

FUTURE LEISURE LIMITED, 519 Green Lanes, N4 1AN

APPLICATION TO VARY ADULT GAMING CENTRE PREMISES LICENCE

INDEX OF DOCUMENTS SUBMITTED ON BEHALF OF THE APPLICANT

LICENSING SUB COMMITTEE HEARING 24th April 2025

1. Applicant Case Summary P1 - 8
2. Applicant Local Area Risk Assessment P9 - 57
3. Applicant Addendum to Risk Assessment P58 -79
4. Premises Licence P80 - 83

HARINGEY COUNCIL LICENSING SUB-COMMITTEE

24th APRIL 2025

APPLICATION FOR VARIATION OF ADULT GAMING CENTRE PREMISES LICENCE

FUTURE LEISURE LIMITED, 519 Green Lanes, N4 1AN

CASE SUMMARY ON BEHALF OF APPLICANT

Introduction

1. This is an application to vary an adult gaming centre ('AGC') premises licence for premises at 519 Green Lanes N4 1AN. The premises have been trading as an AGC since it opened in February 2022.
2. The permitted hours on the existing AGC licence are 0900 - 2300 and the application seeks to remove the restriction on hours so that the AGC licence would allow 24/7 trading.
3. The current planning permission also restricts the hours and if this application is granted then an application will be made to vary the planning permission to allow 24/7 trading. The premises will not trade beyond the current permitted hours unless and until both the AGC licence and planning permission are varied accordingly.
4. The AGC premises licence is subject to 24 conditions and if granted, the AGC will remain subject to the existing conditions and any other conditions deemed appropriate as well as the following controls:
 - Gambling Commission's Licence Conditions and Codes of Practice.
 - Mandatory and default conditions attaching to betting premises licences.

5. The following documents have also been put together and will be implemented by the applicant
- An updated local area risk assessment('LARA') as required by the Gambling Commission's Licence Conditions and Codes of Practice and Haringey's Statement of Gambling Principles.
 - An addendum to the LARA providing additional and detailed information.
6. In preparing these documents the applicant has taken into account its experience in trading these premises for over 3 years and its experience in operating the majority of its sites 24/7.
7. There is no evidence before the Sub-Committee that these premises are harming the licensing objectives or Haringey's Statement of Gambling Principles. There is therefore no reason to think that the variation to the licence, if granted, will cause any greater concern.
8. As the Sub-Committee will be aware, the aim to permit in section 153 of the Act is explained by the Gambling Commission's Guidance to Licensing Authorities as follows:

1.20 The Act places a legal duty on both the Commission and licensing authorities to aim to permit gambling, in so far as it is considered to be reasonably consistent with the pursuit of the licensing objectives. The effect of this duty is that both the Commission and licensing authorities must approach their functions in a way that seeks to regulate gambling by using their powers, for example, powers to attach conditions to licences, to moderate its impact on the licensing objectives rather than by starting out to prevent it altogether.

9. It is submitted on behalf of the applicant:
- it is a competent operator with no issues raised in terms of not promoting the licensing objective at any of its sites;
 - the premises are suitable for the purpose as evidenced by it trading for over 36 months;
 - provision of gambling in this area is not contrary to the licensing objectives as

evidenced by the grant of this AGC licence in the first instance;

- the extension of hours will not impact on the licensing objectives or Haringey's Statement of Gambling Principles.
- NO evidence is put forward by any party who has made a representation to suggest that the premises have had any impact on the licensing objectives.
- NO evidence is put forward by any party that the nearby 24 hour gambling operations has have any impact on the licensing objectives.
- The Police do not submit any evidence of anti social behavior or crime being connected to these premises and upon the applicant agreeing to 4 additional conditions do not object to this application.

10. The applicant is an experienced operator of London adult gaming centres. Its owner, Gavin Tresidder, started the company over 20 years ago. He is a conscientious, hands-on owner, who has built a competent, well-staffed organisation. He is now joined by his sons Ben and Matthew in the business as well as an experienced senior leadership team. There is a senior compliance team in Anna Zietkiewicz and Aleksandra Jemiolo.

11. The organisation has never suffered a licence review.

12. The applicant has operated these premises now since the February 2022 and knows the area and its customers well - the majority are local people.

13. Importantly the applicant operates 15 premises in total all of which except 1 are licensed to operate 24/7. The applicant is an experienced operator of 24/7 premises , understands how to operate such premises and does not experience any issues during the hours between 2300 and 0700.

14. The Sub-Committee will be aware of the Gambling Commission's Guidance that:

5.10 Licensing authorities do not need to investigate the suitability of an applicant for a premises licence, including in relation to crime. The issue of suitability will already have been considered by the Commission, because any applicant (except occupiers of tracks who do not propose to offer gambling themselves) will have to hold an operating licence from the Commission before the premises licence can be issued.

15. Nevertheless, in light of the residential representations raised, the Sub-Committee may be reassured that the applicant is experienced, competent, conscientious and reputationally sound. At very least, it means that if there are any issues, the applicant will deal with them promptly and professionally.

16. The premises have a detailed CCTV system and if required would always liaise regularly with the Metropolitan Police who have not objected to this application and do not suggest that the premises cause no issues.

17. Other measures in place are as follows

- A direct telephone number for the manager available for all residents
- A magnetic locking device on the front door which the staff can use to lock the door.
- A notification to staff when the door opens
- Full staff training to include amongst other things drug and alcohol awareness and Homeless and Street drinking.

18. As the Sub-Committee will be aware, Commission's Guidance advises in paragraph 5.34 that:

An authority's decision cannot be based on dislike of gambling, or a general notion that it is undesirable to allow gambling premises in an area (with the exception of the casino resolution powers).

19. However, an authority can and should identify areas of higher risk and expect applicant's to assess area-based risks and seek to mitigate such risks through licence conditions.

20. The applicant is aware through its own experience of the area that the premises are located and has considered relevant matters in the LARA and addendum to LARA .

21. The applicant has set out to provide extensive and detailed information so as to demonstrate reasonable consistency with these policies and the licensing objectives, and to propose a detailed and comprehensive suite of conditions in furtherance of those policies and objectives.

22. In summary

- a. the AGC licence already has 24 conditions which promote the licensing objectives and Haringey's Statement of Gambling principles;
- b. The applicant has produced an up to date LARA and addendum to LARA ;
- c. The Metropolitan Police have no issues with the premises;
- d. the premises is double-staffed at all times, so assisting surveillance, age-checking and customer interaction;
- e. all control measures are in place to protect the vulnerable
- f. customer visits after 2300 will not be great and will generally be 2 or 3 people at any one time maximum

23. Naturally, should the Sub-Committee consider that further conditions are necessary, the applicant will be pleased to discuss this. As the Gambling Commission advises in its Guidance:

5.31 Licensing authorities should not turn down applications for premises licences where relevant objections can be dealt with through the use of conditions.

The law

24. As the Sub-Committee will be aware, each piece of licensing legislation sets out a different approach to the question of grant. The approach relevant to gambling is in section 153 of the Gambling Act 2005:

“In exercising their functions under this Part, a licensing authority shall aim to permit the use of premises for gambling in so far as the authority thinks it:

(a) in accordance with any relevant code of practice [issued by the Gambling Commission]

(b) in accordance with any relevant guidance issued by the Commission

(c) reasonably consistent with the licensing objectives (subject to (a) and (b))

*(d) in accordance with the [authority's statement of licensing policy]
(subject to (a) to (c))."*

25. The following points should be noted:

- a. The test is mandatory: *"a licensing authority shall"*
- b. The obligation to *"aim to permit"* where (a) – (d) are satisfied is described by the Gambling Commission in its Guidance as *"the licensing authority's primary obligation"* (para 7.56).

- c. The *"aim to permit"* is explained in the leading textbook Patersons:

"... it creates a presumption in favour of granting the premises licence since it is only if the licence is granted that the premises may lawfully be used for gambling. But the duty seems to go further than that. The verb 'to aim' is defined by the OED as meaning 'To calculate one's course with a view to arrive (at a point); to direct one's course, to make it one's object to attain. Hence to have it as an object, to endeavour earnestly....' A person who 'aims' to achieve a result will usually take active steps to bring it about. The provision appears to place a duty upon the licensing authority to exercise their powers so far as is lawfully possible to achieve a position in which they can grant the premises licence and thus permit the premises to be used for gambling."

- d. As the Guidance states: *"Any refusal should be for reasons which demonstrate that the licensing objectives will not or are unlikely to be met"* (para 5.34). That means demonstrate by evidence.
- e. Conversely, the following considerations are legally irrelevant to the determination of an application for a premises licence:
 - i. A dislike of gambling (para 5.34).
 - ii. A general notion that it is undesirable to allow gambling premises in an area (para 5.34).
 - iii. Moral or ethical objections to gambling (para 5.34).

- iv. The demand for gambling premises (see s 153 Gambling Act 2005). As such, objections which state that there are enough gambling establishments in a locality may be relevant to planning, but they are irrelevant to licensing.
- v. Planning considerations (see section 210 Gambling Act 2005), such as the tone or character of the area.
- vi. Nuisance (see Gambling Commission Guidance para 5.5).

Conclusion

26. In this case, there is no objection by the Police (who are the main source of advice on crime and disorder).

27. This is perhaps understandable as :

- The premises have traded for over 3 years without issue or concern
- The premises comply with 24 conditions which in association with the applicant's own experience and implementation of its LARA provide premises which are compliant with all guidance, policies and codes of practice.

28. The applicant acknowledges the feelings of those who have made objections, and if a licence is varied it will ensure that it will liaise with residents in the future should they wish to do so.

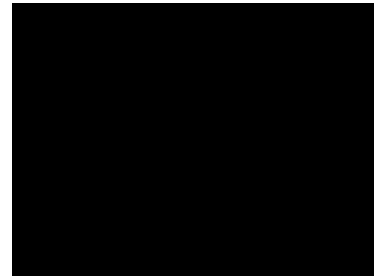
29. The sub-committee is invited to take the view that based on a) the applicant's experience and competence, b) the evidence before it of the premises trading at this site for 36 months c) legal obligations to which it is subject, and c) the compliance material

submitted, that the applicant will promote the licensing objectives during a 24/7 operation.

30. Accordingly, it is submitted that the test in section 153 is fully met. Conversely, taking into account the competence and track record of the applicant, its legal obligations under the Act, Regulations and codes, and the 24 individual licence conditions, it has not been demonstrated that the licensing objectives are unlikely to be met.

31. Accordingly, the Sub-Committee is respectfully invited to grant the variation as asked.

Andrew Woods



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 December 2024
Review date:	19 December 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 	<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 • 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> <ul style="list-style-type: none"> • Burgoyne Road Clinic. 58A Burgoyne Rd, Harringay, London N4 1AE • 51 Mattison Rd, Harringay, London N4 1BG <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 8 betting shops within 1 mile distance.</p> <ul style="list-style-type: none"> Admiral Casino, 513 Green Lanes, Harringay Ladder, London N4 1AN-close proximity (79ft) 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, 48 Grand Parade, London, N4 1AG William Hill. 472/480 West Green Rd, Duckett's Green, London N15 3DA William Hill, 297-301 West 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, 56-57, Grand Parade, Green Lanes, Harringay Ladder, London N4 1AF • Ladbrokes, Betting Office, 12 Grand Parade, Tottenham, London, N4 1JX-close proximity (0.2 miles) • Jenningsbet, 32-33 Grand Parade, Tottenham, London, N4 1LG • Paddy Power, 507 Green Lanes, Harringay, London N4 1TB-close proximity (246 ft) • 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). <p>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</p>	
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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. <p>HMO Population</p> <ul style="list-style-type: none"> • The HMO population in Haringey is made up of two main categories (described above); HMOs that share basic amenities (3,927) (s254) and converted properties with multiple flats that share common parts which are generally defined as less than two thirds owner-occupied (903) (s257). The total licensed HMO 		
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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 Haringay policing neighborhood, under the Metropolitan Police Service force area. <p>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> <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	<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 	<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	<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 • 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 	<p>Low-Low</p>
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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 12 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		19 12 2024

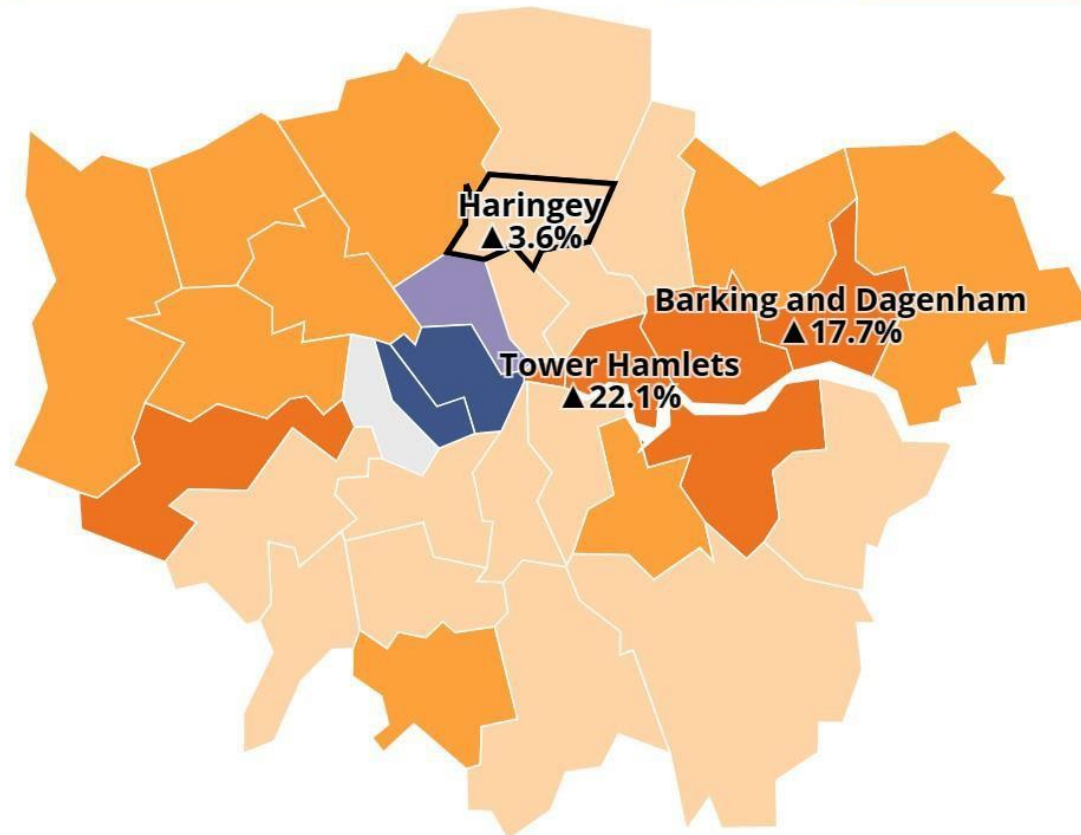
Map of London Borough of Haringey



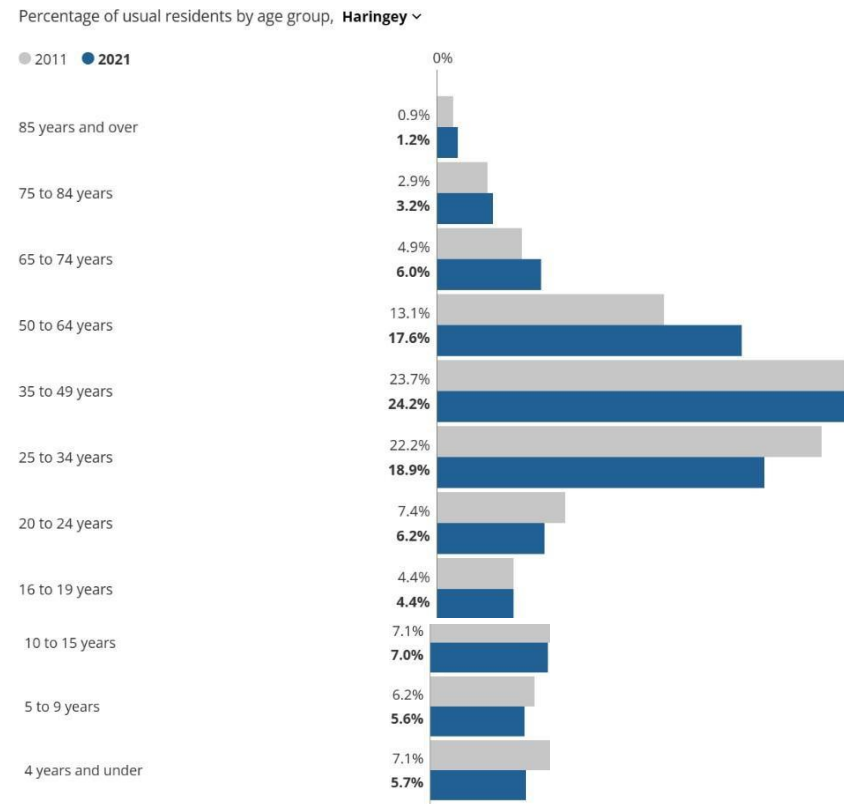
Population changes Haringey

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

Percentage change



Population structure by group age Haringey

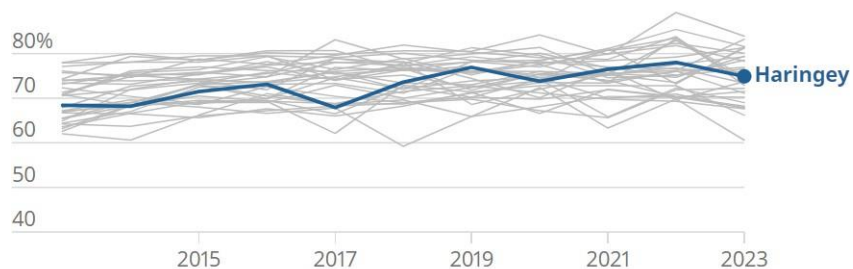


Population by sex and age distribution



Employment rates of areas in London

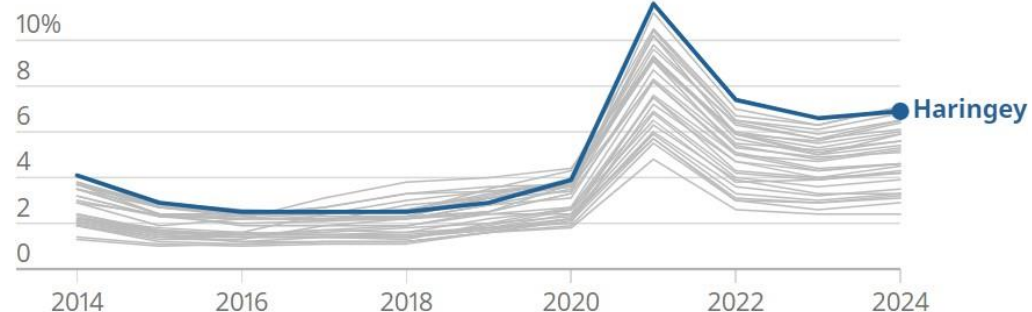
Among those aged 16 to 64 years (%), year ending December 2013 to year ending December 2023



Source: Annual Population Survey from the Office for National Statistics

Claimant Count (%) for areas in London

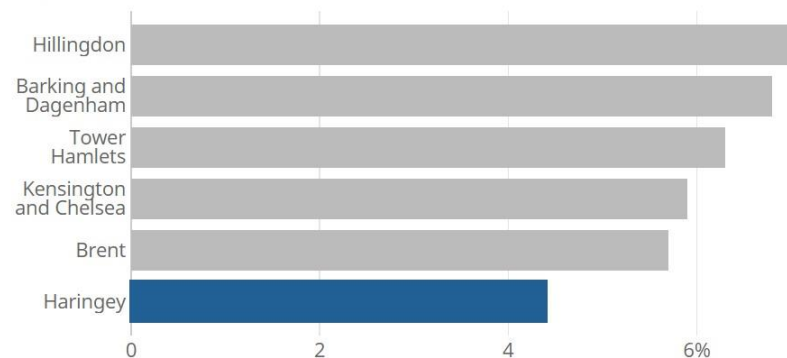
Among those aged 16 to 64 years, March 2014 to March 2024



Source: Claimant Count from Department for Work and Pensions

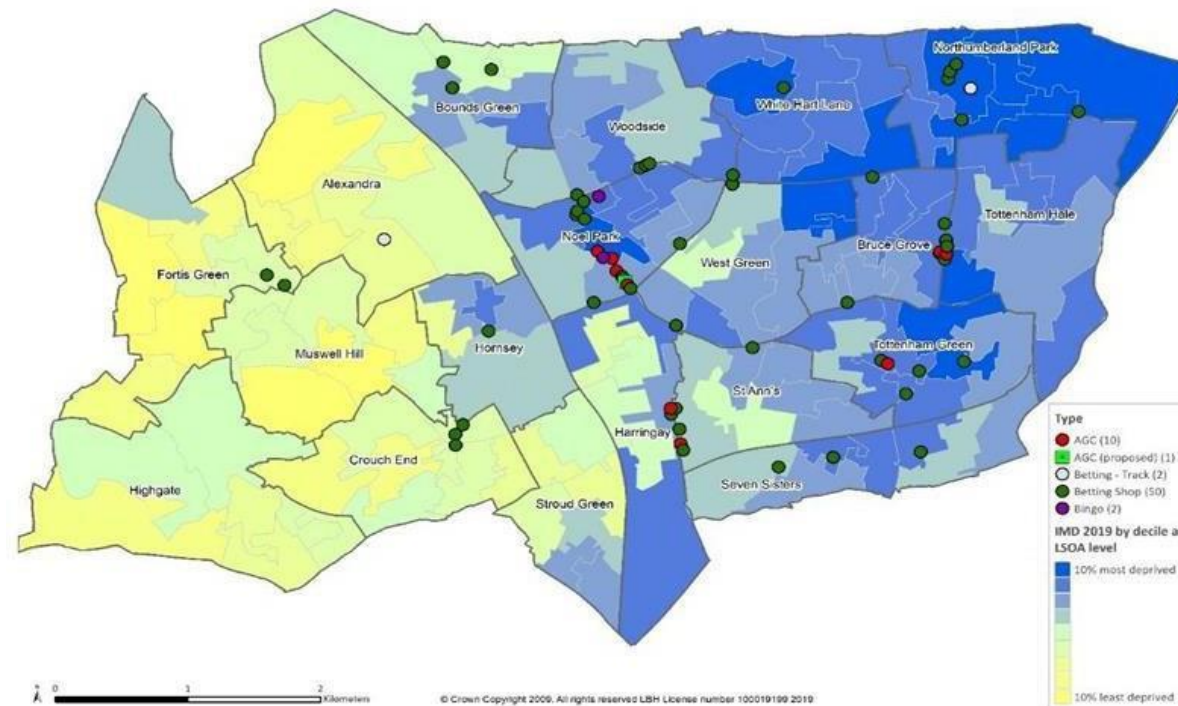
Highest unemployment rates (%) of areas in London, with Haringey for comparison

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



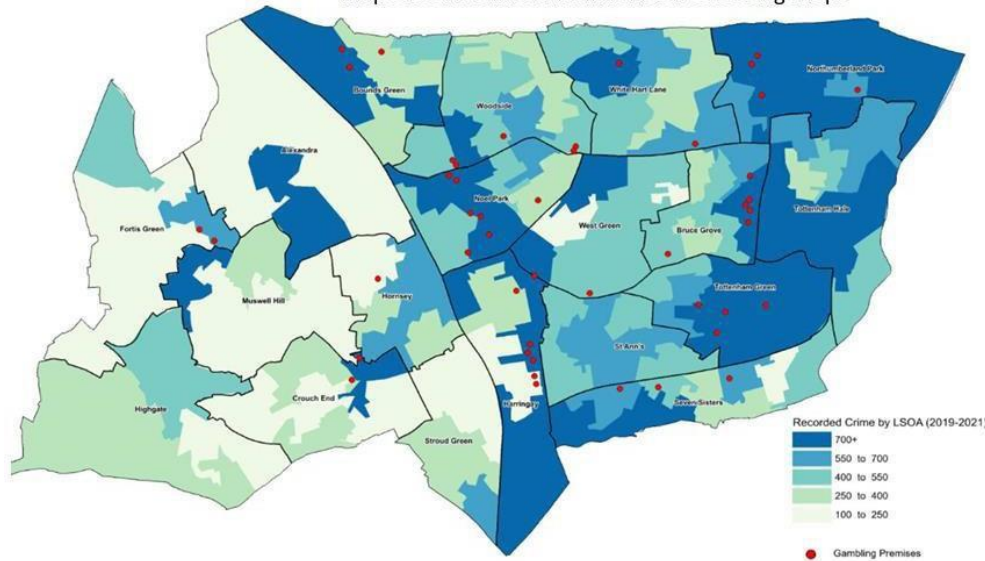
Source: Model-based estimates of unemployment from the Office for National Statistics

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.

Map 3 LSOAs crime stats in relation to betting shops



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

HMO Population

The HMO population is distributed across all wards. Harringay (785) has the most HMOs, Alexandra Park has the least (63) (Figure 1).

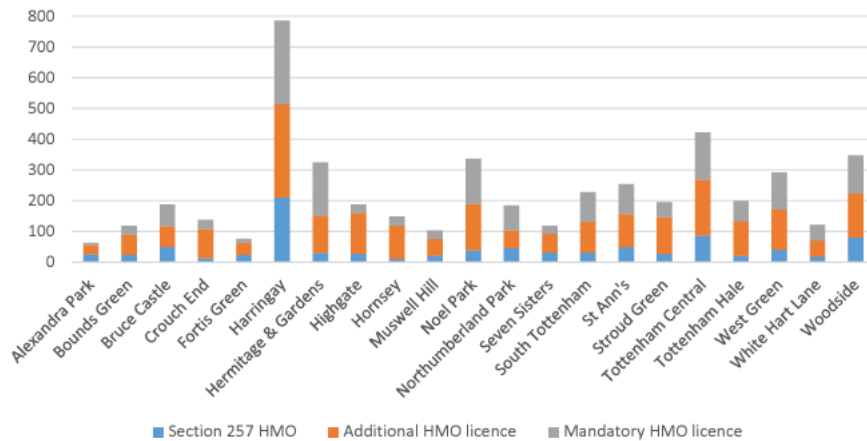


Figure 1. Total licensed HMO population (section 254 & section 257) by ward

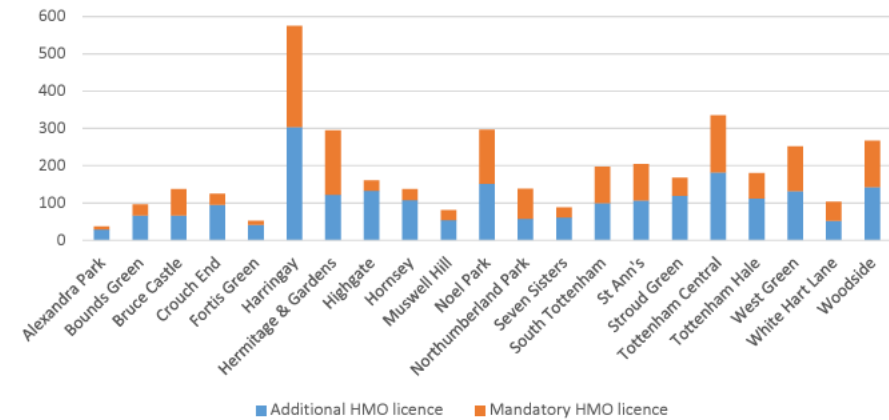
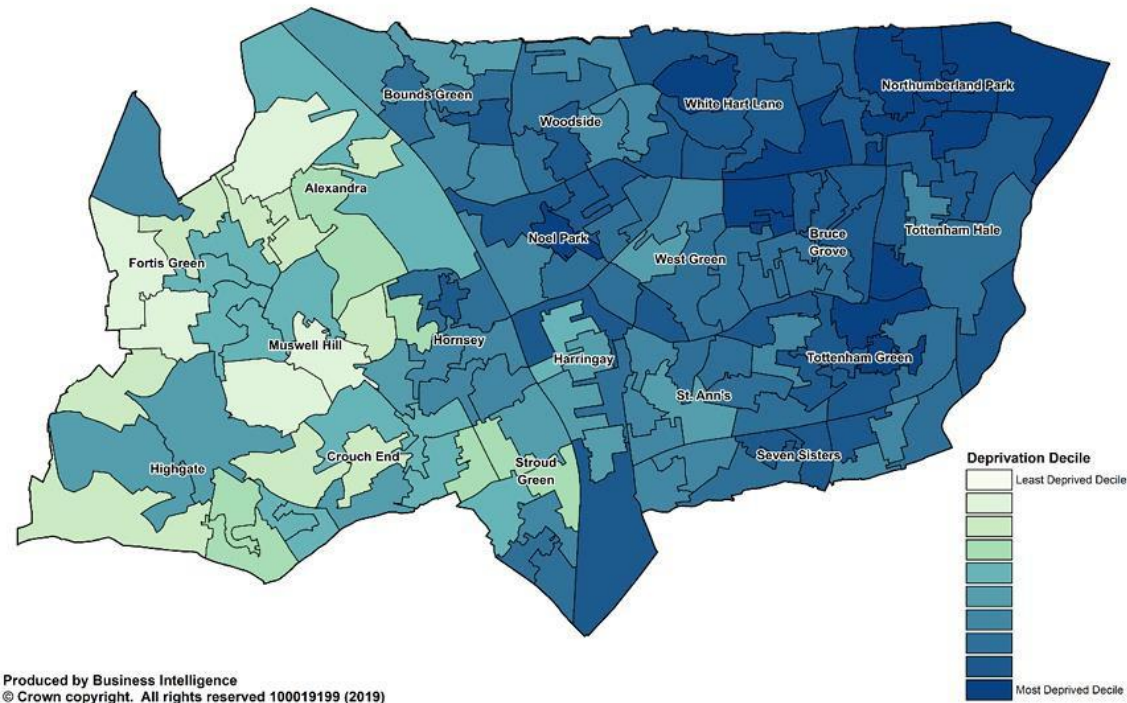


Figure 2. Number of shared amenities HMOs (s254) (Additional and Mandatory) by ward (Source TfL 2023).

2019 IMD Decile Ranks



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Crime Statistics Harringay Oct 2023-Sep 2024

Last 12 months

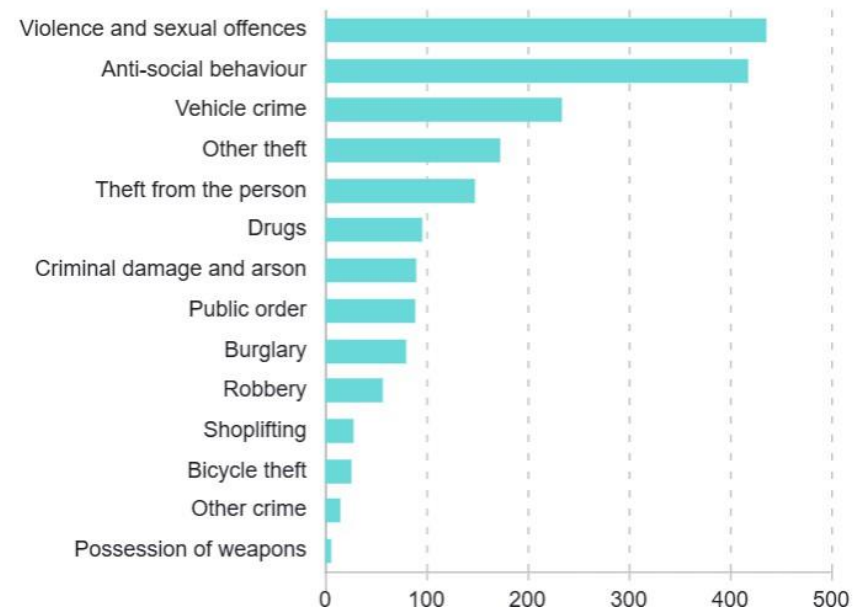
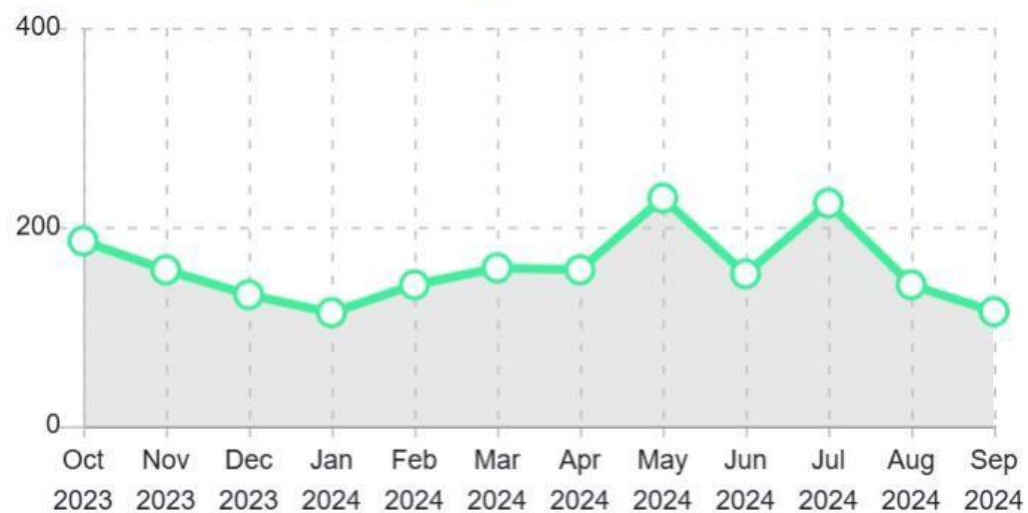
Last 3 years

Latest month

Last 12 months

Last 3 years

Crime per Month



FUTURE LEISURE LIMITED, 519 Green Lanes, N4 1AN
APPLICATION FOR 24/7 OPENING
ADDENDUM TO LARA

This document has been prepared prior to the submission of the application to allow Future Leisure's Adult Gaming Centre at 519 Green Lanes, N4 1AN to trade 24/7. This document is in addition to what would be expected of a normal Local Area Risk Assessment in that it also specifically looks at policy requirements of Haringey gambling policy and other potential questions/concerns that may be raised by the Responsible Authorities. It is intended to be an informative note to assist all authorities considering this application. Further information is available on request. The left hand column sets out potential questions and the right hand side the answers to those questions.

- (a) The premises have operated as an Adult Gaming Centre since February 2022. The premises licence was first granted in September 2020.
- (b) There are 24 conditions attached to the premises licence, which will all continue to be in place and complied with.
- (c) The permitted hours on the premises licence are stated as 0900-23:00 and this application seeks to remove those hours to allow the premises to operate 24/7.
- (d) An application will also be submitted to Haringey Council's planning department to vary the hours on the planning consent to 24/7.
- (e) The Applicant understands that both licensing and planning will need to be granted for the premises to trade 24/7.
- (f) Submitted with the application are the following documents:
 - Updated Local Area Risk Assessment
 - This addendum to the Local Area Risk Assessment
- (g) The noise report prepared by Hepworth confirms that there will be no issues or noise at the premises.
- (h) The Premises Licence Holder will be more than happy to meet with any of the Responsible Authorities to discuss the application or matters referred to in the Local Area Risk Assessment or this addendum.

1	<p>VULNERABILITY</p> <p>The Council have acknowledge that the term 'vulnerable person' is difficult to define and refer to the factors that the Gambling Commission have identified that may contribute to an individuals vulnerability which include personal and demographic factors such as poor physical or mental health, physical or cognitive impairment, side effects from a brain injury or medication, or addiction.</p>	<p>The applicant adopts the following general description of 'vulnerable persons' whilst accepting that it is not limited to the below;</p> <p>It relates to groups that include 'people who gambling more than they want to; people who gamble beyond their means; and people who may not be able to make informed or balanced decisions about gambling due to a mental impairment, alcohol or drugs and individuals vulnerability which include personal and demographic factors such as poor physical or mental health. It may also include financial circumstances, homelessness, domestic or financial abuse. Behavioural factors such as high levels of trust or a high appetite for risk</p>
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<p>They have also set out additional situational factors such as financial difficulties, homelessness, domestic or financial abuse, caring responsibilities, life changes, or sudden change in circumstances which can also make a person vulnerable.</p> <p>Behavioural factors such as high levels of trust or a high appetite for risk can also contribute to vulnerability Market- related factors such as engaging in complex activities with a lack of knowledge and experience of the market can increase vulnerability as well as poor literacy or numeracy skills, lack of knowledge, or dyslexia can make it difficult for individuals to full understand the risk and information</p>	<p>can also contribute to vulnerability Market- related factors such as engaging in complex activities with a lack of knowledge and experience of the market can increase vulnerability as well as poor literacy or numeracy skills, lack of knowledge, or dyslexia can make it difficult for individuals to full understand the risk and information before them.</p> <p>The applicant has policies and procedures in place to protect the vulnerable. All staff are fully trained on this matter including customer interaction and self-exclusion.</p> <p>Policies</p> <p>‘Vulnerable persons’ are covered in the relevant policies used by the applicant:</p> <ul style="list-style-type: none"> - Bacta ToolKit; - Bacta Social Responsibility Charter and Code of Practice; - IHL Smart Hub- Self-Exclusion Services - GambleAware Brief Intervention Guide. <p>Poster and Leaflets</p> <p>In addition there will be posters and leaflets within the premises in relation to ‘staying in control’ and where to find help.</p> <p>24/7 Support Helpline Information: Clear and visible contact information for 24-hour support services, including GambleAware, GamCare, and local emergency support services, will be posted throughout the premises</p> <p>Training</p> <p>The staff are tested in relation to their understanding of ‘vulnerable persons’ at regular intervals, as part of their training programme.</p> <p>Staff on Duty with Mental Health First Aid Training: At least one staff member on duty at all times will be trained in Mental Health First Aid to assist individuals who may be experiencing emotional distress or mental impairment.</p>
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		<p>To address the risks associated with operating 24 hours, the applicant will conduct ongoing vulnerability risk assessments, particularly focusing on the late-night and early-morning hours.</p> <p>Licence conditions and codes of practice The applicant complies with its obligations in relation to vulnerable persons as required by the Gambling Commission's Licence Conditions and Codes of Practice, including the rules regarding customer interaction and self-exclusion.</p> <p>The AGC Premises Licence has 24 Additional Conditions</p> <p>These conditions deal with the following ;</p> <ul style="list-style-type: none"> - Policy requirements - Operational measures and controls - Liaison with local people - Liaison with the MET Police - Promotion of the licensing objectives Gambling Act 2005 - Promotion of the licence conditions and codes of practice - Promotion of Haringey Policy - Staff Training - Social Responsibility
2	Location - The area could be an attraction to vulnerable persons and in particular those with problems with gambling and/or alcohol or drug abuse problems.	<p>The applicant acknowledges the potential uniqueness and potential sensitivity of Green Lanes as a location to operate. The local area risk assessment risk assessment has been updated and the local area profile has been considered in detail. The applicant is experienced in operating Adult Gaming Centres close to similar premises and is experienced in dealing with any potential risk of vulnerable people trying to use its premises. This is evidenced by the fact that the applicant has operated AGCs for over 20 years the majority within the M25 and latterly at this Haringey site - a list of the applicant's premises is provided later.</p>

		<p><u>Engagement with other organisations</u></p> <p>Active Membership in Responsible Gambling Networks:</p> <p>These memberships ensure adherence to best practices in harm prevention and promote responsible gambling standards.</p> <p>Liaison with any local groups as and when required</p> <p><u>Collaboration with Authorities</u></p> <p>Regular Liaison with Police as required:</p> <p>The applicant maintains open communication with local law enforcement to ensure public safety. The premises are monitored to prevent any potential antisocial behaviour.</p> <p><u>Increased Visibility of Support Services</u></p> <p>Additional clearly visible signage can be placed to provide direct access to information on responsible gambling, alcohol abuse, and drug addiction.</p> <p><u>Comprehensive Responsible Gambling Practices</u></p> <p>Self-Exclusion Program:</p> <p>A self-exclusion program is operational, allowing individuals struggling with gambling to voluntarily restrict their access to the premises.</p>
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		<p>Trained Staff:</p> <p>All employees have undergone training to recognise and assist vulnerable individuals. Staff are equipped to provide information about support services and to intervene where necessary.</p> <p>Additionally, they have completed drug and alcohol awareness training enabling them to maintain a safe and controlled environment within the premises.</p> <p>Customer Interaction:</p> <p>Clear procedures for staff to follow when interacting with customers who exhibit concerning behaviour, such as aggression, signs of distress, or emotional outbursts. This include offering a break, providing self-exclusion information, and referring them to support services.</p> <p>Review-Follow up:</p> <p>For customers who may be vulnerable, a follow-up interaction is conducted during next their visit to check on their well-being and offer additional support if necessary</p> <p>Promoting Safer Gambling Tools:</p> <p>All gaming machines have clear and prominent information regarding how to set limits and seek help. Tools like time reminders and deposit limits to encourage responsible gambling behaviour.</p> <p>Partnership with Support Organisations:</p> <p>The applicant actively works with organisations such as Bacta and GamCare to provide resources and referrals for individuals seeking help with gambling-</p>
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		<p>related issues, and will work with any local services, local mental health services, in addition to offering information about self-exclusion programs.</p> <p>Safe and Controlled Environment:</p> <p>Security Measures:</p> <p>Entry is denied to intoxicated individuals or those exhibiting disruptive behaviour.</p> <p>Responsible Advertising:</p> <p>Marketing materials are carefully designed to avoid targeting vulnerable individuals or promoting excessive gambling.</p> <p>Compliance with Licensing and Regulations</p> <p>Future Leisure Ltd operates in full compliance with all licensing requirements, with a focus on harm prevention and social responsibility. A detailed risk assessment specific to this location has been completed, and all measures are regularly audited for effectiveness.</p> <p>Additionally, the applicant will implement the following measures to ensure responsible operations:</p> <p>Security</p> <p>The need for an SIA registered door person employed at the front door of the premises between 11pm and 6am to ensure safe and welcoming environment will be risk assessed. Entry policies will be strictly enforced to prevent access by intoxicated or disruptive individuals.</p>
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		<p>Frequent Risk assessment</p> <p>Risk assessments will be conducted regularly, focusing on the potential effects of extended hours on vulnerable individuals, alcohol, drug abuse and the local community.</p> <p>Through these comprehensive measures, Future Leisure Ltd demonstrates its commitment to protecting vulnerable individuals and fostering a safe, responsible, and positive relationship with the community.</p>
3	Location: Analysis of the area/residents.	<p>The location at Haringey, London (N4 1AN), has been carefully assessed to determine its suitability for extended hours for Royal Casino Slots, especially considering crime and disorder issues.</p> <p>Crime and Safety:</p> <p>The location at Haringey, London (N4 1AN) has been assessed to determine its suitability for extended hours of operation for Royal Casino Slots. The area presents challenges and opportunities, particularly considering crime, disorder issues, and the proximity to vulnerable communities. This section provided an overview of local crime rates, demographics, and considerations.</p> <p>According to Haringey Council and Police.uk the borough recorded 4,283 crimes in December 2024., reflecting a downward trend in overall crime compared to mid-2024. However, Haringey ranks above the London average for anti-social behaviour with 34.6 incidents per 1000 residents, making it the 12th highest borough for ASB related offences. Annual total crime rate in Haringey is 96.2 per 1000 residents , which can be rated as 5b out of 10 or medium level compared to other local authority. The venue is committed to implementing measures to manage and mitigate these risks.</p>

		<p>Local Considerations:</p> <p>The premises are located in a mixed-use area with a blend of residential properties, community centres, places of worship, and schools. The proximity of local fast-food outlets and pubs could potentially attract vulnerable individuals. While the area does have higher foot traffic, previous businesses, including betting shops and entertainment venues, have operated in this location without major issues.</p> <p>Measures:</p> <ol style="list-style-type: none"> 1. Enhanced Safeguarding: The applicant will implement strict conditions to mitigate risks, including advanced staff training to assist vulnerable individuals and prevent exploitation. 2. Collaboration: Regular engagement with local bodies such as police and neighbouring businesses ensures risks are monitored and managed. 3. Operational Improvements: Compared to previous businesses in the area, the AGC introduces additional safeguards, such as extensive CCTV coverage, customer monitoring, and a highly visible customer service desk to prevent inappropriate behaviours. 4. Local Area Profile: The applicant has conducted a detailed risk assessment and will collaborate with local operators including hostels and faith groups, to ensure the premises do not attract or enable harmful activity. 5. Vulnerable Person Identification: Employees are trained to identify individuals showing signs of distress, anxiety, or compulsive gambling behaviour and offer support. This includes offering information on self-exclusion and ensuring customers know where to access support.
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		6. Strict Entry Policies: The venue has strict entry policies to prevent intoxicated or disruptive individuals from accessing the premises, ensuring that the environment remains safe at all times.
4	Are there any issues with the shop to date?	The applicant is not aware that there were any issues with the operation of the shop/ none have been brought to the attention of the shop
5	Policy Considerations	<p>The risk assessment has been updated and the local area profile has been considered in detail as well as this additional document. The applicant is experienced in operating Adult Gaming Centres close to similar premises and is also experienced in dealing with any potential risk of under 18s trying to use its premises. As stated above, consideration has also been given to other vulnerable persons. The above is evidenced by the fact that the applicant has operated at this site since it opened in February 2022.</p> <p>The applicant has policies and procedures in place to protect children and young people. Again, all staff are fully trained in this area.</p> <p>Policies</p> <p>‘Children and young people’ are covered in the relevant policies used by the applicant:</p> <ul style="list-style-type: none"> - Bacta ToolKit; and - Bacta Social Responsibility Charter and Code of Practice. <p>Poster and Signage</p> <p>Please see attached documents. Signs are very clearly placed on the front door and are highly visible to those outside the shop stating: “it is against the law for persons under the age of 18 to enter the premises”. Challenge/Think 25 will be implemented inside the shop by staff who will be on the shop floor.</p>

		<p>Window Signage</p> <p>The only promotional material used will be standard in the window. None of the promotional material will be of a type which would encourage the use of premises by children or young people. This would be wholly self-defeating as children and young people are not allowed access to the premises in any event. Further, the applicant complies with the Licence Conditions and Codes of Practice, which require compliance with the ASA's advertising codes of practice.</p> <p>Training</p> <p>The staff are tested in relation to their understanding of 'exposing children and young people to gambling' at regular intervals, as part of their training programme.</p>
6	<p>Haringey's Statement of Licensing Principles for Gambling states "Adult gaming centres (AGCs) premises licences allow the holder of the licence to make gaming machines available for use on the premises. Persons operating an AGC must hold a gaming machines general operating licence from the Commission and must seek a premises licence from the Licensing Authority.</p>	<p>The applicant is aware of this requirement which is being complied with and an indicative plan is submitted.</p>
7	<p>Gaming machines are a form of gambling which is attractive to children and AGC's will contain machines of a similar format to the Category D machines on which children are allowed to play.</p> <p>Some gambling can be problematic, affecting a person's ability to live and work. People with gambling problems often experience a range of negative effects, including health issues, relationship</p>	<p>The applicant is aware of this. No one under the age of 18 is permitted to enter the AGC and all customers are evaluated and interacted with by staff.</p> <p>In the applicant's experience, children are not attracted to enter its premises in any event, but it has adequate safeguards to ensure that they do not.</p> <p>The applicant is fully aware of the risks associated with problem gambling, including its links to suicide attempts among both men and women, as well as the heightened suicide risk for individuals exhibiting problem gambling</p>

	<p>breakdown and difficulties with debt. In more severe cases, gambling problems can lead to crime, thoughts of suicide or suicide itself.</p>	<p>behaviours. To minimise these risks, the applicant implements several measures in line with its commitment to responsible gambling.</p> <p>No one under the age of 18 is permitted to enter the AGC, and all customers are carefully evaluated and interacted with by trained staff. As part of operating 24/7, the venue maintains vigilant monitoring of customer behaviour, with regular training provided to staff to recognise and address signs of distress, gambling-related harm, or any emotional issues.</p> <p>Additionally, staff members are well-equipped to provide assistance and support, directing customers to relevant resources and offering tools such as self-exclusion and responsible gambling information.</p> <p>The applicant will ensure that all staff, , undergo safeguarding training, specifically in recognising the signs of child sexual exploitation (CSE).</p> <p>Staff will be provided with guidance on how to react if they suspect a person may be at risk of CSE.</p> <p>The premises will implement a comprehensive safeguarding policy to ensure all employees understand their role in identifying, preventing, and responding to child sexual exploitation.</p> <p>The applicant will establish and maintain regular communication with local safeguarding authorities, including child protection agencies and the police, to ensure that the venue's safeguarding measures are aligned with the latest practices and regulations.</p> <p>A risk assessment will be conducted regularly , focusing on any potential risks related to child sexual exploitation, particularly in light of the 24/7 operations. This will include identifying any potential hotspots for exploitation and assessing the risks of vulnerable individuals accessing the premises at night.</p>
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		<p>The premises will display clear and visible signage about the safeguarding measures in place, including how customers can report concerns regarding child sexual exploitation.</p> <p>Regular audit will be conducted annually to review the safeguarding measures in place, ensuring that the premises are meeting the expected standards and continually improving their approach to child sexual exploitation and other safeguarding issues.</p>
8	Signage & window display not to attract under 18s, and advise under 18's access is prohibited.	The applicant is aware of this - confirmed.
9	'This Licensing Authority will specifically have regard to the need to protect children and vulnerable persons from harm or being exploited by gambling, and will expect the applicant to satisfy the Authority that there will be sufficient measures to, for example, ensure that under 18 year olds do not have access to the premises.'	The applicant is aware of this - see above.
10	'Applicants for new or variation applications of premises licences within a gambling vulnerability ward must include detailed information as to how the proposals will be reasonably consistent with the gambling objectives and policies. Applicants are expected to establish whether there are any sensitive premises or locations within close proximity to the premises and what the risk level is for the area based on vulnerability.'	The applicant is aware and has reviewed the local area profile for the application premises. Having considered the local area profile and other relevant factors, further conditions have been offered in support of the application. These include the following specific related conditions:
11	Licensing OBJ1 states 'To prevent gambling from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime, the Licensing Authority will apply the following criteria and take into account the following considerations, where relevant, in determining applications.	The applicant is aware of OBJ1, please see responses above and below.

12	<p>The Licensing Authority expects applicants to consider the measures necessary to be reasonably consistent with the licensing objective of preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.</p>	<p>Having considered the local area profile and other relevant factors and ensured compliance with the conditions the applicant has liaised with the MET POLICE who have no objections</p> <p>Staff trained in identifying early warning signs of problem gambling and offering appropriate support to customers before issues escalate.</p> <p>Staff regularly encourage customers to self-exclude or set personal limits on their gambling activities. Providing clear instructions about the self-exclusion process and how to set spending limits on machines.</p> <p>Posters and leaflets will be placed prominently around the venue, providing information on responsible gambling, where to seek help, and the risks associated with problem gambling. Information also highlight the availability of support services such as GamCare, National Gambling Helpline, and local mental health resources</p>
13	<p>Applicants are advised to examine crime and ASB statistics that relate to the vicinity of the premises and application. There is an expectation that the application must be tailor made to the specific locality and include any additional measures.</p>	<p>Please see above - the existing conditions on the Premises Licence suffice.</p>
14	<p>Licensees must ensure that their policies and procedures take account of the structure and layout of their gambling premises</p>	<p>As with all Future Leisure premises the layout is such that there are good lines of sight over the gaming machines. All premises are well lit and the fit out is designed to minimise conflict and opportunities for crime and disorder.</p> <p>Additional measures also include the 'spotter monitor' being placed inside the premises near the front door showing CCTV images of customers entering, exiting and whilst on the premises.</p> <p>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</p>

		operable by staff. Staff will receive a notification when the front door opens, all of the above measures are contained in the proposed additional conditions.
15	Licensing OBJ2 states 'To ensure that gambling is conducted in a fair and open way, the Licensing Authority will apply the following criteria and take into account the following considerations, where relevant, in determining applications.'	The applicant is aware of OBJ2, please see responses .
16	The Licensing Authority acknowledges that the Gambling Commission does not expect them (the LA) to become concerned with ensuring that gambling is conducted in a fair and open way. However, applicants will be expected to show awareness of the measures necessary to be reasonably compliant with the licensing objective of ensuring that gambling is conducted in a fair and open way	<p>Gambling in a 'fair and open way' is covered in both the risk assessment and Policies and Procedures.</p> <p>Risk Assessment</p> <p>The risk assessment sets out the following steps:</p> <ul style="list-style-type: none"> - All machines purchased from manufactures/suppliers licensed by the Gambling Commission; - Machines maintained by qualified engineers; - Machines turned off should a fault occur; - Complaints procedure and forms available on premises; - Regular staff training on company policy; - Registered with ADR Entity – - Compliant with Bacta Policies & Procedures; - Fully co-operative with Council requirements as evidenced at this site - Terms and Conditions Signage produced in a variety of appropriate languages and displayed at entrance; - Promotional activity clearly communicated in a variety of appropriate languages and displayed around the premises. - Visible and clear information provided on the payout percentages and the odds of games available on the machines, ensuring customers can make informed decisions about their gambling. - The Terms and Conditions of using the machines and other services are prominently displayed, not only at the entrance but also at each machine.

		<ul style="list-style-type: none"> - Clear instructions on how to use the machines, including information on how customers can monitor their spending and gaming time, is displayed on each machine - The self-exclusion program is transparent, with clear guidelines on how customers can enroll, the process for self-exclusion, and how they can resume gambling once the exclusion period has ended. - Collaborating with responsible gambling organisations such as GamCare and GambleAware, ensuring that customers have access to educational resources, advice, and support if they identify issues with their gambling behaviour. <p>Policies 'Fair and open' is covered in the Bacta ToolKit under 'Fair and Open Practice and Dispute Resolution' used by the applicant.</p> <p>Complaint Procedure Complaint Procedure that clearly sets out how customers can make a complaint, should the need arise.</p> <p>Training The staff are questioned in relation to their understanding of 'ensuring that gambling is conducted in a fair and open way' at regular intervals, as part of their training programme.</p> <p>Audits and Compliance Checks Audits to regularly review the fairness of gambling activities, including machine operations, promotional practices, and complaint handling procedures.</p>
17	The Council and its partner services and external agencies work collaboratively together, in a fair, transparent, open and consistent manner, to provide intelligent directed regulation and in conjunction with Haringey's Enforcement Policy .	The applicant has and will always be fully co-operative with enforcement agencies and has had regard for Chapter 5 of the Gambling Policy and Haringey's boroughwide enforcement policy.

		<p>Policies</p> <p>'Cooperation with enforcement agencies' is also covered in the Bacta ToolKit under 'Access to Premises by the Gambling Commission's Enforcement Officers' used by the applicant. This relates specifically to Gambling Commission enforcement officers.</p> <p>Training</p> <p>The staff are tested in relation to their understanding of 'access to the premises by the statutory authorities' at regular intervals, as part of their training programme.</p>
18	Applicant's other licensed premises under the Gambling Act 2005 are all trained to have an understanding of their management and operation of such premises.	<p>The applicant attaches a full list of all Adult Gaming Centres operated by them under the Gambling Act 2005.</p> <ol style="list-style-type: none"> 1. Borehamwood-102 Shenley Rd, WD6 1EB 2. Brick lane- 10 Brick Lane, London, E1 6RF 3. Hackney- 408 Mare Street, London, E8 1JU 4. Hammermith-102 King Street, W6 0QW, Hammersmith 5. Haringey-519 Green Lanes, London, N4 1AN 6. Harrow-17 College Road, Harrow, HA1 1BA 7. High Wycombe- Old Bank House, 39 High Street, HP11 2AG High Wycombe 8. Hounslow-1-2 Cressys Corner, Lampton Road, Hounslow, TW3 1HA 9. Ilford-43/45 Cranbrook Road, Ilford, England IG1 4PA 10. Roman Road- Unit 3 568a Roman Road, Bethnal Green , London, E3 5ES 11. Slough-274 Farnham Road Slough, SL1 4XL 12. 1Stevenage-37 Queensway, Stevenage, Hertfordshire, SG1 1DN 13. Swiss Cottage-3 Northways Parade Swiss Cottage, London, England, NW3 5EN 14. Willesden-9 Walm Lane, London, NW2 5SJ 15. Queensway-74 Queensway, London, W2 3RL

		<p>The applicant is a small independent operator with the owner adopting a very hands on approach. There is also an operations manager and compliance manager to support the owner. Regulatory returns are submitted to the Gambling Commission.</p> <p>The applicant's Adult Gaming Centres operate without issues and operate as standard Adult Gaming Centres which promote the licensing objectives: through their policies and procedures including the BACTA tool kit, the training given to all staff, the Local Area Risk Assessments and other risk assessments undertaken and the strong management control implemented by the applicant.</p> <p>The applicant has never been subject to enforcement action or had a premises licence review.</p>
19	Licensing OBJ3 states 'To protect children and other vulnerable persons from being harmed or exploited by gambling, the Licensing Authority will apply the following criteria and take into account the following considerations, where relevant, in determining applications.'	<p>The applicant has considered this objective, please see response below and above:</p> <p>Houses in Multiple Occupation (HMOs)</p> <p>A review of the local area has identified a number of licensed Houses in Multiple Occupation (HMOs) within proximity to the premises. While no evidence has been provided to suggest these HMOs accommodate vulnerable individuals, they are noted here as part of the wider residential context.</p> <p>HMOs can house a variety of occupants, including students, professionals, and potentially vulnerable individuals. The applicant will seek to liaise with support groups associated with HMO's, such as Care in the Community.</p> <p>The applicant takes the protection of children and other vulnerable persons extremely seriously. All staff are trained in relation to this. The training is</p>

		logged and recorded, with refresher training taking place every 6 months. Please see above responses to 1 & 5.
20	Alcohol and drug dependency	<p>The applicant acknowledges the impact on both health and social wellbeing addiction can have on the local area and its residents.</p> <p>The applicant can demonstrate within their Policies and Procedures how they will protect vulnerable persons and the applicant can confirm that it does have specific training programmes for staff to ensure that they are able to identify children and vulnerable people.</p> <p>Please see below response for further details on how training is delivered.</p>
21	Training	<p>The training provided to staff is provided by each Venue Manager, with the overall responsibility being with the Compliance Manager. The applicant's policies and procedures, including the BACTA tool kit are relied on. Each new member of staff would also spend time working under an experienced manager in an existing shop as set out in the applicant's statement. Hands on training is given by the managers. This training provides that staff are given an understanding of identifying children and vulnerable people, gambling related harm, why people are gambling and how to protect the vulnerable.</p> <p>The training includes;</p> <ul style="list-style-type: none"> • identifying children and Age Verification, • Identifying safe gambling, • identifying the signs of problem gambling, • staff detection of problem gambling and protection of the vulnerable, • implementation of know your customer, • staff trained to encourage customers to think about their gambling, directing customers to information about safer gambling and/or suggesting appropriate gambling management tools such as self-exclusion or specialist support from organisations which deal with advice and treatment,

		<ul style="list-style-type: none"> • information about safer gambling is readily available to customers, • how to interact with customers, record interactions and act on the written interactions providing the right help and support. <p>Staff will receive training on identifying specific risk factors for vulnerable individuals regarding mental health issues, substance abuse.</p> <p>Detailed training on recognising the early warning signs of gambling addiction, such as excessive spending, long sessions without breaks, irrational gambling behaviour, or chasing losses.</p>
22	Provision of information leaflets/helpline numbers for organisations such as GamCare	<p>Please see below responses.</p> <p>Prominent GamCare documentation will be displayed at the premises and other notices promoting responsible gambling.</p>
23	Does the applicant have a referral scheme in place, in regards to self-exclusion?	<p>Yes.</p> <p>The applicant has a self-exclusion referral scheme – IHL Smart Hub self-exclusion referral scheme. This self-exclusion referral scheme allows the applicant to input details of a self-excluder and then tell other operators nearby that a particular person has self-excluded and that they will in the usual way need to stop them entering the premises should they try. Any attempted breaches of a self-exclusion can be recorded on the system. The system uses a 1000 metre radius from the postcode of the AGC to determine which other AGCs are relevant. The system also helps to detect any breaches of the self-exclusion agreement by tracking attempted entries by self-excluded individuals. Any attempt to enter a premises after self-exclusion is automatically recorded and flagged within the system, allowing operators to take immediate action.</p> <p>The applicant is part of a network of gambling venues using the IHL Smart Hub system. This ensures that the self-exclusion information is shared in real time,</p>

		<p>providing a higher level of protection for vulnerable individuals across all local gambling venues.</p> <p>The 1000-metre radius criterion ensures that self-exclusion is not limited to a single venue but extends to the local area, reducing the risk of individuals bypassing their self-exclusion by visiting a nearby establishment.</p> <p>Policies</p> <p>'Self Exclusion' is covered in the relevant policies used by the applicant:</p> <ul style="list-style-type: none"> - Bacta ToolKit; - Bacta Social Responsibility Charter and Code of Practice; and - IHL Smart Hub -Self Exclusion Services <p>Training</p> <p>The staff are questioned in relation to their understanding of 'Self-Exclusion' at regular intervals, as part of their training programme.</p>
24	Is the onus on the individual to self-exclude from a premises? If so, how does an individual go about this?	<p>The first point of contact for self-exclusion is the staff at the premises who are trained to approach and speak to/interact with any customer displaying any signs of problem gambling. Customers may directly request help themselves for a gambling related problem or be approached by staff who spot signs of problem gambling. Customers may ask to self-exclude or request details of gambling help services or they may speak to a member of staff and indirectly refer to concerns about their gambling habits. Staff also are trained and have a duty of care towards customers who wish to self-exclude and staff will refer these individuals to other self-exclusion schemes operated by other gambling sectors as well as care agencies and helplines such as GamCare or Gamble Aware.</p> <p>Staff are trained to ensure that information about self-exclusion is provided in a discreet and confidential manner and the procedure is thoroughly</p>

		<p>explained. If a customer refuses to self-exclude and/or the staff believes that the customer is vulnerable or at risk then the customer will not be allowed to gamble at the premises. Staff are trained to identify, evaluate and interact. Staff will also provide information about the National Self-Exclusion Scheme, which allows individuals to self-exclude across various gambling venues nationwide.</p> <p>National Self-Exclusion:</p> <p>If the customer is interested in National Self-Exclusion, the staff will:</p> <ul style="list-style-type: none"> • offer to assist by either calling or emailing the National Self-Exclusion Scheme on behalf of the customer, or • guide the customer through the process to register themselves on the scheme.
25	What links does the premises have with local services to provide support?	<p>The applicant has already liaised with the local police and will continue to do so if the variation is granted.</p> <p>Partnership with Gambling Support Organizations:</p> <p>The premises work closely with various gambling support organisations, such as GamCare, GambleAware. These organisations provide essential resources and support services for individuals experiencing gambling-related harm. Staff are trained to refer individuals to these organisations and provide information on self-exclusion and responsible gambling tools.</p> <p>The premises are part of MOSES - Multi Operator Self Exclusion Scheme to ensure that individuals self-excluded from one premises are notified across nearby venues. This system links the premises to other operators in the area and provides an additional layer of protection for vulnerable individuals.</p>

26	Will the applicant propose to advertise any promotional material associated with the premises? This could encourage the use of the premises by children or young people.	<p>The only promotional material used will be standard in the window. No promotional material will be 'off site'. None of the promotional material will be of a type which would encourage the use of premises by children or young people. This would be wholly self-defeating as children and young people are not allowed access to the premises in any event.</p> <p>The applicant always ensures compliance with the LCCP on socially responsible advertising, which in turn imports the ASA's CAP code and industry codes.</p>
27	How will the applicant control customers from bringing alcohol onto the premises to consume whilst gaming? Or entering the premises in an intoxicated state?	Staff patrol the shop floor and control the door at all times. Alcohol is not permitted by law. Any patrons bringing alcohol or attempting to bring alcohol into the premises will be immediately asked to leave. Staff are trained in drugs and alcohol awareness. Any patrons who appear under the influence will also not be allowed to enter the premises. There is clear signage on the front door and inside the venue stating no alcohol permitted. There is also a maglock in use at the discretion of the staff to control persons entering.
28	Should this variation be granted all conditions both Mandatory and specific must be complied with.	Confirmed.

GAMBLING PREMISES LICENCE

This licence is issued under section 164 of the Gambling Act 2005 by

ADULT GAMING CENTRE PREMISES LICENCE

Haringey Council Licensing Authority

Premises Licence Number:

LN/000024937

Commencement Date:

8th September 2020

Signature:



Part 1 – Details of person to whom licence is issued

This premises licence is issued to:

Future Leisure Ltd

000-036646-N-318600-012

of the following address:



Part 2 – Details of the premises in respect of which the licence is issued

Facilities for gambling may be provided in accordance with this licence on the following premises:

**Future Leisure
519 Green Lanes
Harringay
London
N4 1AN**

Part 3 – Premises Licence Details

This licence commenced on:

8th September 2020

This licence is of unlimited duration:

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. The 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.

Guidance Notes

The following conditions, which would otherwise attach to the licence by virtue of regulations made under section 168 of the Gambling Act 2005, have been excluded by the issuing authority under section 169(1)(b) of that Act:

