

**Appendix 1**

**Application form**

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

WK/424197  
AG/10905606

**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,

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- 9 NOV 2018

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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: GT PROMOTIONS LTD

*[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:

GROVEDELL HOUSE, 15 KNIGHTSWICK ROAD, CANVEY ISLAND, SS8 9PA

Postcode: SS8 9PA

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

000-027024-N-308751-001

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):

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

Unit 1, 450-454 High Road, Tottenham, N17 9JN

Postcode: N17 9JN

12. Telephone number at premises (if known):

### Part 5 – Miscellaneous

17. Proposed commencement date for licence (leave blank if you want the licence to commence as soon as it is issued): (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?  
NO *[delete as appropriate]*

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

20. Please set out any other matters which you consider to be relevant to your application:  
See covering letter, plan and Gambling Risk Assessment

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

I/ We confirm that, to the best of my/ our knowledge, the information contained in this application is true. I/ 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.

I/ 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
- I/ we understand that if the above requirements are not complied with the application may be rejected
- I/ we understand that it is now necessary to advertise the application and give the appropriate notice to the responsible authorities



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.

Part of the Ground Floor of a 3 storey building

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

No *[delete as appropriate]*

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.

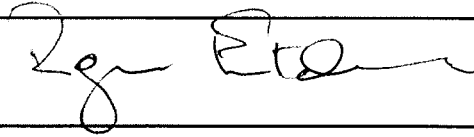
	<i>Start</i>	<i>Finish</i>	<i>Details of any seasonal variation</i>
Mon	<i>hh:mm</i>	<i>hh:mm</i>	
Tue			
Wed			
Thurs			
Fri			
Sat			
Sun			

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 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: ROGER ETCHELLS

Date: 8/11/2018 (dd/mm/yyyy) Capacity: DULY AUTHORISED AGENT

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: \_\_\_\_\_ (dd/mm/yyyy) 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:

ROGER ETCHELLS

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

01530 417554

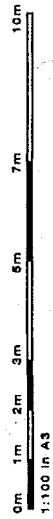
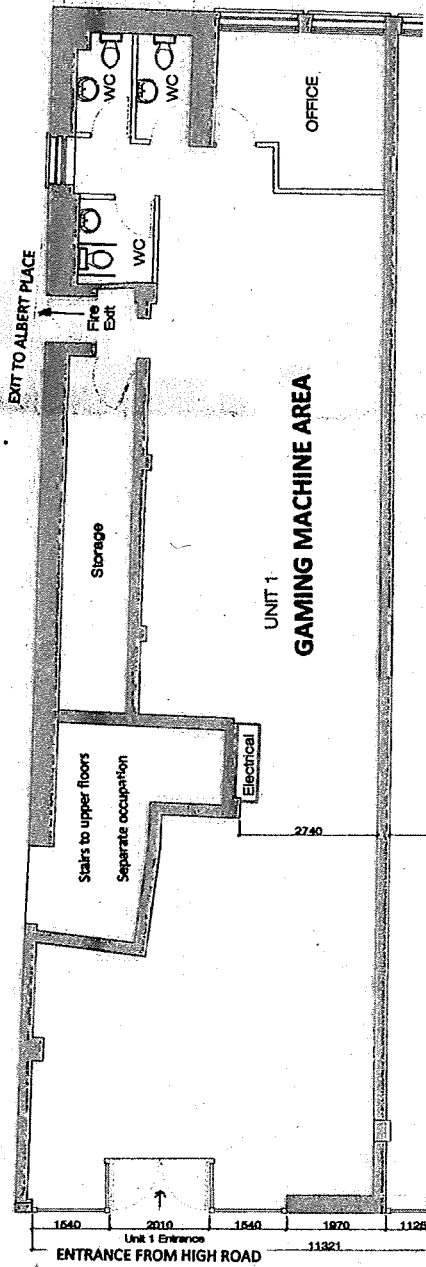
24. Postal address for correspondence associated with this application:

ROGER ETCHELLS, THE OLD BANK, KILWARDBY STREET, ASHBY DE LA ZOUCH

Postcode: LE65 2FR

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:

GENERAL NOTES:



01 Floor Plan\_Proposed  
Scale: 1:100

Rev	Date	Revised By	Checked By	Approved By

**AG DESIGN CONSTRUCTION**  
 Design Consultancy - Construction Management  
 Unit 1, 1st Floor  
 450-454 High Road, Tottenham, London, N17 5JN  
 Tel: 020 8350 0000  
 Fax: 020 8350 0001  
 www.agdesignconstruction.com  
 N17 5JN

**Project:** 450-454 High Road  
**Client:** 01 Promotions Limited  
**Location:** 450-454 High Road, Tottenham, London, N17 5JN

**Rev:** Floor Plan Proposed

Sheet	Scale
Planning	1:100@A3 / 1:50@A1
Project Number	Client Number
1811.01.HRA.PL - 101	

## Appendix 2

### Risk assessment

## LOCAL GAMBLING RISK ASSESSMENT – Tottenham City Slots

### Premises

Premises Name:	City Slots
Premises Address:	Unit 1, 450-454 High Road, Tottenham, London
Premises Post Code:	N17 9JN
Premises Licence Number:	New Application
Category of Premises:	AGC

### Company

Operating Company:	GT Promotions LTD,
Operating Licence Number:	000-027024-N-308751-005

### Assessment Writer

Name of Person Writing this Assessment:	Max Davitt
Position within Company or Name of Authorised Agent:	Managing Director
Date that Original Assessment was Written	25 <sup>th</sup> October 2018

### **Ordinary code provision 10.1.2**

Licencees 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.

### **Manager action**

- Ensure a copy of the local risk assessment is in the social responsibility folder for inspection if required
- Ensure the risk profile is understood and all relevant action/training is undertaken to ensure the risks are mitigated
- Advise line manager of any circumstances that may affect the risk profile requiring it to be reviewed.

## LOCAL GAMBLING RISK ASSESSMENT – Tottenham City Slots

### Local Area Profile

The AGC is located in the High Road within a primary shopping street and adjacent to a Peacocks clothes shop on one side and an empty retail unit and a Halifax Bank the other. There is a wide range of retail outlets in the close vicinity including banks, licensed betting offices, another AGC opposite, fast food outlets. There are 12 public houses within 0.5 miles, 2-night clubs within 0.5 miles. 3 primaries and 2 secondary schools within 0.5 miles 2 colleges and one nursery within 0.5 miles. The venue is medium size, in the shape of rectangle with good visibility with a plan for a standard frontage door/doors opening on to the footway. No auxiliary activities or facilities are offered other than gambling machines of category B3, C and D.

The council advises the area is high incident level within the borough there is a certain amount of anti-social behaviour such as litter and graffiti. The crime stats for June 2017 to July 2018 show 385 reported incidents this is about average for an area like Tottenham in London. Our regulatory return data for our Venue in Kilburn (similar demographic) does not reflect any specific problems associated with consumer complaints, the need to call police for assistance or attempts by children and young persons to enter the premises.

The site will trade 24 hours, the level of customer traffic averages for our Kilburn site show the following profile with Friday/Saturday being the busiest day's rota's and door control measures are managed from this profile (we expect Tottenham to be similar),

The venues late trading profile will operate a door entry control process (doors are secured) known or vetted customers are only allowed access. The full suite of CCTV includes door entry viewing and facial recognition, a night colleague (security) will be SIA badged and all colleagues will wear Panic alarms in the form of a wrist watch that alerts direct to senior Management who also have remote CCTV access. A minimum of two colleagues will be on duty at all times. The venue will be managed within GT Promotions Company Standards Manual that incorporates the BACTA tool kit to effectively operate the AGC. Venue will be fitted with intruder alarms and relevant fire/smoke systems. A disabled Toilet will be available on site with RADAR locks, toilets will be checked regularly. GT Promotions already operate 8 sites 7 within London and are very experienced in operating AGC's within this type of catchment area.

### Gambling Act 2005 – The Licensing Objectives

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

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

## LOCAL GAMBLING RISK ASSESSMENT – Tottenham City Slots

Risk Assessment	LO	Level of Risk	Impact	Control System	Risk Management	Reviewed
Children entering site unnoticed or unchallenged.	(C)	Low	Severe to business Severe to child	Interior Design Exterior Design	<ul style="list-style-type: none"> <li>*Effective monitoring of entrance by floor walkers with well positioned cash desk having direct line of site of the entrance.</li> <li>*Frontage of venue designed so as not to be attractive to children.</li> <li>*door control in late profile trading including SIA certified security.</li> <li>*doors secure in late profile. CCTV coverage of entrance linked to office and control screens (including facial recognition). Colleagues positioning and desks have clear sight of entrance.</li> </ul>	Oct 18 Oct 18
				Physical	<ul style="list-style-type: none"> <li>*Think 25 policies in place and implemented.</li> <li>*Use of external testing resources for age verification testing.</li> <li>*Staff training both in-house and by bacta.</li> <li>*Adherence to bacta's toolkit/GT company stds and staff handbook.</li> <li>*Clear &amp; prominent premises signage and machine labelling.</li> <li>*Think 25 material displayed.</li> <li>*Review of return data.</li> <li>*Preventing the wearing of hoods.</li> <li>*Policies &amp; Procedures in place and regularly reviewed.</li> </ul>	Oct 18
Out of control gambling by other vulnerable persons.	(C)	Low	Moderate to business Severe to vulnerable	Systems Interior Design	<ul style="list-style-type: none"> <li>*Customer interaction policy &amp; procedure/log adhered to.</li> <li>*Staff training both in-house and by bacta</li> <li>*Conducive for effective monitoring of customers/screens/sightlines.</li> <li>*colleague positioning</li> </ul>	Oct 18 Oct 18
Failure to deal with Consumers making complaints about the outcome of Gambling.	(B)	Moderate	Moderate to business Severe to customer	Physical	<ul style="list-style-type: none"> <li>*Machine maintenance carried out by engineer.</li> <li>*Machine turned off immediately should fault be identified.</li> <li>*Machines only acquired from licensed suppliers.</li> </ul>	Oct 18
<b>Risk Assessment</b>	<b>LO</b>	<b>Level of Risk</b>	<b>Impact</b>	<b>Control System</b>	<b>Risk Management</b>	<b>Reviewed</b>
Failure to deal with consumers making complaints about the outcome of Gambling (continued).	(B)	Low	Moderate to business Severe to customer	Systems	<ul style="list-style-type: none"> <li>*Complaints procedure &amp; forms available on premises.</li> <li>*Staff training on company policy.</li> <li>*Registered with ADR Entity – bacta ADR Service.</li> <li>*Compliant with Company P &amp; P – bacta Toolkit.</li> </ul>	Oct 18
Failure to provide information to players on responsible gambling.	(C)	Low	Severe to business Severe to customer	Physical	<ul style="list-style-type: none"> <li>*Stay in Control posters displayed prominently.</li> <li>*Sufficient quantity of posters.</li> <li>*No ATMs in venues</li> <li>*Stay in Control leaflets available, discretely located.</li> <li>*Machine labelling displaying national gambling helpline.</li> </ul>	Oct 18

## LOCAL GAMBLING RISK ASSESSMENT – Tottenham City Slots

				Systems			<ul style="list-style-type: none"> <li>*Stock control system in place for leaflets.</li> <li>*Ensure adherence with P &amp; P – bacta Toolkit</li> <li>*Regular audit to ensure systems in place.</li> <li>*Player positions effectively monitored.</li> <li>*Player's behaviour closely monitored.</li> </ul>	Oct 18
Failure to recognise signs associated with problem gambling or substantial changes in gambling style.	(C)	Moderate	Severe to business Severe to customer	Interior design			<ul style="list-style-type: none"> <li>*Staff trained in customer interaction in line with bacta's toolkit/GT company stds.</li> <li>*Clear policy to record the procedure for interaction and level of staff that are authorised to intervene.</li> </ul>	Oct 18
Failure to properly administer the self-exclusion process and maintain its effectiveness thereafter, including breaches and reinstatements.	(C)	Low	Severe to business Severe to customer	Physical			<ul style="list-style-type: none"> <li>*CCTV effectively positioned at entrance to benefit identification of known excluders including facial recognition ability.</li> </ul>	Oct 18
				Interior Design			<ul style="list-style-type: none"> <li>*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 a self-excluder.</li> </ul>	Oct 18
				Systems			<ul style="list-style-type: none"> <li>*All data subject to review.</li> <li>*Ensure that self-exclusion forms are always available</li> <li>*IPad camera always available on the premises to take photograph of customers wishing to self-exclude.</li> <li>*File of excluders kept and maintained on premises.</li> <li>*Company uses bacta's national sector SE scheme.</li> <li>*Compliant with P &amp; P and log in bacta's toolkit/ gt company stds manual.</li> </ul>	Oct 18
<b>Risk Assessment</b>	<b>LO</b>	<b>Level of Risk</b>	<b>Impact</b>	<b>Control System</b>			<b>Risk Management</b>	<b>Reviewed</b>
Failure to identify attempts to launder money on the premises (e.g. dye stained notes) and to follow correct reporting procedure.	(A)	Low	Severe to business Low to Customers	Interior Design			<ul style="list-style-type: none"> <li>*Effective monitoring of customers' behaviour by good lines of sight from staff, and well positioned CCTV.</li> </ul>	Oct 18
				Physical			<ul style="list-style-type: none"> <li>*Change machines and note acceptors regularly inspected.</li> <li>*TITO tickets not used hand pay only.</li> </ul>	Oct 18
				Systems			<ul style="list-style-type: none"> <li>*Fully compliant with LCCP requirements.</li> <li>*Comply with bacta's P &amp; P in toolkit; in particular the reporting</li> </ul>	Oct 18



## LOCAL GAMBLING RISK ASSESSMENT – Tottenham City Slots

Poor security increasing vulnerability to crime.	(A)	Low	Severe to business Severe to customers	Physical	procedure to NCA by way of SARs. *Staff provided with personal attack alarms carried at all times. *Intruder alarm installed and regularly serviced. *Effective CCTV coverage with data stored for min 31 days. *Drug awareness checks carried out (especially toilets)	Oct 18
				Exterior Design	*Toughened glass windows and door to limit criminal damage. *CCTV fitted to external frontage, overt CCTV visible to customers.	Oct 18
				Systems	*Staff personal floats limited to £100.00. *Key storage and use guidance in place. *Log maintained should police be called to assist. *Keep abreast of local crime trends. *Subscribe to bacta's crime bulletins.	Oct 18
Awareness of heightened local crime in the local area.	(A)			Systems	LA advise is high levels compared to rest of Borough. No heightened risk evidenced from competitor venue operation. <a href="https://www.police.uk">https://www.police.uk</a> <a href="https://ukcrimestats.com">https://ukcrimestats.com</a> <a href="https://www.gov.uk/government/collections/crime-statistics">https://www.gov.uk/government/collections/crime-statistics</a>	Oct 18
Awareness of student learning facilities (schools & colleges) in the local area.	(C)			Systems	*3 primaries and 2 secondary schools 2 colleges and 1 nursery within 0.5 miles.	Oct 18
<b>Risk Assessment</b>	<b>LO</b>	<b>Level of Risk</b>	<b>Impact</b>	<b>Control System</b>	<b>Risk Management</b>	<b>Reviewed</b>
Awareness of residential facilities for the vulnerable in the local area.	(C)			Systems	*no care homes within 0.5 miles and mental health unit within 0.5 miles. *2 hospitals within 1.5 mile <a href="http://www.carehome.co.uk">http://www.carehome.co.uk</a>	Oct 18
Awareness of gambling care agencies in the local area.	(C)			Systems	*No facilities for problem gambling in the vicinity. One Citizens advice within 0.3 miles. Police station 161 metres away. <a href="http://www.gamcare.org.uk">www.gamcare.org.uk</a> <a href="http://www.gordonmoody.org.uk">www.gordonmoody.org.uk</a>	Oct 18

**NOTICE OF APPLICATION FOR A PREMISES LICENCE UNDER THE  
GAMBLING ACT 2005**

Notice is hereby given that **GT PROMOTIONS LTD**  
*[Give the full name of the applicant(s)]*

of the following address:

**GROVEDELL HOUSE, 15 KNIGHTSWICK ROAD, CANVEY ISLAND, SS3 5FA**

we are applying for a **ADULT GAMING CENTRE**  
premises licence under section 159 of the Gambling Act 2005. *[insert kind of premises licence  
being applied for]*

The application relates to the following premises:  
**Unit 1, 450-454 High Road, Tottenham, N17 9JN**

*[Give the trading name to be used at the premises, and the address of the premises (or, if none,  
give a description of the premises and their location)]*

The application has been made to: **London Borough of Haringey**  
*[Specify the name of the licensing authority to which the application has been made]*

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

Any of the following persons may make representations in writing to the licensing authority about  
the application:

- A person who lives sufficiently close to the premises to be likely to be affected by the  
authorised activities
- A person who has business interests that might be affected by the authorised activities
- A person who represents someone in any of the above two categories

Any representations must be made by the following date: **7/12/2019**

It is an offence under section 342 of the Gambling Act 2005 if a person, without reasonable  
excuse, gives to a licensing authority for a purpose connected with that Act information  
which is false or misleading.







## Appendix 3

### Representations

**Roye Chanel**

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**From:**  
**Sent:** 06 December 2018 10:55  
**To:** Licensing  
**Subject:** objection premises application AGC 450-454 High Road N17 9JN  
**Attachments:** IMG\_0387.jpg; IMG\_0388.jpg

Dear licensing team

I attach a completed representation form to object to the above application. It didn't appear possible to complete on line so i have sent photos as the closing date is today. If you'd like the paper copy let me know and i can post it to you.

Regards

Kessock Close  
N17 9PW



# LICENSING ACT 2003 - REPRESENTATION FORM

To make a representation in respect of an application for a Premises Licence or Club Premises Certificate please complete the following form. For representations to be considered relevant they must relate to one or more of the four "Licensing Objectives" (listed below).

Please note all representations will be made available for applicants to view. If you make a representation objecting to the application it is likely that you will be called upon to attend a hearing and present your objection before a Licensing Committee.

HARINGEY COUNCIL  
LICENSING  
RECEIVED  
- 6 DEC 2018

## Personal Details

Name..... [REDACTED]

Address..... [REDACTED] **KESOCK CLARE**  
..... **LONDON**  
.....

Postcode..... **N17 9PW**

## Licence application you wish to make a representation on

You do not need to answer all of the questions in this section, but please give as much information as you can:

Application Number.....

Name of Licensee.....

Name of Premises (if applicable)..... **AGC**

Premises Address (where the Licence will take effect).....  
..... **450-454 HIGH ROAD** .....

Postcode..... **N17 9JN**

## Reason/s for representation

Under the Licensing Act 2003, for a representation to be relevant it must be one that is about the likely effect of the application on the promotion of the four licensing objectives. Any representations that are considered to be vexatious or frivolous will not be considered (please see Haringey Council's leaflet **Variations, Representations and Appeals for Premises Licences and Club Premises Certificates**).



**The Prevention of Crime and Disorder**

There is already a considerable problem with crime and disorder along this stretch of the High Rd. There are several other gaming premises in the immediate locality

**Public Safety**

which have caused ASB + crime

As a woman I already feel intimidated along this bit of the High Rd by groups of men hanging around outside gaming premises. This will make it worse

**The Prevention of Public Nuisance**

Local police are over-stretched already dealing with ASB in this area - drug dealing in the alleyways & disturbances inside gaming premises. This will add to the problem

**The Protection of Children from Harm**

There is a primary school close by on Holcouse Rd which attracts pupils from outside the immediate area - so they use public transport which is close to two application premises.

I, [redacted], hereby declare that all information I have submitted is true and correct.

Signed: [redacted]

Date: 6/12/18.

Please send completed form to:

[redacted]



## Roye Chanel

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**From:** [REDACTED]  
**Sent:** 07 December 2018 18:34  
**To:** Licensing  
**Cc:** Cllr Opoku Felicia; Cllr Ejiofor Joseph; Cllr White Matthew  
**Subject:** 450-454 High Road Bruce Grove N17 London

Hello,

I do not know if this has been decided .

I reiterate my objection. We just cannot afford, socially, to have another gambling house on our High Road. There are too too many and they are taking up retail space where new restaurants and independent shops should move in. They also encourage characters that then hang around their entrances and engage in intimidating behaviour and this has a DIRECT effect on who comes to shop on the High Road which I believe Haringey is trying to regenerate.

I also object to any change of use of any the units from shop (retail) to A1 use as this will have a detrimental effect on the vitality of the High RD.

Please refuse this application.

[REDACTED]

**From:** Licensing <[Licensing.Licensing@haringey.gov.uk](mailto:Licensing.Licensing@haringey.gov.uk)>

**Subject:** RE: objection

**Date:** 15 November 2018 12:37:47 GMT

**To:** [REDACTED], Licensing <[Licensing.Licensing@haringey.gov.uk](mailto:Licensing.Licensing@haringey.gov.uk)>

Dear Mr Best,

Thank you for taking the time to send in this email however under the Gambling Act 2005 there are statutory matters when determining an application, the Licensing Authority will not take into account these are:

- \* the likelihood of the applicant obtaining planning permission or building regulations approval
- \* the expected demand for the facilities which are being proposed
- \* "irrelevant" matters such as those not related to gambling or the licensing objectives
- \* moral objections.

Whilst we note you mention the loitering that takes place around two other existing betting shops nearby these are locational factors and not due to the operation of the premises themselves. We understand this is not very supportive news for you but we must ensure that the process prescribed in the regulations are followed.

If you would like to consider other reasons other than the demand and the number of existing businesses in the area already we can certainly look at any future submissions you make.

Kind regards  
Daliah Barrett  
Licensing Team Leader

-----Original Message-----



From: [REDACTED]  
Sent: 14 November 2018 16:13  
To: Licensing <[Licensing.Licensing@haringey.gov.uk](mailto:Licensing.Licensing@haringey.gov.uk)>  
Subject: objection

I strongly object to the application by GT Promotions for an adult gaming licence for the address at.

I live on Morrison Avenue N17 and shop on the Bruce Grove High Road which has been undergoing improvement actions that local people have called for for some time. People have said that they want less gaming and betting shops. We already have a high density of these in the area and they create real problems for us. People hang out in front of them and deal in drugs and violently harass and proposition passers by (stand in front of the betting shop just up road from this proposed location, next to the post office and you will see what it means).

So there is a real threat of this shop bringing crime and serious anti-social behaviour to our area which is already severely affected by this.

Our neighbourhood is also officially classed as deprived and so there is no need to provide another place for local people to lose money - gambling shops obviously have the odds set so that they make money and this means that the majority of users will be losing the little money that they have in these places. These shops provide absolutely no social value to an area and only bring problems.

Please refuse this application for yet another Gaming centre as there are enough in our area.



## Roye Chanel

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**From:** [REDACTED]  
**Sent:** 22 November 2018 15:15  
**To:** Licensing  
**Subject:** comment on proposal to license Adult Gaming Centre at Unit 1, 450-454 High Road, Tottenham, London N17 9JN

To whom it may concern:

I am writing to oppose the licensure of Adult Gaming Centre at Unit 1, 450-454 High Road, Tottenham, London N17 9JN. The proposed location has problems with antisocial behaviour in the proximity of, and possibly associated with, existing betting shops -- including drinking and drug use, drug sales, violence and late night noise. My family and I avoid walking on the High Road because of these problems, and the granting of this license is likely to put off more residents.

Sincerely,

[REDACTED]  
Scotland Green, N17 9TU  
[REDACTED]



**Roye Chanel**

---

**From:** [REDACTED]  
**Sent:** 02 December 2018 12:56  
**To:** Barrett Daliah; Licensing  
**Subject:** Objection to possible Adult Gaming Centre at Unit 1, 450-454 High Road, Tottenham

Dear Daliah and Licensing

As the landlord of Holcombe Market I would like to formally object to the licensing application for an Adult Gaming Centre at Unit 1, 450-454 High Road Tottenham.

Holcombe Market is situated adjacent to BetFred, and there are a further three bookmakers (William Hill, Ladbrokes and Paddy Power) in close proximity. All four of these establishments have a large number of FOBTs. There is also a 24 hour Gaming Centre directly opposite the proposed site. In view of the well publicised number of vulnerable people who live in the Tottenham Hale and Bruce Grove wards it simply cannot be right to open yet another gambling centre in the area.

There is already a serious problem with ASB outside BetFred which both Haringey Council and the Police are struggling to keep under control. Opening a Gaming Centre just a few doors away will only make this problem worse. The 24 hour Gaming Centre has also had many incidents of ASB and I have seen the Police attending the site on numerous occasions.

I am sure that after considering all of these facts that Licensing will come to the right decision which is to turn down this application.

Kind Regards

[REDACTED]  
Holcombe Market

**Ward Councillors**

## Roye Chanel

---

**From:** Cllr Brabazon Zena  
**Sent:** 22 November 2018 14:46  
**To:** Licensing  
**Subject:** FW: Objection to granting of licence for Adult Gaming Centre at Unit 1, 450-454 High Road, Tottenham

Dear Licensing

I am writing to you again regarding the application for an Adult Gaming Centre at Unit 1, 450-454 High Road Tottenham. As well as being a councillor, I am a local resident living some five minutes from Tottenham High Road. I also chair our local Residents' Association – Dowsett Estate RA.

I have further considered my representation and wish to make these additional comments.

The Council's Statement of Gambling Policy sets out the licensing objectives related to gambling premises.

*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.*

It makes reference to using local area profiles as part of a risk based approach and the detail on this is in appendix 2 of the policy. The Appendix makes clear that Bruce Grove and Tottenham Hale wards score highly on the Index of Multiple Deprivation in relation to crime, anti-social behaviour and have very high levels of people living in the vicinity who would be considered vulnerable. 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'.

This proposed Adult Gaming Centre will be across the road from the existing Adult Gaming Centre on Tottenham High Road. That centre is open 24 hours and I understand has had problems with anti-social behaviour and crime and disorder, which on occasion has required the police to intervene. It is therefore of great concern to me, that another such establishment is proposed on our High Road and I would ask that this is brought before the Licensing Committee to consider.

Thank you

Cllr Zena Brabazon  
Labour Member for Harringay Ward  
Cabinet Member for Civic Services

Haringey Council  
225 High Road, River Park House, N22 8HQ

t. 0208 489 5788  
m. 07812677710  
[zena.brabazon@haringey.gov.uk](mailto:zena.brabazon@haringey.gov.uk)

[www.haringey.gov.uk](http://www.haringey.gov.uk)  
twitter [@haringeycouncil](https://twitter.com/haringeycouncil)  
[facebook.com/haringeycouncil](https://facebook.com/haringeycouncil)

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**From:** Cllr Brabazon Zena

**Sent:** 19 November 2018 15:14

**To:** Barrett Daliah <[Daliah.Barrett@haringey.gov.uk](mailto:Daliah.Barrett@haringey.gov.uk)>; Licensing <[Licensing.Licensing@haringey.gov.uk](mailto:Licensing.Licensing@haringey.gov.uk)>

**Subject:** FW: Objection to granting of licence for Adult Gaming Centre at Unit 1, 450-454 High Road, Tottenham

Dear Daliah and Licensing

I am writing to formally object to the licensing application for an adult gaming centre at unit 1 450-454 High Road, Tottenham, London N17 9JN. There is already a 24hr gaming centre/slot machine centre almost directly opposite this proposed venue, and there are five betting shops in the immediate vicinity. There are at least three further betting shops on Tottenham High Road – one near Philip Lane and a further two near Northumberland Park.

These establishments, and in particular the number of betting shops and the adult gaming centre in Bruce Grove form a cluster of gambling venues which already cause anti-social behaviour in the area. I believe opening another will encourage further gambling and will act as a magnet for vulnerable people.

Thanks

Cllr Zena Brabazon  
Labour Member for Harringay Ward  
Cabinet Member for Civic Services

Haringey Council  
225 High Road, River Park House, N22 8HQ

t. 0208 489 5788  
m. 07812677710  
[zena.brabazon@haringey.gov.uk](mailto:zena.brabazon@haringey.gov.uk)

[www.haringey.gov.uk](http://www.haringey.gov.uk)  
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[facebook.com/haringeycouncil](https://facebook.com/haringeycouncil)

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## **Roye Chanel**

---

**From:** Cllr Adje Charles  
**Sent:** 23 November 2018 14:56  
**To:** Licensing  
**Subject:** Objection to granting of licence for Adult Gaming Centre at Unit 1, 450-454 High Road, Tottenham

Hi there

I am writing to raise my objections to the granting of a licence under the Gambling Act 2005 to the applicant AGC at unit 1 450-454 High Road, Tottenham, London N17 9JN. The application is for the an Adult Gaming Centre at the heart of the area I represent in the ward of Tottenham Hale, Haringey.

Given the numerous issues in the area as well as the socio economic problems, opening an Adult Gaming Centre at the above premises or on the High Road is not acceptable, It will not add any value or improve on the quality of the lifestyle of the residents in the area.

I urge you to decline the licence.

Many thanks.

**Cllr Charles Adje**  
Cabinet Member - Strategic Regeneration  
Labour Member for White Hart Lane Ward

Internal: 7924 Mobile: 07870157924  
Email: Charles.adje@haringey.gov.uk  
Haringey Council, 5th Floor, River Park House  
225 High Road, Wood Green, London | N22 8HQ



## Roye Chanel

---

**From:** Gordon, Ruth (2010) <Ruth.Gordon.2010@live.rhul.ac.uk>  
**Sent:** 28 November 2018 12:45  
**To:** Licensing  
**Subject:** Objection to granting of licensing application for adult gaming centre at Unit 1, 450-454 High Road, Tottenham

Dear Licensing

I am writing to you again regarding the application for an Adult Gaming Centre at Unit 1, 450-454 High Road Tottenham. I am a councillor for the Tottenham Hale ward which covers this part of the High Road as well as being a local resident living at 158 Dowsett Road, N17 9DH, just five minutes from Tottenham High Road.

I would like to make some additional comments to my original objection having had some time to reflect and discuss the issue with local residents.

The Council's Statement of Gambling Policy sets out the licensing objectives related to gambling premises.

*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.*

It makes reference to using local area profiles as part of a risk based approach and the detail on this is in appendix 2 of the policy. The Appendix makes clear that Bruce Grove and Tottenham Hale wards score highly on the Index of Multiple Deprivation in relation to crime, anti-social behaviour and have very high levels of people living in the vicinity who would be considered vulnerable. 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'.

This proposed Adult Gaming Centre will be across the road from the existing Adult Gaming Centre on Tottenham High Road. That centre is open 24 hours and I understand has had problems with anti-social behaviour and crime and disorder, which on occasion has required the police to intervene. It is therefore of

great concern to me, that another such establishment is proposed on our High Road and I would ask that this is brought before the Licensing Committee to consider.

Thank you in advance.

Regards,

Ruth Gordon

Cllr Ruth Gordon

Tottenham Hale ward

[Ruth.Gordon@haringey.gov.uk](mailto:Ruth.Gordon@haringey.gov.uk)

## Roye Chanel

---

**From:** Cllr Opoku Felicia  
**Sent:** 05 December 2018 22:57  
**To:** Licensing  
**Cc:** Cllr Ejiofor Joseph; Cllr White Matthew; Barrett Daliah  
**Subject:** Objection to granting of licence for Adult Gaming Centre at Unit 1, 450-454 High Road, Tottenham

Dear All,

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

T – 07812677717

E – [felicia.opoku@haringey.gov.uk](mailto:felicia.opoku@haringey.gov.uk)

A - Haringey Council | 5th Floor, River Park House | 225 High Road | Wood Green, London | N22 8HQ

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## **Trade Representation**

## Roye Chanel

---

**From:** elizabeth speed <espeed@novomatic.co.uk>  
**Sent:** 06 December 2018 18:11  
**To:** Licensing  
**Cc:** Tracey Rose  
**Subject:** The Gambling Act 200: AGC Application Unit 1, 450-454 High Road Tottenham N17 9JN.  
**Attachments:** IMG\_0742.JPG

**Importance:** High

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

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 for 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 followings representation.

1. The consultation period is unclear. The council website says that the last date for representations is 6 December 2018 whilst the attached notice of application which is in the window of the site states that it is 7 December 2018. A further confusion is that the application itself, which you have kindly provided, has two "received" dates. I assume the later date is the date on which outstanding documents and/or the fee, were received. The application cannot be treated as complete until all detail as required in the Gambling Act (Premises Licences and Provisional Statements) Regulations 2007 (the Regulations), is received by the Licensing Authority. That appears to have been the 13<sup>th</sup> November. That in turn means that the last date for representations would be 10 December 2018 – not 6 or even 7 December 2018. This is a real deficiency as the error renders the notice defective under the Regulation which specifically provide for such a situation. The date also sets the clear window in which the application must be advertised
2. Have the notices 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)?
3. 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, I note that the site is also the subject of an application for planning permission. 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 those circumstances, the appropriate application would be for a provisional stement 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.
4. It is not clear that the applicant has fulfilled its obligations under 2.8 pf your Statement of Policy. There is no information setting out how the applicant will fulfil the relevant LCCP code provisions relating to Social Responsibility. That is clearly something that is critical to the application and does not appear to have been provided to the Authority or indeed to Responsible authorities.
5. Has the applicant provided the LRA to the Responsible authorities as required by the LCCP?
6. Finally, the plan accompanying the application appears defective in that the boundary of the premises to be covered by the licence and the boundary of the area in which gaming machines will be available for use, are not clearly marked on the plan as required by the Regulations. The plan is a very important part of the application and of licences and this is a real issue.

Please accept the above serious issues as representations in relation to the application

I should be grateful if you wold confirm receipt. I may have further representations to make and reserve Talarius Ltd's position in this regard.

Elizabeth Speed

Group General Counsel  
Novomatic UK  
For Talarius Limited

Direct +44 (0) 191 497 8222  
Mobile +44 (0) 7808 571 588  
espeed@novomatic.co.uk

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## Shah Noshaba

---

**From:** elizabeth speed <espeed@novomatic.co.uk>  
**Sent:** 07 December 2018 15:05  
**To:** Licensing  
**Subject:** The Gambling Act 2005: AGC Application Unit 1, 450-454 High Road Tottenham N17 9JN.

**Importance:** High

Dear Sirs,

I write further to my email below containing representations on behalf of Talarius Limited, which is an interested party under section 158 of the Gambling Act 2005, in relation to the Gambling Act 2005 application for an AGC at the above site,

Please accept my apologies for the typographical error at paragraph 2 below – some words were omitted. The sentence should read: "Have the notices 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) *contain the correct date by which representations must be made.*" [italics added]

I would also like to make the following additional representations in relation to the Local Risk Assessment that has been filed by the Applicant. The Local Risk Assessment is deficient in a number of ways, including the following:

1. It does not identify two local centres for those seeking treatment for drug/alcohol dependencies – BUBIC and Blenheim CDP. As a result there are no mitigating steps to deal with these centres.
2. The LRA does not identify places of worship, which are referred to in the draft Local Area Profile to be effective in January 2019.
3. While the LRA identifies local schools, no measures to mitigate risks arising are included in the document – just a statement that they are there.
4. Similarly, there are no mitigating steps included for the risk of the close location of the CAB – just a statement that it is there.
5. Related to the above, the first column in the table refers to "Risk Assessment". It is not clear what this purports to relate to. I assume that it was meant to be the risk identified, but it is not clear. The last 4 entries under this heading refer to "Awareness" of particular facts. "Awareness" is not a risk and it is very difficult to understand what risks are being referred to and what steps are required by way of mitigation. The "impact" column of the unidentified risks is not completed.

Please accept these additional representations in relation to the application.

I should be grateful if you would confirm receipt.

Yours faithfully,

Elizabeth Speed  
Group General Counsel  
Novomatic UK  
For Talarius Limited

---

**From:** elizabeth speed  
**Sent:** 06 December 2018 18:11  
**To:** 'Licensing' <Licensing.Licensing@haringey.gov.uk>  
**Cc:** 'Tracey Rose' <Tracey.Rose@Luxury-Leisure.co.uk>  
**Subject:** The Gambling Act 200: AGC Application Unit 1, 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 for 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 followings representation.

1. The consultation period is unclear. The council website says that the last date for representations is 6 December 2018 whilst the attached notice of application which is in the window of the site states that it is 7 December 2018. A further confusion is that the application itself, which you have kindly provided, has two "received" dates. I assume the later date is the date on which outstanding documents and/or the fee, were received. The application cannot be treated as complete until all detail as required in the Gambling Act (Premises Licences and Provisional Statements) Regulations 2007 (the Regulations), is received by the Licensing Authority. That appears to have been the 13<sup>th</sup> November. That in turn means that the last date for representations would be 10 December 2018 – not 6 or even 7 December 2018. This is a real deficiency as the error renders the notice defective under the Regulation which specifically provide for such a situation. The date also sets the clear window in which the application must be advertised
2. Have the notices 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)?
3. 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, I note that the site is also the subject of an application for planning permission. 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 those circumstances, the appropriate application would 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.
4. It is not clear that the applicant has fulfilled its obligations under 2.8 of your Statement of Policy. There is no information setting out how the applicant will fulfil the relevant LCCP code provisions relating to Social Responsibility. That is clearly something that is critical to the application and does not appear to have been provided to the Authority or indeed to Responsible authorities.
5. Has the applicant provided the LRA to the Responsible authorities as required by the LCCP?
6. Finally, the plan accompanying the application appears defective in that the boundary of the premises to be covered by the licence and the boundary of the area in which gaming machines will be available for use, are not clearly marked on the plan as required by the Regulations. The plan is a very important part of the application and of licences and this is a real issue.

Please accept the above serious issues as representations in relation to the application

I should be grateful if you would confirm receipt. I may have further representations to make and reserve Talarius Ltd's position in this regard.

Elizabeth Speed  
Group General Counsel  
Novomatic UK  
For Talarius Limited

Direct +44 (0) 191 497 8222  
Mobile +44 (0) 7808 571 588  
[espeed@novomatic.co.uk](mailto:espeed@novomatic.co.uk)

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## NOTICE OF APPLICATION FOR A PREMISES LICENCE UNDER THE GAMBLING ACT 2005

Notice is hereby given that **GT PROMOTIONS LTD**

*[Give the full name of the applicant(s)]*

of the following address:

**GROVEDELL HOUSE, 15 KNIGHTSWICK ROAD, CANVEY ISLAND, SS8 9PA**

is/are opening for a **ADULT GAMING CENTRE**

premises licence under section 159 of the Gambling Act 2005. *[insert kind of premises licence being applied for]*

The application relates to the following premises:

**Unit 1, 450-454 High Road, Tottenham, N17 5JN**

*[Give the trading name to be used at the premises, and the address of the premises (or, if none, give a description of the premises and their location)]*

The application has been made to: **London Borough of Haringey**

*[Specify the name of the licensing authority to which the application has been made]*

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

Any of the following persons may make representations in writing to the licensing authority about the application:

- A person who lives sufficiently close to the premises to be likely to be affected by the authorised activities
- A person who has business interests that might be affected by the authorised activities
- A person who represents someone in any of the above two categories.

Any representations must be made by the following date: **7/12/2018**

It is an offence under section 342 of the Gambling Act 2005 if a person, without reasonable excuse, gives to a licensing authority for a purpose connected with that Act information which is false or misleading.

## **Met Police Representation**

## Roye Chanel

---

**From:** Roye Chanel on behalf of Licensing  
**Sent:** 05 December 2018 13:42  
**To:** 'Roger'  
**Subject:** METROPOLITAN POLICE REPRESENTATION- Application for a New Gambling Premises Licence - Unit 1, 450-454 High Road, Tottenham, London N17 9JN (WK/424197)  
**Attachments:** Application & Risk Assessment.pdf; Plan.pdf  
**Importance:** High

Afternoon Roger,

Please see representation below from the Metropolitan Police regarding the above application.

Kind regards

Chanel Roye  
Licensing Administrator



Licensing Authority I  
1st Floor I River Park House I 225 High Road I Wood Green I London I N22 8HQ  
T: 020 8489 5544  
E: [chanel.anderson@haringey.gov.uk](mailto:chanel.anderson@haringey.gov.uk)  
[twitter@haringeycouncil](https://twitter.com/haringeycouncil)  
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**From:** Mark.L.Greaves@met.pnn.police.uk <Mark.L.Greaves@met.pnn.police.uk> **On Behalf Of** yrmailbox-.licensing@met.pnn.police.uk  
**Sent:** 05 December 2018 11:42  
**To:** Licensing <Licensing.Licensing@haringey.gov.uk>; Shah Noshaba <Noshaba.Shah@haringey.gov.uk>  
**Cc:** Barrett Daliah <Daliah.Barrett@haringey.gov.uk>  
**Subject:** Application for a New Gambling Premises Licence - Unit 1, 450-454 High Road, Tottenham, London N17 9JN (WK/424197)  
**Importance:** High

Dear Mrs Barrett

I am writing as Haringey Police Licensing Officer making a representation against the attached application for a New Gambling Premises Licence by GT Promotions for City Slots, Unit 1, 450 – 454 High Road, London N17 9JN.

The proposed venue is in Tottenham Hale Ward in a High Road with a similar venue opposite and nearby Betting Shops. This immediate area has been a crime generator for many years despite patrols and initiatives by the Safer Neighbourhood Team supported by specialist units and Community / Business Groups. Drug dealing is a serious concern and it is known they will loiter in the vicinity and attempt to frequent gambling venues to avoid Police and inclement weather and to target potential clients despite the efforts of the venues to deter them. Once someone is inside the venue and slowly playing on a gaming machine whilst his friends chat with him it is not always easy or safe for staff to remove them despite their suspicions regarding the persons real reason for being in the venue. Drug dealers include gang members. Drug dealing and street drinking add to the serious anti-social behaviour taking place in this immediate area.



The application is to trade 24 hours. The Local Gambling Risk Assessment compares customer traffic averages with their Kilburn and consider Friday / Saturday to be the busiest day's rota's and door control measures are managed from that profile, Tottenham is expected to be similar, as opposed to every day. The venues late trading profile will operate a door entry control process ( doors are secured ) known or vetted customers are only allowed access so not controlled outside of 'late trading' hours and Friday and Saturdays.

Crime profiles for Betting Shops and similar venues show Gaming Machines and dealing with clients refused use of facilities generate the most crime and requirement for Police attendance.

The Local Gambling Risk Assessment mentions crime statistics, 385 reported incidents between June 2017 and July 2018 and a certain amount of anti-social behaviour such as litter and graffiti. The area covered by the 385 crimes reported is not made clear. Calls to Police not resulting in a crime report are not in the Assessment. Drug dealing, gangs and street drinking are not mentioned.

Police concerns in this matter are not about Haringey or Tottenham or even Bruce Grove / Tottenham Hale Wards but rather the vicinity where the proposed venue will be. The Safer Neighbourhood Teams are working with local businesses and community groups to combat the crime / anti-social behaviour concerns in this area and feel that the presence of a new venue of this type will only add to those concerns despite the efforts of the venues owners and its staff to negate them. This concern relates to the venues location. If located away from this area concerns would be lessened. Given the local issues and the nature of the venue including hours requested Police ask that the licence is not granted. Should the application be granted Police ask consideration be given to reducing the operating hours and having an SIA registered security operative present to control entry and client behaviour during operating hours.

Regards

Mark Greaves

**Mark Greaves PC 164YR  
Community & Youth Engagement  
Licensing Officer  
Haringey BOCU  
Territorial Policing**

**Tel: 020 3276 0150      Mobile: 07766 161877**

Haringey police are here

- *for victims,*
- *to build trust with communities,*
- *to prevent crime in partnership,*
- *and to bring offenders to justice.*

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## **Licensing Authority Representation**

## Roye Chanel

---

**Subject:**

FW: UNIT1 450 HIGH ROAD TOTTENHAM LONDON N17

**From:** Barrett Daliah

**Sent:** 26 November 2018 09:38

**To:** Licensing <[Licensing.Licensing@haringey.gov.uk](mailto:Licensing.Licensing@haringey.gov.uk)>

**Subject:** Fwd: UNIT1 450 HIGH ROAD TOTTENHAM LONDON N17

Dear Mr Etchells,

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.

Tottenham High Road has a diverse range of premises offering retail and leisure alongside a number of established premises providing gambling activity. The area also has a local soup kitchen and a drug outreach centre in close proximity. This area of the High road has had ongoing issues with street drinkers, drug dealing centred around the existing betting premises in the vicinity and the anti-social behaviour that comes from that activity.

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., 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 attached given 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 they could not afford to lose. 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 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.

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.

Daliah Barrett (Licensing Team Leader)  
Haringey Council - Licensing Authority

**Regeneration Team**

**Public Health Rep**

## Roye Chanel

---

**From:** Cavanagh Catherine  
**Sent:** 23 November 2018 12:49  
**To:** Licensing  
**Cc:** Ahmad Maria; Reba Toussainte; Trotter Keith; Hart Sarah; Maple Matthew; Barrett Daliah; McClellan Neil; D'Aguilar Marlene  
**Subject:** RE: Gambling/licensing application - Unit 1, 450-454 High Road N17 9JN  
**Attachments:** gambling licence 450-4 HiRd.docx

Dear Licensing

Please find the Regeneration objection attached and below.

### **Objection to Application for Premises Licence Gambling Act 2005: Adult Gaming Centre**

Unit 1, 450-454 High Road is within Bruce Grove District Centre, where significant investment is being made to improve the District Centre as part of Haringey Council's Tottenham High Road Strategy

The Development Management DPD 2017 Policy DM46 B is specifically referenced in the High Road Strategy as seeking: 'to address the proliferation of betting shops', which are already dominant in the area.

The retail survey at Bruce Grove summarised in the Draft *High Road Strategy* Feb 2018 states that the service is: 'dominated by hairdressers/hair supplies and betting shops'. The Soundings consultation report from 2014 headline findings include: 'people wanted fewer betting shops'.

There is already a cluster of five 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.

### **The Prevention of crime and disorder, Public safety and the Prevention of public nuisance**

In relation to the Gambling Act 2005, we are liaising with the police over concerns about anti social behaviour in the Bruce Grove local centre, where noisy groups frequently congregate outside betting shops.

The High Road Strategy seeks greater diversity in retail offer, more active frontages and community safety. The adult gaming centre would present an inactive frontage on a prime stretch of the High Road, reducing passive surveillance and making the townscape more hostile and less welcoming.

### **The protection of children from harm**

The proposals for 450-454 High Road are in direct conflict with Public Health's new Superzone around the Holy Trinity School, aimed at tackling gambling and other factors that could have a detrimental impact on health. An amusement centre would be attractive to young people.

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.

In addition, 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'

Yours sincerely  
Catherine Cavanagh



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Yours sincerely

Catherine Cavanagh

Regeneration Team, Haringey Council



Blenheim

Barnet, Enfield and Haringey **NHS**  
Mental Health NHS Trust

The Grove Drug Treatment Service  
9 Bruce Grove  
London N17 6RA  
Tel: 020 8702 6220

18/01/2019

To:  
The Licensing Team  
Level 1 North - River Park House  
225 High Road  
Wood Green  
N22 8HQ  
via email at [licensing@haringey.gov.uk](mailto:licensing@haringey.gov.uk)

Dear Licensing Team,

**Re: Objection to Application for a Premises license for Unit 1, 450-454 High Road, Tottenham, London, N17 9JN**

As an individual and on behalf of Haringey Drug Treatment Services (The Grove) I wish to raise an objection to this licensing application. The Grove provides treatment and support for vulnerable people suffering substance and alcohol addiction.

The Grove is part of BEH Mental Health NHS Trust. The service is located in close proximity to the proposed application. Our patients are vulnerable to the temptation of gambling which, as a result of their complex underlying issues, may disproportionately lead to problematic or addiction to gambling. Our patients are also frequently in a precarious financial position as a result of their health and social care issues. Access to further potential sources of debt, incurred by the attraction of gambling income, will only compound their difficulties.

In my opinion it would be in the interests of the local population and our patients for this application to be refused by London Borough of Haringey. For completeness I have copied this letter to Cllr Joseph Ejiofor, within his role as a Bruce Grove Ward Councillor.

Yours sincerely,

**Dr Pardeep Grewal BSc, MBBS, MSc, FRCPsych**  
Clinical Lead for Substance Misuse Services, Barnet, Enfield and Haringey Mental Health NHS Trust  
The Grove Drug Treatment Service 9 Bruce Grove London N17 6RA

cc [joseph.ejiofor@haringey.gov.uk](mailto:joseph.ejiofor@haringey.gov.uk)

## Appendix 4

### Proposed conditions

## **TOTTENHAM APPLICATION – GT PROMOTIONS LTD**

### **SUGGESTED CONDITIONS (24 January 2019)**

1. There shall be a minimum of 2 members of staff on duty at all times the premises are open.
2. One of those members of staff shall be SIA registered, be badged and be on duty at all times the premises are open.
3. External CCTV cameras shall be provided prominently facing in each direction along the High Road also covering the frontage of the premises and over the entrance door (3 cameras).
4. A covert CCTV camera will be mounted inside the door.
5. The CCTV system will be linked to a facial recognition system which in turn will identify members of the public who have been barred or self-excluded.
6. 12 internal CCTV cameras will be operated at all times.
7. 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 on reasonable notice including downloading footage in pdf format.
8. Toilets are to remain locked at all times and are only available to customers who have requested access. Anyone abusing the use of the toilets is to be banned.
9. 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. During the first 6 months of trading the 'buzzer system' shall be operated 24 hours a day.
10. Entry to the premises shall be limited to members only. The company will operate a membership scheme recording members details on its system, including their photograph.

**Appendix 5.**

**Sector specific Codes of Practice**



# **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 October 2018**

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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:

Gambling Commission  
Victoria Square House  
Victoria Square  
Birmingham B2 4BP  
T 0121 230 6666  
F 0121 230 6720  
E [info@gamblingcommission.gov.uk](mailto:info@gamblingcommission.gov.uk)

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 31 **October 2018**.

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 II: Suite of general conditions attached 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 etc

#### 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

- 1 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.
- 2 In the case of licensees which are bodies corporate, but not companies, any event substantially equivalent to those listed at 1 above.
- 3 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

- 4 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.
- 5 Any investment in a licensee which is not by way of subscription for shares.
- 6 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.



- 7 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.
- 8 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)

**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

### **Licence condition 16.1.1**

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

##### **All licences**

- 1 Licensees 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 for third parties

**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 of 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 Combating 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 between them research into the prevention and treatment of gambling-related harm, develop harm prevention approaches and identify and fund treatment to 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.
- 3 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.
- 4 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.
- 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.

### **3.3 Gambling management tools and responsible gambling 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 (standard) (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 – SR code

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

- 1 Licensees must put into effect policies and procedures for customer interaction where they have concerns that a customer's behaviour may indicate problem gambling. The policies must include:
  - a identification of the appropriate level of management who may initiate customer interaction and the procedures for doing so
  - b the types of behaviour that will be logged/reported to the appropriate level of staff and which may trigger customer interaction at an appropriate moment
  - c the circumstances in which consideration should be given to refusing service to customers and/or barring them from the operator's gambling premises
  - d training for all staff on their respective responsibilities, in particular so that they know who is designated to deal with problem gambling issues
  - e specific provision for making use of all relevant sources of information to ensure effective decision making, and to guide and deliver effective customer interactions, including in particular
    - i provision to identify at risk customers who may not be displaying obvious signs of, or overt behaviour associated with, problem gambling: this should be by reference to indicators such as time or money spent
    - ii specific provision in relation to customers designated by the licensee as 'high value', 'VIP' or equivalent
  - f specific provision for interacting with customers demonstrating signs of agitation, distress, intimidation, aggression or other behaviours that may inhibit customer interaction
- 2 For gambling premises, licensees must ensure that their policies and procedures take account of the structure and layout of the gambling premises.
- 3 But such policies and procedures must be consistent with, and implemented with due regard to, licensees' duties in respect of the health and safety of their staff.



**Ordinary code provision 3.4.2**

**Customer interaction – ordinary code**

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

- 1 Operators should work together to share experience and deliver good practice across the full range of social responsibility requirements for customer interaction.
- 2 Operators should keep a record of customer interactions, and where an interaction has been ruled out, the reasons for this. Where an interaction has taken place at a later date, this should also be recorded.
- 3 In providing training to staff on their responsibilities for customer interaction, licensees should have, as a minimum, policies for induction training and refresher training.

### 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
  - 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
  - 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 the 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 procedure, 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 advance 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 person offering alternative dispute resolution services whose name appears on the list maintained by the Gambling Commission in accordance with *The Alternative Dispute Resolution for Consumer Disputes (Competent Authorities and Information) Regulations 2015*.

## **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.



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