

# Smart Hub Background



## SmartHUB – The Support Hub for the Gaming Industry

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

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

# Smart Hub – Overview

A digital log has numerous advantages of a paper log

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

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



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

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

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

# Smart Hub – Player Protection Systems

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

## Self Exclusion

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

## Self Exclusion Breaches

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

## Age Verification Challenges

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

## Customer Interactions

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

# IHL Smart hub – Dash Board

The screenshot shows the IHL Smart Hub dashboard. At the top, there is an orange header with the IHL Hub logo on the left and 'Dashboard' and 'Profile' links on the right. A left-hand navigation menu lists various sections: Dashboard, SmartExclusion, Age Verification Log, SmartINCIDENT, SmartALERT, Anti-Money Laundering, SmartINTERACTION, ADR, AV TestPurchase, Compliance, Feature Activation, and IHL Hub. The main content area is titled 'Dashboard' and features three summary cards: 'Total Venues' with a value of 35, 'Total Exclusions' with a value of 97, and 'Total Breaches' with a value of 146. Below these is a section titled 'Since Last Sign In' containing a table with three rows: 'Total Venues' (0), 'Total Exclusions' (0), and 'Total Breaches' (0).

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

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

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

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

# IHL Smart hub – Dash Board

**IHL Hub** Dashboard Profile

Dashboard

SmartExclusion ▶  
Age Verification Log ▶  
SmartINCIDENT ▶  
SmartALERT ▶  
Anti-Money Laundering ▶  
SmartINTERACTION ▶  
ADR ▶  
AVTestPurchase ▶  
Compliance ▶  
Feature Activation ▶  
IHL Hub ▶

### Dashboard

**Total Records**

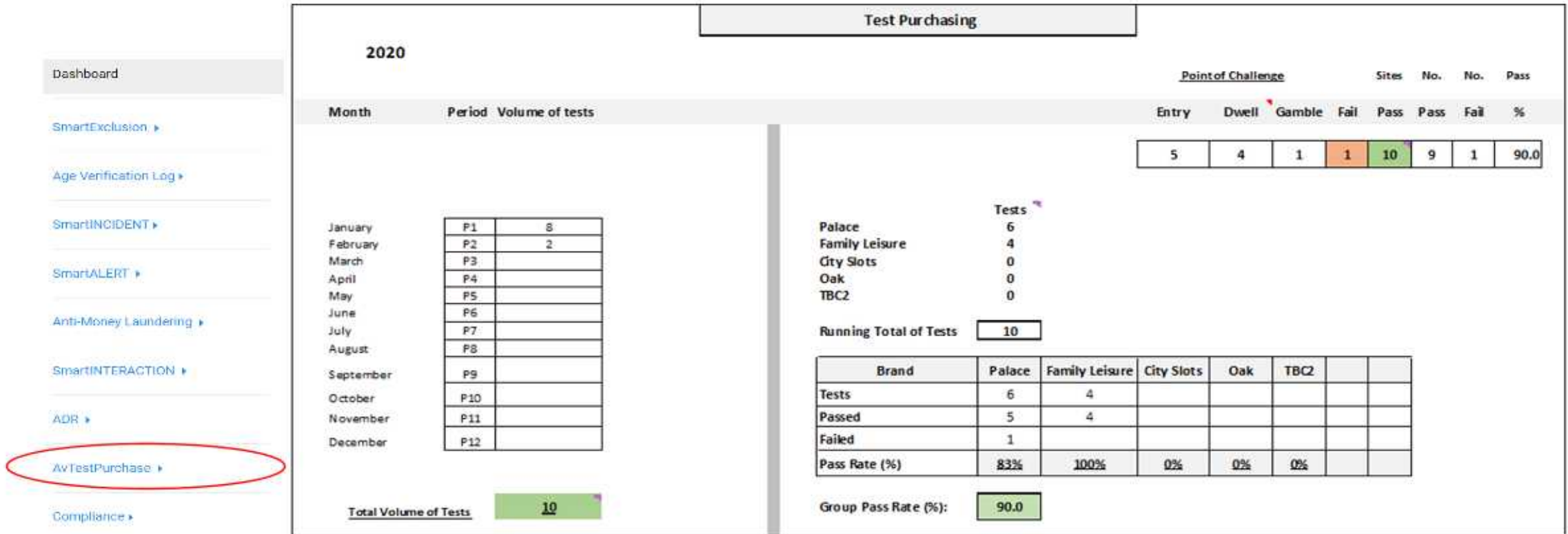
Total Venues →	35	Total Exclusions →	97	Total Breaches →	146
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**Since Last Sign In**

Total Venues	0
Total Exclusions	0
Total Breaches	0

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

# Age Verification



- City Gaming employ a third party test purchase provider to carry out regular Age Verification testing across all venues. This is carried out by CheckPolicy who also carry out AV testing on behalf of Bacta.
- All tests are monitored and reported on a weekly basis. Test failures are investigated within 48 hours of the test report being received and remedial action/disciplinary action taken.
- The following chart shows the 2019 results from the businesses within the City Gaming group.









- We are tested independently every week across our business
- Are results exceed the national average consistently
- Our test results prove we are exceptionally proactive in this Area
  - Any failure occurs, the entire venue undergo retraining

# Self Exclusions reporting

**IHL Hub** Dashboard Profile

## Exclusions

Filter exclusions >

 Name: Mr Lee Ford Added on: Mar 17, 2020 Expires on: Mar 17, 2021	 Name: Mr Zaman Qorbani Added on: Mar 16, 2020 Expires on: Mar 16, 2021	 Name: Mr Iosub Iulian Added on: Mar 15, 2020 Expires on: Mar 15, 2021	 Name: Mr Gyan Bukram Added on: Mar 15, 2020 Expires on: Mar 15, 2021
 Name: Miss Cathy Cathy Added on: Mar 14, 2020 Expires on: Mar 14, 2021	 Name: Mr Osman Nedunchezhain Added on: Mar 13, 2020 Expires on: Mar 13, 2021	 Name: Mrs Ramca Gladwin Added on: Mar 5, 2020 Expires on: Mar 5, 2021	 Name: Miss Amy Hawksworth Added on: Mar 5, 2020 Expires on: Mar 5, 2021

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

# Interaction – Smart Incidents example

**IHL Hub** Dashboard Profile

Dashboard

SmartExclusion

Age Verification Log

SmartINCIDENT

**Incidents**

Reports

SmartALERT

Anti-Money Laundering

### SmartINCIDENTS

Filter Incidents

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



# Incident detail Example

**IHL Hub** Dashboard Profile

Dashboard  
SmartExclusion  
Age Verification Log  
SmartINCIDENT  
**Incidents**  
Reports  
SmartALERT  
Anti-Money Laundering  
SmartINTERACTION  
ADR  
AVTestPurchase  
Compliance

## Incident Details REVIEW INCIDENT

### Incident Details

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

### Other Details

#### Police Assistance Details

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

#### Incident Injury Details

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

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

## SmartINCIDENTS

Filter Incidents &gt;

Incident No	Venue Name	Incident Occured at	Incident Type	Is Reviewed	
5946	Ramsgate Palace	March 20, 2020 - 08:30PM	incident relating to barred or previously barred customer	Not Reviewed	
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# Incident Detail -

**IHL Hub** Dashboard Profile ▾

Dashboard  
SmartExclusion ▶  
Age Verification Log ▶  
SmartINCIDENT ▾  
**Incidents**  
Reports  
SmartALERT ▶  
Anti-Money Laundering ▶  
SmartINTERACTION ▶  
ADR ▶  
AvTestPurchase ▶

## Incident Details

[REVIEW INCIDENT](#)

### Incident Details

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

### Other Details

#### Police Assistance Details

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

#### Incident Injury Details

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

# Area Managers Review Process

The screenshot displays the IHL Hub interface. The top navigation bar is orange and contains the IHL Hub logo on the left and 'Dashboard' and 'Profile' on the right. A left-hand sidebar lists various menu items: Dashboard, SmartExclusion, Age Verification Log, SmartINCIDENT (with a sub-menu for Incidents and Reports), SmartALERT, Anti-Money Laundering, SmartINTERACTION, ADR, and AvTestPurchase. The main content area is titled 'Incident Details' and is divided into two columns. The left column, 'Incident Details', lists fields such as Venue Name (Islington Palace), Occurred at (March 19, 2020 - 07:14PM), Type of incident (Incident relating to aggressive behaviour), Incident Description (a male walked into the shop looks at me and started shouting I asked for ID started shouting and calling me names, at this time I told him he's got to LEAVE THE SHOP, he asked why, i then told him I do not accept that behaviour shouting and swearing), Device name (samsung), Submitted by (Lincoln), People involved (1 (More info)), Known to venue? (No), Was incident violent? (No), Is stake returned? (No), Returned stake amount (N/A), and Left premises? (Yes). The right column, 'Other Details', lists fields under 'Police Assistance Details' (Reported to police? No, Crime reference number N/A, Police called time N/A, Police arrived time N/A, Area manager informed? Yes, Night manager informed? Yes, CCTV footage captured? Yes, Alarm initiated? No) and 'Incident Injury Details' (Is anyone injured? No, Injury details N/A, Called ambulance? No, Any property damage? No, Damage details N/A). A blue button labeled 'REVIEW INCIDENT' is located in the top right corner of the main content area and is circled in red.

**IHL Hub** Dashboard Profile

Dashboard

SmartExclusion

Age Verification Log

SmartINCIDENT

Incidents

Reports

SmartALERT

Anti-Money Laundering

SmartINTERACTION

ADR

AvTestPurchase

## Incident Details

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

<b>Police Assistance Details</b>	
<b>Reported to police?</b>	No
<b>Crime reference number</b>	N/A
<b>Police called time</b>	N/A
<b>Police arrived time</b>	N/A
<b>Area manager informed?</b>	Yes
<b>Night manager informed?</b>	Yes
<b>CCTV footage captured?</b>	Yes
<b>Alarm initiated?</b>	No
<b>Incident Injury Details</b>	
<b>Is anyone injured?</b>	No
<b>Injury details</b>	N/A
<b>Called ambulance?</b>	No
<b>Any property damage?</b>	No
<b>Damage details</b>	N/A

**REVIEW INCIDENT**

# Area Managers Review Process

The screenshot displays the IHL Hub interface. A modal window titled "Review Incident" is open, allowing an area manager to review an incident. The modal contains four questions with radio button options for "Yes" and "No":

- Was the incident reported timely and effectively?  
 Yes  No
- Is the venue CCTV coverage accurate?  
 Yes  No
- Is any further training required?  
 Yes  No
- Do we need to update the venue risk assessment?  
 Yes  No

At the bottom of the modal are two buttons: "REVIEWED" (in blue) and "CANCEL" (in white). The background shows the "Incident Details" page with a "REVIEW INCIDENT" button in the top right corner. The page includes a sidebar with navigation options like "Dashboard", "SmartExclusion", "Age Verification Log", "SmartINCIDENT", "Reports", "SmartALERT", "AntiMoney Laundering", "SmartINTERACTION", "ADR", "AvTestPurchase", "Compliance", "Feature Activation", and "IHL Hub".

Below the modal, the text "Area Manager to review regular with subsequent actions taken accordingly" is overlaid in white. At the bottom of the page, there is an "Incident Updated Log" table with a "DOWNLOAD CSV" button in the top right corner. The table has columns for "Incident Type", "From Venue", "Staff Name", "Known to venue", and "Log created at". The number "171" is displayed in the "Staff Name" column.

Incident Type	From Venue	Staff Name	Known to venue	Log created at
		171		

Conditions	Game Nation, 450-454 Tottenham High Road	Admiral 475 Tottenham High Road	Paddy Power, 486 Tottenham High Road	Ladbrokes, 480 Tottenham High Road	William Hill, 440 Tottenham High Road	Ladbrokes, 529-531 Tottenham High Road
Minimum of 2 members of staff on duty when the premises are open	✓	✗	✗	✗	✗	✗
SIA registered Security Guard on duty between 1700 and closing	✓	✗	✗	✗	✗	✗
Staff training on recognizing drug use, conflict management, and restricting service to persons under 18 years of age	✓	✗	✗	✗	✗	✗
Staff training on specific issues related to the local area	✓	✗	✗	✗	✗	✗
Induction and refresher training every six months for new and seasonal staff	✓	✗	✗	✗	✗	✗
Training records maintained and made available for inspection	✓	✗	✗	✗	✗	✗
Comprehensive 4K HD CCTV System maintained throughout the building covering all key locations	✓	✗	✗	✗	✗	✗
3 x 4K cameras will be specifically focused on the High Street	✓	✗	✗	✗	✗	✗
Large "spotter screen" inside the entrance showing live CCTV images viewable by customers as they						

enter the premises	✓	✗	✗	✗	✗	✗
Ensure that sufficient lighting is installed outside the premises	✓	✗	✗	✗	✗	✗
CCTV images recorded on a Hard Drive and retained for 30 days	✓	✗	✗	✗	✗	✗
CCTV images to be made available for Police and Licensing Authority inspection in reasonable time	✓	✗	✗	✗	✗	✗
Staff member conversant with the procedure for obtaining CCTV images on the premises at all times when the premises are open to the public	✓	✗	✗	✗	✗	✗
Premises shall display notices near the entrance to the venue stating that CCTV is in operation	✓	✗	✗	✗	✗	✗
Premises to be connected to external conflict management facility staffed by SIA licensed conflict Management Operators (City Gaming Limited Conflict Management Centre (CMC))	✓	✗	✗	✗	✗	✗
CMC to operate 24 hours a day	✓	✗	✗	✗	✗	✗
Staff in the venue provided with remote-control key fob or keyring, which on activation alerts the CMC	✓	✗	✗	✗	✗	✗
The CMC system will provide 2-way communications enabling the CMC operator to speak to the member of staff and customer causing concern	✓	✗	✗	✗	✗	✗

Licensee shall implement a policy of banning customers who engage in crime or disorder within or outside the premises	✓	✗	✗	✗	✗	✗
Licensee will refuse entry to customers who appear to be under the influence of alcohol or drugs	✓	✗	✗	✗	✗	✗
A Maglock will be installed and maintained on the main entrance/exit to the premises which will be operable by staff	✓	✗	✗	✗	✗	✗
The front door will be locked between 1900 and closing time each day	✓	✗	✗	✗	✗	✗
Access between 1900 and closing time available at the discretion of the staff	✓	✗	✗	✗	✗	✗
Front Door Entry Security system to include video images on internal screen	✓	✗	✗	✗	✗	✗
Toilets will be always locked, and access controlled by staff	✓	✗	✗	✗	✗	✗
Toilet design will ensure no storage space can be gained to conceal drugs	✓	✗	✗	✗	✗	✗
Licensee will engage with the local centres for the vulnerable and provide them with Safer Gambling information and contact details of the premises	✓	✗	✗	✗	✗	✗
Gang Management Policy will be implemented, in conjunction with the Police	✓	✗	✗	✗	✗	✗



All staff shall receive training on the Gang Management Policy	✓	✗	✗	✗	✗	✗
An incident log shall be kept and made available on request to an authorised officer of the Licensing Authority or the Police	✓	✗	✗	✗	✗	✗
Licensee shall install and maintain an intruder alarm on the premises	✓	✗	✗	✗	✗	✗
Challenge 25 proof of age scheme shall be operated at the premises	✓	✗	✗	✗	✗	✗
Posters prominently displayed advising that no antisocial behaviour will be tolerated, that a Challenge 25 policy is in place and that Drinking Alcohol is not permitted on the premises	✓	✗	✗	✗	✗	✗
Third party testing on age restricted sales systems shall take at least twice a year and results provided to the Licensing Authority upon request	✓	✗	✗	✗	✗	✗
Licensee will ensure customer toilets are checked every hour for evidence of drug taking. Toilet checks to be documented stating the time and member of staff	✓	✗	✗	✗	✗	✗
Prominent GamCare documentation will be displayed at the premises	✓	✗	✗	✗	✗	✗
Licensee shall take all reasonable steps to prevent street drinking of alcohol directly outside the premises and to ban those who do so	✓	✗	✗	✗	✗	✗
Licensee shall place a notice visible from the						

exterior stating that customers drinking alcohol outside the premises are not permitted and those who do so will be banned	✓	✗	✗	✗	✗	✗
No cash point or ATM facilities on the premises	✓	✗	✗	✗	✗	✗
Default Hours limited by condition	0900 - 0000 Mon to Fri; 0900 – 2300 Sun	24 hrs Not Limited	Not limited	Not limited	Not limited	Not limited

**Premises**

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

**Company**

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

**Assessment Completion**

Original Assessment completed by (Signature):		Updated Assessment completed by (Signature):	
Original Assessment completed by (Print):	Darren Russell	Updated Assessment completed by (Print):	G Glanfield
Position within the Company:	Regional Director	Position within the Company:	Consultant
Date of completion of Original Assessment:		Date of completion of Updated Assessment:	19 <sup>th</sup> October 2022

**Requirement to Comply**

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

Effective as at 6 April 2016

Social responsibility code provision 10.1.1

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

**Ordinary code provision 10.1.2**

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

**COMPANY OVERVIEW**

1. Senior Management of City Gaming Limited have worked in the gaming industry for approximately 30 years. In addition to being a Board Members of multiple gambling operating companies, they have also operated large scale Holiday Park FEC's, including AGCs.
2. City Gaming Limited is a leading operator of AGC premises in London, the South East and Midlands and has full authority to provide AGC facilities through the grant of an Operating Licence by the Gambling Commission. The Gambling Commission has approved the measures which City Gaming Limited has put in place to ensure that it implements effective anti-money laundering procedures, security procedures and trades responsibly in accordance with gambling legislation, the licensing objectives and the licence conditions and codes of practice.
3. The City Gaming Group has thirteen Personal Management Licence holders throughout their operational structure. All in key, high profile positions.
4. The Executive Board of Directors is formed of highly experienced operators and management. The Executive Chairman, Sina Azeri, was also a Partner in a private equity firm and has extensive experience in the gambling industry.
5. The entire management team from head office to premises level are fully aware of their roles and responsibilities in regards to the Licence Conditions and Codes of Practice (LCCP).
6. City Gaming Group employs a highly recognised individual within industry as Compliance Officer, reporting directly to the CCO to carry out compliance checks and audits to ensure that the Company's responsibilities and procedures relating to the LCCP are upheld.
7. City Gaming Group employs over 400 people in London, the South East and the Midlands.
8. City Gaming utilises an E-Learning platform to under pin the emphasis we apply to our learning culture.
9. City Gaming engages with a reputable 3<sup>rd</sup> Party Security Business. We have worked extensively with Incognito (our security advisor and agent) the following policies have been established in order to ensure provision of the very best advice and practical solutions, for the benefit to deliver high quality engagement and effective problem resolution.

**EXPLANATORY NOTE**

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

Local Area Profile

Image of Premises



Location Plan



**Description of Local Area**

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

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



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

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

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

**Betting Shops** – Ladbrokes \* 2, William Hill, Betfred and Paddy Power

**Adult Gaming Centres** – Admiral

**Pawn Shops** – H&T Pawnbrokers \* 2, Pickwicks

**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, Halifax and TSB also nearby.

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

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

**SELF EXCLUSION**

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

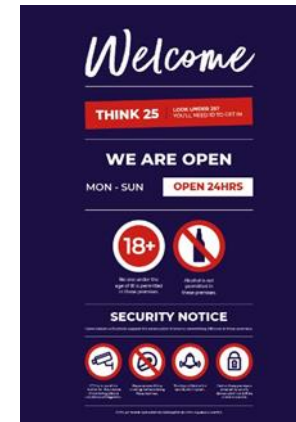
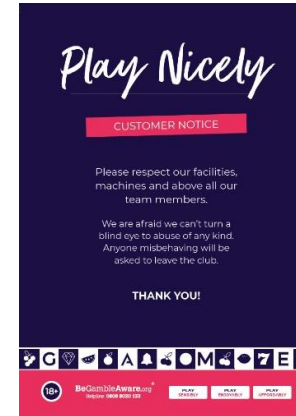
Self-exclusions may also occur through the interaction process whereby a member of staff sees a change in a customer's behaviour that causes concern, and the staff member interacts accordingly. During these interactions, Self-exclusion would be discussed along with spending limits, time-outs, referral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

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

**SIGNAGE**

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

Over 18s Only messaging will also be prominently displayed.



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

### Schools

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

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

### Junior Schools

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

### Secondary Schools and Colleges

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

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

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

### Other areas of interest to children and young persons

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

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

**Centres for vulnerable people**

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

**Residents Associations and other groups**

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

**Risk from gambling related harm**

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



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


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

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

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





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




**4K ColorVu PoC Fixed Mini Bullet Camera**

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







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

<b>Camera</b>	
Image Sensor	1/2.5" Progressive Scan CMOS
Min. Illumination	Color: 0.028 Lux @ (F2.0, AGC ON), 0 Lux with IR
Shutter Speed	1/3 s to 1/100,000 s
Slow Shutter	Yes
Wide Dynamic Range	120dB
Day & Night	IR Cut Filter
Angle Adjustment	Pan: 0° to 355°; tilt: 0° to 75°, rotate: 0° to 355°
<b>Lens</b>	
Focus	Fixed
Lens Type	Fixed lens, 2.8/4/6 mm
FOV	2.8 mm, horizontal FOV: 102°, vertical FOV: 53°, diagonal FOV: 124°; 4 mm, horizontal FOV: 79°, vertical FOV: 42°, diagonal FOV: 95°; 6 mm, horizontal FOV:



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

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

CCTV Information

**Door Control**

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

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

Company: \_\_\_\_\_ Site Address: \_\_\_\_\_ Site Ref: \_\_\_\_\_ Serial No. \_\_\_\_\_ / \_\_\_\_\_

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

**SUMMARY OF STAFF TRAINING**

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

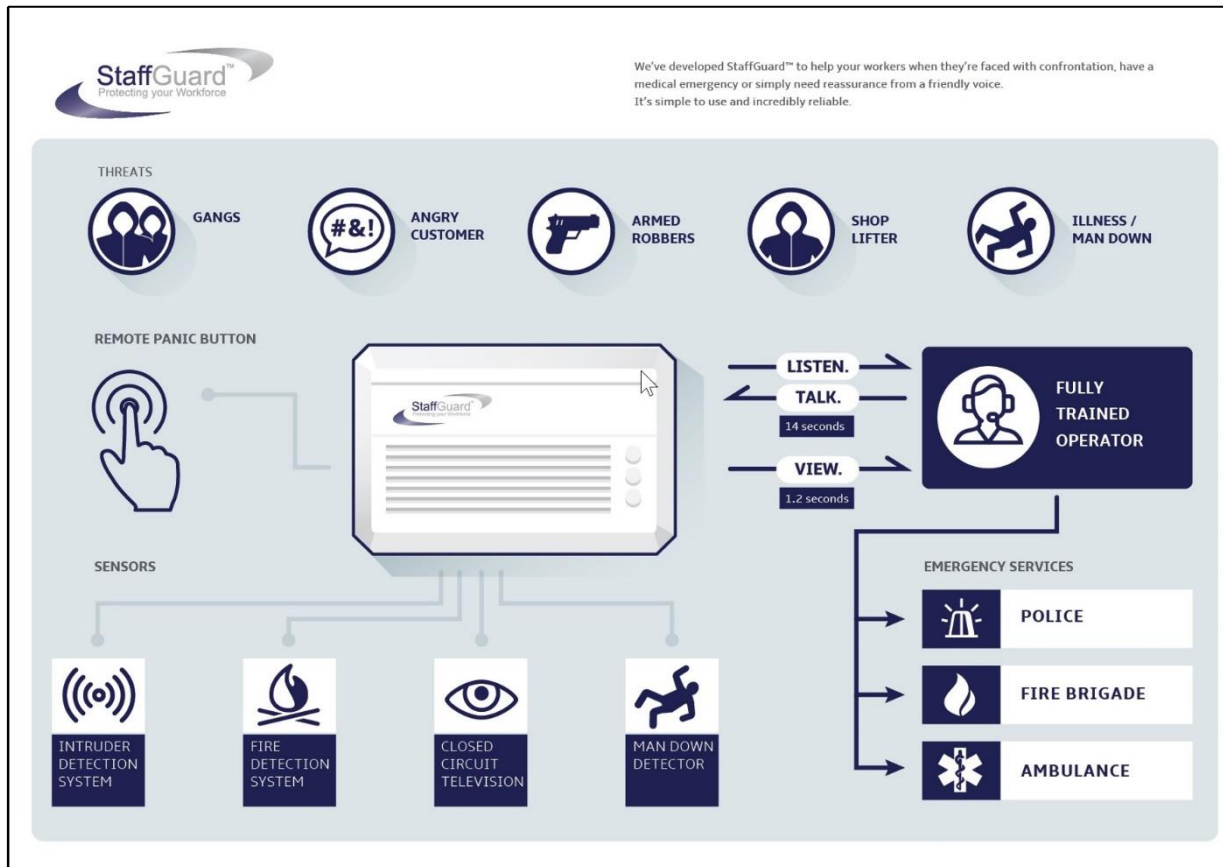
<ol style="list-style-type: none"> <li>1. Access to Gambling by Children and Young Persons</li> <li>2. Access to Premises by the Gambling Commission's Enforcement Officers</li> <li>3. Advertising Standards and Marketing</li> <li>4. Customer Interaction</li> <li>5. Employment of Children and Young Persons</li> </ol>	<ol style="list-style-type: none"> <li>6. Fair and Open Practice and Dispute Resolution</li> <li>7. Information on how to Gamble Responsibly and Help for Gamblers with problems</li> <li>8. Money laundering, Cash handling &amp; Suspicious Transactions</li> <li>9. Self-exclusion</li> </ol>
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Name	Position	Interval not to exceed 7 days		Signature	Leave Date	Tick against relevant Policies										
		Joining Date	Training Date			1	2	3	4	5	6	7	8	9		



**In addition to CCTV**

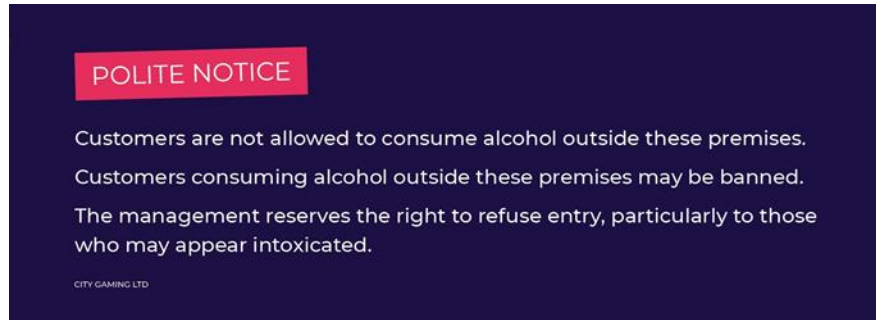
We've developed StaffGuard™ to help create a safe environment for our Customers and Staff when they're faced with an incident, have a medical emergency or simply need reassurance from a friendly voice. It's simple to use and incredibly reliable. Staff Guard is a supplementary remote managed service from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



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

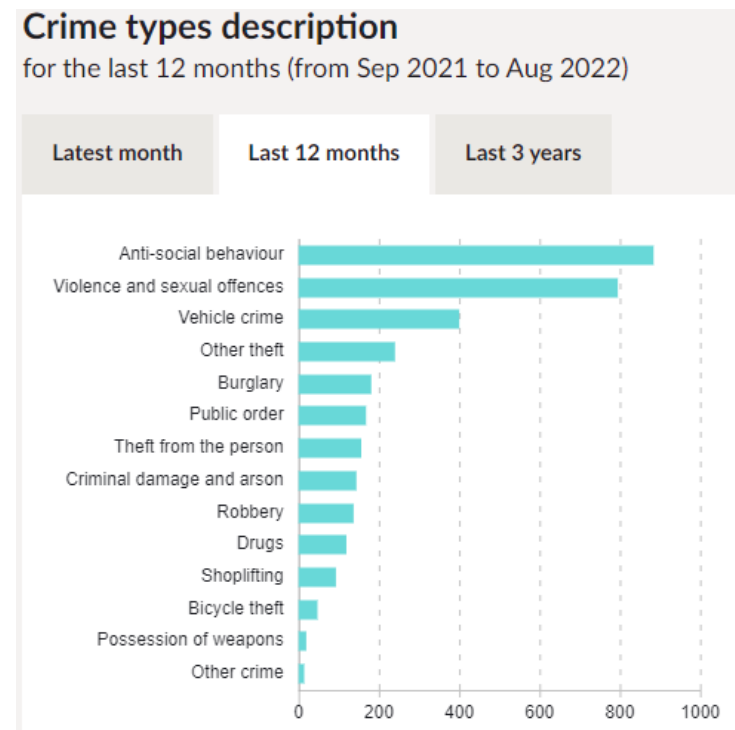
- Access controlled by staff
- Toilets inspected after every use to identify those individuals involved in drug or alcohol abuse
- Zero tolerance to drug or alcohol abuse with appropriate signage
- Toilet facilities designed so that no areas are accessible to hide drugs, syringes or alcohol.
- Also disabled facility

**Zero tolerance to alcohol abuse with appropriate signage**



Local Factors

Crime statistics – (Source Police.uk)



Between Sept 2021 and Aug 2022 an average of 285 crimes were reported each month in the Tottenham High Road area. This remains very much in line with the statistics reported in Oct 2022.

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

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

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

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

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

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

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

**Ethnic and Religious Demographics**

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

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

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

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

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

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

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

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

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

**Gambling Act 2005 – The Licensing Objectives**

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

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

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

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

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



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