

Local Area Gambling Risk Assessment

Premises Address:	519 Green Lanes, London, N4 1AN
Premises Licence No:	LN/000024937
Operating Licence No:	000-036646-N-318600-017
Company Details:	Future Leisure Limited, Unit 20 Fleetway West Business Park, 14-16 Wadsworth Road, Greenford, Middlesex, UB6 7LD
Name of Assessor:	Anna Zietkiewicz
Colleagues Present:	Gavin Tresidder

Date of assessment:	19 November 2024
Review date:	19 November 2025

Local Area

Future Leisure Limited offers various types of gaming machines, providing customers an opportunity to gamble, meet and socialise in a safe and controlled environment. We offer various types of gaming machines. Machines played by inserting cash (not credit cards or debit cards)

Category B3 Max. stake £2 Max. prize £500

Category B4 Max. stake £2 Max. prize £400

Category C Max. stake £1 Max. prize £100

Category D Max. stake 10p Max. prize £5

This Local Area Gambling Risk assessment takes into account the Haringey Statement of Gambling Policy effective from 2022-2025. Any Local gambling Risk assessment will continue to be assessed and evolve and this will be the case with this assessment.

In this risk assessment following information have been taken into account

- *Relevant Guidance from the Gambling Commission.*
- *The Councils Statement of Gambling Policy 2022-2025*
- *The Councils Gambling Local Area Profile.*
- *The history of this and other gambling premises in this area.*
- *Its own appraisal of local conditions.*

It has considered all relevant information relating to the Licensing Objectives, demographics and crime levels and will continue to do so. This Local Area Risk Assessment takes into account these factors in assessing risk and reflects them in its provisions to inform the proper and safe conduct of the premises without exacerbating the local problems.

Local Area				
Licensing Objective		Risks	Existing Control Measures	Level of Risk of Occurrence / Manageability
1.1	Protecting children and other vulnerable persons from being harmed or exploited by gambling.	LOCALITY <ul style="list-style-type: none"> Brown Bears Nursery - Green Lanes. 582 Green Lanes, Harringay, London N8 0RP South Harringay Infant and Nursery School, 110 Pemberton Rd, Harringay, London N4 1BA Little skippers nursery, 140 Falkland Rd, Harringay Ladder, London N8 0NP North Harringay Primary School. Falkland Rd, Harringay, London N8 0NU West Green Primary School. Woodlands Park Rd, West Green, London N15 3RH Chestnuts Primary School, Black Boy Ln, West Green, London N15 3AS South Harringay Junior School, Mattison Rd, Harringay, London N4 1BD Athena College of Professional Studies. 659 Green Lanes, Tottenham, London N8 0QY Haringey Education Centre, 584 Green Lanes, Harringay Ladder, London N8 0RP 	<ul style="list-style-type: none"> Staff to 'patrol' – supervising the whole of the premises. Implementation of the BACTA Toolkit policies & procedures including Think/Challenge 25 Return the stake/retain the prize. Anyone reluctant in providing identification with suspicious behaviour will trigger further investigation. Incident to be logged in IHL Smart Hub AV Log 25+ and customer removed from the area. Age verification incident report (log) maintained on licensed premises and reviewed on regular basis by team staff members. Training of staff with 3 monthly refreshers/ local area profile/licence conditions Training and guidance is provided to staff members regarding customer interaction and the implementation of the ID verification procedure. 	Medium occurrence Initially/low of not managing

		<ul style="list-style-type: none"> London Academy of Business Studies and Hotel Management. 657 Green Lanes, Tottenham, London N8 0QY <p style="text-align: center;"><u>OTHER:</u></p> <p><u>Student accommodation:</u></p> <p>No student accommodation within distance</p> <p><u>Family Services</u></p> <p>No Family services within ½ mile distance</p> <p><u>Job centre/ recruitment agency</u></p> <p>No job center or recruitment agency within ½ m distance</p> <p><u>Community centres/Libraries</u></p> <ul style="list-style-type: none"> Kurdish Community Centre. 11 Portland Gardens, Haringay, London N4 1HU Chestnuts Community Centre. 280 St Ann's Rd, West Green, London N15 5BN 	<ul style="list-style-type: none"> Review self-excluded data to ensure continued exclusion. Regular patrols of the premises, including external areas to identify any vulnerable and children Recording & reporting concerns to the police. Regular Test Purchasing Monitoring customers as they leave the premises. “Know Your Customer” in place, developing customer interaction policies & procedures (importance of behaviour, time and spend limits) Staff monitors customer activity and behaviour to interact early to recognise customer with potential gambling issues. Staff aware of the importance of social responsibility, the causes and consequences of gambling. Adequate staffing levels to be maintained at all times. Sharing of information by staff regarding concerns about customers Mystery shopper tests by BACTA 	
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		<ul style="list-style-type: none"> Turkish Cypriot Community Association, 628-630 Green Lanes, Tottenham, London N8 0SD <p><u>Youth Centre</u></p> <ul style="list-style-type: none"> London Mets Youth Baseball & Softball Club, Endymion Rd, Finsbury Park, London N4 1EE <p><u>Care Home</u></p> <p>Belmont Care Home Ltd. 41 Belmont Rd, West Green, London N15 3LS</p> <ul style="list-style-type: none"> Peregrine House, 350 Hermitage Rd, London N15 5RE Ashness Two, 41 Cranleigh Rd, West Green, London N15 3AB The Jennifer Home, 17 Pemberton Rd, Harringay Ladder, London N4 1AX <p><u>Places of Worship</u></p> <ul style="list-style-type: none"> Taiba Community Centre, Mosque 30 Willoughby Rd, Harringay Ladder, London N8 0JG Saint Augustine's of Canterbury Church (Roman Catholic), 51 Mattison Rd, Harringay, London N4 1BG 	<ul style="list-style-type: none"> Posters, 'Stay in Control' leaflets and GamCare leaflets (near toilets as well as in the main trading area) Smart-Exclusion logged in IHL SmartHub Photo equipment available for self-exclusions Ensure a stock of leaflets (stay in control and self-exclusion) through weekly checks of stock. GamCare stickers with contact number clearly displayed on machines. Staff trained in Safeguarding Policy Staff Crime Prevention training Contact/sharing information with AGC operators within ½ mile). Staff aware of refusing customers entry due to alcohol or drugs. Staff aware of refusing customers entry due to alcohol or drugs. Individuals consuming alcohol outside premises will be immediately banned 	
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		<ul style="list-style-type: none"> • Christ Church With Saint Peter,33 Waldeck Rd, Duckett's Green, London N15 3EL • Willoughby Methodist Church,107 Hampden Rd, Hornsey, London N8 0HU • St Paul's Harringay Harringay, Wightman Rd, Harringay, London N4 1RW • Harringay United Church, Green Lanes, Harringay, London N8 0RG • Lighthouse Seventh-day Adventist Church,88B Cavendish Rd, Harringay, London N4 1RS • Holy Spirit Conference - Freedom - MCL Church, Wightman Rd, Harringay, London N8 0NA • Assembly Of God Church,425/431 W Green Rd, West Green, London N15 3PJ • St John Vianney Catholic Church,4 Vincent Rd, West Green, London N15 3QH <p><u>GP/Medical Centre</u></p> <ul style="list-style-type: none"> • The Old Surgery, 572 Green Lanes, Harringay Ladder, London N8 0RP • West Green Surgery, 590 - 598 Green Lanes, Harringay Ladder, London N8 0RA • Bridge House Medical Practice,96 Umfreville Rd, Harringay, London N4 1TL • St Ann's Road Surgery, 256 St Ann's Rd, London N15 5AZ • 	<ul style="list-style-type: none"> • CCTV coverage of all public areas, office, all entry and exit points to and from the premises enabling frontal identification of every person entering under any light conditions with ability for management to review remotely online. • Premises laid out to avoid blind spots. • Entrance readily visible from throughout the premises • Signage & window display not to attract under 18s, and advice under 18's access is prohibited. • Regular patrols of the premises, including external areas to identify any vulnerable and children. • Monitoring customers as they leave the premises. • Machines properly labelled. • The entrance layout enables staff to monitor those entering the premises. • Supervision of entrances and machines areas. • Toilet inspected at least once every hour to check for any signs of drug use. 	
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		<ul style="list-style-type: none"> • Havergal Surgery, 10 Havergal Villas Green Lanes, London N15 3DY • St. Ann's Road Surgery, 256 St Ann's Rd, West Green, London N15 5AZ • MediPark Clinic, 573, 575 Green Lanes, Harringay Ladder, London N8 0RL <p><u>Supervised Pharmacies</u></p> <p>No supervised pharmacy within ½ mile distance</p> <p><u>Mental Health:</u></p> <ul style="list-style-type: none"> • Chesterfield Gardens - Sanctuary Supported Living. 44 & 60 Chesterfield Gardens, Harringay, London N4 1LP • TelmaToniol - PsicologaemLondres. 128 B Effingham Rd, Harringay, London N8 0AD • Burgoyne Road Clinic. 58A Burgoyne Rd, Harringay, London N4 1AE • Lucia Corti, 110 Seymour Rd, Harringay, London N8 0BG • Tania Glynn, 4 Warham Rd, Harringay, London N4 1AT • Tina Leslie, 200 Frobisher Rd, Hornsey, London N8 0QU • Shivanath Suhith, 5 Roseberry Gardens, Harringay, London N4 1JQ 		
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		<ul style="list-style-type: none"> • Andy Rushton Counselling and Psychotherapy, Roseberry Gardens, Harringay, London N4 1JL • The Laurels Healthy Living Centre, 256 St Ann's Rd, London N15 5AZ • Halliwick Centre at St Anns Hospital, Hospital, St Ann's Rd, London N15 3TH <p><u>Addiction/Recovery Centres/support services</u></p> <ul style="list-style-type: none"> • Haringey Migrant Support Centre, St John Vianney Church Hall, 386 W Green Rd, West Green, London N15 3QL <p><u>Homeless centres/Sheltered Housing</u></p> <p>No homeless centre or sheltered housing within ½ mile distance</p> <p><u>Hospitals</u></p> <ul style="list-style-type: none"> • St Ann's Hospital, St Anns Hospital, St Ann's Rd, London N15 3TH 		
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		<p><u>Loan Shops, Pawn Brokers, Food Banks</u></p> <ul style="list-style-type: none"> • H&T Pawnbrokers, 457 Green Lanes, Harringay Ladder, London N4 1HE • Derby Hall Foodbank, 425-431 W Green Rd, Harringay Ladder, London N15 3RS • St Ann's Mutual Aid Food Hub, Chestnuts Community Centre, 280 St Ann's Rd, London N15 5BN <p><u>Bank/Building Society</u></p> <ul style="list-style-type: none"> • Turkish Bank, 577-579 Green Lanes, Harringay Ladder, London N8 0RG <p><u>Leisure/entertainment centres</u></p> <ul style="list-style-type: none"> • Legends Gym, 6-9 Salisbury Rd, Green Lanes, Harringay Ladder, London N8 0RX • The Gym Group, London, Harrinay, Unit 4C, Arena Shopping Park, Green Lanes, Finsbury Park, The N4 1DT 		
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		<p><u>Parks / playgrounds/basketball courts</u></p> <ul style="list-style-type: none"> • Ducketts Common Basketball Court, Harringay N15 3DX • Fairland Park, 27 Fairfax Rd, Harringay, London N8 0NH • The New RIVER, Harringay, London N4 2RH • Railway Fields - TCV, 381 Green Lanes, Harringay, London N4 1ES • Chestnuts Park, St Ann's Rd, West Green, London N15 5BN <p><u>Markets/Shops/Fast food</u></p> <ul style="list-style-type: none"> • KFC Haringey - Green Lanes, 397 Green Lanes, Harringay Ladder, London N4 1EU • McDonald's, Green Lanes, Williamson Rd, Finsbury Park, London N4 1DR <p>Various markets and shops within ½ mile distance</p>		
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1.2	<p>Preventing Gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime</p>	<p>LOCALITY Assess threats.</p> <p>PREMISES Layout</p> <ul style="list-style-type: none"> • Consider 'blind spots' • Visibility of the entrance <p>CUSTOMERS Customer behaviour</p> <p>STAFF</p> <ul style="list-style-type: none"> • Personal protection • Security • Staff behaviour <p>Listed 5 AGC and 6 betting shops within 1 mile distance.</p> <ul style="list-style-type: none"> • Admiral Casino, 513 Green Lanes, Harringay Ladder, London N4 1AN • Merkur Cashino, 91 High Rd, London N22 6BB • Admiral Casino, 9 High Rd, London N22 6BH • Little Vegas, 17 High Rd, London N22 6BH • Golden Slots, 49 Grand Parade, London, N4 1AG • William Hill. 472,480 Green Lanes, Harringay, London N4 1HA • William Hill, 297-301 W Green Rd, London N15 3PA 	<ul style="list-style-type: none"> • CCTV coverage of all public areas, office, all entry and exit points to and from the premises enabling frontal identification of every person entering under any light conditions with ability for management to review remotely online • Social Responsibility training and incident recording logs available to all staff. • Toughened/laminated glass to front window • Machine door opening keys only available to management • Log visits by Police, Local Authority and Gambling Commission officers • Customer toilet to be kept locked at all times with access given by staff only • Review unusual patterns of play (as per PoCA), 'non-regular' players and consider exclusion/reporting • Exclude badly behaved customers • Maintain contact with local traders and Police • Limited staff floats • Staff trained to look out for unusual/dyed notes • Staff trained in signs of alcohol or drugs abuse 	<p>Medium of Occurrence Initially / Low of not Managing</p>
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		<ul style="list-style-type: none"> • Ladbrokes, 13 High Rd, London N22 6BH • Ladbrokes, 56, Grand Parade, Green Lanes, Harringay Ladder, London N4 1AF • Paddy Power, 507 Green Lanes, Harringay, London N4 1TB • Paddy Power, 33 High Rd, London N22 6BH 	<ul style="list-style-type: none"> • Any customer impaired by alcohol or drugs will be refused entry and prevented from gambling • Staff & management to be alert to customers exchanging large volumes of paper notes for alternative denominations • Staff to be alert to customer redeeming stake with little or no play • Staff trained about AML basics, strange transaction behaviour • CCTV coverage over all cash transactions • TiTo machines have built in software protection to identify suspicious activity and alert staff. • Fruit machines played by inserting cash (not credit cards or debit cards) • Full machine audit on all machines on a weekly basis – ad hoc spot-check in case of any suspicion • Gaming machines are supplied and maintained by businesses licensed by the Gambling Commission • Extra Training and guidance is provided to staff members regarding Anti-Social Behaviour • Staff fully trained how to deal with homeless people seeking refuge 	
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		<p>LOCAL AREA PROFILE</p> <p>Population</p> <ul style="list-style-type: none"> • Haringey, situated in the northern part of the capital, spans over 11 square miles. • As of the 2021 census, nearly half of its 264,200 residents belong to ethnic minority backgrounds. This diversity makes Haringey a lively and dynamic area, where a rich blend of cultures thrives alongside a fantastic array of unique and characterful high streets. • In Haringey, the population size has increased by 3.6%, from around 254,900 in 2011 to 264,200 in 2021. This is lower than the overall increase for England (6.6%), where the population grew by nearly 3.5 million to 56,489.800 • Haringey is now ranked 18 (out of 33 London boroughs) for total population. • The population increase between the 2 Census for Haringey (3.6%) is lower than that for London (7.7%) and for England (7%). • The gender split in Haringey is 49% female and 51% male. • Since 2011, Haringey has seen 	<ul style="list-style-type: none"> • Staff trained on local are risk assessment • Company registered to receive crime bulletins from BACTA. • Customer interaction may provide knowledge of criminal background and/or association leading to closer security and monitoring of such a customer. • Customers are efficiently monitored throughout the time they are on the premises to satisfy age requirements, prevention of machine related crime (money laundering). Suspicious and knowledge activity to be logged in AML Recording IHL Smart Hub and to be handed over to Nominated Officer who will then report to NCA 	
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		<p>the following changes:</p> <ul style="list-style-type: none"> • 8% decrease in children aged under 15. • 4% increase in adults aged 15 to 64 and • 24% increase in those aged 65 and over <p>The population is split in 3 broad age groups:</p> <ul style="list-style-type: none"> • Under 15 years: 27,700 • 15 to 64 years: 191,300 • 65 and over: 27,700 • The Census 2021 recorded 59,800 children and young people aged between 0-19 years usually resident in Haringey, compared to 63,374 in the Census 2011, a decrease of around 5.7%. • In 2021 the largest age group in Haringey (split by 5-year age bands) was that of people aged 30 - 34 (25,900 people or 9.80%). • Between 2011-2021, the group of people aged 50–64 saw the largest increase. The groups of people 0–4 and 25-34 saw the largest decrease. • Census 2021 recorded 27,700 usual residents aged 65 years and over. This compares to approximately 22,369 in Census 2011. An increase of around 24%. • Overall, Haringey is ageing faster than London. The borough still has a lower proportion of people aged 65+ than London overall. 		
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		<p>Of the 264,200 people in Haringey:</p> <ul style="list-style-type: none"> • 137,000 were women (51.9% of the population) • 127,200 men (48.1%) <p>Culture</p> <ul style="list-style-type: none"> • Haringey's cultural identity is characterized by its diversity and vibrant mix of ethnicities, languages, and religions. According to the 2021 Census data, nearly half of its population comes from ethnic minority backgrounds. This reflects a wide array of cultures, making Haringey a melting pot within London. • The borough hosts various cultural festivals, community events, and markets that celebrate its diversity. Additionally, multilingualism is a significant feature of the area, with many residents speaking languages other than English at home. Religious affiliations in Haringey also span a range of traditions, further contributing to its rich cultural fabric. 		
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		<p>Unemployment:</p> <ul style="list-style-type: none"> • Employment rate 74.9% (ages 16-64). Employment in Haringey has decreased compared with the previous year. Haringey's employment rate was higher than across London as a whole in the year ending December 2023. • Unemployment rate 4.4% (ages 16-64). Unemployment (people looking for work) has fallen since a year earlier. The most recent unemployment rate for Haringey was lower than across London as a whole. • Claimant Count 6.9% (ages 16-64). Claimant Count was higher in March 2024 compared with a year earlier. • Economic inactivity 22% (ages 16-64). Economic inactivity has increased since the previous year. These are people who are neither employed nor seeking work. 		
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		<p>Deprivation</p> <ul style="list-style-type: none"> • Haringey is the 4th most deprived borough in London, with deprivation more concentrated in the north east. Relative deprivation has reduced since 2015, though Haringey's London ranking has not shifted significantly. • According to the Index of Multiple Deprivation 2019, Haringey (of which Harringay is a ward) is the 4th most deprived borough in London and ranked 49 out of 317 authorities in England. Relative deprivation has reduced since 2015, though Haringey's London ranking has not shifted significantly. • The risk factors associated with gambling-related harm in individuals such as a Ward with high deprivation indices, increased number of residents on Universal Credit, high numbers of people who are rough sleeping, high percentage of residents from minority ethnic background, families from very low median household income, high unemployment rates, high level of long-term health condition and disability (which may include mental health issues). • The estimated prevalence of common mental disorders in Haringey for ages 16 and over is 22.3%, which is higher than 		
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		<p>London (19.3%) and England (16.9%) (PHE, 2017). The proportion of residents living alone (24%) locally is greater than in London and England (22% and 18% respectively). Five in every 1,000 residents in Haringey are homeless, a rate which is higher than the London average (Source: DCLG).</p> <ul style="list-style-type: none"> • Joblessness is higher in the east and 48% of people claiming allowance have mental health behavioural disorders. Increases in unemployment, debt, overcrowding and homelessness (driven by changes to the temporary accommodation subsidy system, combined with high rents) can potentially further increase the level of mental health problems in Haringey. • Haringey has also seen an increase in the number of people who are rough sleeping with a range of overlapping and multiple disadvantages, such as addiction, poor physical and mental health, contact with institutions as children or adults and offending histories and experiences of trauma. • Gambling problems are more prevalent in the population facing homelessness than the general population, 11.4% of the homeless population is found to have problem gambling. 61.5% of 		
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		<p>participants with some level of gambling risk had problems before homelessness, 15.4% reported experiencing problems after homelessness.</p> <p>Gambling Facilities</p> <ul style="list-style-type: none"> In Haringey, there is currently 50 betting shops, 10 Adult Gaming Centres, 2 Bingo premises and 2 track betting premises. Gambling is a pressing health inequalities issue. More deprived wards have higher number of betting shops, adult gaming centres and bingo and this is linked to deprivation levels. (See Map below) <p>Crime</p> <ul style="list-style-type: none"> Green Lanes, Haringey, London, N4 1AN is within the Harringay policing neighborhood, under the Metropolitan Police Service force area. The crime rate in Haringey is 140 crimes per 1,000 people. This is higher than the overall crime rate in London, which is 103 per 1,000 daytime population. In the year ending September 2023, there were 30,346 incidents of crime in Haringey, a 993 increase compared to the previous year. Haringey has a population of 264,238, resulting in a crime rate of 142.49 per 1,000 residents <p>Transport & car park facilities:</p> <p>Connectivity to the public transport is 6 out of 9 in Green Lanes, London, N4 1AN</p>		
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1.3	<p>Ensuring that gambling is conducted in a fair and open way.</p>	<p>PREMISES</p> <ul style="list-style-type: none"> • Promotions • Advertising <p>EQUIPMENT</p> <ul style="list-style-type: none"> • Information clearly displayed. • Maintenance • Compliance <p>CUSTOMERS</p> <ul style="list-style-type: none"> • Treatment of customers • Complaints 	<ul style="list-style-type: none"> • Clear terms & conditions provided within the licensed premises. • Machines only obtained from licensed suppliers. • Machines properly labelled. • Implementation of the BACTA Toolkit policies • Training of staff with 3 monthly refreshers • Review advertising material and promotions for compliance with LCCP • Machines maintained/serviced regularly. • Machines to be turned off should a fault occur. • Procedure for making refunds • Details of machine operation and winning combinations clearly shown on machines • Staff have a full understanding of stakes and prizes, and odds associated with each machine. • Complaints policy visibly displayed for customer information. All complaints to be fully investigated in accordance with policy and referred to nominated ADR 3rd party as required. • Suitable public liability Insurance • Council conditions openly displayed • Regular Compliance Audits 	<p>Low-Low</p>
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Gambling Operation & Physical Design (Internal and External)

Licensing Objective		Risks	Existing Control Measures	Level of Risk of Occurrence / Manageability
2.1	Protecting children and other vulnerable persons from being harmed or exploited by gambling.	<p>PREMISES</p> <ul style="list-style-type: none"> Consider 'blind spots'. Visibility of the entrance Signage Presentation of premises (signage/window display) <p>CUSTOMERS</p> <ul style="list-style-type: none"> U18s entering. Problem Gambling Providing Information Administering self-exclusion Signage 	<ul style="list-style-type: none"> CCTV coverage of all public areas, office, all entry and exit points to and from the premises enabling frontal identification of every person entering under any light conditions with ability for management to review remotely online No cash point or ATM facilities on the premises. Premises laid out to avoid blind spots. Entrance readily visible from throughout the premises Signage & window display not to attract under 18s, and advice under 18's access is prohibited. Machines properly labelled. Staff Guard installed and regularly tested. The entrance layout enable staff to monitor those entering the premises. 	Implementation of physical and design control measures will ensure low risk and effective management

2.2	<p>Preventing Gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.</p>	<p>PREMISES</p> <p>Layout</p> <ul style="list-style-type: none"> • Consider 'blind spots'. • Visibility of the entrance <p>CUSTOMERS</p> <p>Customer behaviour</p> <p>STAFF</p> <ul style="list-style-type: none"> • Personal protection • Security • Staff behaviour 	<ul style="list-style-type: none"> • CCTV coverage of all public areas, office, all entry and exit points to and from the premises enabling frontal identification of every person entering under any light conditions with ability for management to review remotely online • No cash point or ATM facilities on the premises. • Regular patrols of the premises, including external areas to identify any vulnerable and children. • Monitoring customers as they leave the premises. • Toughened/laminated glass to front window. • Mag Lock on front door • Intruder alarm installed and regularly serviced. • Staff guard installed and regularly tested • Panic Button linked to Police 	
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2.3	Ensuring that gambling is conducted in a fair and open way	<p>PREMISES</p> <ul style="list-style-type: none"> • Promotions • Advertising <p>EQUIPMENT</p> <ul style="list-style-type: none"> • Information clearly displayed • Maintenance • Compliance 	<ul style="list-style-type: none"> • CCTV coverage of all public areas, office, all entry and exit points to and from the premises enabling frontal identification of every person entering under any light conditions with ability for management to review remotely online • Clear terms & conditions provided within the licensed premises. • Machines only obtained from licensed suppliers • Machines to be properly labelled • Implementation of the BACTA Toolkit policies • Machines to be maintained/serviced regularly • Machines to be turned off should a fault occur • Procedure for making refunds • Details of machine operation and winning combinations to be clearly shown on machines • Complaints policy visibly displayed for customer information. All complaints to be fully investigated in accordance with policy and referred to nominated ADR 3rd party as required • Suitable public liability Insurance • Council conditions openly displayed • Regular compliance audit 	
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24 hours opening				
3.0	Objective	Risks	Existing Control Measures	Level of Risk of Occurrence/Manageability
	<p>Potential greater risk of the vulnerable trying to gain access, potential risk to staff during the hours of 11pm to 9am</p>	<p>CUSTOMERS</p> <ul style="list-style-type: none"> Increased impulsivity and risky behaviours Increased problem gambling Social Harm Vulnerability to crime Security challenges Increased access by intoxicated individual <p>STAFF</p> <ul style="list-style-type: none"> Increased security risks Aggressive/unpredictable behaviour Vulnerability to crime 	<ul style="list-style-type: none"> Comprehensive CCTV monitoring. All public areas, the office and all entry and exits points are covered by CCTV, allowing clear frontal identification of every individual entering the premises under any lighting review footage remotely. ATM facilities not provided on the premises to minimise financial risk and enhance security. Employees are trained to identify and manage intoxicated individuals effectively. Individuals consuming alcohol outside premises will be immediately banned Premises laid out to avoid blind spots. Entrance readily visible from throughout the premises Signage & window display not to attract under 18s, and advice under 18's access is prohibited. Regular patrols of the premises, including external areas to identify any vulnerable and children. Monitoring customers as they leave the premises. Machines properly labelled. The entrance layout enables staff to monitor those entering the premises. 	<p>Medium of Occurrence Initially / Low of not Managing</p>

			<ul style="list-style-type: none"> • Supervision of entrances and machines areas. • Staff trained in conflict resolution and recognizing substance influence including refusal of service • Regular patrols of the premises, including external areas to identify any vulnerable and children • Safeguarding training. Staff trained to identify signs of vulnerability and respond appropriately. • Panic button installed • Staff guard installed and regularly tested. Available at all times. • Intruder alarm installed and regularly serviced. • Ensure a stock of leaflets (stay in control and self-exclusion) through weekly checks of stock. • GamCare stickers with contact numbers clearly displayed on machines. • Self-exclusion facilities available at all times. • Strict time and spent limit enforcement. • Adequate staffing levels • Recording & reporting concerns to the police • All incidents recorded in IHL Tablet and reported to management. • Staff trained in Health and Safety • Security during late night hours to deter and handle incidents • Supervisors or managers available during all shifts • Designated individual to monitor CCTV during night hours • ID checks at entry point to prevent access by intoxicated individual 	
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			<ul style="list-style-type: none"> • Mag lock on front door • Doorbell system to control access of individuals requesting entry before unlocking the door • Toilet inspected at least once every hour to check for any signs of drug use. 	
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24 hours opening

3.1	Licensing Objective	Risks	Existing Control Measures	Level of Risk of Occurrence/Manageability
	Protecting children and other vulnerable persons from being harmed or exploited by gambling.	CUSTOMERS <ul style="list-style-type: none"> Greater risk to vulnerable individuals Increased problem gambling Increased risk of minors attempting access 	<ul style="list-style-type: none"> CCTV coverage of all public areas, office, all entry and exit points to and from the premises enabling frontal identification of every person entering under any light conditions with ability for management to review remotely online Staff to 'patrol' – supervising the whole of the premises. Implementation of the BACTA Toolkit policies & procedures including Think/Challenge 25 Return the stake/retain the prize. Anyone reluctant in providing identification with suspicious behaviour will trigger further investigation. Incident to be logged in IHL Smart Hub AV Log 25+ and customer removed from the area. Age verification incident report (log) maintained on licensed premises and reviewed on regular basis by team staff members. Training of staff with 3 monthly refreshers/ local area profile/licence conditions Training and guidance is provided to staff members regarding customer interaction and the implementation of the ID verification procedure Review self-excluded data to ensure 	Medium of Occurrence Initially / Low of not Managing

			<p>continued exclusion.</p> <ul style="list-style-type: none"> • Regular patrols of the premises, including external areas to identify any vulnerable and children • Recording & reporting concerns the police. • Regular Test Purchasing • Monitoring customers as they leave the premises. • “Know Your Customer” in place, developing customer interaction policies & procedures (importance of behaviour, time and spend limits) • Staff monitors customer activity and behaviour to interact early to recognise customer with potential gambling issues. • Safeguarding training. Staff trained to identify signs of vulnerability and respond appropriately. • Panic button installed • Staff guard installed and regularly tested. available at all times. • Staff aware of the importance of social responsibility, and the causes and consequences of gambling. • Adequate staffing levels to be maintained at all times. • Sharing of information by staff regarding concerns about customers • Mystery shopper tests by BACTA • Designated individual to monitor CCTV during night hours • Implement ID checks at entry point to prevent access by intoxicated individual • Mag lock on front door 	
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			<ul style="list-style-type: none"> • Doorbell system to control access of individuals requesting entry before unlocking the door • Posters, 'Stay in Control' leaflets and GamCare leaflets (near toilets as well as in the main trading area) • Smart Exclusion logged in IHL SmartHub • Photo equipment available for self-exclusions. • GamCare stickers with contact numbers clearly displayed on machines. • Staff Crime Prevention training • Contact/sharing information with AGC operators within ½ mile). Staff aware of refusing customers entry due to alcohol or drugs. • Staff aware of refusing customers entry due to alcohol or drugs • Individuals consuming alcohol outside premises will be immediately banned • Toilet inspected at least once every hour to check for any signs of drug use. 	
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3.2	<p>Preventing Gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime</p>	<p>LOCALITY Assess threats.</p> <p>PREMISES Layout</p> <ul style="list-style-type: none"> • Consider 'blind spots' • Visibility of the entrance <p>CUSTOMERS</p> <ul style="list-style-type: none"> • Higher risk of anti-social behaviour • Greater opportunity for criminal activities <p>STAFF</p> <ul style="list-style-type: none"> • Personal protection • Security • Staff behaviour 	<ul style="list-style-type: none"> • CCTV coverage of all public areas, office, all entry and exit points to and from the premises enabling frontal identification of every person entering under any light conditions with ability for management to review remotely online • Social Responsibility training and incident recording logs available to all staff. • Toughened/laminated glass to front window • Machine door opening keys only available to management • Log visits by Police, Local Authority and Gambling Commission officers • Customer toilet to be kept locked at all times with access given by staff only • Review unusual patterns of play (as per PoCA), 'non-regular' players and consider exclusion/reporting • Exclude badly behaved customers • Maintain contact with local traders and Police • Limited staff floats • Staff trained to look out for unusual/dyed notes • Staff trained in signs of alcohol or drugs abuse 	<p>Medium of Occurrence Initially / Low of not Managing</p>
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			<ul style="list-style-type: none"> • Any customer impaired by alcohol or drugs will be refused entry and prevented from gambling • Staff & management to be alert to customers exchanging large volumes of paper notes for alternative denominations • Staff to be alert to customer redeeming stake with little or no play • Staff trained about AML basics, strange transaction behaviour • CCTV coverage over all cash transactions • TiTo machines have built in software protection to identify suspicious activity and alert staff. • Fruit machines played by inserting cash (not credit cards or debit cards) • Full machine audit on all machines on a weekly basis – ad hoc spot-check in case of any suspicion • Gaming machines are supplied and maintained by businesses licensed by the Gambling Commission • Extra Training and guidance is provided to staff members regarding Anti-Social Behaviour • Staff fully trained how to deal with homeless people seeking refuge 	
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			<ul style="list-style-type: none"> • Staff trained on local are risk assessment • Company registered to receive crime bulletins from BACTA. • Customer interaction may provide knowledge of criminal background and/or association leading to closer security and monitoring of such a customer. • Customers are efficiently monitored throughout the time they are on the premises to satisfy age requirements, prevention of machine related crime (money laundering). • Suspicious and knowledge activity to be logged in AML Recording IHL Smart Hub and to be handed over to Nominated Officer who will then report to NCA 	
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3.3	Ensuring that gambling is conducted in a fair and open way.	<p>PREMISES</p> <ul style="list-style-type: none"> • Promotions • Advertising <p>EQUIPMENT</p> <ul style="list-style-type: none"> • Information clearly displayed. • Maintenance • Compliance <p>CUSTOMERS</p> <ul style="list-style-type: none"> • Treatment of customers • Complaints 	<ul style="list-style-type: none"> • Clear terms & conditions provided within the licensed premises. • Machines only obtained from licensed suppliers. • Machines properly labelled. • Implementation of the BACTA Toolkit policies • Training of staff with 3 monthly refreshers • Review advertising material and promotions for compliance with LCCP • Clear and accessible terms including information about payouts and promotional conditions. • Machines maintained/serviced regularly. • Machines to be turned off should a fault occur. • Procedure for making refunds • Details of machine operation and winning combinations clearly shown on machines • Staff have full understanding of stakes and prizes, and odds associated with each machine. • Complaints policy visibly displayed for customer information. All complaints to be fully investigated in accordance with policy and referred to nominated ADR 3rd party as required. • Suitable public liability Insurance • Council conditions openly displayed • Regular Compliance Audits 	Low-Low
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Conditions on the Premises Licence to promote the Licensing Objectives at all times

The following conditions have been attached to the licence by the issuing authority under section 169(1)(a) of the Gambling Act 2005: • Restrict the times of operation to 9 a.m. to 11 p.m.

1. A comprehensive CCTV system shall be installed and maintained on the premises as required by the Metropolitan Police Licensing Team. CCTV should cover the following: a) All entry and exit points to and from the premises enabling frontal identification of every person entering under any light conditions b) The areas of the premises to which the public have access (excluding toilets) c) Gaming machines and the counter area
2. CCTV shall continue to record activities 24 hour a day and recordings should be kept for 31 days.
3. CCTV shall be made available for the police viewing at any time with minimum delays when requested.
4. The premises shall display notices near the entrance of the venue stating that CCTV is in operation.
5. A monitor shall be placed inside the premises above the front door showing CCTV images of customers entering exiting the premises.

Children and Young People

6. The Licensee shall maintain a bound and paginated 'Challenge 25 Refusals' register at the premises. The register shall be produced to the police or licensing authority forthwith on request.
7. Prominent signage and notices advertising the Challenge 25 will be displayed showing the operation of such policy.
8. Third party testing on age restricted sales systems purchasing shall take at least twice a year and the results shall be provided to the Licensing Authority upon request.
9. A Challenge 25 proof of age scheme shall be operated at the premises where the only acceptable forms of identification are recognised photographic identification cards, such as a driving licence, passport or proof of age card with the PASS Hologram.

Entrances and Doors

10. A magnetic locking device, commonly referred to as a Maglock will be installed and maintained on the main entrance/exit to the premises which will be operable from the ground floor cashier counter by staff.

Staffing levels

11. There will be a minimum of 2 staff present at all times when the premises is open.

Identification of Offenders or Problem Persons

12. The Licensee shall implement a policy of banning any customers who engage in crime or disorder within or outside the premises.
13. The licensee will refuse entry to customers who appear to be under the influence of alcohol or drugs.

Seating

14. The licensee shall ensure that all seating within the premises are either secured to the floor or are weighted to prevent lifting.

Alarms

15. The licensee shall install and maintain an intruder alarm on the premises.
16. The premises shall install and maintain a panic button behind the cashiers counter.

Toilets

17. The licensee will ensure that customer toilets are checked every hour for evidence of drug taking. Toilet checks are to be documented stating the time and member of staff who made the checks.

Signage, Promotional Material and Notices

18. Prominent GamCare documentation will be displayed at the premises.

Staff Training

19. The licensee shall: provide training on the specific local risks to the licensing objectives that have been identified for these premises as part of the staff induction training programme, periodically provide refresher training to all of its staff working at these premises on the specific local risks to the licensing objectives. Participation in this training shall be formally recorded on each member of staffs training records which, if requested will be presented to the Licensing authority or the Police as soon as practicable.
20. New and seasonal staff must attend induction training and receive refresher training every six months. Homeless and Street Drinking
21. The Licensee shall take all reasonable steps to prevent street drinking of alcohol directly outside the premises and to ban from the premises those who do so.
22. The Licensee shall place a notice visible from the exterior of the premises stating that customers drinking alcohol outside the premises is not permitted and those who do so will be banned from the premises.

Recording of Incidents and Visits

23. An incident log shall be kept for the premises and made available on request to an authorised officer of the City Council or the Police which will record the following; a) All crimes reported to the venue; b) Any complaints received regarding crime and disorder; c) Any incidents of disorder; d) Any faults in the CCTV system; and e) Any visit by a relevant authority or emergency service.

ATMs

24. There shall be no cash point or ATM facilities on the premises.

Action Plan						
Local Area (insert number)	Gambling Operation and Physical Design (insert number)	Question	Action Required	By Whom (name)	By When (date)	Date Completed

Assessment Review			
Frequency of Review (enter time period e.g. 12 months)	12 months	Date Review Due	19 11 2025
Completed Risk Assessment brought to the attention of:			
Name (person responsible for premises and/or implementing control measures)	Position	Signature	Date this assessment was brought to this persons attention
Anna Zietkiewicz	Compliance Manager		17 11 2024

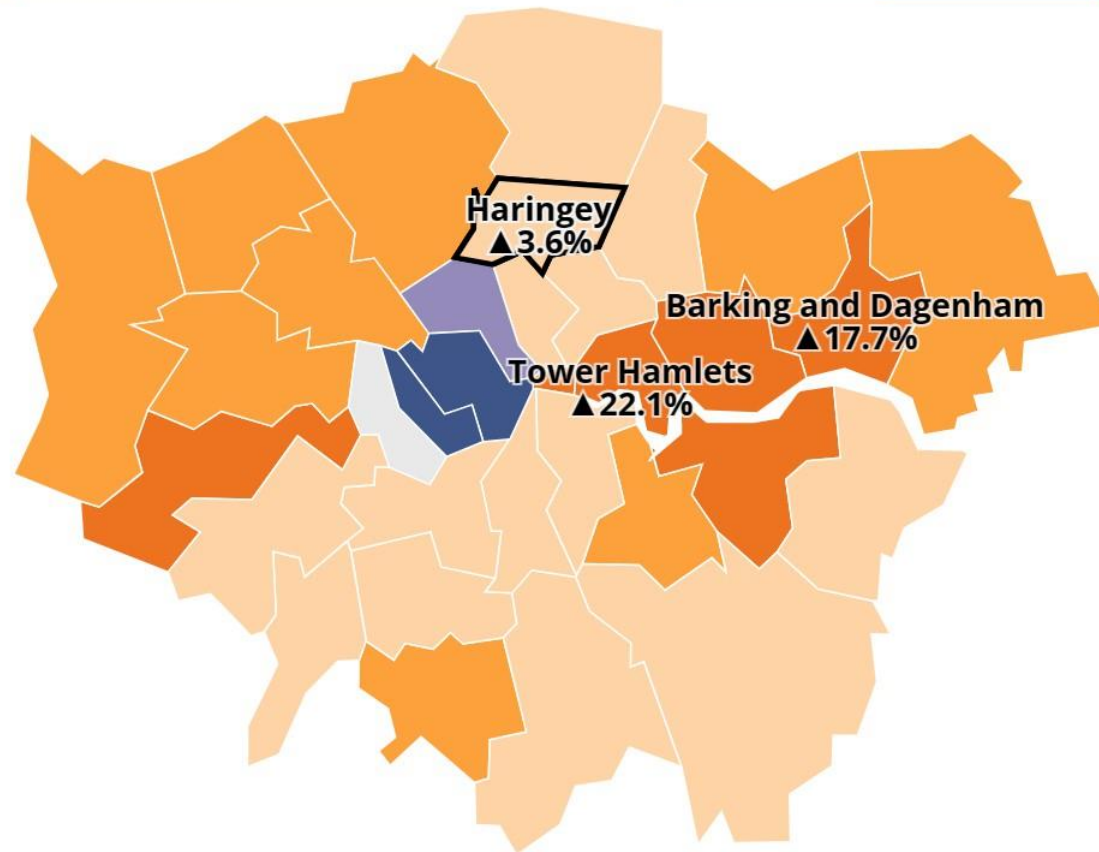
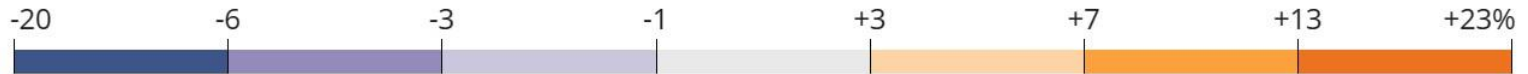
Map of London Borough of Haringey



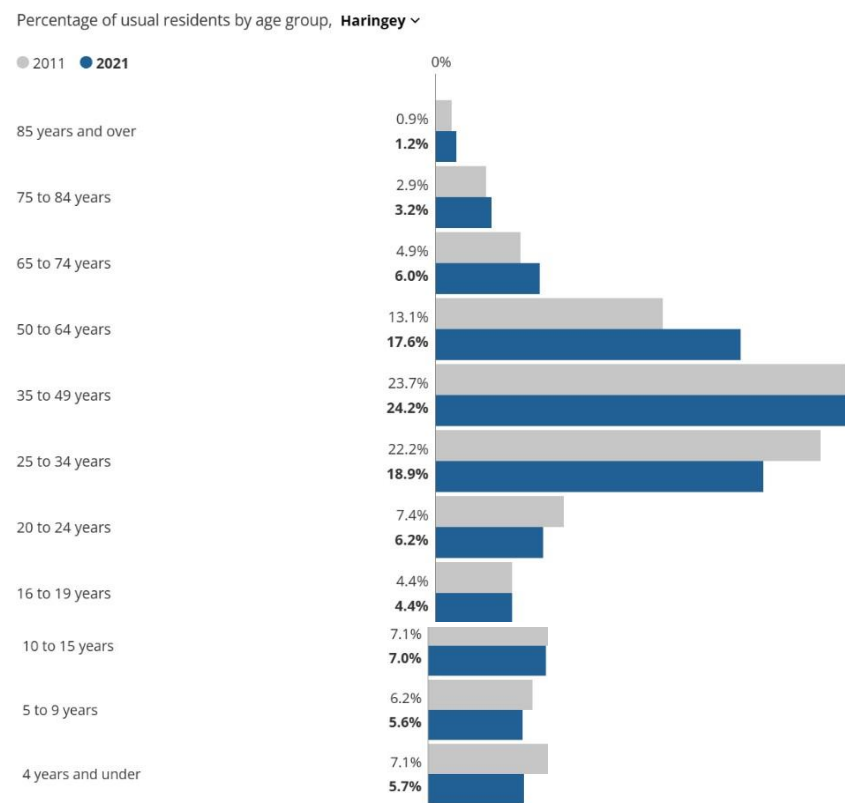
Population changes Haringey

Population change of local authority areas in London between 2011 and 2021

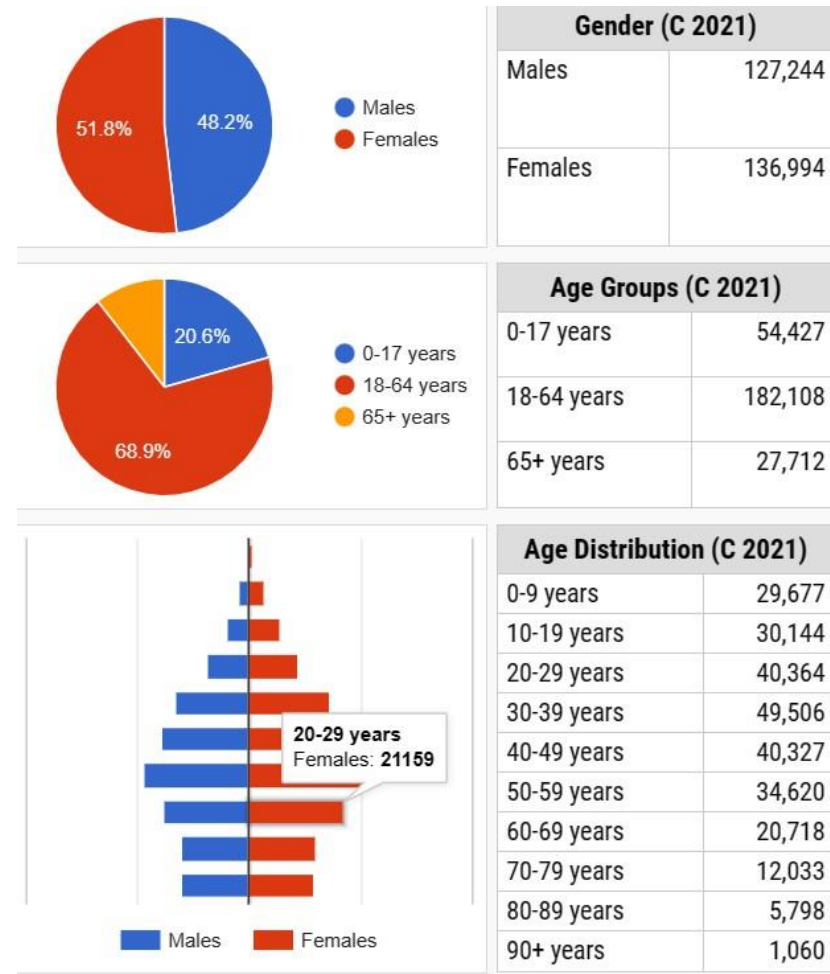
Percentage change



Population structure by group age Haringey

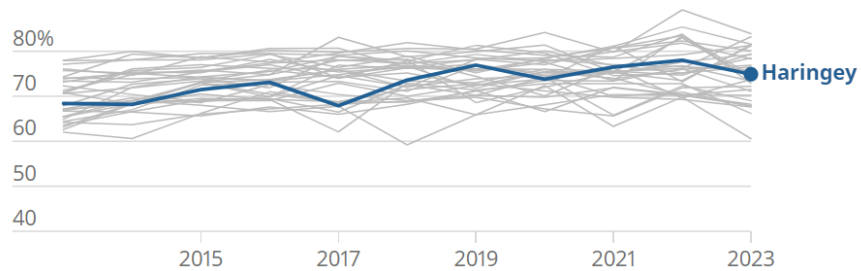


Population by sex and age distribution



Employment rates of areas in London

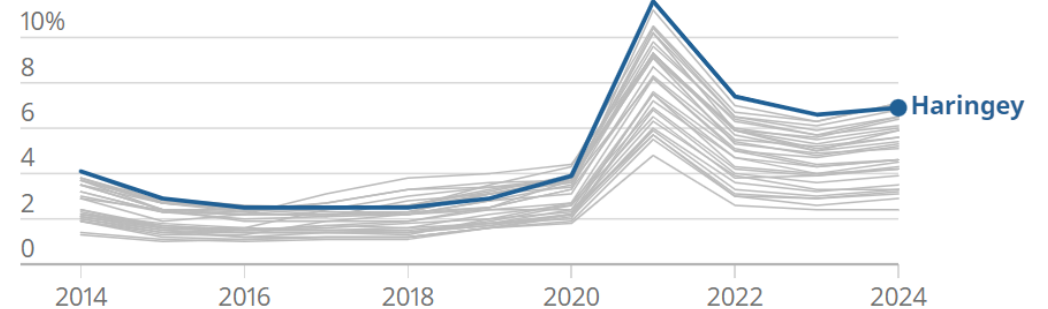
Among those aged 16 to 64 years (%), year ending December 2013 to year ending December 2023



Source: Annual Population Survey from the Office for National Statistics

Claimant Count (%) for areas in London

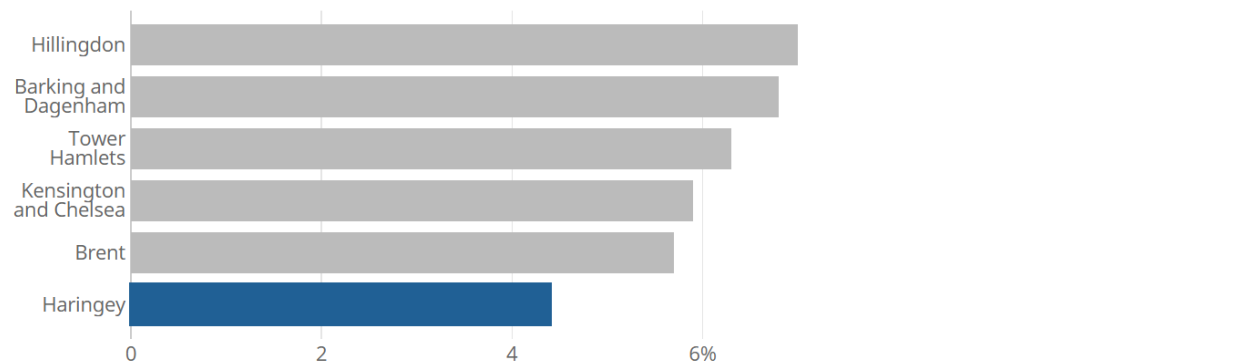
Among those aged 16 to 64 years, March 2014 to March 2024



Source: Claimant Count from Department for Work and Pensions

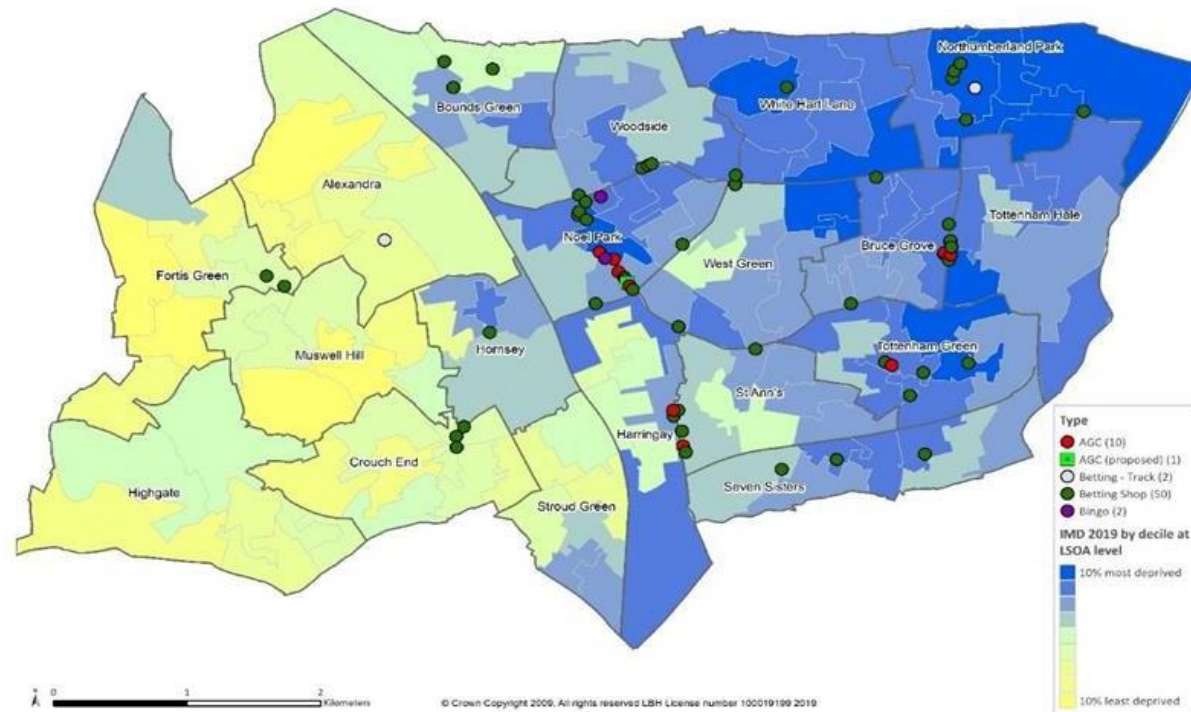
Highest unemployment rates (%) of areas in London, with Haringey for comparison

Among those aged 16 and over and active in the labour market, year ending December 2023

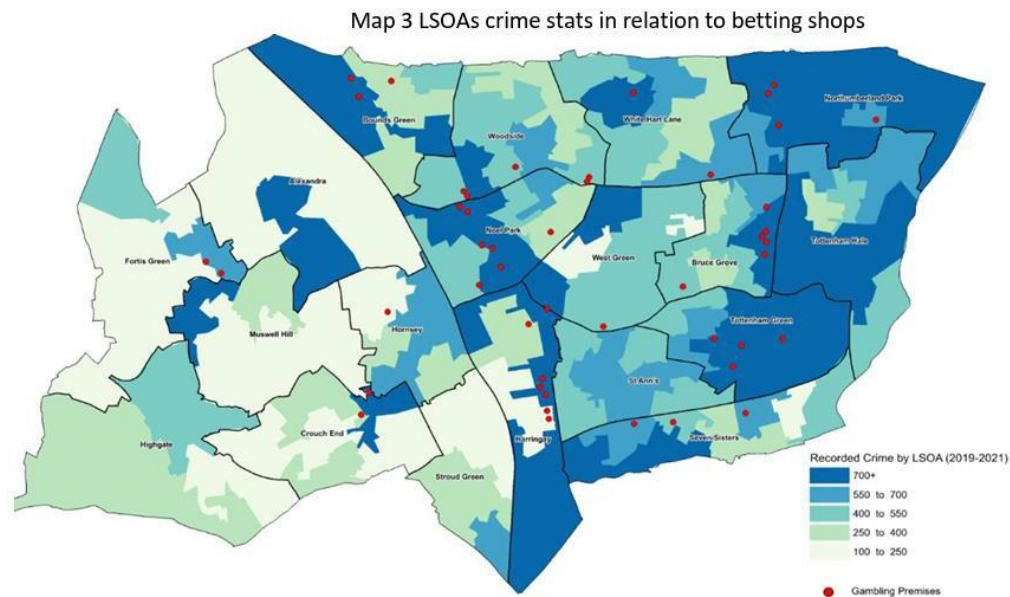


Source: Model-based estimates of unemployment from the Office for National Statistics

Deprivation indices across Haringey linked to Betting shops, Adult Gaming Centres and Bingo



LSOA crime stats, which have been overlaid with the betting shop locations.

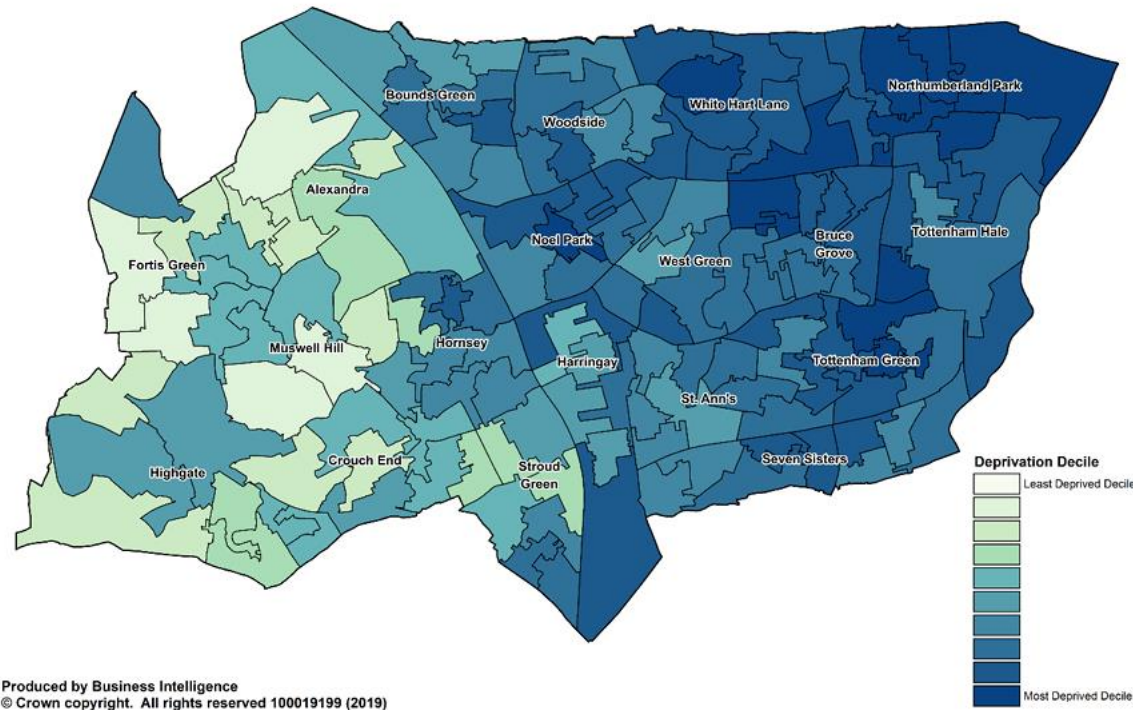


Average Count of Total Recorded Crime per LSOA (2019-2021)	
LSOAs with no gambling premises	344
LSOAs with one or more gambling premises	572
LSOAs with three or more gambling premises	989

Gambling premises (betting shops, adult gaming centres, bingo only) per 10,000 population in Haringey.

Ward	Ward Population	Number of Betting shops, Adult Gaming centres and Bingo	Premises per 10,000
Alexandra	11,758	1	0.9
Bounds Green	14,998	3	2
Bruce Grove	14,820	5	3.3
Crouch End	12,315	2	1.6
Fortis Green	6,341	2	3.1
Harringay	14,243	3	2.1
Highgate	10,713	0	0
Hornsey	13,003	2	1.5
Muswell Hill	10,636	0	0
Noel Park	12,787	14	10.9
Northumberland Park	9,224	6	6.5
Seven Sisters	17,744	3	1.6
St. Ann's	14,434	5	3.5
Stroud Green	11,568	0	0
Tottenham Green	16,516	4	2.4
Tottenham Hale	10,250	5	4.9
West Green	9,652	3	3.1
White Hart Lane	7,882	1	1.3
Woodside	10,724	5	4.7
	229,608	64	2.8

2019 IMD Decile Ranks



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Crime Statistics Harringay Oct 2023-Sep 2024

Last 12 months

Last 3 years

Latest month

Last 12 months

Last 3 years

Crime per Month

