



AGENDA

LICENSING COMMITTEE

Date: TUESDAY, 3 NOVEMBER 2020 at 7.30 pm

Remote via Microsoft Teams

Enquiries to: Clare Weaser
Telephone: 0208 314 7369 (direct line)
Email: clare.weaser@lewisham.gov.uk

MEMBERS

This meeting is an open meeting and all items on the agenda may be audio recorded and/or filmed.

Councillors:

Councillor Eva Stamirowski (Chair)
Councillor Kim Powell (Vice-Chair)
Councillor Juliet Campbell
Councillor Colin Elliott
Councillor Alan Hall
Councillor Sue Hordijkeno
Councillor Coral Howard
Councillor Caroline Kalu
Councillor Susan Wise

Members are summoned to attend this meeting

Kim Wright
Chief Executive
Laurence House
Catford
London SE6 4RU
Date: 26 October 2020



INVESTOR IN PEOPLE

The public are welcome to attend our committee meetings, however occasionally committees may have to consider some business in private. Copies of reports can be made available in additional formats on request.

ORDER OF BUSINESS – PART 1 AGENDA

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INVESTOR IN PEOPLE

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Licensing Committee

Minutes

Date: 3 November 2020

Key decision: No

Class: Part 1

Ward(s) affected: All

Contributors: Chief Executive (Director of Law)

Outline and recommendations

Members are asked to consider the Minutes of the meetings of the Licensing Committee, held on 6 October 2020.

Recommendation

That the Minutes of the meeting of the Licensing Committee, held on 6 October 2020 be confirmed and signed.

Agenda Item 2



Licensing Committee

Declarations of Interest

Date: 3 November 2020

Key decision: No

Class: Part 1

Ward(s) affected: All

Contributors: Chief Executive (Director of Law)

Outline and recommendations

Members are asked to declare any personal interest they have in any item on the agenda.

1. Summary

1.1. Members must declare any personal interest they have in any item on the agenda. There are three types of personal interest referred to in the Council's Member Code of Conduct:

- (1) Disclosable pecuniary interests
- (2) Other registerable interests
- (3) Non-registerable interests.

1.2. Further information on these is provided in the body of this report.

2. Recommendation

2.1. Members are asked to declare any personal interest they have in any item on the agenda.

3. Disclosable pecuniary interests

3.1 These are defined by regulation as:

- (a) Employment, trade, profession or vocation of a relevant person* for profit or gain
- (b) Sponsorship –payment or provision of any other financial benefit (other than by the Council) within the 12 months prior to giving notice for inclusion in the register in respect of expenses incurred by you in carrying out duties as a member or towards your election expenses (including payment or financial benefit from a Trade Union).
- (c) Undischarged contracts between a relevant person* (or a firm in which they are a partner or a body corporate in which they are a director, or in the securities of which they have a beneficial interest) and the Council for goods, services or works.
- (d) Beneficial interests in land in the borough.
- (e) Licence to occupy land in the borough for one month or more.
- (f) Corporate tenancies – any tenancy, where to the member’s knowledge, the Council is landlord and the tenant is a firm in which the relevant person* is a partner, a body corporate in which they are a director, or in the securities of which they have a beneficial interest.
- (g) Beneficial interest in securities of a body where:
 - (a) that body to the member’s knowledge has a place of business or land in the borough; and
 - (b) either:
 - (i) the total nominal value of the securities exceeds £25,000 or 1/100 of the total issued share capital of that body; or
 - (ii) if the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which the relevant person* has a beneficial interest exceeds 1/100 of the total issued share capital of that class.

*A relevant person is the member, their spouse or civil partner, or a person with whom they live as spouse or civil partner.

4. Other registerable interests

4.1 The Lewisham Member Code of Conduct requires members also to register the following interests:

- (a) Membership or position of control or management in a body to which you were appointed or nominated by the Council
- (b) Any body exercising functions of a public nature or directed to charitable purposes, or whose principal purposes include the influence of public opinion or policy, including any political party
- (c) Any person from whom you have received a gift or hospitality with an estimated value of at least £25.

5. Non registerable interests

- 5.1. Occasions may arise when a matter under consideration would or would be likely to affect the wellbeing of a member, their family, friend or close associate more than it would affect the wellbeing of those in the local area generally, but which is not required to be registered in the Register of Members' Interests (for example a matter concerning the closure of a school at which a Member's child attends).

6. Declaration and impact of interest on members' participation

- 6.1. Where a member has any registerable interest in a matter and they are present at a meeting at which that matter is to be discussed, they must declare the nature of the interest at the earliest opportunity and in any event before the matter is considered. The declaration will be recorded in the minutes of the meeting. If the matter is a disclosable pecuniary interest the member must take not part in consideration of the matter and withdraw from the room before it is considered. They must not seek improperly to influence the decision in any way. **Failure to declare such an interest which has not already been entered in the Register of Members' Interests, or participation where such an interest exists, is liable to prosecution and on conviction carries a fine of up to £5000**
- 6.2. Where a member has a registerable interest which falls short of a disclosable pecuniary interest they must still declare the nature of the interest to the meeting at the earliest opportunity and in any event before the matter is considered, but they may stay in the room, participate in consideration of the matter and vote on it unless paragraph 6.3 below applies.
- 6.3. Where a member has a registerable interest which falls short of a disclosable pecuniary interest, the member must consider whether a reasonable member of the public in possession of the facts would think that their interest is so significant that it would be likely to impair the member's judgement of the public interest. If so, the member must withdraw and take no part in consideration of the matter nor seek to influence the outcome improperly.
- 6.4. If a non-registerable interest arises which affects the wellbeing of a member, their, family, friend or close associate more than it would affect those in the local area generally, then the provisions relating to the declarations of interest and withdrawal apply as if it were a registerable interest.
- 6.5. Decisions relating to declarations of interests are for the member's personal judgement, though in cases of doubt they may wish to seek the advice of the Monitoring Officer.

7. Sensitive information

- 7.1. There are special provisions relating to sensitive interests. These are interests the disclosure of which would be likely to expose the member to risk of violence or intimidation where the Monitoring Officer has agreed that such interest need not be registered. Members with such an interest are referred to the Code and advised to seek advice from the Monitoring Officer in advance.

8. Exempt categories

- 8.1. There are exemptions to these provisions allowing members to participate in decisions notwithstanding interests that would otherwise prevent them doing so. These include:-
- (a) Housing – holding a tenancy or lease with the Council unless the matter relates to your particular tenancy or lease; (subject to arrears exception)
 - (b) School meals, school transport and travelling expenses; if you are a parent or

guardian of a child in full time education, or a school governor unless the matter relates particularly to the school your child attends or of which you are a governor

- (c) Statutory sick pay; if you are in receipt
- (d) Allowances, payment or indemnity for members
- (e) Ceremonial honours for members
- (f) Setting Council Tax or precept (subject to arrears exception).

9. Report author and contact

9.1. Kath Nicholson, Director of Law, Kath.Nicholson@lewisham.gov.uk, 0208 31 47648

Agenda Item 3



Licensing Committee

Report title: Palace Amusements, 70 Deptford High Street, SE8 4RT

Date: 3 November 2020

Key decision: No.

Class: Part 1.

Ward(s) affected: New Cross

Contributors: Community Services – Crime, Enforcement & Regulation Service, Head of Law.

Outline and recommendations

Determination of New Premises Licence Application submitted by East Kent Leasing Ltd.

After having regard to all the representations heard, Members must take such steps as they consider appropriate to promote the Licensing Objectives.

Timeline of engagement and decision-making

The Application was advertised in accordance with regulation 12 of the Gambling Act 2005.

The last day for representations was 25 August 2020.

This matter must be heard as soon as is reasonably practicable after the expiry of any period for representations.

The report was deferred on 6 October 2020 to this meeting.

1. Summary

1.1. East Kent Leasing Ltd have applied for a new Premises Licence for the purposes of the following activity:

Adult Gaming Centre

24 hours 7 days a week

- 1.2. Representations were received from four interested persons on the grounds of all the licensing objectives. The representations received from interested parties have been examined by Officers and are considered not to be vexatious or frivolous. These representations were all received within the specified time.
- 1.3. Conditions were agreed between the applicant, Police and Crime, Enforcement & Regulation Service.

2. Recommendations

- 2.1 After having regard to all the representations heard, Members must take such steps as they consider appropriate to promote the prevention of crime and disorder and public nuisance.
- 2.2 On considering an application for a premises licence (whether at a hearing or not) a licensing authority shall—
 - (a) grant it, or
 - (b) reject it.
- 2.3 Either party has a right of appeal to the Magistrates Court against a decision which should be submitted to the court within 21 days of the date of the decision letter.

3. Policy Context

- 3.1. Decisions by Members of the Licensing Committee should have regard to the Gambling Act 2005 and the promotion of the three Licensing Objectives at all times, which includes the following:
 - (a) preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime,
 - (b) ensuring that gambling is conducted in a fair and open way, and
 - (c) protecting children and other vulnerable persons from being harmed or exploited by gambling.
- 3.2. Members should also have regard to the Licensing Authority's Statement of Gambling Policy 2019-22.
- 3.3. Decisions made will link in with the following objectives under the Council's Corporate Strategy – Building an Inclusive Local Economy and Building Safer Communities.

4. Financial implications

- 4.1. Applicants have the right of appeal against any decision by the Licensing Committee. Therefore there would likely be costs for the Authority in seeking legal support should an appeal be brought by the applicant.

5. Legal implications

- 5.1 The Licensing Authority is a public authority under the Human Rights Act 1998. Therefore the licensing authority is required to act compatibly with the convention rights in the exercise of their functions. Article 6 (1) of the Convention provides that everyone is entitled to a fair and public hearing within a reasonable time by an independent and impartial hearing established by law.
- 5.2 A Premises Licence is a possession for the purpose of the Human Rights Act 1998. The

right to hold a licence is a qualified rather than an absolute right. Therefore the right to hold a licence may be interfered with if it affects the interests of local residents or others. Such interference may be justified if it is necessary and proportionate to promote the licensing objectives.

6. Equalities implications

- 6.1 The Equality Act 2010 (the Act) introduced a public sector equality duty (the equality duty or the duty). It covers the following protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- 6.2 In summary, the Council must, in the exercise of its functions, have due regard to the need to:
- eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
 - advance equality of opportunity between people who share a protected characteristic and those who do not.
 - foster good relations between people who share a protected characteristic and those who do not.
- 6.3 It is not an absolute requirement to eliminate unlawful discrimination, harassment, victimisation or other prohibited conduct, or to promote equality of opportunity or foster good relations between persons who share a protected characteristic and those who do not. It is a duty to have due regard to the need to achieve the goals listed above.
- 6.4 The weight to be attached to the duty will be dependent on the nature of the decision and the circumstances in which it is made. This is a matter for the Mayor, bearing in mind the issues of relevance and proportionality. The Mayor must understand the impact or likely impact of the decision on those with protected characteristics who are potentially affected by the decision. The extent of the duty will necessarily vary from case to case and due regard is such regard as is appropriate in all the circumstances.
- 6.5 The Equality and Human Rights Commission has issued Technical Guidance on the Public Sector Equality Duty and statutory guidance entitled "Equality Act 2010 Services, Public Functions & Associations Statutory Code of Practice". The Council must have regard to the statutory code in so far as it relates to the duty and attention is drawn to Chapter 11 which deals particularly with the equality duty. The Technical Guidance also covers what public authorities should do to meet the duty. This includes steps that are legally required, as well as recommended actions. The guidance does not have statutory force but nonetheless regard should be had to it, as failure to do so without compelling reason would be of evidential value. The statutory code and the technical guidance can be found at:
- <https://www.equalityhumanrights.com/en/advice-and-guidance/equality-act-codes-practice>
- <https://www.equalityhumanrights.com/en/advice-and-guidance/equality-act-technical-guidance>
- 6.6 The Equality and Human Rights Commission (EHRC) has previously issued five guides for public authorities in England giving advice on the equality duty:
- [The essential guide to the public sector equality duty](#)
 - [Meeting the equality duty in policy and decision-making](#)
 - [Engagement and the equality duty: A guide for public authorities](#)
 - [Objectives and the equality duty. A guide for public authorities](#)
 - [Equality Information and the Equality Duty: A Guide for Public Authorities](#)

6.7 The essential guide provides an overview of the equality duty requirements including the general equality duty, the specific duties and who they apply to. It covers what public authorities should do to meet the duty including steps that are legally required, as well as recommended actions. The other four documents provide more detailed guidance on key areas and advice on good practice. Further information and resources are available at:

<https://www.equalityhumanrights.com/en/advice-and-guidance/public-sector-equality-duty-guidance#h1>

7. Climate change and environmental implications

7.1. Any decision made by Members must fall in line with the Gambling Act 2005, to that end there are no climate change or environmental considerations.

8. Crime and disorder implications

8.1. Under the Gambling Act 2005, one of the 3 licensing objectives is preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime

8.2. It is the a requirement of the Gambing Act 2005 that any decision made by the Licensing Committee must not negatively impact on the Licensing objectives.

9. Background papers

9.1. Application and Risk Assessment received 29 July 2020

9.2. Representations as served.

10. Glossary

Term	Definition
Adult Gaming Centre	Adult gaming centres, often called arcades, allows you to offer an unlimited number of category C and D gaming machines and up to 20% of your total number of machines, can be of category B3 or B4. The premises is for those aged 18 and over only.
Appeal	asking a court to overturn a lower court's decision. If the decision of a court is disputed it may be possible to ask a higher court to consider the case again by lodging an appeal.
Gaming & game of chance	<p>In the Gambling Act 2005 “gaming” means playing a game of chance for a prize.</p> <p>A “game of chance”—</p> <p>(a)includes—</p> <ul style="list-style-type: none"> - a game that involves both an element of chance and an element of skill, -a game that involves an element of chance that can be eliminated by superlative skill, and -a game that is presented as involving an element of chance, but <p>(b)does not include a sport.</p>

Term	Definition
Adult Gaming Centre	Adult gaming centres, often called arcades, allows you to offer an unlimited number of category C and D gaming machines and up to 20% of your total number of machines, can be of category B3 or B4. The premises is for those aged 18 and over only.
Licence	an authority to do something.
Licensee	the holder of a licence to do something.
Licensing Authority	The Council (London Borough of Lewisham) Under section 2 of the 2005 Act, the licensing authority's area is the area for which the authority acts.
Licence Objectives	Under section 1 of the 2005 Act the Licensing Authority must promote the following 3 objectives <ul style="list-style-type: none"> • preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime, • ensuring that gambling is conducted in a fair and open way, and • protecting children and other vulnerable persons from being harmed or exploited by gambling.
Interested Person	A person who lives in the vicinity of the premises A body who represents the persons who live in that vicinity A person involved in a business in that vicinity A body representing businesses in that vicinity An elected member of the council
Relevant Representation	A representation that is specific to the premises in question, related to the four licensing objectives and/or the local licensing policy.
Responsible Authorities	Public bodies that must be notified of all applications and who are entitled to make representations in relation to Premises Licences, as follows: <ul style="list-style-type: none"> • LBL Childrens Services • The Gambling Commission • HM Revenue and Customers • LBL Licensing Authority • LBL Planning Authority • Environmental Protection (noise) • London Fire Brigade

11. Report author and contact

- 11.1. Lisa Hooper, Crime, Enforcement & Regulation Manager,
lisa.hooper@lewisham.gov.uk, 020 8314 6324.

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

PLEASE READ THE FOLLOWING INSTRUCTIONS FIRST

If you are completing this form by hand, please write legibly in block capitals using ink. Use additional sheets if necessary (marked with the number of the relevant question). You may wish to keep a copy of the completed form for your records.

Where the application is—

- In respect of a vessel, or
- To convert an authorisation granted under the Betting, Gaming and Lotteries Act 1963 or the Gaming Act 1968,

the application should be made on the relevant form for that type of premises or application.

Part 1 – Type of premises licence applied for

Regional Casino

Large Casino

Small Casino

Bingo

Adult Gaming Centre

Family Entertainment Centre

Betting (Track)

Betting (Other)

Do you hold a provisional statement in respect of the premises? Yes No

If the answer is “yes”, please give the unique reference number for the provisional statement (as set out at the top of the first page of the statement):

Part 2 – Applicant Details

If you are an individual, please fill in Section A. If the application is being made on behalf of an organisation (such as a company or partnership), please fill in Section B.

Section A

Individual applicant

1. Title: Mr Mrs Miss Ms Dr Other (please specify)

2. Surname:

Other name(s):

[Use the names given in the applicant's operating licence or, if the applicant does not hold an operating licence, as given in any application for an operating licence]

3. Applicant's address (home or business – *[delete as appropriate]*):

Postcode:

4(a) The number of the applicant's operating licence (as set out in the operating licence):

4(b) If the applicant does not hold an operating licence but is in the process of applying for one, give the date on which the application was made:

5. Tick the box if the application is being made by more than one person.

[Where there are further applicants, the information required in questions 1 to 4 should be included on additional sheets attached to this form, and those sheets should be clearly marked "Details of further applicants".]

Section B

Application on behalf of an organisation

6. Name of applicant business or organisation: East Kent Leasing Ltd

[Use the names given in the applicant's operating licence or, if the applicant does not hold an operating licence, as given in any application for an operating licence.]

7. The applicant's registered or principal address:

Rotunda House
Unit H Concept Court
Shearway Business Park
Folkestone
CT19 4RH

Postcode: CT19 4RH

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

000-034401-N-315687-005

8(b) If the applicant does not hold an operating licence but is in the process of applying for one, give the date on which the application was made:

9. Tick the box if the application is being made by more than one organisation.

[Where there are further applicants, the information required in questions 6 to 8 should be included on additional sheets attached to this form, and those sheets should be clearly marked "Details of further applicants".]

Part 3 – Premises Details

10. Proposed trading name to be used at the premises (if known): Palace Amusements

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

70 Deptford High Street, London, SE8 4RT

Postcode: SE8 4RT

12. Telephone number at premises (if known):

13. If the premises are in only a part of a building, please describe the nature of the building (for example, a shopping centre or office block). The description should include the number of floors within the building and the floor(s) on which the premises are located.

THE GROUND FLOOR AND BASEMENT SHOP (formerly a betting office) IN A 3 STOREY BUILDING

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

No *[delete as appropriate]*

14(b). If the answer to question 14(a) is yes, please give the names of all the licensing authorities within whose area the premises are partly located, **other than the licensing authority to which this application is made:**

Part 4 – Times of operation

15(a). Do you want the licensing authority to exclude a default condition so that the premises may be used for longer periods than would otherwise be the case? No *[delete as appropriate]* *[Where the relevant kind of premises licence is not subject to any default conditions, the answer to this question will be no.]*

15(b). If the answer to question 15(a) is yes, please complete the table below to indicate the times when you want the premises to be available for use under the premises licence.

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

16. If you wish to apply for a premises licence with a condition restricting gambling to specific periods in a year, please state the periods below using calendar dates:

Part 5 – Miscellaneous

17. Proposed commencement date for licence (leave blank if you want the licence to commence as soon as it is issued): (dd/mm/yyyy)

18(a). Does the application relate to premises which are part of a track or other sporting venue which already has a premises licence? No [delete as appropriate]

18(b). If the answer to question 18(a) is yes, please confirm by ticking the box that an application to vary the main track premises licence has been submitted with this application.

19(a). Do you hold any other premises licences that have been issued by this licensing authority?
NO [delete as appropriate]

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

20. Please set out any other matters which you consider to be relevant to your application:

Part 6 – Declarations and Checklist (Please tick)

I/ We confirm that, to the best of my/ our knowledge, the information contained in this application is true. I/ We understand that it is an offence under section 342 of the Gambling Act 2005 to give information which is false or misleading in, or in relation to, this application.

I/ We confirm that the applicant(s) have the right to occupy the premises.

Checklist:

- Payment of the appropriate fee has been made/is enclosed
- A plan of the premises is enclosed
- I/ we understand that if the above requirements are not complied with the application may be rejected
- I/ we understand that it is now necessary to advertise the application and give the appropriate notice to the responsible authorities

Part 7 – Signatures

21. Signature of applicant or applicant’s solicitor or other duly authorised agent. If signing on behalf of the applicant, please state in what capacity:

Signature:



Print Name: ROGER ETCHELLS

Date: 27/07/2020 (dd/mm/yyyy) Capacity: DULY AUTHORISED AGENT

22. For joint applications, signature of 2nd applicant, or 2nd applicant’s solicitor or other authorised agent. If signing on behalf of the applicant, please state in what capacity:

Signature:

Print Name: _____

Date: _____ (dd/mm/yyyy) Capacity: _____

[Where there are more than two applicants, please use an additional sheet clearly marked “Signature(s) of further applicant(s)”. The sheet should include all the information requested in paragraphs 21 and 22.]

[Where the application is to be submitted in an electronic form, the signature should be generated electronically and should be a copy of the person’s written signature.]

Part 8 – Contact Details

23(a) Please give the name of a person who can be contacted about the application:

ROGER ETCHELLS

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

01530 417554

24. Postal address for correspondence associated with this application:

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

Postcode: LE65 2FR

25. If you are happy for correspondence in relation to your application to be sent via e-mail, please give the e-mail address to which you would like correspondence to be sent:

To Whom It May Concern:

The management of Bench Outreach objects to the above proposal. Bench Outreach is a charity working with vulnerable people in Lewisham, especially with residents of the Evelyn and New Cross wards, who will be immediately and adversely affected by this development. Our objections are raised on the following grounds:

- **It contravenes Lewisham Council's aim of preventing gambling being a source of crime or disorder.**

The proposed premises are in New Cross ward. This ward already suffers levels of anti-social behaviour that are almost twice the level recorded overall in Lewisham borough, and more than twice the national average. The applicant's risk assessment does not mention the hyperlocal issue of street drinking, nor does it address the existing levels of anti-social behaviour in the area.

<https://www.observatory.lewisham.gov.uk/crime-and-community-safety/report/view/30a1abb2a53f42fa87dea33c0c73c342/E05000449>

Recorded crimes of every type except shoplifting are consistently much higher in New Cross than the average across the borough, and it has the third highest level of crime of all the borough's wards.

Deptford High Street has existing high levels of anti-social behaviour and ongoing problems with street drinking. Anti-social behaviour and street drinking is such an issue for residents and traders that officers from the local Safer Neighbourhoods Team conduct monthly walkabouts on Deptford High Street with licensing officers from Lewisham Council to try and address the problem.

Street drinkers regularly congregate outside existing gambling premises (Paddy Power and Ladbrokes in particular) and this was also a problem outside 70 Deptford High Street when it was operating as a betting shop. The disorder and anti-social behaviour that this generated had a negative impact on nearby businesses and traders do not want to see this return.

Deptford High Street, with its regular market, has a reputation as a family-friendly shopping destination and our local business owners believe that the presence of an adult gaming centre will undermine this reputation and be a backward step for local businesses.

A petition has been signed by 36 high street businesses against this application.

- **It contravenes Lewisham Council's aim of protecting children and other vulnerable persons from being harmed or exploited by gambling.**

According to the council's own Joint Strategic needs Assessment, Lewisham has one of the highest proportion of working-age residents on out-of-work benefits at 9.1%. This contributes to extremely high levels of child poverty, estimated at over 35% in the Evelyn and New Cross wards. A business that exists solely to encourage gambling would not be a welcome addition in an area in which poverty is already highly visible.

- **It contravenes Lewisham Council's aim of protecting vulnerable adults from abuse and exploitation.**

The premises are close to three local charities working with people with mental health issues, substance use issues and alcohol dependence – all of whom are vulnerable to exploitation. One, the 999 Club, operates a night shelter funded by Lewisham Council for people sleeping rough. The premises are also adjacent to a pawnbrokers shop, and across the road from CEX, another business that gives cash for goods. Approving a gambling licence for premises close to shops which provide

high-interest cash loans is inappropriate and will put those already in difficult circumstances at risk of increased debt.

I am writing to register a personal objection to the above licence application which, as a Lewisham resident I hope the council will reject. My son went to school in Deptford and both as a parent and a frequent shopper on the high street I am deeply concerned about a gambling arcade opening on a prime site in this very special high street. I believe it will be very damaging for both the image of the high street as a whole, for the businesses and for frequent users of the high street as well as those living nearby.

My grounds for objecting are as follow:

1. Normalisation of gambling. This is a prime site on the high street, highly visible to passersby and with 3 schools nearby. The high street provides access to these, and it is (under normal circumstances) busy with children walking to and from school, buying lunch etc at certain times of day. A further gambling establishment, and especially one that involves gaming, gives these young people a very bad impression and would normalise gambling. This is a family shopping area!
2. Damage to reputation of Deptford High Street. This is a popular high street, and a family destination, yet there is already a proliferation of betting shops. The presence of gambling establishments should be kept to a minimum or it will threaten the image and desirability of the high street as a shopping destination (with cafes and the market). A reduction of gambling establishments, rather than an increase, is what the council should be seeking to support. Shopping in an agreeable environment, where everyone, and families in particular feel safe will suffer if this goes ahead and the high street will be deprived of the potential for a more community focussed shop or amenity.
3. Increasing anti-social behaviour. The high street already struggles with some anti-social behaviour and encouraging more gambling will further add to these problems.
4. Adding to pressures of high levels of poverty. There are some high levels of deprivation in this area, including child poverty, (likely to worsen in the foreseeable future due to the impact of covid), casual gambling in the form of gaming, will cause further harm and deprivation to those who can least afford it.

Thank you for this opportunity to put forward these points. I sincerely hope that you take note of the grave concerns of locals who support the high street and the majority of hard-working business owners who make it what it is.

Dear sir or madam

Please find below our representation in relation to the licence application for an Adult Gaming Centre at 70 Deptford High Street. This is being filed on behalf of Deptford Society members who are resident on the high street and adjoining streets, and those who own and operate businesses on Deptford High Street.

We attach a petition which has been signed by 36 business owners who operate on Deptford High Street, close to the premises, and who have also asked us to represent them in bringing this objection.

We object to the application on the following grounds:

1. Preventing gambling being a source of crime or disorder.

The proposed premises is in New Cross ward - this ward already suffers levels of anti-social behaviour that are almost twice the level recorded overall in Lewisham borough, and more than twice the national average. The applicant's risk assessment does not mention the hyperlocal issue of street drinking, nor does it address the existing levels of anti-social behaviour in the area.

<https://www.observatory.lewisham.gov.uk/crime-and-community-safety/report/view/30a1abb2a53f42fa87dea33c0c73c342/E05000449>

Recorded crimes of every type except shoplifting are **consistently** much higher in New Cross than the average across the borough, and it has the third highest level of crime of all the borough's wards.

Deptford High Street has existing high levels of anti-social behaviour and ongoing problems with street drinking. Anti-social behaviour and street drinking is such an issue for residents and traders that officers from the local Safer Neighbourhoods Team have told us they conduct a monthly walkabout on Deptford High Street with licensing officers from Lewisham Council to try and address the problem.

Street drinkers regularly congregate outside existing gambling premises (Paddy Power, Ladbrokes and Jennings in particular) and this was also a problem outside 70 Deptford High Street when it was operating as a betting shop. The disorder and anti-social behaviour that this generates has a direct impact on nearby shops and traders are of the opinion that other gambling establishments will exacerbate this problem.

Deptford High Street, with its regular market, has a reputation as a family-friendly shopping destination and local business owners believe that the presence of an adult gaming centre will undermine this reputation and be a backward step for local businesses. The Deptford Society supports this view and considers that the presence of such an establishment will neither improve nor enhance the Conservation Area that we seek to protect.

Please see attached the copy of the petition signed by 36 high street businesses against this application.

2. Protecting children and other vulnerable persons from being harmed or exploited by gambling.

The premises is based in New Cross ward, very close to the border with Evelyn ward. Both wards have extremely high levels of deprivation and child poverty.

In Evelyn ward, **30% of children live in low income families**, and in New Cross this figure is 28%; this is double the figure reported across Lewisham borough and the national average, both of which are around 15%. In both of these wards, 22% of children under 16 live in families with absolute low income, compared to 15.5% across the borough. A business that exists solely to encourage gambling, and that has the potential to operate on a 24/7 basis, would not be a welcome addition to an environment in which poverty is already highly visible.

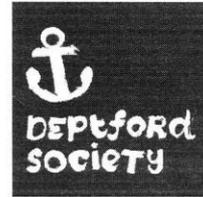
The proposed premises is in close proximity to two primary schools and a secondary school; another secondary school and a college are within a short walk of the site. During lunchtime and after school, large numbers of unsupervised pupils from both secondary schools come to the High Street for refreshment and to socialise. Regarding the protection of children and young persons, the Gambling Commission states in their Adult Gaming Centre guidance for licensing authorities:

21.3 Licensing authorities will wish to have particular regard to the location of and entry to AGCs to minimise the opportunities for under-18s to gain access. This may be of particular importance in areas where young people may be unsupervised for example, where an AGC is in a complex, such as a shopping centre or airport. Licensing authorities should consider whether their statement of policy can be used to reflect such locally based considerations.

The proposed amusement arcade is at a central location on the high street and the young people of the area will pass it at least twice a day, on their way to and from schools and nurseries. The presence of such a business in the middle of a popular shopping street will lead to gambling being normalised in the eyes of these children and young adults.

Deptford is also a focus for organisations that provide support services to vulnerable adults; at least seven different organisations and charities are based on Deptford High Street or adjoining streets. The help that these places provide means that Deptford is either home to or each day brings a population of adults who are already experiencing severe difficulties in managing their affairs. Granting this licence would do a considerable disservice to the efforts of these organisations to rehabilitate their clients.

The social deprivation detailed above is, in itself a form of vulnerability with debt being a well known result of poverty. The fact that the proposed premises is on a road with no less than three pawnbroker shops and a long established money lenders providing short term high interest cash loans, proves that this is an area with above average susceptibility to negative gambling and will put those already in difficult circumstances at risk of increased and uncontrolled debt. The developing economic effects of Covid 19 are likely to make these issues even more acutely felt in the local area.



Application for an Adult Gaming Centre licence at 70 Deptford High Street

We the undersigned shop-keepers and traders of Deptford High Street object strongly to the above licensing application on the following grounds;

Potential to encourage anti-social behaviour

No 70 is a large, central unit on the southern stretch of Deptford High Street. Families and children will have to pass by at all times of the day when the proposed amusement arcade is open.

Deptford has a large number of street drinkers and when this premises was a betting shop, groups of street drinkers regularly congregated outside the building. Since the betting shop closed, this activity has reduced. However we believe that granting a licence for an AGC will see this unwanted situation return, or maybe even worsen.

Loss of uses sympathetic to the High Street

The premises was formerly used as a betting shop for more than a decade, during a time when gaming laws were relaxed and the number of betting shops on the high street rose rapidly. Subsequent reviews of that policy indicated that it had a detrimental impact on poorer communities such as those in Deptford.

Prior to 2004, the premises was a community hub cafe and prior to that a shop - these uses contributed to the character of the High Street in a way that an amusement arcade will not.

In summary

Deptford High Street currently has four betting shops, two pawnbrokers and one 'payday loan' shop. We consider that granting a licence for another gambling premises will lead to an unacceptable concentration of such businesses on the high street, and will undermine Deptford's established reputation as a popular family shopping destination.

We strongly oppose the licensing of a gambling premises at No 70 as we would consider it a backward step for the reasons set out above.

Name	Address

As a long-standing resident of Deptford (I have lived here for 35 years), I am deeply troubled by the licence application for an adult gaming centre on Deptford High Street and wish to register a strong objection to it.

I have seen the High Street change over the decades, and nothing has been more detrimental than the betting shops that proliferated when other shops went out of business. These shops encouraged gambling (obviously) but also drug dealing, street drinking, groups congregating near betting shops and abusing passers-by, and begging – some of it pretty intimidating.

I can't see that an adult gaming centre would be of any benefit to Deptford. It would encourage vulnerable people to get into debt and lead to some of the disbenefits listed above. I understand that premises for betting/gaming provide a warm spaces in which people can shelter – but this comes at a cost. It would be irresponsible to approve the licence. Its effects would also be harmful to other businesses on the High Street, trying their best to make a living in very difficult circumstances.

I hope that the application for a licence will be turned down and the premises used to better advantage.

I would like to submit an objection to this application.

Deptford High Street and New Cross ward in general suffer from high levels of anti-social behaviour. I am concerned that given the concentration of gambling premises in the area, and the link between these premises and anti-social behaviour, this application could contribute to crime and disorder locally.

I note that the Deptford Society have also opposed this application on behalf of a number of local residents and businesses.

I have copied my fellow ward Councillors and the Deptford Society.

All the best,

Cllr Joe Dromey

Local Area Profile

The Adult Gaming Centre will be located on a busy High Street which benefits from a rich mix of cultures and age ranges. In the local surrounding there is a variety of typical high street shops which includes Fast Food restaurants/Coffee shops, A1 Retailers and High Street Banks. There are no nearby provisions of Adult Gaming Centres, though there are other gambling uses, namely Licensed Betting Offices.

Travel links include a local Overground Train Station and impressive Bus links to virtually all parts of London; on street parking is very limited.

The premises is located within a medium risk area when compared to other locations within the M25 with regard to Vulnerable People however does not add to the risk as a result of it replacing a current Licensed Betting Office. Within the locality, there is one pawnbroker, one homeless night shelter¹, one outreach day centre for vulnerable adults² and numerous schools. It is also noted that there are multiple Licensed Betting Offices and one Snooker Club. Although there is a small cross-over of customer from Licensed Betting Office and Adult Gaming Centre, our teams are fully aware to expect a different style, age range and gender of customer from that which is usually associated with Licensed Betting Offices³.

As a result of the numerous Schools, including Tidemill Academy, St Joseph's Catholic School, Addey and Stanhope amongst others; it will be necessary to reinforce regular training with all team members that at school entry and exit times it will be necessary to be located near to the front of the premises to prevent any School Aged Children from entering. However, it is noted that as a company and as a sector, it is very rare for any attempts by school aged children at any of the companies' other premises.

In order to assist the vulnerable and prevent them from gambling; we will make contact with both shelters so that they can help us form a local profile of persons who have previously indicated problems with Gambling. The reason for this is that as a company we utilise the BACTA self-exclusion portal which enable a person to exclude from Adult Gaming Centres within a certain radius. As a

result of no Adult Gaming Centres in Deptford High Street, we will not have a full picture of those that may wish to be excluded prior to opening.

In conjunction with reviewing the local crime statistics⁴, there are known problems with crime and anti-social behaviour as a result of Anti-Social Behaviour, Drug Crime and Burglary Logged Crimes in the last 12 months⁵. However, this crime is not directly related to gambling nor related to low stake gambling found in Adult Gaming Centres but is more in keeping with the national picture on high footfall environments such as Deptford High Street. Falling within a medium-density area for vulnerable adults⁶ together with being in close proximity to locations where vulnerable adults can be found, the premises manager will have enhanced responsibility for managing potential problem gamblers whilst adhering to company policy whereby 'non-players' are not allowed to remain in the premises or loiter around the entrance. This policy encourages only those that wish to gamble, and have the means to gamble, to enjoy the adult gaming environment safely for themselves and for others.

Overall, the environment is broadly similar to other City Centre High Street shopping/leisure environments present across London [together with similar location's that the company operates from] with low levels of footfall in the early hours of the morning, increasing at rush-hour (or peak) times with the passing footfall increasing dramatically during the mid-afternoon to evening and at weekends; from various visits to the High St at specific times of a calendar month, I can see no evidence of increased footfall following the standard four weekly or monthly payday(s) as outside of seasonal events – key Religious dates etc – the people/footfall present appears to follow normal High St trends found in our other locations in the UK.

Our standard Company Policy is to review our Local Gambling Risk Assessment on a regular basis with all members of our team. Regular training on all elements of Gambling Commission Compliance is undertaken. Information will be constantly fed into the from local statistics and partners allowing reviews to our response, if required, to any risk element. It is also important to note that as a family owned business, we always attempt to forge close links to the local SNT Police Team, attending regular meetings etc, so as to become a trusted business within the Community.

A door entry system will be fitted to the external door, or an internal lobby door if formed, which provides extra security for our Customers & Staff during the night, which will be in use between 10pm and 7am each night and this facility will allow our Staff to

monitor and control who is entering and leaving the venue. In addition, there will be CCTV in place covering all main areas of the Venue, along with the area directly outside (pavement).

As per standard Company procedure we will have a policy which is displayed in our window, if anyone is seen drinking alcohol or taking drugs will be barred from entering our premises and the toilet within the Venue will be locked at all times so the staff can monitor who is using them, plus an hourly checklist will be in place. No single manning will be planned, and the company's management will intensively scrutinise and analyse the first four weeks trade, and thereafter on regular intervals to ensure adequate staffing levels are present at all times, to cope with the 'peaks' and 'troughs' within the business.

As we are not open, we have not completed a regulatory return.

No auxiliary gambling provisions will be offered other than CAT B3's, CAT C's and CAT D's machines. Customers will be able to enjoy high-end coffee and snacks as long as they are a player.

A copy of the Lewisham Statement of Principles Gambling Policy 2019-2022 will be located on site for reference.

Gambling Act 2005 – The Licensing Objectives

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

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

Risk Assessment	LO	Level of Risk	Impact	Control System	Risk Management	Reviewed
Children entering site unnoticed or unchallenged.	(C)	Low	Severe to business Severe to child	Interior Design	*Effective monitoring of entrance by floor walkers.	May 2020
				Exterior Design	*Frontage of venue will be designed so as not to be attractive to children.	May 2020
				Physical	*CCTV coverage of entrance linked to office with our Staff able to view/review and we will be able to review remotely. *Staff regularly trained, reviewed and audited on the delivery of the Think 25 policy	May 2020
				Systems	All of the points listed below are part of our standard operating procedures which are all subject to an Internal Audit process and are discussed/reviewed on a regular basis via Management checks: *Think 25 policies will be in place and implemented with Think 25 material displayed. *Use of BACTA's resources for age verification testing. *Use of Citizen Card facility to allow for consistent ID format checks *Regular staff training (quarterly) both in-house and by BACTA. *Adherence to BACTA's toolkit and our staff handbook. *Use of the BACTA tracking system for both successful and unsuccessful Think 25 challenges with *Clear and prominent premises signage along with machine labelling. *Strict implementation of our policy of preventing the wearing of hoods, caps or any material that prevents the Staff present from being able to enact our Think 25 policy *Policies & Procedures in place that are regularly reviewed with outputs captured. *Internal Audit process, review & output(s)	May 2020
Out of control gambling by other vulnerable persons.	(C)	Low	Moderate to business Severe to vulnerable	Systems	*Customer interaction procedures & policy are in place following the guidelines & process by BACTA at all times. *All customer interactions recorded in the problem gambling log book which details the action(s) taken. *Logbook, Staff training and Staff development reviewed on a regular basis by the Shop Manager, their senior team and the Operations Management.	May 2020

				Interior Design	*Conducive for effective monitoring of customers *Internal Audit process, review & output(s)	May 2020
Failure to deal with Consumers making complaints about the outcome of Gambling.	(B)	Moderate	Moderate to business Severe to customer	Physical	*Preventative machine maintenance (PPM) carried out by our qualified engineer. *Machine turned off immediately should fault be identified *Incident reported to BACTA *Machines only acquired from licensed suppliers. *Customer complaint procedure in place, discussed & reviewed on a regular basis with the Staff present *Machines regularly tested via the internal Audit process *Weekly reviews of Net Win percentages to monitor pay out changes via our (internal) collection process	May 2020

Risk Assessment	LO	Level of Risk	Impact	Control System	Risk Management	Reviewed
Failure to deal with consumers making complaints about the outcome of Gambling (continued).	(B)	Low	Moderate to business Severe to customer	Systems	*Complaints procedure & forms available on premises. *Quarterly staff training on company policy. *Registered with ADR Entity – BACTA ADR Service. *Compliant with Company P & P – BACTA Toolkit.	May 2020
Failure to provide information to players on responsible gambling.	(C)	Low	Severe to business Severe to customer	Physical	*Stay in Control posters displayed prominently. *Sufficient quantity of posters & leaflets. *Stay in Control leaflets available in racks, discretely located. *Machine labelling displaying national gambling helpline. *Staff regularly trained and assessed to ensure full Compliance to GC guidelines	May 2020
				Systems	*Stock control system in place for leaflets. *Ensure adherence with P & P – BACTA Toolkit *Regular audit to ensure systems in place/being used effectively	May 2020
Failure to recognise signs associated with problem gambling or substantial changes in gambling style.	(C)	Moderate	Severe to business Severe to customer	Interior Design	*Player positions effectively monitored by the staff along with a Player's behaviour. * CCTV cameras positioning *Location of note changing facilities	May 2020
				Systems	*Staffed trained in customer interaction in line with BACTA's toolkit. *Clear policy to record the procedure/process of customer interaction *Staff trained to intervene with customers showing signs of a problem; stake patterns, use of local cashpoints and looking for customer behaviour patterns. *Player's spending effectively monitored by Staff and wherever possible recorded into the BACTA log book, which is reviewed on a daily basis	May 2020
Failure to properly administer the self-exclusion process and maintain its effectiveness thereafter, including breaches and reinstatements.	(C)	Low	Severe to business Severe to customer	Physical	*CCTV and monitor effectively positioned at entrance to benefit identification of known excluders and images on wall in office. * Staff regularly trained on Self Exclusion policy, process and understanding * Internal audit process to ensure full adherence to GC policy, process and understanding	May 2020
				Interior Design	*Consideration given to internal layout so as to ensure effective monitoring of customers entering the premises and those that might enter in order to gamble on behalf of a self-excluder.	May 2020

				Systems	<ul style="list-style-type: none"> *All data subject to quarterly review. *Ensure that self-exclusion forms are always available for supply. *File of excluders kept and maintained on premises. *Company keeping abreast of the developments of BACTA's national sector SE scheme *Compliant with P & P and log in BACTA's toolkit. *Regular internal Auditing 	May 2020
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Risk Assessment	LO	Level of Risk	Impact	Control System	Risk Management	Reviewed
Failure to identify attempts to launder money on the premises (e.g. dye stained notes) and to follow correct reporting procedure.	(A)	Low	Severe to business Low to Customers	Interior Design	*Effective monitoring of customers' behaviour by good lines of sight from staff, and well positioned CCTV.	May 2020
				Physical	*Pay station and note acceptors regularly inspected. The majority of large hand pays will go through the pay station, so staff can monitor more closely *Weekly collection process in place with cash (notes & coins) identified to each machine present *Staff regularly trained on AML importance, reporting process and potential signs of abuse	May 2020
				Systems	*Fully compliant with LCCP requirements. *Comply with BACTA's P & P in toolkit, in particular the reporting procedure to NCA by way of SARs. *Anti ML systems built into Tito systems *Log book kept on site detailing AML activities	May 2020
Poor security increasing vulnerability to crime.	(A)	Low	Severe to business Severe to customers	Physical	*Static panic alarms. *Staff provided with personal attack alarms. *Intruder alarm installed and regularly serviced. *Effective CCTV coverage with data stored for 31 days.	May 2020
				Exterior Design	*Toughened glass windows and door to limit criminal damage. *Mag-lock entrance/exit with intercom system and CCTV recording	May 2020
				Systems	*Staff personal floats will be limited to £100.00. *Regular liaison with local law enforcement agencies. *Log maintained should police be called to assist. *Keep abreast of local crime trends. *Subscribe to BACTA's crime bulletins. *Attendance to SNT meetings, along with local Business Group meetings	May 2020
Awareness of heightened local crime in the local area.	(A)			Systems	*CCTV cameras will be installed at the front and back of the building to monitor this at all times. *No Lone working will be planned. *Mag locks will be fitted to the lobby doors for the extra security of our staff and customers. *Regular meetings will be held with the local police to help resolve any ongoing issues with locals found drinking alcohol or taking drugs on the High Street. *Attendance to SNT meetings to ensure awareness *Regular reviews of Police Crime Stats for local area	May 2020

Awareness of student learning facilities (schools & colleges) in the local area.	(C)			Systems	<ul style="list-style-type: none"> * Entrance monitoring given extra resources between 7am to 9am and 3pm and 6pm on school/college days given the local of several schools, further education facilities present *Regular Staff training on Think 25 process *Recording of success or unsuccessful Think 25 challenges *Internal Audit process to review performance of Think 25 procedure 	Dec 2019 May 2020
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Risk Assessment	LO	Level of Risk	Impact	Control System	Risk Management	Reviewed
Awareness of residential facilities for the vulnerable in the local area.	(C)			Systems	<ul style="list-style-type: none"> *Regular updates on the Local Gambling Risk Assessment to ensure adhered to LCCP * Signage displayed in the front window, informing everyone, if they are seen drinking alcohol or taking drugs outside the venue they will be barred from the venue. * The venue toilets will be kept locked at all times, so staff can monitor the use of them, plus an hourly checklist in place. 	May 2020
Awareness of gambling care agencies in the local area.	(C)			Systems	None present	May 2020

BRIEF INTERVENTION GUIDE

Addressing risk and harm related to gambling





ACKNOWLEDGEMENTS

GambleAware is grateful to Matua Raki, New Zealand, for allowing us to use “Brief Intervention Guide: Addressing risk and harm related to alcohol, tobacco, other drugs and gambling” as the basis for developing this document. Particular thanks go to Vanessa Caldwell for providing helpful insight.

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Disclaimer

The Guidelines in this document should not be considered exhaustive, exclusive or a substitute for individualised care and treatment decisions.

Access

Copies may be obtained electronically via infohub.gambleaware.org

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INTRODUCTION TO THE GUIDE

Who is the Brief Intervention Guide for?

The **Brief Intervention Guide** has been developed as a resource to assist workers to provide brief intervention to address risks and harms related to problematic gambling. Additionally, it is a resource to assist organisational leaders to set up and implement the processes necessary to support workers to provide brief intervention.

The **Brief Intervention Guide** is aimed at professionals who do not specialise in the treatment of gambling problems. Within the terms of this Guide, the term “brief intervention” refers specifically to an intervention carried out by professionals not from the problem gambling treatment sector.

The Guide aims to clarify what brief intervention is, where brief intervention sits in the spectrum of intervention and to address a lack of guidance available to those working in social and criminal justice settings, for example social workers, employment advisers, probation officers, community workers, counsellors, GPs, nurses and psychologists. The Guide is also likely to be useful for others working in primary care and other health settings.

Sections within the Guide

The first six chapters of the **Brief Intervention Guide** focus on practical ‘how to’ instruction aimed directly at the worker providing the intervention, building on their overall professional values, knowledge and skills. There is an assumption that the worker undertaking the intervention is bound by an appropriate code of ethics.

The final chapter, **Brief intervention: requirements at an organisational level**, outlines the key steps that organisations need to undertake in order to support brief interventions being implemented in a service. This section is aimed at managers, leaders and others who are responsible for an organisation.

Appendix 1 lists readily available gambling screening tools.

What is Brief Intervention?

Brief intervention has many definitions in research literature and practice guidelines. In this Guide, brief intervention refers to:

“A short, purposeful, non-confrontational, personalised conversation with a person about an issue related to gambling.”

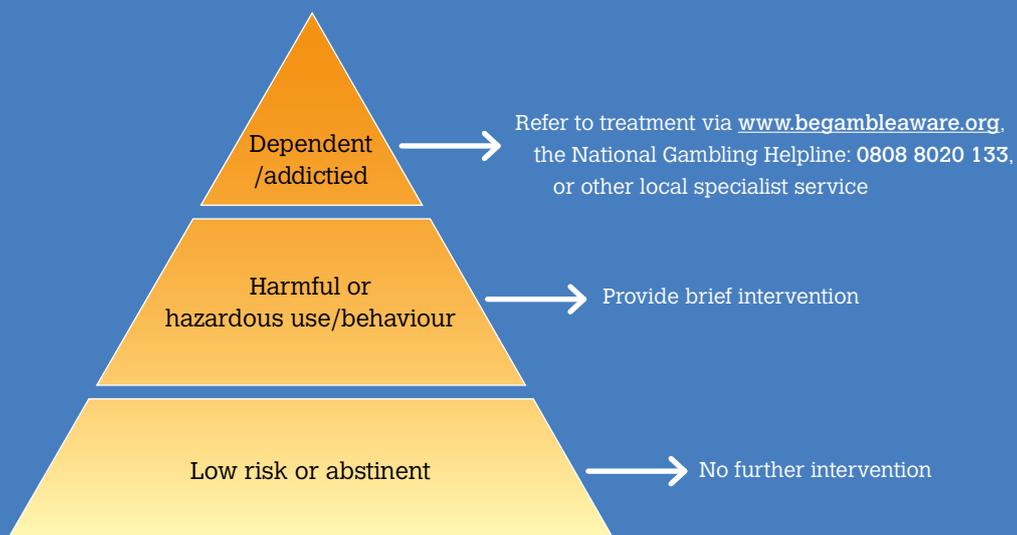
The purpose is to support the person to think about their behaviour, assisting them to make a connection between their behaviour and any associated risks and harms (adapted from NHS Health Scotland, 2009).

From there, the nature of the intervention depends on the level of risk and/or harm and the person’s readiness to change.

The key word here is brief. Brief intervention generally takes as little as 5 to 15 minutes. This does not take into account the time that is needed to establish rapport and engagement with the person before a brief intervention is carried out. Failing to engage with the person will undermine the effectiveness of the brief intervention.

Brief intervention is most effective for people whose behaviour is hazardous or harmful, in other words people who are at risk of developing or people who are experiencing current harm related to gambling. Brief interventions are not designed to treat people who are dependent or addicted, although they are considered to be useful to improve motivation to seek more intensive treatment. Those people with more severe problems are likely to benefit from more comprehensive assessment and intervention and the role of the brief intervention worker is to refer this group of people to specialist treatment services for further assessment. Levels of harm and corresponding intervention types are shown in Figure 1 overleaf.

Figure 1. Level of risk/harm and corresponding intervention types



Source: Adapted from Substance Abuse and Mental Health Services Administration (2007)

Why offer brief intervention?

Problematic gambling often contributes to other problems such as financial, employment, health, family-related and legal issues. In other words, the issues people present with in social, justice and health service settings may often be linked to gambling. Brief intervention provided in these service contexts can have a significant positive impact for service users and can enhance the benefits of the services being provided.

Harms from gambling

Problematic gambling directly affects an estimated 430,000 people in Britain, with a further 1,985,000 deemed as being at risk of developing a gambling problem. An estimated 5-8 other people are affected by someone else's gambling problem. This makes gambling a significant social issue.

- > Gambling can be related to poor health (Petry et al., 2005; Morasco et al., 2006)
- > Gambling can be related to employment problems (Reed in Partnership, 2016)
- > Gambling can be related to family problems (Holdsworth et al., 2013)
- > Gambling can be related to criminal activity (Banks, 2013)
- > People experiencing gambling problems may be over-represented in certain groups, e.g. young men, some minority ethnic groups.

Brief intervention is part of the spectrum of effective responses

The risks and harms from gambling may go undetected for many people despite their contact with health and social services. Brief intervention provided in generalist settings is a key component within an effective spectrum of responses. It is particularly important in those settings where the prevalence of problems is known to be high, for example in criminal justice service settings. To effectively tackle the risks and harms related to gambling these problems must become the business of all social, justice and health services.

Brief intervention evidence base

Research indicates that brief intervention can be both effective and efficient for those with hazardous or harmful substance use and/or gambling problems. The evidence supporting brief intervention is strongest in relation to primary health settings and alcohol use, however evidence to support the effectiveness of brief intervention for gambling is emerging and beginning to provide guidance for further development (Petry et al, 2008; Abbott et al., 2013; CADTH, 2015; Neighbors, et al., 2015) There is growing support for brief intervention to be provided in other non-health settings, such as criminal justice and social work settings (Bliss & Pecukonis, 2009; Brown, Newbury-Birch, McGovern, Phinn & Kaner, 2010; Hopkins & Sparrow, 2006; McGovern, Newbury-Birch, Deluca & Drummond, 2012).

Additionally more guidance and tools are emerging which focus on providing brief intervention to address a wider range of issues (McQueen et al., 2015; Orr et al., 2015; Mitchell et al., 2015).

KEY CONCEPTS IN SCREENING AND BRIEF INTERVENTION

Screening as a basis for brief intervention

Brief intervention is generally provided after a screening process has been undertaken. The results of a screening process provide an opportunity for a service user to consider the effects of gambling on their lives, depending on the scope of the screening.

Screening is not assessment or diagnosis. It is a structured process that provides an indication that a problem may exist and, depending on the tool or questions used, an indication of the potential severity of the problem. The results of a screening process assist the worker to determine whether intervention is required and the level of intervention that is likely to be of most benefit to the person (see Table 1 below).

A screening result that indicates a potential problem should be followed up with a brief intervention, referral to a specialist service or with a more detailed assessment of the problem potentially identified.



Table 1: Screening result and level of intervention

Screening result	Level of intervention
No problem indicated	Provide positive affirmation. Offer information to support continued no/low risk
Hazardous or harmful use/behaviour indicated	Provide brief intervention
Possible dependence or addiction indicated	Advise need for specialist treatment and refer to specialist

Screening can occur in variety of ways, from asking simple questions to administering a screening tool. The selection of screening method depends on the purpose or focus of the brief intervention, the population being screened, and the setting in which screening takes place. Some screening tools can be self-administered; others are administered by the worker in a collaborative interview style. A standardised screening tool provides more accurate information for the person being screened and can be particularly useful for a generalist who does not have specialist knowledge. A list of commonly used screening tools is provided in Appendix 1.

Most screening tools and brief intervention resources have been designed for use within a specific context. For example, in a general health setting it may be feasible to screen opportunistically for a range of potential health issues and to provide brief intervention or further assessment for those issues that the service user is willing to discuss further. Alternatively an organisation may decide to screen separately for gambling as this is more likely to be prevalent within the population served and/or is more feasible in the service context. Information to guide selection of screening tools is provided in the **Brief intervention requirements at an organisational level** chapter of this guideline.

BEFORE OFFERING BRIEF INTERVENTION

Preparation

For the worker embarking on brief intervention it is essential to ensure that approval and support from the organisation is in place. Commitment at organisational governance and management levels is essential to support workers to provide brief intervention.

Once organisational policy, systems and processes are in place minimum preparation requirements for the worker include:

- > Familiarity with the selected screening process or processes.
- > Understanding of the selected brief intervention systems and processes, including those for referring to specialist assessment and treatment.
- > Having the resources needed to support brief intervention, these include self-help materials, handouts, reference materials and a list of local providers for when referral is indicated. (See Box 1).
- > Practice screening and providing brief intervention.
- > Knowing who to consult regarding any problems that are encountered, e.g. line manager support where appropriate.

Box 1: Resources for brief intervention

The GambleAware website has helpful information and a range of self-help material, including printable leaflets targeted at identifying a problem, preparing to change, gambling triggers, warning signs etc. More substantial self-help booklets are also available. There is also material aimed to support family and friends who are concerned about someone else's gambling. This material is available at: www.begambleaware.org



The knowledge base

It is not necessary to be an expert in gambling to provide brief intervention. A basic understanding of risks and harms and a working knowledge of simple interventions to reduce harm, including referral options, are the essential requirements. Those providing brief intervention for harmful use of gambling need to know basic facts about the effects that harmful gambling can have on the individual and their family and friends, steps that those at risk of, or experiencing, gambling-related harm can take to reduce the risk (e.g. self-exclusion, limit setting) and knowledge of specialist agencies to refer people with significant problems to.

Key information is available at the website listed in Box 1 adjacent, and is also included in Appendix 2.

Training

Training in brief intervention is recommended. Evidence consistently suggests that training increases the rate at which brief intervention is provided (Johnson, Jackson, Guillaume, Meier & Goyder, 2010). There are a number of training providers offering short courses in brief intervention and motivational interviewing. Addiction studies courses at graduate and postgraduate level include screening, brief intervention and motivational interviewing. There are also online training courses and videos available.

It is important to check out whether the training offered is sufficiently aligned with the workers and/or organisation's aims and approach.

HOW TO PROVIDE BRIEF INTERVENTION

Elements of brief intervention: **FRAMES**

Regardless of the approach to brief intervention, there are key elements that apply in all contexts. These can be summarised by the acronym **FRAMES**:

F**EEDBACK**: about personal risk or level of current harm, as indicated by the screening process.

R**ESPONSIBILITY**: responsibility for choices and change sits with the person. It is not the role of the professional to confront or persuade. Respect the person's autonomy.

A**DVICE**: increase the person's awareness of the costs and consequences of their behaviour and provide advice to support positive change.

M**ENU**: outline options or strategies to support positive change; help with goals and action planning if appropriate to the person.

E**MPATHY**: listen and reflect; maintain rapport; use an empathic communication style.

S**ELF-EFFICACY**: convey optimism and strengthen the person's self-belief in their ability to change.

FRAMES does not describe stages of brief intervention. The elements in **FRAMES** are not presented in order. Rather, **F**, **A**, and **M** describe **WHAT** is provided in brief intervention; **R**, **E** and **S** describe **HOW** brief Intervention is provided (NHS Scotland, 2009).

The elements in **FRAMES** can be applied to working with young people (Christie, 2008).

Motivation and brief intervention

It is useful to have an understanding of the 'stages of change' model and motivational interviewing as a background to providing brief intervention (Prochaska & DiClemente, 1983). However it is important not to be overly concerned with assigning people to a stage of change and applying specific motivational techniques. Having a general understanding of the stages of change can help the worker listen for readiness to change and ensure that their response is in step with the person.

Applying the broad principles of motivational interviewing (see Box 2 below) can enhance motivation to change. Attempting to persuade and argue for change can be ineffective and counter-productive. A person who doesn't see their behaviour as problematic is unlikely to respond to ideas about changing the behaviour. When the worker is out of step with the person resistance is a likely outcome. While responsibility for change sits with the person the worker is responsible for engaging the person and maximising their opportunity to consider change.

There are three broad elements of motivational interviewing that are helpful in brief intervention:

- > **Collaboration** (rather than confrontation): the process is undertaken in partnership. The views and experiences of the person are central. Both the person and the worker have expertise to share. The process involves mutual understanding. The person is a primary resource in finding answers and solutions.
- > **Evocation** (drawing out rather than imposing ideas): the worker's role is to draw out the person's ideas, goals, plans and skills to make positive change. These are not imposed. The person presents the arguments for change.
- > **Autonomy** (rather than authority): the power for change rests with the person. The person determines what and how change will occur.

Box 2. Key Principles of Motivational Interviewing

Express Empathy: show acceptance and develop rapport. Ambivalence to change is normal. The worker listens to and accepts what is important to the person. Empathy and rapport make space for gentle challenge.

Develop Discrepancy: Change is motivated by a perceived discrepancy between a person's current behaviour and their important personal goals and values.

Roll with Resistance: Resistance is a signal for the worker to respond differently. Avoid arguing for change.

Support Self-efficacy: If a person believes they can change, the likelihood of change occurring is greatly increased. A person's belief in the possibility of change is an important motivator.

Source: Adapted from Miller and Rollnick (2012).

Bring together the stages of change and a motivational response

A guide to the stages of change (adapted from NHS Scotland, 2009) and associated motivational responses are provided in Table 2 below. Brief intervention is usually focused on people who are in Pre-contemplation, Contemplation and Preparation.

Table 2. Stages of change and motivational responses

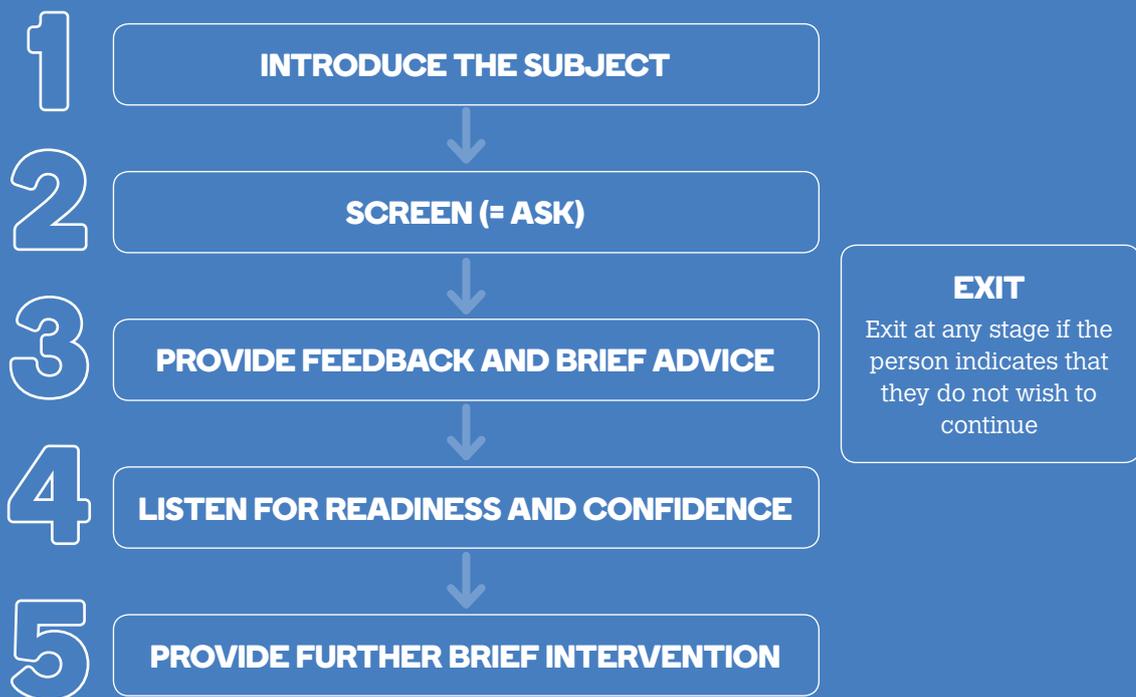
Stage	Response
Pre-contemplation – not thinking about change; don't see a problem "My brother gambles and he hasn't got any problems, it's no big deal"	Work towards engendering motivation Provide information and advice (with permission) on the benefits of change
Contemplation – thinking about change; maybe I have a problem; ambivalent "Sometimes I think about all the money I spend in casinos"	Enhance motivation Explore concerns, explore benefits of change
Preparation/decision making – actively planning change "I want to stop."	Provide menu of options Build confidence
Action – making changes, new behaviour not yet established "I haven't been to a bookies for eight days. Self-exclusion is helping."	Build confidence Affirm success
Maintenance – new behaviour established "I get nervous when I go out with my friends, I might just have a drink and then place a bet without even thinking."	Build confidence Assist with problem solving and planning
Relapse – return to patterns of old behaviour "I blew it."	Build confidence Enhance motivation

For further information on Motivational Interviewing the Motivational Interviewing website is a good start. This is available at: www.motivationalinterviewing.org

Stages of brief intervention at a glance

The key stages of brief intervention are shown in Figure 2 below.

Figure 2. Stages of brief intervention



Source: Adapted from Center for Substance Abuse Treatment (1999)

Each stage of brief intervention is outlined in some detail below. Objectives, actions and examples corresponding to each action are provided. Relevant elements of FRAMES are shown for each stage.

Examples are provided as simple scripts that the worker can adapt to suit their own style and context. The stages, objectives and actions are provided as a guide only. In practice some may blend and overlap. It may not be necessary to follow each action or stage for every person.

Tips are provided for each stage as a further aid.

Where appropriate, specific tips are provided for working with young people. Those working within youth service settings or within youth focussed roles are encouraged to use a resource which is tailored specifically for working with young people.



Introduce the subject

In a general setting, where a person is not expecting to talk about gambling etc., introducing the subject can be the biggest hurdle for the worker. Several examples are provided below to cover a range of options for different circumstances. The key is for the worker to be clear, confident and relaxed in talking about these issues and to normalise the process.

OBJECTIVES

- > **To respectfully obtain consent to explore specific behaviour/s**
- > **To maintain rapport and convey empathy, regardless of the person’s decision to consent or not**

Responsibility sits with the person

Empathy: listen and reflect; maintain rapport

Actions	Examples
Ask permission to talk about the behaviour	<p>“Would it be ok to have a quick discussion about gambling? We like to cover this with all of our clients. It’s an opportunity to have a think about how gambling fits in to your life. Do you gamble at all?”</p> <p>“While we’re discussing what you like to do with your free time, could we talk about gambling?”</p> <p>“You’ve mentioned that you were arrested for a crime related to gambling. Could we talk a bit more about where gambling fits in for you?”</p> <p>“You sound a bit worried about how much you’ve been gambling lately? Could we talk a bit more about that?”</p> <p>“We’re trying to improve our service and offer people a bit more. We’re offering screening for a range of things - including gambling. Are you interested in finding out more; it only takes a few minutes?”</p>
Explain your role in relation to the behaviour/s to be explored	<p>“If you are interested we can work through a few quick questions. We use a process called a gambling screen. The screen provides you with your personal result. What you do with that information is your choice.”</p>
Clarify confidentiality issues	<p>“We have already discussed confidentiality but I just want to restate that this discussion will be confidential, in the same way as any other information about you.”</p>
Reinforce and respect the person’s choice	<p>“It’s up to you.”</p> <p>“What do you think you might want to do next?”</p> <p>“It is your choice whether you want to take up this opportunity.”</p>

TIPS

- > Your own values and behaviour are not the focus and should not interfere with your efforts to support people to reduce harm from gambling.
- > When working with people of cultures other than your own ensure that you convey respect for cultural difference. Use cultural support and expertise to assist in providing an effective service. Pay attention to cultural norms in relation to rapport building. Taking the time to effectively engage with people and building a trusting relationship will increase the likelihood of being able to provide an effective intervention.
- > With young people: It is generally important to develop rapport before you introduce the issues i.e., by talking about topics other than gambling. Clarity about confidentiality is especially important to develop trust.

2

Screen

OBJECTIVES

- > **To gather personalised information about potential levels of risk or harm resulting from selected behaviours**
- > **To determine whether intervention could be useful**
- > **To determine the level of intervention that is indicated**

Responsibility sits with the person

Empathy: listen and reflect; maintain rapport

Action	Example
Administer the screening tool OR Ask screening questions	"This is the screening questionnaire. Shall we work through the questions together?" "This is the gambling questionnaire. It will give you an indication about whether gambling might be causing problems for you." "Do you gamble?" "How soon after you wake up do you usually check your betting account?"
Score the screening tool	"What we do now is look at your responses and total them up. One of the good things about this is that it's an objective measure – a bit like a blood test."

TIPS

- > Be familiar and comfortable with the screening questions and/or tools.
- > Defer screening when other needs are clearly more immediate, for example, the person is highly agitated, in need of urgent medical attention etc.
- > Emphasise the objective nature of the tool.
- > Be sensitive to literacy levels and adjust accordingly e.g. work through the tool with the person.
- > Be sensitive to language issues where English is not the person's first language. Ensure this does not become a barrier.
- > **If the person says no or changes their mind mid-way through the process respect their choice and exit the brief intervention process.** Consider whether it could be an option to revisit the issue at a later date and if so flag this as your systems allow.
- > With young people: Use a screening tool or process that has been validated for use with young people, for example The Substances and Choices Scale (SACS) available at www.sacsinfo.com.

3

Provide feedback and brief advice

OBJECTIVES

- > **To provide personalised information about levels of risk and harm (the screening results and interpretation of these)**
- > **To facilitate reflection and review of behaviour**
- > **To provide tailored advice to assist with reducing risk and/or harm**

Feedback: about personal risk or level of current harm, as indicated by the screening process

Responsibility sits with the person

Advice: provide advice

Empathy: listen and reflect; maintain rapport

Actions	Examples
<p>Review screening data in collaboration with the person</p> <p>Check for level of risk/harm:</p> <p> hazardous, harmful or dependent</p> <p>Give personalised brief advice (as appropriate)</p> <p>Note: encourage referral to specialist service where there is a need for further assessment</p>	<p>"The PGSI score shows that your gambling is unlikely to cause problems.</p> <p>If your circumstances change, say you are planning to buy a house, then it might be helpful to stop gambling."</p> <p>"The screening test suggests that you are gambling at a harmful level.</p> <p>This means there are risks for your mental health, your finances, and potentially for your family relationships. The best thing you can do is to try to stop gambling. There would also be other immediate benefits. I know it is not an easy thing to do. There are a number of options that could support you to stop."</p> <p>"Given your result, there would be significant benefits if you were to cut down on gambling."</p> <p>"Your score shows that your gambling is well above normal participation levels for someone your age and gender. This is worth getting checked out further and it's likely to be linked to some of the issues you're facing right now. I recommend that you see a specialist for an assessment to find out more. I can arrange for you to contact the National Gambling Helpline or [insert local service name]. There is no charge for the service. At a minimum you will get some more information. What you do with it will be up to you."</p>

TIPS

- > Brief intervention can stop at this point if there is insufficient time to provide any further intervention.
- > Check in with the person about how they are finding the process. Make space for them to ask questions.
- > If the person becomes withdrawn, argumentative or resistant take this as a sign to back up. Avoid arguing and/or persuading, avoid presenting reasons for change, maintain rapport and simply reflect back what the person is saying to you.
- > If there are indications of dependence or addiction recommend and support referral for further assessment or more intensive assistance.
- > If there are indications of other health problems, including mental health problems, recommend and support referral to appropriate services.
- > With young people: look for opportunities to provide positive feedback, focus on their strengths and achievements as much as possible. Avoid the discussion becoming overly problem-saturated (Christie, 2008a).

4

Listen for readiness and confidence

OBJECTIVES

- > **To check out the person’s readiness to change their behaviour**
- > **To support consideration of the connection between behaviour, risk and/or harm**

Feedback: about personal risk or level of current harm

Responsibility sits with the person

Empathy: listen and reflect; maintain rapport

Self efficacy: convey optimism about their ability to change.

Action	Example
Check out how the person is responding	<p>“What are your thoughts about the screening result?”</p> <p>“It’s a lot to take in. Are you surprised about your score?”</p> <p>“I know you weren’t necessarily expecting to be looking at this today, but I wonder what you think about how gambling fits in with some of the other issues that have brought you here today?”</p>
Explore readiness to make changes:	<p>“What are your thoughts at this point? Are there any concerns that you have?”</p>
Does change seem to be worthwhile to the person?	<p>“Have you considered cutting down on your gambling?”</p> <p>“Can you think of any benefits if you were to stop gambling?”</p>
Are they confident about their ability to change?	<p>“What connections do you see between your gambling and the stresses in your life right now?”</p>
Try to elicit change talk	<p>“On a scale of 1-10, if 1 is not ready at all and 10 is totally ready, how ready are you to make changes to your gambling?... What are some of your reasons for giving this rating?” OR “why did you rate 5 instead of 3?”</p>



Reflect the person's views on change back to them

Person is not indicating readiness to change

"Thanks for agreeing to check out your gambling. It sounds like right now you can't see any benefits in cutting back on your gambling? If you decide you want to talk about this again, you can let me know. Would it be all right if we talk about it again in a few months' time to see if anything has changed for you?"

"From what you're telling me, it sounds as though you are not interested in stopping gambling right now. Would it be useful to talk about some ways to put limits in place to try to reduce the impact of your gambling?"

Person is ambivalent about change

"So, if I'm hearing you correctly, you can see that cutting back on gambling would help keep you out of trouble but you can't see your friends letting you get away with it. How do you think things will turn out for you?"

"What are the pros and cons with your gambling?"

"On balance would it be worth having a go at stopping?"

"What are some things that could help you stop?"

"What are some of the barriers that might prevent you from limiting your gambling?"

Person wants to change, lacks confidence

"You want to stop gambling but you've tried many times and it hasn't worked out. You just don't think you can manage to do it. Would you be interested in looking at some strategies to help with this?"

"What would need to happen for you to become more confident to make a change?"

"What would be helpful to you at this point?"

"You said that you stopped gambling for a short time about a year ago? How did you achieve that? Could you use some of the same strategies that were successful then to help with cutting down on gambling now?"

TIPS

- > Avoid arguing, persuading and/or presenting reasons for change and maintain rapport.
- > Respect the person's views and don't assume that the intervention has not been helpful if they choose to close the subject.
- > Remember responsibility for change sits with the person themselves.
- > Encourage the person to explore and articulate their own reasons for change.
- > Listen carefully for what the person is prepared to work on at this time and focus on that.
- > Use the readiness scale/ruler to quickly elicit change talk. Available at [www.adultmeducation.com/downloads/Readiness-to-Change TOOL.pdf](http://www.adultmeducation.com/downloads/Readiness-to-Change_TOOL.pdf)
- > With young people: don't discount or minimise the young person's experiences of the good things about gambling. Let them talk about the good things before gently guiding/inviting them to explore the downsides. Avoid coming up with the downsides, let the young person tell you from their own experience.

5

Provide further intervention (as appropriate)

OBJECTIVES

- > **To facilitate reflection and review of behaviour**
- > **To support change if the person is seeking change**

Feedback: about personal risk or level of current harm

Responsibility sits with the person

Empathy: listen and reflect; maintain rapport

Menu of options: outline options or strategies

Self efficacy: convey optimism about their ability to change

Action	Example
For people who are considering change or wanting support to change, select an appropriate approach (one or more):	
Provide information	Provide information: focus on the benefits of change: “Would you like more information? I have a leaflet here that you could take home. It might be interesting to read about some of the benefits other people have experienced after cutting back.”
Goal/s and Menu of options	Facilitate goal setting and explore menu of options: “Could you consider setting yourself a goal in relation to gambling?”
Build confidence	“What are some changes that you are interested in trying out?”
Enhance motivation	“Would it be helpful to look at some options that have been helpful for other people? There are some effective strategies available to help people stop gambling, such as letting a loved one take care of your finances for a while or self-exclusion. It could be helpful to look at whether any of these are worth trying for you.” “There are lots of options for cutting down on gambling, you are the best judge of what is likely to work for you. Would it be helpful to talk about some ideas and then, if you want to, set a goal for yourself to try out?” “It sounds like the smartphone gambling is your main concern because it is impacting on your family time. We could explore some practical options and you could make a plan, then if you think it’s worth a go you could try it out. If it doesn’t work out we could look at some other ideas next time we meet.”

TIPS

- > Keep it personalised, relevant and achievable. The change goal must be something that is worthwhile and “doable” for the person. Avoid the lure of encouraging goal setting that does not meet these criteria.
- > Encourage the person to come up with their own strategies and/or explore in detail how strategies will fit into the person’s situation. People are more likely to try things out if they come up with their own ideas.
- > Spend time looking at a range of options. It is important to convey that there is more than one way to address issues and improve situations. This helps generate self-efficacy.
- > Listen carefully for what the person is prepared to work on at this time and focus on that.

IMPORTANT CONSIDERATIONS

Cultural considerations and brief intervention

Throughout the process of screening and brief intervention workers are encouraged to be mindful of the social and cultural context of the people they are working with. Effective engagement, assessment and goal setting may be affected by a person's 'ethnocultural identity'. The way a person might identify themselves and 'see the world' may impact on the ways they might express distress; the way in which they might perceive problems or solutions and/or their communication styles. Workers have an important role in ensuring that the people they are working with understand information well enough to be able to make informed choices or decisions. Clients may have poor literacy. This may mean giving some thought to how screening information is interpreted and communicated. Comprehension may be improved by putting it into a relevant context as well as considering the content of any message.

Overcoming potential barriers to brief intervention

There are a number of well identified barriers to the provision of brief intervention in generalist settings. The more prevalent of these are outlined below along with some suggestions as to how these barriers can be overcome or managed. These barriers and potential solutions relate to both the organisational level and the worker.

Causing offence: Both workers and organisational leaders are often concerned that service users, who are generally not expecting to be talking about these issues, may be annoyed or offended if they are asked about them. The evidence suggests that this is rarely the case (NHS Health Scotland, 2009).

Within the approach presented in this Guide all issues are raised with empathy and respect for the autonomy of the person and if a person does not want to engage in brief intervention then that choice should always be respected. Such an approach minimises perceptions of judgment and intrusiveness.

Workers are more likely to overcome their concern by actually providing brief interventions, seeing that service users are not offended and seeing the benefits brief intervention can provide. Organisational leaders can support and encourage workers to overcome any initial reservations by ensuring staff have access to training to build their skills and confidence. Leaders can also ensure that staff have access to ongoing supervision and support. Additionally, it is useful to set realistic targets for brief intervention in the early stages, recognising that it may take some time for staff to become sufficiently comfortable to more routinely introduce the subject etc.

The issue of coercion: In settings where service users are facing or undergoing legally imposed sanctions e.g. justice and some social service settings, workers can be concerned about imposing screening and brief intervention. It is important to note that the principles and stages of brief intervention do not change in these contexts. Respect for the autonomy of the person, empathy and collaboration are integral to brief intervention and help to ensure the intervention is not imposed.

Own behaviour and values: It is not uncommon for a worker who gambles to feel open to being judged as hypocritical when talking with others about these issues.

In this circumstance it is important that workers and organisational leaders are mindful that brief intervention is provided to assist service users to make informed choices. The worker's own patterns of use and behaviour are not relevant and should not be a barrier to providing brief intervention.

Using standardised screening tools and a structured approach to brief intervention will help to ensure that the worker's own values and choices do not prevent them from providing effective brief intervention to service users.

Outside of the scope of worker's role: Some generalists believe that providing brief intervention is outside of the scope of their role. This is understandable as many are not well informed about brief intervention or trained in providing it.

Organisational leaders have a role to play in overcoming this barrier by ensuring that workers are well informed and supporting them to learn about their potential role in brief intervention. It is important to stress that many people who are at risk of or experiencing harm will never see a specialist and brief intervention provided by a generalist may be of huge benefit to them. Increasingly it is recognised that the substantial harms that can arise from alcohol, tobacco, other drugs and gambling make these issues everybody's business. However it is important to consider professional boundaries carefully and to ensure that there is organisational support with approved processes, training and ongoing back up for the provision of brief intervention.

Competing priorities: The demands on time within a service environment may present one of the most significant barriers to brief intervention. It is common to hear workers and leaders comment on the burden of expectations placed on them to address a wide range of issues. This is a challenge for both the worker and the organisation and there is no simple answer. However, focus and commitment at all levels are required to implement and maintain brief intervention.

It is up to the organisation and the worker to determine what services can be provided within resource constraints.

RESPONDING TO FAMILY AND AFFECTED OTHERS

Resources for family and affected others

Many people are adversely affected by others' gambling. Sometimes these effects are identified in the course of health and social service delivery.

There is a range of resources available to assist families including self-help resources such as:

Concerned About Someone Else's Gambling. Produced by the Gambling Helpline for families seeking help with gambling issues. Available at: www.gamblinghelpline.co.nz/data/media/documents/Concerned_about_someones_gambling.pdf

The 5-Step Method

The 5-Step Method (Orford, Templeton, Patel, Velleman & Copello, 2007) for helping affected family members offers a simple and effective approach for responding to family members. It is a non-blaming approach to working with families and others affected by substance use or gambling. It can be delivered by a range of workers in a range of settings. The approach is designed to assist families to develop effective coping strategies and access effective social support.

The 5 steps are shown below and further explained adjacent.



Figure 3 The Five-Step method

- 1 Listen carefully to the experience of the family member/s to develop an understanding of how they are affected. Explore their concerns. Provide reassurance that others also have these experiences. Convey empathy and non-judgement.
- 2 Provide relevant information about substance use/gambling/addiction as relevant. Provide information about other relevant issues tailored to the concerns raised e.g. child care, financial assistance etc. Targeted information helps family members to gain a sense of having some control in their lives.
- 3 Explore coping responses. Research associated with the model has identified three broad coping responses:
 - > Engaged – Standing up to
 - > Tolerant – Putting up with
 - > Withdrawn – WithdrawingExplore the current responses and discuss what is effective and what is less effective? Explore alternatives.
- 4 Explore social support. Draw a network diagram to determine current support. Work on strategies to increase positive support and decrease negative support.
- 5 Explore further options for help and support. Check out further needs, provide information, refer as necessary and arrange follow up if required.

Research indicates that families from a range of cultures have found that brief intervention provided within the 5-Step model in a range of settings has helped them to:

- > Focus on their own needs.
- > Be assertive in communication.
- > Calm down and find different ways of dealing with frustration and anger.
- > Have a better understanding of the drinking /drug taking behaviour and the links with their own health.

(Orford et al., 2007).

BRIEF INTERVENTION REQUIREMENTS AT AN ORGANISATIONAL LEVEL

This section offers guidance to support effective planning, set up, implementation and monitoring of brief intervention within an organisational context. The guidance provided here is generic and will need to be tailored and adapted to the specific conditions within each organisational context.

Evidence suggests that organisational factors can limit or enable implementation of brief interventions (Johnson et al., 2010). Successful implementation of brief intervention programmes is more likely when the programme is championed at management and/or leadership level (McGovern et al., 2012). Commitment at organisational governance and management levels is essential to support workers to provide brief intervention.

The implementation of brief intervention within an organisation is best approached as a project.

Key steps in planning and implementing brief intervention for a large organisation are outlined below. The steps are set out in a chronological order, however in practice they are likely to overlap, particularly the second and third steps. In summary the steps are:

- > Project initiation
- > Consulting within the organisation
- > Project planning
- > Implementation
- > Ongoing improvement

Project initiation

Key actions at the outset include:

- > Developing a project brief (or charter) specifying goals, key objectives, deliverables, resources available, costs, risks and benefits of the project.
- > Assigning a project leader to manage and coordinate the implementation of brief intervention.
- > Determining if a project team is required to assist implementation (usually this is best, particularly in medium to large organisations) and if so assigning membership and roles.
- > Preparing an information sheet on brief intervention (see Box 3 below for suggestions on what to include).

Once these actions above are completed, the implementation of brief intervention should be announced within the organisation. Preferably the announcement is made by a senior person to indicate the importance of the project within the organisation.

The announcement can be made via email, staff bulletin, team meeting etc., depending on the organisational communication systems already in place and the size of the organisation.

After the project is announced provide an information sheet to all staff to begin the process of developing a shared understanding of brief intervention and fostering enthusiasm for the initiative.

Box 3. Inform and educate

Provide an information sheet for staff outlining the intention to develop a brief intervention initiative within the organisation, explaining what brief intervention is and why it is a worthwhile activity for the organisation i.e. how it will benefit service users. Ideally, this information is tailored to your organisation and sector.

The information sheet should cover the following:

A brief description of brief intervention (as provided in this Guide):

A clear definition, how brief intervention is delivered and who it is most effective for.

A statement emphasising the brevity of the intervention and that it is not addiction treatment.

The key reasons for offering brief intervention in your organisation, for example:

Information on the harms associated with gambling as these relate to the service user population.

Evidence for the effectiveness of brief intervention.

Information promoting the role of the generalist:

A clear message that brief intervention does not require significant or in-depth understanding of the issue/s and that the issues are everybody's business.

A statement emphasising that brief intervention will potentially provide significant benefit to service users who might otherwise miss out on assistance for their issues.

A brief statement regarding training and support.

Contact details of the project leader

Encouragement of questions, comments and ideas.

Consulting within the organisation

Ensure key people within the organisation are informed and involved as necessary. This is a process of both informing and gaining information from various perspectives about the organisational barriers and enablers to implementing brief intervention. Early input from key people can foster engagement and help identify both snags and shortcuts.

It is important that key people and groups within the organisation develop a common understanding of the project including what is likely to be expected of them, how they can contribute and how they will be supported to make their contribution.

Consulting can happen via meetings, telephone and email discussions, providing documents for feedback etc.

It is likely that the following people will need to be consulted with: team leaders, supervisors, trainers (if you have these in your organisation), front line staff likely to be providing brief intervention, human resources staff, IT people, administration staff etc.

In determining who to consult the following could be considered:

- > Who is most likely to be delivering brief intervention? Who are the leaders and supervisors of this group?
- > Is HR input needed?
- > Are there specific IT requirements?
- > How will records be kept? Who manages records for the service?
- > Will administrative processes need to be adjusted?
- > Are there any policy changes required?
- > Are there any accounting requirements e.g. invoicing for services provided?

Project planning

Develop a detailed project plan including objectives, structure, processes, milestones, key responsibilities, reporting and costs. A communications plan may be required as part of the overall plan.

The planning should incorporate the following key requirements specific to brief intervention:

- > The brief intervention approach and pathway: define this thoroughly i.e. the scope.
- > The screening tools (See Box 4 for further guidance on selecting screening tools).
- > The steps in the intervention and the timing of these within the business of the organisation.
- > Referral sources and resources that the organisation will use.
- > The population to be screened and any exclusions.

- > Policy and procedures for confidentiality and consent.
- > The personnel delivering brief intervention: key considerations will include feasibility within the role i.e. are service users likely to accept brief intervention from those in this role, time available, workload, knowledge, skills and attitudes.
- > Training and support requirements: specify requirements to enable personnel to understand and deliver brief intervention and integrate this into their role.
- > Administrative systems and IT requirements.
- > Data requirements (see Box 5 overleaf) including reporting, monitoring and ongoing quality improvement processes.
- > Review the plan with others in the organisation as relevant. Ensure sign off by senior management.

Box 4. Key considerations in selecting screening methods

The make-up of the population/group to be screened: what are the issues that this population may be experiencing?

Whether to screen for single issues or multiple issues: what is optimal given the needs of service users and the expertise and resources available within the service?

Setting: what is realistic in the service setting i.e. if office based then computer-based or pen and paper and more in-depth screening may be possible. If in the field (e.g. working with homeless population) there may only be opportunity to ask a couple of key questions with record keeping occurring at a later time.

Systems for responding to screening results: the level at which the organisation can respond to those whose screening results are positive and in particular those whose results indicate the potential for a significant problem is an important consideration in selecting a tool. Where workers have time and an ongoing relationship with the service user it may be optimal to use a tool that provides information about presence and levels of problem (e.g. AUDIT or ASSIST); where there is limited time a short screen such as AUDIT-C which focuses on the presence/absence of a problem may be more appropriate.

The time available to screen and provide intervention and any associated costs: what can the service optimally provide?

The expertise of the staff: what level of knowledge and skill is required to screen and respond appropriately based on the screening result?

The level of management support: is there management approval for the process? Do management support staff training and ongoing staff support?

Box 5. Data considerations for organisational monitoring

The following measures are suggested for monitoring brief intervention:

Number of service users in the brief intervention target population: i.e. the number of people that would be expected to be screened.

Percentage screened: i.e. the number of service users screened divided by the number in the target population. It is recommended that a realistic target is set initially.

Number and percentage of “positive” screens: i.e. the percentage of service users whose screening results indicate that intervention is required.

The percentage of “positives” receiving an intervention (including a subset of those who are referred for specialist intervention).

Source: Adapted from Higgins-Biddle, Hungerford, & Cates-Wessel (2009).

Implementation

- > Ensure the roll out of brief intervention is well notified to all relevant people in the organisation.
- > Provide regular communication to encourage, remind and support people at this early stage; for example, thanking people for their work in getting the project off the ground.
- > Ensure that help and support is readily available during the early implementation stage to increase uptake.
- > Actively monitor implementation and address any issues that arise.

Ongoing improvement

- > Gather and provide feedback regarding progress. It is useful to do this on an ongoing basis to keep up the momentum and embed the change in practice.
- > Review data and other feedback to determine improvements. Manage the requirements for embedding improvements.

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APPENDIX

Appendix 1

Lie/Bet Questionnaire

The Lie/Bet Questionnaire is a two question screening tool for pathological gambling, useful in determining if a longer screening tool or further assessment is appropriate.

Lie/Bet Questionnaire:

1. Have you ever had to lie to people important to you about how much you gambled?
2. Have you ever felt the need to bet more and more money?

Administer Lie/Bet Questionnaire:

“Yes” response to one or both items: Further assessment is needed. Refer to www.begambleaware.org or the National Gambling Helpline: 0808 8020 133

“No” response to both questions: No referral necessary for problem gambling services.

The NODS-CLiP Short Problem Gambling Screen

Have there ever been periods lasting 2 weeks or longer when you spent a lot of time thinking about your gambling experiences or planning out future gambling ventures or bets?

Yes ?/ No?

Have you ever tried to stop, cut down, or control your gambling?

Yes?/ No?

Have you ever lied to family members, friends, or others about how much you gamble or how much money you lost on gambling?

Yes?/ No?

If “Yes” to one or more questions, further assessment is advised refer via www.begambleaware.org or the National Gambling Helpline: 0808 8020 133

Problem Gambling Severity Index

When you think of the past 12 months, have you bet more than you could really afford to lose?

0: Never 1: Sometimes 2: Most of the time 3: Almost always

Still thinking about the last 12 months, have you needed to gamble with larger amounts of money to get the same feeling of excitement?

0: Never 1: Sometimes 2: Most of the time 3: Almost always

When you gambled, did you go back another day to try to win back the money you lost?

0: Never 1: Sometimes 2: Most of the time 3: Almost always

Have you borrowed money or sold anything to get money to gamble?

0: Never 1: Sometimes 2: Most of the time 3: Almost always

Have you felt that you might have a problem with gambling?

0: Never 1: Sometimes 2: Most of the time 3: Almost always

Has gambling caused you any health problems, including stress or anxiety?

0: Never 1: Sometimes 2: Most of the time 3: Almost always

Still thinking about the last 12 months, have you needed to gamble with larger amounts of money to get the same feeling of excitement?

0: Never 1: Sometimes 2: Most of the time 3: Almost always

Have people criticized your betting or told you that you had a gambling problem, regardless of whether or not you thought it was true?

0: Never 1: Sometimes 2: Most of the time 3: Almost always

Has your gambling caused any financial problems for you or your household?

0: Never 1: Sometimes 2: Most of the time 3: Almost always

Have you felt guilty about the way you gamble or what happens when you gamble?

0: Never 1: Sometimes 2: Most of the time 3: Almost always

Total score:

The higher the score, the greater the risk that your gambling is a problem.

Score of 0: Non-problem gambling.

Score of 1 or 2: Low level of problems with few or no identified negative consequences.

Score of 3 to 7: Moderate level of problems leading to some negative consequences.

Score of 8 or more: Problem gambling with negative consequences and a possible loss of control

Appendix 2

This section highlights strategies that can be used by a person directly experiencing or at risk of gambling-related harm. Further information can be found at www.begambleaware.org.

The Money, Access, Time Triangle

An effective way to reduce or stop gambling is to put barriers in place that limit your ability to gamble – specifically barriers to Money, Access and Time. No barrier is infallible but if you have the right barriers they can certainly slow you down enough for you to take a look at what you're doing and decide whether or not you really want to do it.

Limit Access

- > Customers may self-exclude from gambling establishments (see below).
- > Avoiding places with a high density of betting shops or casinos can be helpful so take care to plan your route before heading out the door. A little planning goes a long way when it comes to avoiding unexpected triggers like the sight of a flashing casino sign.
- > If you're an online gambler you can add blocking software such as "betfilter" which will remove access to all gambling websites from your PC. Depending on which blocking software is used a password may be needed so ask for help from a friend or family member to set it up for you so you remain unaware of the password and unable to remove the software. If you gamble on a phone or iPad please contact your network provider to discuss the possibility of setting up parental controls to exclude gambling sites. If all else fails, you may need to consider the possibility of getting a low spec phone capable of making and receiving calls, and not having a computer for a while.
- > Think about times and places when you may be at your most vulnerable and ensure that someone you trust is either available at the end of the phone or able to be physically with you at these times. These could be times of emotional upset, or on pay days or anniversaries but looking at how you may be affected and planning for it can save you a lot of heartache.

Filling Time previously spent gambling

- > Explore the type of things that interest you and in particular things you can enjoy doing with friends or family members rather than seeking isolated pursuits. You may also want to look at projects you can undertake such as decorating a room or working on the garden.
- > Ensuring that you are engaging with a routine can be very helpful so include yourself in day to day tasks around the house so you feel like a valued part of family life.
- > Filling time with positive activities away from gambling can help you to feel productive and healthy and it can strengthen relationship bonds that have previously been neglected.

Money

- > Often the understanding of money and its value becomes warped whilst in the grip of a gambling addiction. Effective budgeting can restore an understanding of the value of money and it may also help to improve a negative financial situation brought on by gambling.
- > Ask a friend or family member to take control of your finances during the early stages of recovery. This can be done by giving away any debit or credit cards you may have (If you've memorised the card numbers be honest about that and get replacements before you hand them over). If you're budgeting effectively you'll be able to inform the person managing your finances of exactly how much you will need on any given day and receipts can be provided as evidence of your purchases.

Self-Exclusion

The following information is produced by the Gambling Commission, the body responsible for licencing gambling operators in Britain. It describes the role of licenced gambling operators in assisting people who no longer wish to gamble to exclude themselves for a defined period of time. Regulations may change and therefore readers may wish to consult up to date information at the following address:

www.gamblingcommission.gov.uk/for-the-public/Safer-gambling/Self-exclusion.aspx

If you think you are spending too much time or money gambling in an arcade, betting shop, bingo venue or casino, then ask staff for information about their self-exclusion scheme.

Self-exclusion is when you can ask a gambling company or operator to stop you from gambling with them for an amount of time. It usually lasts for at least six months. It is mainly used by people who think they have a problem with gambling and want help to stop. It is up to you to stick to a self-exclusion agreement with a gambling company, but the company should help you do that.

If you want to self-exclude from an online (remote) gambling company then you will need to contact each of the companies with which you hold an account. This can usually be done on the responsible gambling pages of the website.

If you are worried about online gambling then you can download a 'site blocker' such as Gamblock or Netnanny, which can block access to on line gambling sites. However there may be a charge for this.

Although I have self-excluded, my gambling operator has allowed me to gamble. What should I do?

A self-exclusion agreement may not always work properly and you might want to complain about this. Gambling operators must have a system they follow when a customer wants to complain. You should be able to find information on how to complain to the gambling operator on their website or by talking direct to a member of staff in the betting shop, arcade, bingo hall or casino where you have self-excluded.

If you wish to seek compensation from the operator because you feel that they haven't taken reasonable steps to prevent you from gambling then you will have to raise this as a civil matter through the courts.

The Gambling Commission's role is to make sure that the gambling companies follow the rules. Those rules include helping customers who want to stop gambling and have self-excluded. We will look into any concerns that that company may have broken the rules and investigate whether its self-exclusion system is working properly. If we think a company is not doing what it should, we have ways to make them improve. This can include, as a last resort, taking away the company's licence.

If you believe that the operator has broken the self-exclusion rules, we will need the following information:

- > When did you enter into the self-exclusion agreement?
- > How did you let the operator know you wanted to self exclude?
- > What did the operator give you to confirm that the self-exclusion was in place?
- > What period did you self-exclude for?
- > What date were you able to gamble even though you believe you had a self-exclusion agreement in place?
- > Can you provide details of any contact you have had with the operator since you gambled with them?

We will need your permission to contact the operator with your details but you should note that this will not be helping in getting your money back.

Limit setting

Most gambling operators will have facilities that allow you to set limits on the amount of time or money you spend gambling. Speak to a member of staff if you would like further information regarding limit setting.

Referring to specialist services

The National Gambling Helpline on 0808 8020 133 and www.begambleaware.org act as the first port of call for people affected by problem gambling. These services provide immediate advice and support, and from there people who need further help can be referred on to specialist services for further interventions.

ORGANISATIONS THAT PROVIDE HELP AND ADVICE

GAMBLEAWARE

begambleaware.org

A website that gives advice on gambling responsibly – this means making choices based on all the facts, and staying in control of how much time and money you spend.

NATIONAL GAMBLING HELPLINE:

0808 8020 133

CENTRAL AND NORTH WEST LONDON NHS FOUNDATION TRUST

www.cnwl.nhs.uk/cnwl-national-problem-gambling-clinic

Tel: 020 7534 6699 / 6687

Treats problem gamblers in England and Wales who are aged 16 and over. It assesses the needs of problem gamblers as well as those of their partners and family members, and offers evidence based treatments as well as interventions to assist with financial, employment, social and relationship difficulties.

GAM-ANON

www.gamanon.org.uk

Support to those affected by another person's gambling. A fellowship of men and women who are husbands, wives, relatives or close friends who have been affected by problem gambling.

GAMBLERS ANONYMOUS

www.gamblersanonymous.org.uk

A fellowship of men and women who have joined together to do something about their own gambling problem and to help other compulsive gamblers do the same.

GAMCARE

www.gamcare.org.uk

A registered charity that takes a non-judgemental approach to gambling, and a leading authority on the provision of information, advice and practical help in addressing the social impact of gambling.

GORDON MOODY ASSOCIATION

www.gordonmoody.org.uk
01384 241292

Provides residential treatment for severely addicted gamblers, as well as providing outreach support and internet counselling service.

CONSUMER SUPPORT:

CITIZENS ADVICE

www.citizensadvice.org.uk

Helps people resolve their legal, money and other problems by providing free information and advice, and by influencing policymakers.

DEBT SUPPORT ORGANISATIONS:

MONEY ADVICE SERVICE

www.moneyadviceservice.org.uk

An independent service, set up by government, to help people manage their money.

NATIONAL DEBTLINE

www.nationaldebtline.org

National helpline number: 08088 084000

Provides free confidential and independent advice on how to deal with debt problems.

STEPCHANGE DEBT CHARITY

www.stepchange.org

0800 138 1111

A debt advice organisation offering free, confidential and impartial debt help to anyone who needs it, available online 24 hours a day.

OTHER SUPPORT ORGANISATIONS:

SAMARITANS

www.samaritans.org

116 123

A 24 hours a day service providing confidential emotional support for people who are experiencing feelings of distress or despair, including those which may lead to suicide.

GambleAware is the leading charity in Britain committed to minimising gambling-related harm. As an independent national charity, GambleAware funds education, prevention and treatment services and commissions research to broaden public understanding of gambling-related harm. The aim is to stop people getting into problems with their gambling, and ensure those that do develop problems receive fast and effective treatment and support.

GambleAware
7 Henrietta St
London
WC2E 8PS

about.gambleaware.org
info@gambleaware.org
+44 (0) 20 7287 1994

GambleAware

LOCAL GAMBLING RISK ASSESSMENT

Premises

Premises Name: Palace Amusements
Premises Address: 70 Deptford High Street
Premises Post Code: SE8 4RT
Premises Licence
Number:
Category of Premises: Adult Gaming Centre

Company

Operating Company: East Kent Leasing Limited
Operating Licence
Number: 000-034401-N-315687-010

Assessment Writer

Name of Person Writing this Assessment: Jeremy Godden
Position within Company or Name of Authorised
Agent: Managing Director
Date that Original Assessment was Written: September 2020

LOCAL GAMBLING RISK ASSESSMENT

Requirement to Comply

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

Social responsibility code provision 10.1.1

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

Ordinary code provision 10.1.2

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

LOCAL GAMBLING RISK ASSESSMENT

Index

1. Company Background Information
2. Licensing Conditions
3. Local Area Profile
4. Risk Assessment

LOCAL GAMBLING RISK ASSESSMENT

Company Background Information

1. The owners (Jeremy Godden and Jordon Godden) and the operations director (Stephen Lawrence) have over 50 years' experience between them in operating Adult Gaming Centres and have been involved in operating at least 400 Adult Gaming Centres.
2. An Adult Gaming Centre provides no seating areas or other areas for customers to loiter and is low stake (20p-£2) gaming on machines.
3. It is a very different clientele to a betting office or pub. Staff remain on the shop floor and interact with clients and do not sit behind a counter or screen.
4. The shop frontage is not enticing and there is generally a 50/50 mix of male and females.
5. There is no other AGC nearby and AGCs cannot be compared to betting offices.
6. There is no representation from the police submitting any evidence or submission that these premises will not promote the licensing objectives or would contribute to crime or anti-social behaviour in the area.
7. There is no representation from the licensing department that the application or Local Area Risk Assessment is deficient or missing information.
8. There is no representation from any local social services that vulnerable people in the area will be impacted by this application or that the applicant does not have policies in place to protect the vulnerable.

LOCAL GAMBLING RISK ASSESSMENT

9. No other premises operated by the owners or operating director have been the subject of a review application brought by any person relating to any of the licensing objectives.
10. The owners and operators have considered fully the Lewisham Gambling Policy, the local risks and are proposing 31 conditions to promote the licensing objectives.
11. There is a detailed set of policies and procedures with particular emphasis in this locality on protecting the vulnerable and training documents on gambling intervention guide and safeguarding in gambling have been served with this application.
12. The conditions deal with all licensing objectives, but some specific conditions relate to CCTV, challenge 25 and 4 conditions on liaising with the local neighbourhood. The owners and operators are committed to working with local charities and local people.
13. The local area risk assessment deals with local issues, but also takes into account the evidence and experience gained in other localities by the owners and operators.

LOCAL GAMBLING RISK ASSESSMENT

Licensing Conditions

CCTV

1. CCTV shall be installed to Home Office Guidance standards and maintained in a good working condition and recordings shall be kept for 31 days and shall be made available to police and local authority licensing officers with minimum delay if requested.
2. A CCTV camera shall be installed to cover
 - 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 any counter area
3. An overt CCTV monitor to be installed, able to be seen by customers.
4. The premises shall display notices near the entrance of the venue stating that CCTV is in operation.

Crime Prevention

5. The following crime prevention measures shall be implemented:
 - A time delay safe with deposit slot and anti fishing mechanisms must be used at the counter till area
 - Regular robbery awareness and cash handling training shall be given to all staff.
6. The Licensee shall maintain 'Challenge 25 Refusals' register at the premises. The register shall be produced to the police or licensing authority forthwith on request.

LOCAL GAMBLING RISK ASSESSMENT

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.
10. A maglock shall be installed and maintained on the main entrance/exit to the premises and which will be operable from the ground floor by staff. The maglock shall be in operation at staff's discretion from 09.00 hours to 22:00 hours. Outside these hours, the mag lock must be in operation at all times.
11. The entrance door shall remain closed during any licensable activity except for the entry and egress of customers/staff.
12. A suitable intruder alarm complete with panic button shall be fitted and maintained.
13. A fire alarm and smoke detections system will be installed.
14. The licensee will ensure that customer toilets are checked every hour for evidence of drug taking and alcohol consumption. Toilet checks are to be recorded on documents stating the time and member of staff who made the checks.
15. Toilet doors remain locked. Access to them is to be given by staff only.
16. An incident log shall be maintained and made available on request to an authorised Local Authority officer or the Police which will record the following;
 - a) All crimes reported to the venue;
 - b) Any complaints or incidents regarding crime and disorder; A
 - c) Refusals and banned customers
 - d) Any faults in the CCTV system; and
 - e) Any visit by a relevant authority or emergency service.

LOCAL GAMBLING RISK ASSESSMENT

17. The Licensee shall implement a policy of banning any customers who engage in crime or disorder within or outside the premises.
18. The licensee will refuse entry to customers who appear to be under the influence of alcohol or drugs.
19. Prominent GamCare documentation will be displayed at the premises.

Staff Training

20. 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 and 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 as soon as practicable.
21. The Licensee shall train staff on specific issues related to the local area and shall conduct periodic refresher training. Participation in this training shall be formally recorded. and the records produced to the police or licensing authority upon request.
22. New and seasonal staff must attend induction training and receive refresher training every six months.

Homeless and Street Drinking

LOCAL GAMBLING RISK ASSESSMENT

23. 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.
24. 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.
25. The Licensee shall place a notice visible from the exterior of the premises stating that anyone drinking alcohol outside the premises is not permitted and those who do so will be banned from the premises. The admission policy will include refusal if known/identified as a Street drinker.
26. The Licensee shall risk assess the number of staff required to staff the premises at any one time and will also risk assess the need for SIA door staff.

Neighbourhood liaison

27. The Licensee will make available a contact number for local residents to enable the local residents to contact the premises.
28. The Licensee will contact Bench Outreach and local charities identified by the Licensee as working with people with mental health issues and gambling addiction issues on a quarterly basis to work in partnership and identify local issues and a contact telephone number will be made available to such organisations.
29. The Licensee will ensure that the outside areas of the premises are monitored so as to ensure that all reasonable efforts are made to prevent any crime , disorder, anti social behaviour being connected to the premises.

LOCAL GAMBLING RISK ASSESSMENT

30. The Licensee shall provide the Licensing Authority with their compliance/operating manual which sets out all of the premises policies to meet the regulatory requirements under the Gambling Act 2005 and shall provide a copy of any update or revision as soon as practicable following the implementation of that change.

ATM

31. Any ATM made available for use on the premises shall be located in a place that requires any customer who wishes to use it to cease gambling at any gaming machine in order to do so

LOCAL GAMBLING RISK ASSESSMENT

Local Area Profile

The Adult Gaming Centre will be located on a busy High Street which benefits from a rich mix of cultures and age ranges. In the local surrounding there is a variety of typical high street shops which includes Fast Food restaurants/Coffee shops, A1 Retailers and High Street Banks. There are no nearby provisions of Adult Gaming Centres, though there are other gambling uses, namely Licensed Betting Offices.

Travel links include a local Overground Train Station and impressive Bus links to virtually all parts of London; on street parking is very limited.

The premises is located within a medium risk area when compared to other locations within the M25 with regard to Vulnerable People however does not add to the risk as a result of it replacing a current Licensed Betting Office. Within the locality, there are several pawnbrokers, one homeless night shelter¹, several outreach day centre for vulnerable adults² and numerous schools. It is also noted that there are multiple Licensed Betting Offices and one Snooker Club. Although there is a small cross-over of customer from Licensed Betting Office and Adult Gaming Centre, our teams are fully aware to expect a different style, age range and gender of customer from that which is usually associated with Licensed Betting Offices³. In spite of this differing customer demographic, senior management will liaise with the management of Paddy Power, Jennings bet and Ladbrokes in order to be fully informed prior to opening of any Players who are vulnerable or may be the cause of Anti-Social Behaviour.

As a result of the numerous Schools, including Tidemill Academy, St Joseph's Catholic School, Addey and Stanhope amongst others; it will be necessary to reinforce regular training with all team members that at school entry and exit times it will be necessary to be located near to the front of the premises to prevent any School Aged Children from entering. However, it is noted that as a company and as a sector, it is very rare for any attempts by school aged children at any of the companies' other premises.

¹ 999 Club Night Shelter – 21 Deptford Broadway SE8 4PA

² Deptford Reach – 64 Speedwell Street, London SE8 4AT, Bench Outreach – Jessica's Heart, 14 New King Street, Deptford, London SE8 3HS, Speedwell Community Mental Health – 63 Speedwell Street, New Cross, London.

³ See 2.5 Lewisham Gambling Statement 2019-22 – Notes Younger Males Problem Gamblers. AGC Customer tends to be Female and older.

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Rotunda House,
Deptford High Street, Deptford, London SE8 6JF
Shearway Business Park,
Shearway, Deptford, London SE8 6JF
Kent, UK
020 7494 4999

In order to assist the vulnerable and prevent them from gambling; we will make contact with all local shelters, charities and addiction centres⁴ so that they can help us form a local profile of persons who have previously indicated problems with Gambling. The reason for this is that as a company we utilise the BACTA self-exclusion portal which enable a person to exclude from Adult Gaming Centres within a certain radius. As a result of no Adult Gaming Centres in Deptford High Street, we will not have a full picture of those that may wish to be excluded prior to opening. In order to assist the vulnerable and prevent them from Gambling; we will make contact with both shelters [and make the on-site team aware] so that they can help us form a local profile of persons who have previously indicated problems with Gambling.

In conjunction with reviewing the local crime statistics⁵, there are known problems with crime and anti-social behaviour as a result of Anti-Social Behaviour, Drug Crime and Burglary Logged Crimes in the last 12 months⁶. However, this crime is not directly related to gambling nor related to low stake gambling found in Adult Gaming Centres but is more in keeping with the national picture on high footfall environments such as Deptford High Street. Falling within a medium-density area for vulnerable adults⁷ together with being in close proximity to locations where vulnerable adults can be found, the premises manager will have enhanced responsibility for managing potential problem gamblers whilst adhering to company policy whereby 'non-players' are not allowed to remain in the premises or loiter around the entrance. This policy encourages only those that wish to gamble, and have the means to gamble, to enjoy the adult gaming environment safely for themselves and for others. As AGC players tend to be from a wide age spectrum, but predominantly over 40 and are 55% female, there is a low cross-over with other night-time economy establishments. However, in order to improve the area and be aware of those that do crossover the on-site management will liaise with these aforementioned establishments in order to help solve any local issues.

Street drinking is a known problem in Deptford High Street. We operate a zero-tolerance policy on inebriated players. In order to assist with the prevention of this, CCTV is placed at eye level on the entrance door so that it is possible to have a clear picture of any offender's faces. Furthermore, members of the management team will work with other premises in the area in order to tackle the problem. As Adult Gaming Centre's are not allowed alcohol on site, it is policy to reject entry or eject any player who is a known street drinker. Any known problem Gamblers will be offered to self-exclude from the premises prior to opening. This will enable

⁴ The London Recovery Partnership, The Deptford Psychotherapy Centre and Addiction Blaster.

⁵ <https://www.ukcrimestats.com/Constituency/66041>

⁶ Search Undertaken May 2020

LOCAL GAMBLING RISK ASSESSMENT

them to self-exclude not just from this premises but also any other Adult Gaming Centre within a 1-mile radius as part of the BACTA Self-Exclusion Scheme.

As part of routine training, all staff are made aware of the signs, both physical and verbal, of a player gambling beyond their means. This training will enable staff to spot and prevent any potential anti-social behaviour committed by a player who could reach this position. This training contributes to the company's excellent record on ASB and will contribute to reducing the homelessness and street begging in the locality.

Overall, the environment is broadly similar to other City Centre High Street shopping/leisure environments present across London [together with similar location's that the company operates from] with low levels of footfall in the early hours of the morning, increasing at rush-hour (or peak) times with the passing footfall increasing dramatically during the mid-afternoon to evening and at weekends; from various visits to the High St at specific times of a calendar month, I can see no evidence of increased footfall following the standard four weekly or monthly payday(s) as outside of seasonal events – key Religious dates etc – the people/footfall present appears to follow normal High St trends found in our other locations in the UK. To note, there are several religious buildings nearby⁸. The site team are made aware of the socio-economic make-up of the area⁹ which shows an estimated unemployment rate amongst adults at 25%. This figure will be reinforced as part of the on-site training with regard to players gambling within their means.

Our standard Company Policy is to review our Local Gambling Risk Assessment on a regular basis with all members of our team. Regular training on all elements of Gambling Commission Compliance is undertaken. Information will be constantly fed into the from local statistics and partners allowing reviews to our response, if required, to any risk element. It is also important to note that as a family owned business, we always attempt to forge close links to the local SNT Police Team, attending regular meetings etc, so as to become a trusted business within the Community.

A door entry system will be fitted to the external door, or an internal lobby door if formed, which provides extra security for our Customers & Staff during the night, which will be in use between 10pm and 7am each night and this facility will allow our Staff to monitor and control who is entering and leaving the venue. In addition, there will be CCTV in place covering all main areas of the Venue, along with the area directly outside (pavement).

⁸ The Shaftesbury Christian Centre and The Baraka Mosque.

⁹ <https://londondatastore-upload.s3.amazonaws.com/instant-atlas/borough-profiles/atlas.html> - Search Lewisham

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As per standard Company procedure we will have a policy which is displayed in our window, if anyone is seen drinking alcohol or taking drugs will be barred from entering our premises and the toilet within the Venue will be locked at all times so the staff can monitor who is using them, plus an hourly checklist will be in place. No single manning will be planned.

As we are not open, we have not completed a regulatory return.

No auxiliary gambling provisions will be offered other than CAT B3'3, CAT C's and CAT D's machines. Customers will be able to enjoy high-end coffee and snacks as long as they are a player.

A copy of the Lewisham Statement of Principles Gambling Policy 2019-2022 will be located on site for reference.

Gambling Act 2005 – The Licensing Objectives

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

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

LOCAL GAMBLING RISK ASSESSMENT

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Risk Assessment	LO	Level of Risk	Impact	Control System	Risk Management	Reviewed
Children entering site unnoticed or unchallenged.	(C)	Low	Severe to business Severe to child	Interior Design	*Effective monitoring of entrance by floor walkers.	September 2020
				Exterior Design	*Frontage of venue will be designed so as not to be attractive to children.	September 2020
				Physical	*CCTV coverage of entrance linked to office with our Staff able to view/review and we will be able to review remotely. *Staff regularly trained, reviewed and audited on the delivery of the Think 25 policy	September 2020
				Systems	All of the points listed below are part of our standard operating procedures which are all subject to an internal Audit process and are discussed/reviewed on a regular basis via Management checks: *Think 25 policies will be in place and implemented with Think 25 material displayed. *Use of BACTA's resources for age verification testing. *Use of Citizen Card facility to allow for consistent ID format checks *Regular staff training (quarterly) both in-house and by BACTA. *Adherence to BACTA's toolkit and our staff handbook. *Use of the BACTA tracking system for both successful and unsuccessful Think 25 challenges with *Clear and prominent premises signage along with machine labelling. *Strict implementation of our policy of preventing the wearing of hoods, caps or any material that prevents the Staff present from being able to enact our Think 25 policy *Policies & Procedures in place that are regularly reviewed with outputs captured. *Internal Audit process, review & output(s)	September 2020
Out of control gambling by other vulnerable persons.	(C)	Low	Moderate to business Severe to vulnerable	Systems	*Customer interaction procedures & policy are in place following the guidelines & process by BACTA at all times. *All customer interactions recorded in the problem gambling log book which details the action(s) taken. *Logbook, Staff training and Staff development reviewed on a regular basis by the Shop Manager, their senior team and the Operations Management. *Other Gambling establishments will be contacted in order to risk profile any player prior to opening who fall into this category.	September 2020

LOCAL GAMBLING RISK ASSESSMENT

				Interior Design	<p>*Conducive for effective monitoring of customers</p> <p>*Internal Audit process, review & output(s)</p>	<p>September 2020</p>
Failure to deal with Consumers making complaints about the outcome of Gambling.	(B)	Moderate	Moderate to business Severe to customer	Physical	<p>*Preventative machine maintenance (PPM) carried out by our qualified engineer.</p> <p>*Machine turned off immediately should fault be identified</p> <p>*Incident reported to BACTA</p> <p>*Machines only acquired from licensed suppliers.</p> <p>*Customer complaint procedure in place, discussed & reviewed on a regular basis with the Staff present</p> <p>*Machines regularly tested via the internal Audit process</p> <p>*Weekly reviews of Net Win percentages to monitor pay out changes via our (internal) collection process</p>	<p>September 2020</p>

LOCAL GAMBLING RISK ASSESSMENT

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Risk Assessment	LO	Level of Risk	Impact	Control System	Risk Management	Reviewed
Failure to deal with consumers making complaints about the outcome of Gambling (continued).	(B)	Low	Moderate to business Severe to customer	Systems	<ul style="list-style-type: none"> *Complaints procedure & forms available on premises. *Quarterly staff training on company policy. *Registered with ADR Entity – BACTA ADR Service. *Compliant with Company P & P – BACTA Toolkit. 	September 2020
Failure to provide information to players on responsible gambling.	(C)	Low	Severe to business Severe to customer	Physical	<ul style="list-style-type: none"> *Stay in Control posters displayed prominently. *Sufficient quantity of posters & leaflets. *Stay in Control leaflets available in racks, discretely located. *Machine labelling displaying national gambling helpline. *Staff regularly trained and assessed to ensure full Compliance to GC guidelines <p>All Training will be recorded and made available to the LA and the Police.</p>	September 2020
				Systems	<ul style="list-style-type: none"> *Stock control system in place for leaflets. *Ensure adherence with P & P – BACTA Toolkit *Regular audit to ensure systems in place/being used effectively 	September 2020
Failure to recognise signs associated with problem gambling or substantial changes in gambling style.	(C)	Moderate	Severe to business Severe to customer	Interior Design	<ul style="list-style-type: none"> *Player positions effectively monitored by the staff along with a Player's behaviour. * CCTV cameras positioning *Location of note changing facilities 	September 2020
				Systems	<ul style="list-style-type: none"> *Staffed trained in customer interaction in line with BACTA's toolkit. *Clear policy to record the procedure/process of customer interaction *Staff trained to intervein with customers showing signs of a problem; stake patterns, use of local cashpoints and looking for customer behaviour patterns. *Player's spending effectively monitored by Staff and wherever possible recorded into the BACTA log book, which is reviewed on a daily basis 	September 2020
Failure to properly administer the self-exclusion process and maintain its effectiveness thereafter, including breaches and reinstatements.	(C)	Low	Severe to business Severe to customer	Physical	<ul style="list-style-type: none"> *CCTV and monitor effectively positioned at entrance to benefit identification of known excluders and images on wall in office. * Staff regularly trained on Self Exclusion policy, process and understanding * Internal audit process to ensure full adherence to GC policy, process and understanding 	September 2020
				Interior Design	<ul style="list-style-type: none"> *Consideration given to internal layout so as to ensure effective monitoring of customers entering the premises and those that might enter in order to gamble on behalf of a self-excluder. 	September 2020
				Systems	<ul style="list-style-type: none"> *All data subject to quarterly review. *Ensure that self-exclusion forms are always available for supply. 	September 2020

LOCAL GAMBLING RISK ASSESSMENT

					<p>*File of excluders kept and maintained on premises</p> <p>*Company keeping abreast of the developments of BACTA's national sector SE scheme</p> <p>*Compliant with P & P and log in BACTA's toolkit</p> <p>*Regular internal Auditing</p>
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Risk Assessment	LO	Level of Risk	Impact	Control System	Risk Management	Reviewed
Failure to identify attempts to launder money on the premises (e.g. dye stained notes) and to follow correct reporting procedure.	(A)	Low	Severe to business Low to Customers	Interior Design	*Effective monitoring of customers' behaviour by good lines of sight from staff, and well positioned CCTV.	September 2020
				Physical	*Pay station and note acceptors regularly inspected. The majority of large hand pays will go through the pay station, so staff can monitor more closely *Weekly collection process in place with cash (notes & coins) identified to each machine present *Staff regularly trained on AML importance, reporting process and potential signs of abuse	September 2020
				Systems	*Fully compliant with LCCP requirements. *Comply with BACTA's P & P in toolkit, in particular the reporting procedure to NCA by way of SARs. *Anti ML systems built into Tito systems *Log book kept on site detailing AML activities	September 2020
Poor security increasing vulnerability to crime.	(A)	Low	Severe to business Severe to customers	Physical	*Static panic alarms. *Staff provided with personal attack alarms. *Intruder alarm installed and regularly serviced. *Effective CCTV coverage with data stored for 31 days.	September 2020
				Exterior Design	*Toughened glass windows and door to limit criminal damage. *Mag-lock entrance/exit with intercom system and CCTV recording	September 2020
				Systems	*Staff personal floats will be limited to £100.00. *Regular liaison with local law enforcement agencies. *Log maintained should police be called to assist. *Keep abreast of local crime trends. *Subscribe to BACTA's crime bulletins. *Attendance to SNT meetings, along with local Business Group meetings	September 2020
Awareness of heightened local crime in the local area.	(A)			Systems	*CCTV cameras will be installed at the front and back of the building to monitor this at all times. *No Lone working will be planned.	September 2020

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LOCAL GAMBLING RISK ASSESSMENT

					<p>*Mag locks will be fitted to the lobby doors for the extra security of our staff and customers.</p> <p>*Regular meetings will be held with the local police to help resolve any ongoing issues with locals found drinking alcohol or taking drugs on the High Street.</p> <p>*Attendance to SNT meetings to ensure awareness</p> <p>*Regular reviews of Police Crime Stats for local area</p> <p>All Training will be recorded and made available to the LA and the Police.</p>	<p>Botunda House, Shearway Court, Shearway Business Park, Folkestone Kent</p>
Awareness of student learning facilities (schools & colleges) in the local area.	(C)			Systems	<p>* Entrance monitoring given extra resources between 7am to 9am and 3pm and 6pm on school/college days given the local of several schools, further education facilities present</p> <p>*Regular Staff training on Think 25 process</p> <p>*Recording of success or unsuccessful Think 25 challenges</p> <p>*Internal Audit process to review performance of Think 25 procedure</p>	<p>Dec 2019 Septemb er 2020</p>

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Risk Assessment	LO	Level of Risk	Impact	Control System	Risk Management	Reviewed
Awareness of residential facilities for the vulnerable in the local area.	(C)			Systems	<p>*Regular updates on the Local Gambling Risk Assessment to ensure adhered to LCCP</p> <p>* Signage displayed in the front window, informing everyone, if they are seen drinking alcohol or taking drugs outside the venue they will be barred from the venue.</p> <p>* The venue toilets will be kept locked at all times, so staff can monitor the use of them, plus an hourly checklist in place.</p> <p>All Training will be recorded and made available to the LA and the Police.</p>	<p>Septemb er 2020</p>
Awareness of gambling care agencies in the local area.	(C)			Systems	<p>None present</p>	<p>Septemb er 2020</p>



Safeguarding Children and Vulnerable Adults

The Partnership Approach



Content

- Aims
- Who are the Vulnerable?
- Signs and indicators of risk?
- What can I do about it?
- Q & A

Introductions

Why we work in partnership

Mutual benefits of working together:

- protecting vulnerable people
- protecting local businesses
- community safety
- Legal and social responsibility
- Financial and reputational reasons



Aims of today's session

- To be able to identify signs of vulnerability and know what actions you could take to help!

What can make people vulnerable?

- Age (children, teenagers, elderly)
- Physical disabilities / sensory impairment
- Mental Health needs
- Capacity / Learning difficulties
- Communication difficulties
- Money issues
- Social problems
- Relationships
- Addictions
- Problem gambling

– *Can you think of any others?*

Spotting the signs: Indicators of vulnerability

Scenario 1

- Albert is a 68 year old man who is disabled and uses a walking stick
- He lives with his son and family, just around the corner from the betting shop.
- Every Thursday after drawing his pension he comes into the shop, to play on the FOBT and have a 'flutter' on the horses
- He likes chatting to the shop staff, who have noticed on a couple of occasions he has bruising on his wrists and face.
- Every week, before he leaves, he counts up his money before going home
- One day after losing £20 on the horses he becomes hysterical. He pleads with the shop staff, saying he daren't go home without the money as his son will be angry. He asks the shop assistant for a loan.

Scenario 2

- Sarah is a 45 year old professional
 - She works at a Solicitor's office near to your city centre premises
 - She calls into the shop most days to place a bet at lunchtime and again after work when she plays on the FOBTs. Often she smells of alcohol even during the work day
 - She can become quite aggressive when she loses money but always keeps betting until she wins, or the shop closes
 - She has now started nipping in during the morning when she does this she seems agitated, avoids eye contact with staff and leaves at high speed in her car
-

Scenario 3

- Jay is 15 years old
- He is known to the police and regularly truants from school to hang around with a group of 'undesirables' in the area
- He hangs around the shopping precinct near your premises a lot
- He is aggressive, rowdy and threatening to staff.
- He always looks unkempt and staff have seen him in winter, without a coat or jumper, scanning the pavement and bins looking for cigarette ends or food
- One day he is standing outside the shop talking to an older male. You notice Jay is wearing brand new designer jeans and a leather jacket.
- You see the older male point towards a car and he pushes Jay into the shop with his hand on the boy's shoulder. Jay is much quieter than usual.
- When staff ask Jay if he has any ID, the older male pushes Jay to one side and answers for him, saying 'he's with me I've come to collect'.
- Jay looks frightened as they leave the shop and you notice that a car picks them up outside, there are 2 other older men in the car.

Scenario 4

- Zoe always insists on organising the office sweepstake for the Grand National and the World Cup
- Now she's set up an office lottery syndicate

Scenario 5

- Dorothy is a 75 year old woman who visits the betting shop every morning after she has collected her newspaper and milk from the convenience store next door
- She is always sociable and loves chatting to the staff and having a cup of tea at the shop
- She lives alone and has no family
- She spends a couple of pounds every now and then on the FOBTs
- Lately staff have noticed that she has become forgetful and confused and she looks frail
- Last week she was coughing a lot and almost fell over, staff had to help her home
- This week, you notice that she has not been in for a couple of days

Scenario 6

- Trevor bets most days at the bookies and tells you he has recently started playing online poker at night
- He tells you that he and his wife frequently argue about money and that sometimes it 'gets out of hand'

Scenario 7

- Terry is one of your regular customers. He tells you that he has been approached by a young girl who offered him sex if he would give her money or cigarettes
- You have noticed that a group of 3 young females have started hanging around the shop after school each day. They arrive around 3.45pm and are wearing school uniform
- You check back on CCTV over the past week and see that the girls have been approaching a number of male customers, one of whom is recorded going away from the premises towards a car with a girl



Scenario 8

- Declan is a 20 year old student who recently started work at the betting shop
- After a few weeks, he begins arriving late to work in the morning and then starts taking odd days off sick
- One day he tells a colleague that he loves playing online poker after his flatmate has gone to bed, but he can't get up in the morning.
- He tells you that he's started on anti depressants and other medication to help him with his anxiety but he doesn't think its working
- You've noticed the smell of cannabis on his clothes



Scenario 9

- Debbie plays bingo every Friday night with 'the girls'
- Occasionally, she can't afford to go, so she borrows the money from her friend so as not to miss out

Scenario 10

- Darren is a 54 year old customer who has self excluded
- He has not been to the shop for 2 weeks
- One morning he enters the shop and demands to place a bet
- He is aggressive and shouting
- When he is refused, he storms out of the shop threatening to destroy the building and everyone in it, by setting the place on fire
- Darren has attempted this at another premises, in the past
- There are several customers in the shop, one of whom has left his toddler in a pushchair outside. The toddler is not being supervised by anyone.



Scenario 11

- Chen is an International student at Sheffield University
- He enjoys playing at the casino at the weekend
- He has started skipping lectures on Fridays and Mondays

Scenario 12

- Ash calls in the betting shop most days
- He uses several bank cards to place bets and occasionally disappears and comes back with more cash to play
- You overhear him on the phone telling his ex-wife he hasn't got enough money for child maintenance this month, but he has told you he's had a good win this week on the horses

What we can do!

- Interventions
- Reporting
- Recording: IRF (Incident Report Forms)
- Report to your Line Manager
- **Phone 999 if risk is imminent / assault happened or likely to**
- **Record and report concerns** to the police **101** and / or safeguarding - if a child ring 0114 2734855 or contact children's social care via the website <https://www.sheffield.gov.uk/caresupport/childfam/childrens-social-care/social-work.html>).
- **Safeguarding Adults Advice Line** (9am to 5pm, Monday to Friday) 0114 2736870. If your report is about a vulnerable adult ring 0114 2734908.
- **Signpost if safe to do so** – offer the domestic abuse helpline number 0808 808 2241 via a Sheffield Domestic Abuse Partnership contact card
- **Crimestoppers** – 0800 555 111 or online crimestoppers-uk.org and fill in the form
- **Protecting yourself:**
 - know your safeguarding policy
 - working to the code of conduct



