



LOCAL AREA RISK ASSESSMENT

Premises

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

Company

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

Assessment Completion

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



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Requirement to Comply

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

Effective as at 6 April 2016

Social responsibility code provision 10.1.1

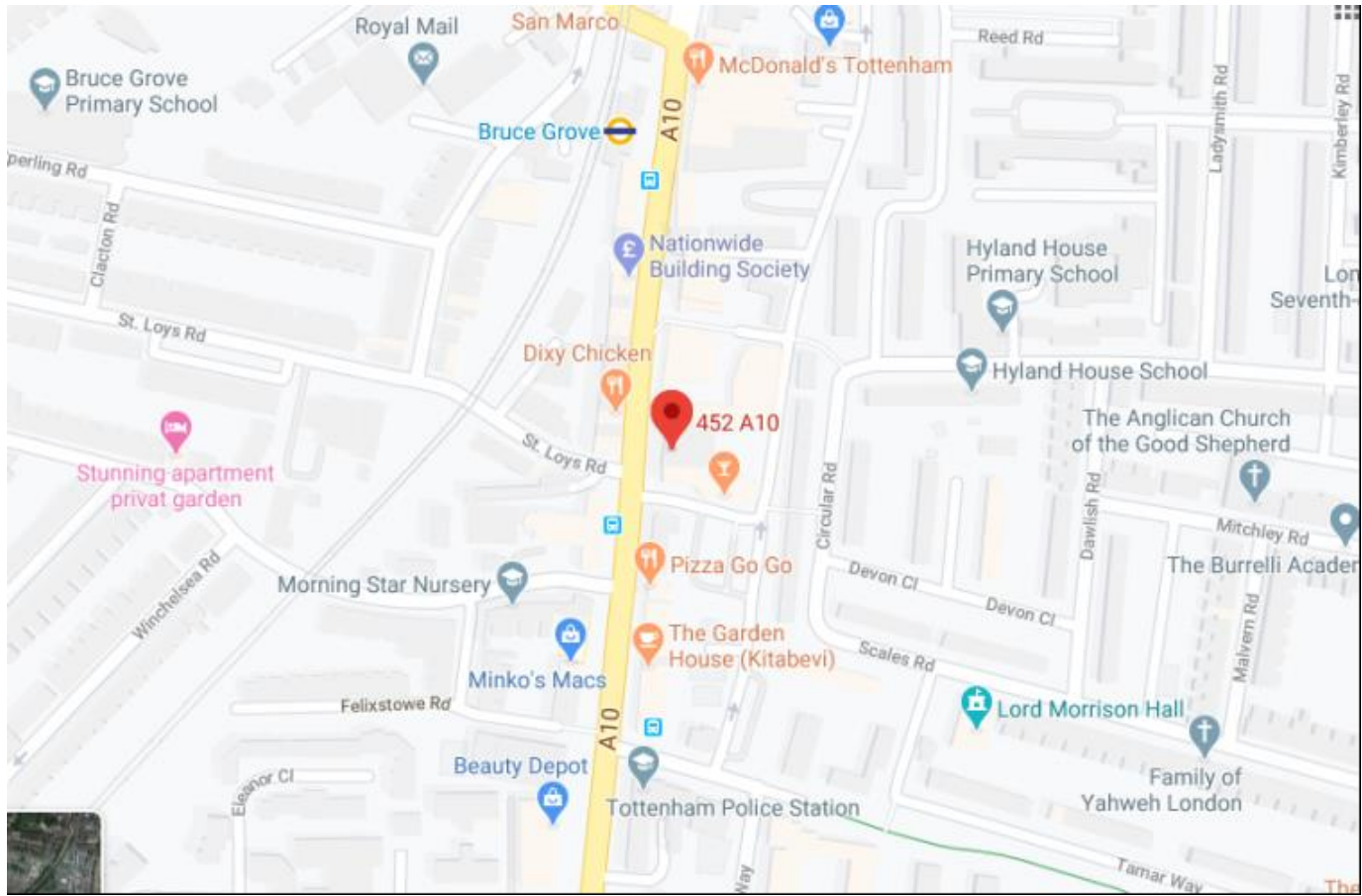
1. Licensees must assess the local risks to the licensing objectives posed by the provision of gambling facilities at **each of their premises**, and have policies, procedures and control measures to mitigate those risks. In making risk assessments, licensees must take into account relevant matters identified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

Ordinary code provision 10.1.2

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

Local Area Profile

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Current frontage of property

Proposed frontage of property

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

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



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

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

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

Adult Gaming Centres – Admiral

Pawn Shops – H&T Pawnbrokers

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

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

Post Office – Bruce Grove Post Office is very close by

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

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

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



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Schools

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

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

Junior Schools

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

Secondary Schools and Colleges

North London College is within a short distance of the venue with a further 4 being in the vicinity, these being Ambitious College, The College of Haringey, Enfield and N E London, National college of Digital Skills and the London College of Law Harris Academy and Park View are both Secondary Schools within a relatively short distance of the unit.

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



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Other areas of interest to children and young persons:

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

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

Centres for vulnerable people

BUBIC drug and alcohol dependency unit – Bruce Grove

Blenheim CDP drug and alcohol dependency unit – Bruce Grove

Haringey drug & alcohol service – Bruce Grove

Barnet, Enfield & Haringey Mental Health Trust – St Ann's Road

HAGA, Action on Alcohol – Park Lane

Ashness Care – Philip Lane

Citizen's Advice Haringey – Waltheof Gardens

OK Foundations Soup Kitchen – Holcombe Road

Tottenham Town Hall Food Bank – Town Hall Approach Road

Home Start Children's Home – Tower Gardens Road

CARIS Haringey Homeless Shelter – Philip Lane

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

St Mungo's Homeless Shelter – Tottenham High Road



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St Mungo's Homeless Shelter – High Cross Road

Highway House Homeless Shelter – Fountayne Road

Residents Associations and other groups

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

Risk from gambling related harm

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

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

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

CCTV systems

CCTV system specification is detailed in Appendix 1



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Customer signage will be in place

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

Door Control

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

External CCTV coverage.

- Mag lock door control
- Minimum of two members of staff on duty at all times
- Night Security staff on duty from Thursday to Sunday
- Door and frontage design will ensure that children will not be able to see gambling taking place whether on the footpath or travelling by bus or other vehicle type.

Local Factors

Crime statistics – (Source Police.uk)

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

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



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

We are also aware that drug dealing, gangs and street drinking are a particular problem in the area as well as drug use and gang members fleeing into betting shops and AGCs as places of sanctuary – City Gaming propose to minimise the risk by the implementation of systems as described in Appendix 1 which are in addition to the door control process as detailed in the previous section.

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

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

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

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

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

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



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

Ethnic and Religious Demographics

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

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

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

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

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

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



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

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

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

Gambling Act 2005 – The Licensing Objectives

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

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

Risk Assessment	LO	Level of Risk	Impact	Control System	Risk Management	Reviewed
Children entering site unnoticed/unchallenged	1	Low	Severe to Business Sever to Child	Interior Design	✓ Constant and effective monitoring of the main entrances by Managers/Staff/Security at all times. ✓ Staff have uninterrupted visibility of all gaming machines at all times	March 2020



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				Exterior Design	<ul style="list-style-type: none"> ✓ Front of the Venue is designed not to be attractive to children and challenge 25 posters clearly visible from street. ✓ Frontage and doors designed so that children cannot see gambling taking place from the footpath or passing vehicles 	March 2020
				Physical	<ul style="list-style-type: none"> ✓ Think 25 Policies in place and implemented ✓ Regular independent (by Check Policy) age verification testing ✓ Regular staff training in-house and through e learning with 6 monthly refresher courses ✓ The City Gaming Limited/Game Nation policies and procedures relating to the LCCP ✓ the E Learning program ✓ Clear & Prominent premises signage and machine labelling ✓ Thank 25 material displayed ✓ Regulatory Return data collected through IHL tablet process and reviewed weekly with weekly reporting up to CEO level by Commercial team ✓ Policy of preventing the wearing of hoods ✓ Health and Safety Policies & procedures in place 	March 2020
Failure to deal with Consumers making complaints about the outcome of Gambling	2	Moderate	Moderate to Business Severe to vulnerable customer	Physical	<ul style="list-style-type: none"> ✓ Machine maintenance carried out by qualified engineer ✓ Machine turned off immediately should fault be identified ✓ Machine only acquired from licensed suppliers. 	March 2020
				Systems	<ul style="list-style-type: none"> ✓ Complaints Procedure & Forms available on premises ✓ Staff training through E Learning with 6 monthly refresher courses 	March 2020



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					<ul style="list-style-type: none"> ✓ Registered with ADR Entity – CEDR. Centre for Effective Dispute Resolution ✓ Compliant with Company Procedures 	
Failure to provide information to players on responsible gambling.	3	Low	Severe to Business Sever to Customers	Physical	<ul style="list-style-type: none"> ✓ Sufficient quantity of posters and leaflets. “Playing the machines” posters displayed prominently (with QR code) ✓ All machines labelled displaying National Gambling Helpline number and website address. 	March 2020
				Systems	<ul style="list-style-type: none"> ✓ Stock control system in place for leaflets and is monitored daily. ✓ Adhere to Company Procedures and Policies ✓ Regular audit to ensure system is in place 	March 2020
Failure to recognise signs associated with problem gambling or substantial changes in gambling style.	3	Moderate	Severe to Business Sever to Customers	Interior design	<ul style="list-style-type: none"> ✓ Players behaviour and positions are closely and effectively monitored. Clear lines of sight to all machines and effective CCTV systems 	March 2020
				Systems	<ul style="list-style-type: none"> ✓ Staffed trained in customer interaction via E Learning with 6 monthly refresher training ✓ Clear policy to record the procedure for interaction and logging of interactions through IHL SmartHub tablet system. All interactions reviewed weekly by the Commercial team and a weekly report produced and distributed to all senior management. 	March 2020
Staff lacking awareness and unsure how to recognise or respond to a vulnerable person who may be at risk	4	Moderate	Severe to Business Sever to Customers	Training	<ul style="list-style-type: none"> ✓ Safeguarding Adults Policy and Training 	March 2020
Failure to properly administer the self-exclusion process and	3	Low	Severe to Business Sever to Customers	Physical	<ul style="list-style-type: none"> ✓ CCTV effectively positioned at entrance to benefit identification of knowns excluders. ✓ Use of VeriGuard system to automatically alert staff 	March 2020



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maintain its effectiveness thereafter, including breaches and reinstatements.					of any known Excluded customer and prevent access	
				Interior Design	<ul style="list-style-type: none"> ✓ Consideration given to internal layout so as to ensure effective monitoring of customers entering the premises and those that might enter in order to gamble on behalf of self-excluder. 	March 2020
				System	<ul style="list-style-type: none"> ✓ IHL Multi Operator Self Exclusion System in place ✓ All exclusion and breach data subject to weekly review by Commercial team and reported to senior management. ✓ IHL tablet always available to ensure that customers wishing to exclude can do so ✓ Details of Self Excluded customers distributed to other sites and operators via IHL/Bacta MOSES systems 	March 2020
Failure to identify attempts to launder money on the premises (e.g. dye stained notes) and to follow correct reporting procedure.	1	Low	Sever to business Low to customers	Interior Design	<ul style="list-style-type: none"> ✓ Effective monitoring of customers' behaviour by good lines of sight from floor staff and Managers, and well positioned CCTV cameras. 	March 2020
				Physical	<ul style="list-style-type: none"> ✓ Where machines operate TITO, tickets cannot be transferred or used in any other premises. Suspicious tickets are automatically flagged and staff interaction is then required ✓ The majority of larger wins are paid by hand which forces interaction with staff 	March 2020



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				Training	<ul style="list-style-type: none"> ✓ Red Flag indicators trained. ✓ For example – Increased spend inconsistent with the customer’s normal profile, unknown customers staking large amounts, customers with no known means of income staking large amounts etc 	March 2020
				System	<ul style="list-style-type: none"> ✓ The Company has an appointed Money Laundering Officer and has Policies and Procedures in place which are reviewed regularly, are implemented and monitored in respect of Money Laundering and Suspicious Transactions including a Disclosure Procedure for use by staff and reporting to the National Crime Agency using SARs. 	March 2020
Poor security increasing vulnerability to crime	1	Low	Sever to business Sever to customers	Physical	<ul style="list-style-type: none"> ✓ StaffGuard system incorporating Panic Alarms that connect to an independent Conflict Management Centre ✓ Intruder alarm installed and regularly serviced ✓ Effective CCTV coverage with data stored for a minimum of 30 days 	March 2020
				Exterior Design	<ul style="list-style-type: none"> ✓ Toughed glass windows and door to limit criminal damage ✓ Outdoor CCTV with full coverage of all entrances 	March 2020
				Systems	<ul style="list-style-type: none"> ✓ Limited cash desk and personal floats ✓ Regular liaison with local law enforcement agencies ✓ Log maintained should Police be called to assist. All incidents reviewed weekly by Commercial Team and reported to senior management ✓ Keep abreast of local crime trends 	March 2020



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



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

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

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

Examples of our operations are as follows;

CCTV

4K High Definition CCTV System

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

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

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



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

Door Entry Controls

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

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

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

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

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

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



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

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

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

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

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

Door Entry System



Front Door Entry System provides additional Security.

Buzz to Enter

Video Image presented to Internal screen

Allows venue staff to assess
Who is requesting to enter?

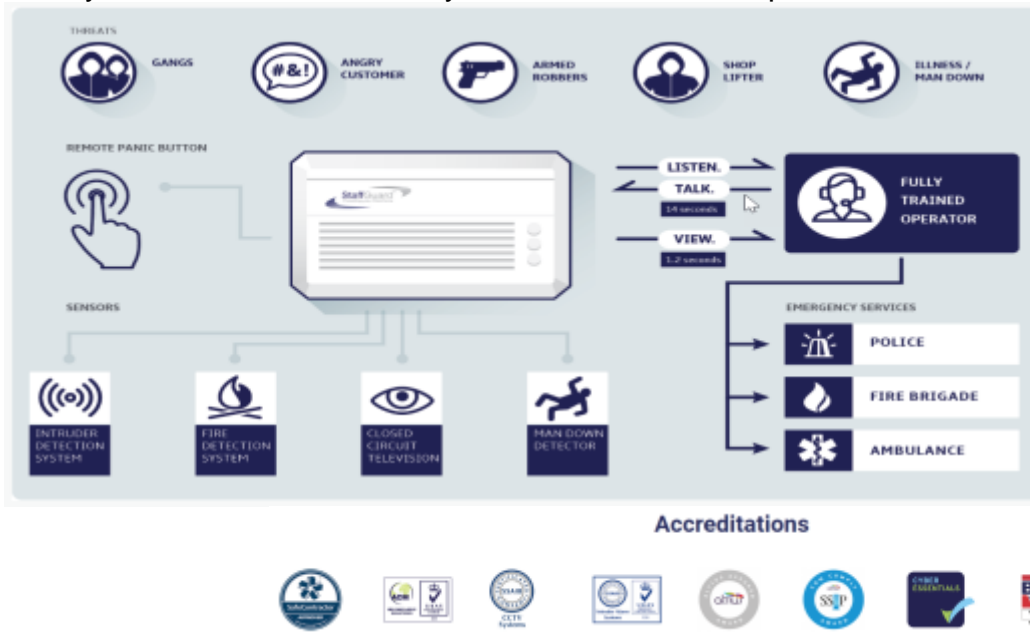
Are there multiple people

Voice over control to engage directly



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The system can be used for any circumstance that requires assistance



Recruitment

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



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Training

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

See Document named: Conflict Resolution