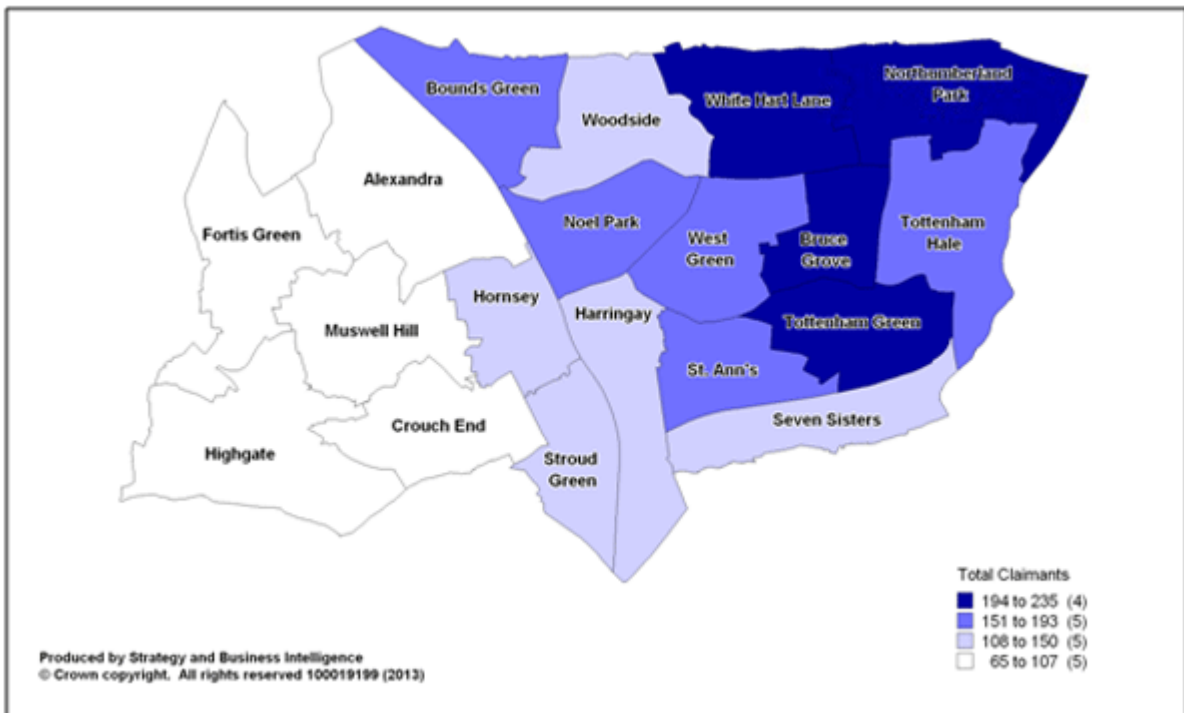
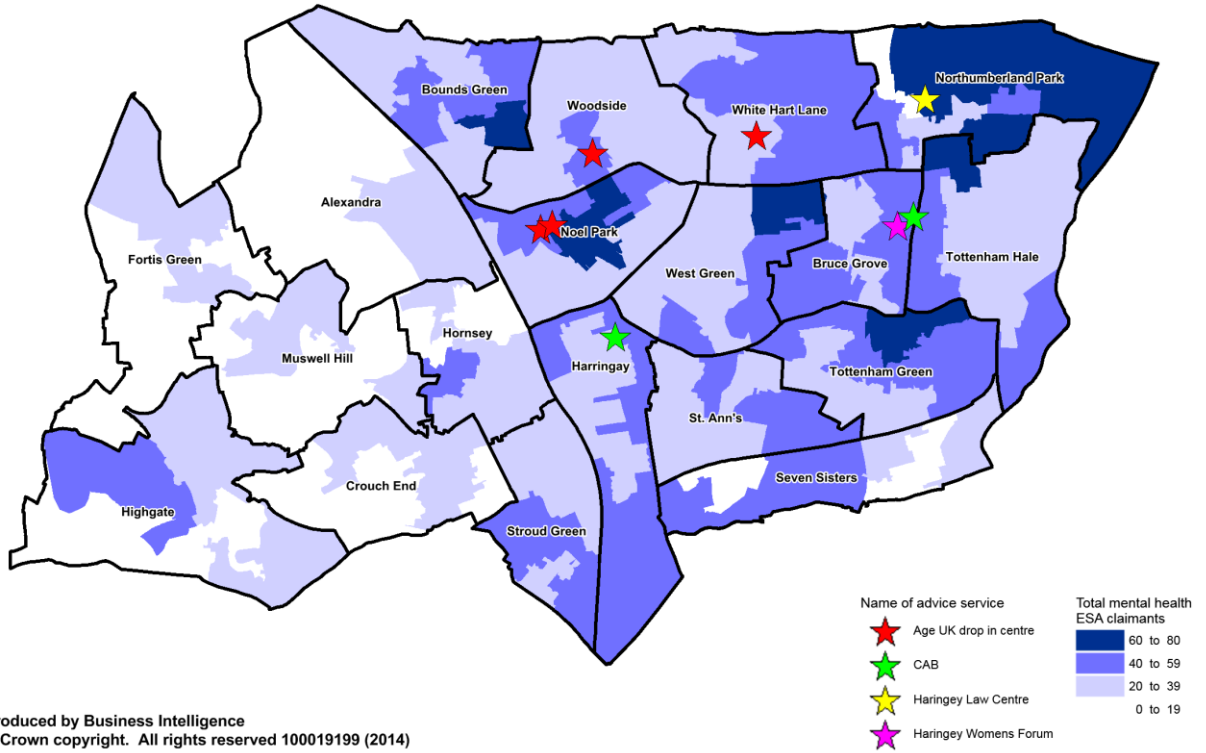
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Schools with the highest number of gambling premises within the 400m radius

School Name	Number of Gambling Premises
(80,81) South Haringay 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**

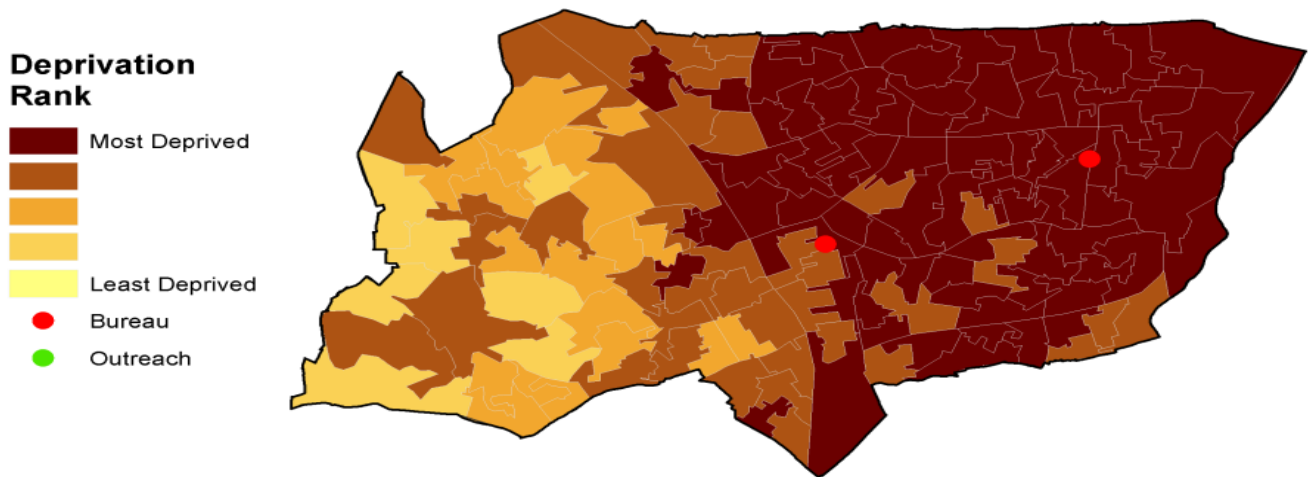
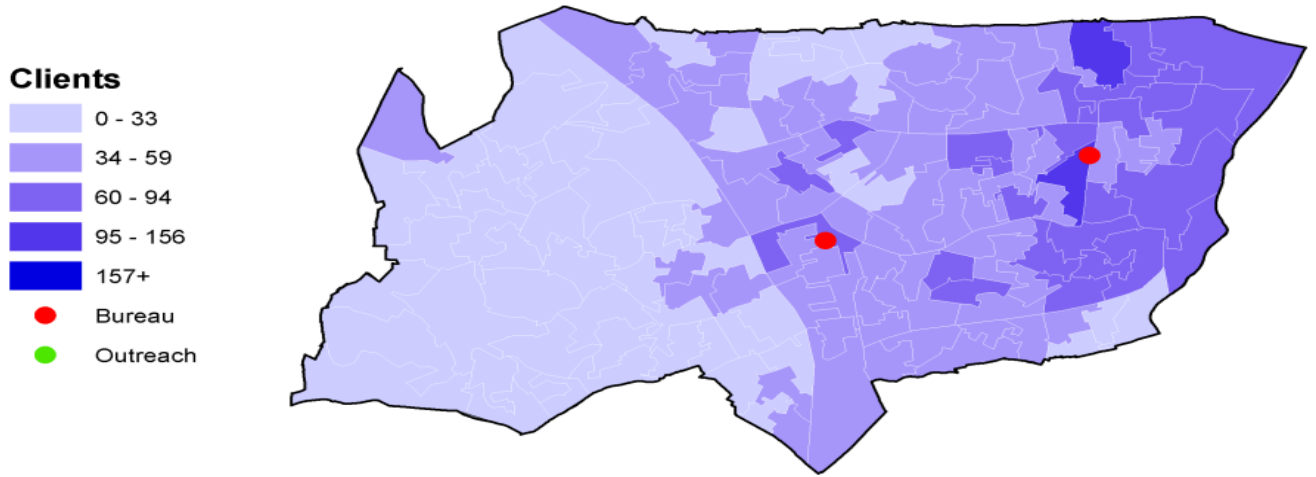


Risk factors in Haringey

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.