



Local Area Risk Assessment

Date of assessment:	1 st July 2023.
Review date:	30 th June 2024 or before if any significant changes take place within the location.

Shop Name:	
Premises Address:	80-82 Deptford High Street, Deptford, London, SE8 4RT
Name of Assessor:	Sue Spencer & Peter Jowett
Branch Manager:	TBC
Can shop single man and if so during what times?	Yes 08:00-18:30

1. Local Area

The shop is in a main commercial high street parade of mainly retail stores, convenience stores, restaurants, coffee shops and takeaways. It is a mixed commercial and residential area and serves the local community

Shop Banking Arrangements:

Address and Location to Shop:	Opening Times:
<p>Primary Evelyn Street Post Office 301 Evelyn St, London SE8 5RA</p> <p>Secondary Post Office, 500 New Cross Road, London, SE14 6TL</p>	<p>Mon – Fri 08:30-17:00 Sat – 08:30-15:00 Sun – Closed</p> <p>Mon – Fri 09:00-17:30 Sat – 09:00-13:00 Sun - Closed</p>

Local Police Details:

Address and Location to Shop:	Opening Times:
<p>Lewisham Police Station, 43 Lewisham High St, London, SE13 5JZ</p>	<p>Open 24 hours</p>

External Shop Details:		
Access Routes to the Shop:	The premises has one access route which leads to the front of the premises from the High Street, the premises faces onto a busy High Street. Parking is close by to the rear of the shop with Frankham Street providing both vehicular and pedestrian access	
Passing Traffic:	The premises are located on a busy High Street and serves local residents and visitors to the area. Passing traffic is restricted by a one way system.	
Adjoining Properties:	The premises is a corner property, an oriental food centre is to one side, a sight specialist is across the road to the other side.	
Betwatch Scheme:	None available that serve this locality	
Establishment type	Risk	Location and details
Other gambling premises:	Problem gamblers could self-exclude from other operators but still attempt to gamble in our premises	One of the largest national bookmakers, Paddy Power hold licences for premises in Deptford High Street and Evelyn Street. Jenningsbet hold Licences for premises in Deptford High Street and Evelyn Street. Merkur Slots have premises in Deptford High Street.
Educational establishment:	Increased presence of under 18 in local area. 6 th form colleges particularly give a higher risk of underage gambling	Tidemill Academy is 0.1km away Lewisham College is 0'3km away.
Hospital or mental health facility:	This could lead to an increased presence in the local area of vulnerable people	University College Hospital - Lewisham High St, SE13 6LH Speedwell Mental Health Centre - 62 Speedwell St, SE8 4AT Max Out Southwark - 3, Norman House, 110-114 Norman Rd, SE10 9QJ
Job centre:	This could lead to an increased presence in the local area of vulnerable people	Deptford High Street Job Centre is closed, the closest now being at Peckham Job Centre - 24-26 Peckham High St, SE15 5DS

Pub, social club, club serving alcohol:	This could lead to an increased presence in the local area of vulnerable people	Stocktons - 2 Deptford High St, LSE8 4AF Badger, Badger - 139, 145 Deptford High St, SE8 3NU The Bunker - 46 Deptford Broadway, London SE8 4PH Little Crown - 495 New Cross Rd, SE14 6TQ Star and Garter - 490 New Cross Rd, SE14 6TJ Royal Standard - 86 Tanner's Hill, SE8 4PN The Hatch Club - 23 Lewisham Way, SE14 6PP Aaja - The Snake Pit, 30 Deptford Church St, SE8 4RZ
Off licences:	This could lead to an increased presence in the local area of vulnerable people	There are several off licences and other convenience stores in the local vicinity that sell alcohol
Specialised housing for vulnerable people:	This could lead to an increased presence in the local area of vulnerable people	999 Club - 21 Deptford Broadway, London SE8 4PA
Gambling addiction support facilities:	This could lead to an increased presence in the local area of vulnerable people	The London Recovery Partnership - 14 B, 14 New King St, SE8 3HS Addiction Blasters - 87 Thornham St, SE10 9SB
Alcohol or drug support facilities:	This could lead to an increased presence in the local area of vulnerable people	The London Recovery Partnership - 14 B, 14 New King St, SE8 3HS Addiction Blasters - 87 Thornham St, SE10 9SB
Hostels or support services for homeless:	This could lead to an increased presence in the local area of vulnerable people	Centrepont - 204 Evelyn St, SE8 5BZ Bench Outreach - 14 New King St, SE8 3HS St Mungo's Broadway - Exeter Way, SE14 6LL
Pawn brokers or pay day loan businesses:	This could lead to an increased presence in the local area of vulnerable people	H&T Pawnbrokers - 72 Deptford High St, SE8 4RT Cash Xchange - 184 Deptford High St, SE8 3PR

Public Transport Hubs:	Increased presence of under 18 in local area. Groups of young people gathering during evenings would heighten risk	The area is served by several local bus routes. Deptford Mainline station is 0.2km away. Deptford Bridge DLR station is 0.4km away.
Others:	This could lead to an increased presence in the local area of vulnerable people	We Care Food Bank - 50 Friendly St, SE8 4DR

2. The Gambling Operation

<p>Winter Trading Times (September to April)</p> <p>Monday to Friday: 09:00 to 22:00</p> <p>Saturday: 09:00 to 22:00</p> <p>Sunday: 10:00 to 22:00</p>	<p>Summer Trading Times (April to September)</p> <p>Monday to Friday: 09:00 to 22:00</p> <p>Saturday: 09:00 to 22:00</p> <p>Sunday: 10:00 to 22:00</p>
How many employees are based in this shop?	6
<p>How many employees are usually on duty at the specified times:</p> <p style="text-align: right;">Opening time to 12.30: 1</p> <p style="text-align: right;">12:30 to 18:30 2</p> <p style="text-align: right;">18:30 to closing time: 2</p>	
Does the company operate lone person working in this shop from 18:30	No
<p>What products does the premises provide for gambling:</p> <p style="text-align: right;">No. of tills to process over the counter bets in operation: 2</p> <p style="text-align: right;">No. of FOBTs in operation: 4</p> <p style="text-align: right;">No. of SSBT's in operation: 5</p>	
How is training provided to employees in the premises:	<p>All training is devised with the three licencing objectives at it's core. The Company's Training Manager provides face to face induction training to new employees before they take up a formal position. On site training further enhances their development over the first 8 weeks working alongside a suitable branch training manager. A new recruit to the business whether previously employed in the sector or not MUST undertake and pass a final examination before being allowed to manage a branch. Refresher training is undertaken on at least an annual basis via the Elearning portal. All training records are held at by the Compliance Team.</p>

Specific Control Measures	YES/NO	Location and details
Safe:	Yes	This will be free standing with a 2 minute time delay and a 10 minutes time delay for the insert.
Time-Delay Insert:	Yes	This will be 10 minutes.
Additional Safe:	No	
Monitored Safe:	No	
Intruder Alarm:	Yes	Alarm Monitored by Central Monitoring System
CCTV:	Yes	To be installed and will cover the customer area, the counter area, the machines area and a covert camera to cover persons leaving the premises to provide a head and shoulder image.
Blind Spot Mirrors:	No	All areas to be covered by the CCTV.
Staff Guard:	Yes	Staff Guard lanyards will be used in shop which the shop team wear upon themselves with full visibility to the customers.
EGM/FOBT Blocking Facility:	Yes	Blocking facility controlled and monitored by staff behind the counter.
Security Screens:	Yes	Full screen, counter to ceiling
Counter Door Lock:	Yes	Push button digital lock and further internally controlled lock/bolt
Safe Haven:	Yes	To the rear of the counter area (see plan)
Toilet Door Maglock:	Yes	Buzzer entry access only, controlled and monitored by staff behind the counter.
UV Toilet Light:	Yes	
Front Door Maglock:	Yes	An electric locking device will be installed and maintained on the main entrance/exit to the premises which will be operable by staff to restrict entry when required.
Shutters:	No	
Steel Doors:	No	
External Lighting:	No	None other than the public street lights
Others:	Yes	We operate a third-party security system called StaffGuard. This provides a live link to an off-site operator, Shop staff can also trigger assistance and request a call for police assistance if deemed necessary. If the StaffGuard facility is triggered due to criminal activity the audio and live pictures are recorded and used as evidence.

3. Licensing objectives

Licensing Objective	Risks	Existing Control Measures	Further Controls Recommended
<p>Protecting children and other vulnerable persons from being harmed or exploited by gambling.</p>	<ul style="list-style-type: none"> • Underage customers attempting to gamble on the premises. • Children accompanying adults onto the premises. • Enhanced number of children or young adults in vicinity before school, at lunchtimes and after school • Vulnerable people visiting the premises and gambling beyond their means or in an out-of-control manner. Vulnerable people could include (but not limited to) people with: <ul style="list-style-type: none"> • Mental health conditions • Drug dependency • Alcohol dependency • Problem gamblers • Homelessness • Debt issues • Persons that have identified as having potential or actual gambling problems have self-excluded from the premises or other betting shops locally but still attempt to enter the premises 	<ul style="list-style-type: none"> • Think 21 policy in operation to aid identification of under 18's. • Serve legal test purchase scheme checks our adherence to this policy. • Zero tolerance on children being on the premises. • External advertising is not aimed at young people or use images likely to appeal to young people. • No alcohol policy on premises • Internal self-exclusion process in place • Internal self-exclusion process in place • We subscribe to the multi operator self-exclusion scheme (MOSES) • Safer Gambling material is available in a prominent position in the branch as per the GamCare land-based Code definition of prominent i.e visible at a 360-degree view anywhere in the branch where gambling can take place, in addition these materials are available in discreet locations such as 	<ul style="list-style-type: none"> • Increased awareness of children attempting to enter the shop after 3pm • Increased awareness of customer behaviour. Refuse service to any customers who are not in control of themselves. • Jenningsbet provide extensive ongoing guidance and awareness training in this area, which includes off-site training, the use of distance learning and availability of reference materials on the staff portal. • JB are part of the Multi Operational Self Exclusion Scheme (MOSES) and will add this branch to the scheme before it opens. Those individuals who have excluded from our branches at 14 Deptford High Street and 240/242 Evelyn Street will also be excluded from this branch • Check self-exclusions at the start of every shift for new MOSES self-excluded customers. • Make sure any self-exclusion breaches are logged with support.

	<ul style="list-style-type: none">• Customers may show 'trigger' signs of developing a problem with gambling	<p>toilets. There are also materials by the exits to allow customers the option of 'discreet takeaway'.</p> <ul style="list-style-type: none">• Staff are trained in spotting signs of problem gambling and responding with customer interactions encouraging customers to take a break from play when exhibiting signs of problem gambling.• Relevant self-exclusion information and forms are available for customers and colleagues. Responsible gambling interactions (RGIs) are reported and recorded centrally; and trend reporting conducted on a regular basis by the Compliance Department.• FOBT terminals have mandatory warnings in place for session time and spend. These pause the session for 30 seconds to allow the customer to take a break.• FOBT terminals allow customers to voluntarily set limits for both time and spend, when reached the session is paused for 30 seconds to allow the customer to take a break.• No FOBT advertising material to be placed in external windows.• We adhere to the cross-industry Gambling Industry Code on Socially Responsible Advertising• Responsible gambling messages are displayed on all external marketing material and also on FOBT terminals.• All staff trained in these policies and refresher training takes place on an annual basis.	
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<p>Preventing Gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.</p>	<ul style="list-style-type: none"> • Shop to be used for money laundering purposes, either through over the counter bets or on the terminals in the shop • Gaming machines may allow 'dyed notes' for credit. • Premises may be used by drug dealers. • Vulnerable people may fund their betting through crime e.g., shoplifting. • Visitors to the shop may attempt to sell stolen goods to customers. • Robbery 	<ul style="list-style-type: none"> • Company policies and procedures in place to operate in accordance with the Proceeds of Crime Act 2002 (POCA) to mitigate against Money Laundering and Terrorist Financing. These are independently audited at a minimum of yearly to ensure compliance. • Jenningsbet Money Laundering Reporting Officer (MLRO) is Peter Jowett. There is a clear escalation and reporting process in respect of all products. The MLRO monitors staking patterns for KYC purposes. • Terminals raise alert if suspicious pattern of play. All instances reported via the online reporting system to the MLRO. • Staff trained to report suspicions to MLRO. • Staff trained to report any instances of dyed notes in terminals to MLRO and the security department. • We have zero tolerance on drugs on the premises and a drug policy in place. Any suspicions will be reported to the police. • Staff trained to not allow any goods to be sold on the premises. • Shop is fitted with the following security measures: <ul style="list-style-type: none"> • CCTV • StaffGuard monitoring system. • Remote operated magnetic lock • Time delayed safe. • Staff receive training on dealing with robberies and serious incidents. Further information can be found in our security handbook. 	<ul style="list-style-type: none"> • Jenningsbet provide extensive ongoing guidance and awareness training in this area, which includes off-site training, the use of distance learning and availability of reference materials on the staff portal. • Staff to be vigilant to local crime levels and instances. Crimes local to the branch should be reported to senior management as appropriate.
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	<ul style="list-style-type: none"> • Anti-Social Behaviour • Conflict Management • Subject to customer fraud • Subject to staff fraud • Alcohol • Drug Misuse • Begging and Money Lending 	<ul style="list-style-type: none"> • Systems to mitigate potential risk of conflicts include: <ul style="list-style-type: none"> • Staff Guard (monitored two-way audio and video support) • Central operational control team • Security Department with video support • Suitability of lone person working assessed on a shop-to-shop basis. • Staff are trained in identifying and preventing attempted customer fraud. Images of known offenders are circulated regularly to shop. • Security department monitor transactions in shop to identify and prevent staff fraud. • Customers may not bring onto the premises any intoxicating liquor for consumption on the premises. Sale or resale of any item is strictly forbidden. Staff are trained in removing any customer consuming alcohol with the assistance of staff guard. • Staff are trained in the definitive escalation process for reporting suspected drug problems, which include informing the Security department and other relevant Operations Managers. • Staff are trained to treat all customers with dignity and respect, where appropriate, known street beggars are refused service. • Suspicions of organised money lending will be escalated to the security department and onwards to local authority investigation teams. • Jenningsbet operate a zero-tolerance approach to all criminal activity, there are comprehensive reporting processes to escalate, record and ensure action is taken in respect of exceptional incidents. We have full CCTV installed to cover all areas and the facility to record and store footage. 	
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<p>Ensuring that gambling is conducted in a fair and open way.</p>	<ul style="list-style-type: none"> • Customer disputes and Complaints • Customers may not be aware of who to make a complaint to • Unusual betting patterns may lead to the integrity of events being questioned. • Data Protection- GDPR • Gaming machine's chance and Randomness. 	<ul style="list-style-type: none"> • The law states that bets are contracts and, therefore legally enforceable. The independent Betting Adjudication Service (IBAS) acts as an impartial adjudicator on disputes that arise between operator and customers. • Bets are settled by Jenningsbet Rules, which are displayed in a prominent position in every Jenningsbet branch. • Any changes to rules are communicated to customers by way of customer notice in advance of any changes coming into effect. • Terms and Conditions of any in shop promotions will be available for customers. • Complaints leaflets are available in store in prominent location. • To ensure disputes are dealt with efficiently managers may make discretionary payments to defined thresholds based on seniority. Jenningsbet will process gestures of goodwill were applicable. • We receive information about unusual betting patterns or suspicious betting from the Gambling Commission, either directly or via the BGC • Jenningsbet GDPR policy is available upon request included within that information is our policy concerning our CCTV. • Staff are trained on Return to Player Ratios (RTP) and where these are located on the FOBTs in order to inform customers about each games chance and randomness. 	<p>Colleagues receive on-going training to verify the accuracy of bets at the point of acceptance and to resolve issues with customers where possible, along with refresher training on discretionary payments.</p>
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4. Gambling Operation & Physical Design (Internal and External)

Licensing Objective	Risks	Existing Control Measures	Further Controls Recommended
<p>Protecting children and other vulnerable persons from being harmed or exploited by gambling.</p>	<ul style="list-style-type: none"> • Underage customers could enter the premises unseen and gamble on a FOBT or a SSBT • Self-excluded customer could enter the premises unseen and gamble on a FOBT or SSBT • Problem gamblers may not have access to responsible gambling literature. • Vulnerable people able to see into the premises and having sight of gambling activity. 	<ul style="list-style-type: none"> • The entrance has a direct line of sight from the counter and is covered by CCTV. • All FOBT and SSBT's can be seen directly from the counter position and are covered by our CCTV. • FOBT's have the facility to be blocked immediately by staff from behind the counter if required. • Responsible gambling posters and leaflets are available next to the FOBT's. • Safer Gambling material is available in a prominent position in the branch as per the GamCare land-based Code definition of prominent i.e visible at a 360-degree view anywhere in the branch where gambling can take place, in addition these materials are available in discreet locations such as toilets. There are also materials by the exits to allow customers the option of 'discreet takeaway'. • Self-exclusion leaflets are available in multiple positions on the premises. • This branch has a restricted view from the shop front proving privacy for customers and creating difficulty for vulnerable persons to see the gambling activity. 	

<p>Preventing Gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.</p>	<ul style="list-style-type: none"> • Blind spots in shop / toilets being used to carry out illegal activity. • Premises and equipment being damaged by customers. • The use of stolen debit cards as payment for bets • Shop being targeted for burglary out of hours. • Jenningsbet are aware of instances a few years ago when the william Hill shop (now closed) was targeted for "follow" robberies. 	<ul style="list-style-type: none"> • Entrance to the toilet is in clear view of the counter or and entry is controlled by staff. • There are no blind spots on the premises. • Staff are trained in identifying signs of problem gambling and having meaningful customer interaction. • All card transactions over £100 requires PIN. • Any bet / terminal credit that is paid by card has returns paid back to the same card. • Names on card are checked to ensure it belongs to the customer i.e.a male name. • Alarm system in place for out of hours • Jenningsbet at 14 Deptford High Street had no instances of this crime or attempted crime 	<p>Staff to be vigilant to local crime levels and instances. Crimes local to the branch should be reported to senior management as appropriate. Information to be shared between local branches at 14 Deptford High Street and 240/242 Evelyn Street.</p> <p>Jenningsbet staff to remain vigilant and adhere to company policy when carrying out banking process.</p>
<p>Ensuring that gambling is conducted in a fair and open way.</p>	<ul style="list-style-type: none"> • Customers may be mis-led by unclear offers. • Customers may not be aware of who to make a complaint to • Advertising may mis-lead customers 	<ul style="list-style-type: none"> • Our rules are clearly displayed in shop. • Any changes to rules are communicated to customers by way of customer notice in advance of any changes coming into effect. • Terms and Conditions of any in shop promotions will be available for customers. • Complaints leaflets are available in store in prominent location. • All marketing of gambling products and services is undertaken in a socially responsible manner. • Jenningsbet comply with the advertising codes of practice issued by the Committee of Advertising Practice (CAP) 	

Security incidents (including any robberies or attempted robberies/follow offs in area (all outlets not just betting shops) including/own branch in the last 12 months and any incidents of DSM/fake notes)

Date	Type	Summary
July 2023	N/A	None Known

Compliance Incidents (including any self-exclusion breaches or attempted breaches in the last 12 months)

Date	Type	Summary
July 2023	New Licence Application	Since May 1 st 2022 1 customer has breached his Self Exclusion between our two existing shops at 14 Deptford High Street and 240/242 Evelyn Street. 2 other customers attempted to breach but were unsuccessful.

5.Action Plan

Question	Action Required	By Whom (name)	By When (date)	Date Completed

6.Assessment Review

Frequency of Review (Enter time period e.g., 12 months)	12 months	Date Review Due	30 June 2024
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Completed Risk Assessment brought to the attention of:

Name	Position	Signature	Date this assessment was brought to

			this persons attention
	Branch Manager		

Local Risk Profile – 80-82 Deptford High Street, Deptford, London, SE8 4RT.

Local Authority:

London Borough of Lewisham

Potential Licensing Risk Factors:

None other than those identified within the LCCP, Gambling Act and the Local Authorities Statement of Principles for Gambling

Demographic:

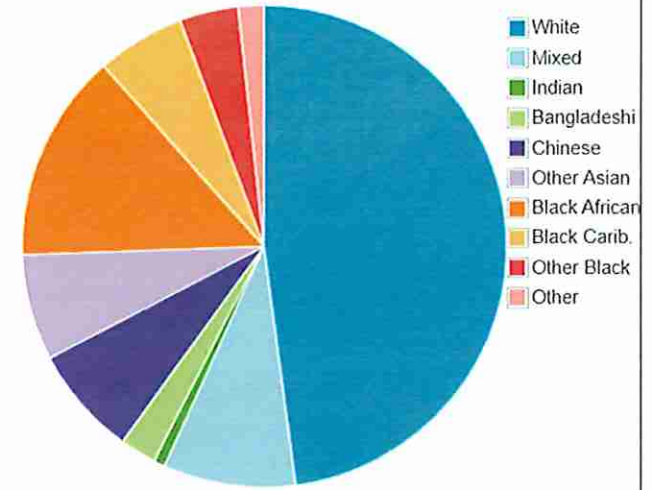
Deptford High Street, London can be considered more ethnically diverse than the UK average. As whole, the UK population claims itself as approximately 86% white, with residents of this area being 48% so.

As a country with a diverse population, the UK is home to other sizable ethnic groups, with mixed ethnicity (2.1%), Indian (2.4%) and Pakistani (1.9%) being the largest groups reported.

There is considerable division of ethnicities within the UK, with ethnically diverse addresses uncommon outside of urban areas.

Ethnic Group

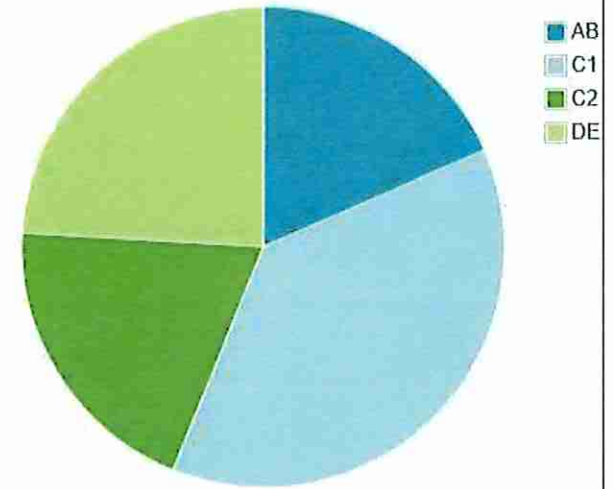
White	195
Mixed Ethnicity	36
Indian	3
Bangladeshi	10
Chinese	30
Other Asian	29
Black African	57
Black Caribbean	24
Other Black/African/Caribbean	16
Other	7



Deptford High Street, London can be considered more ethnically diverse than the UK average. As whole, the UK population claims itself as approximately 86% white, with residents of this area being 48% so.

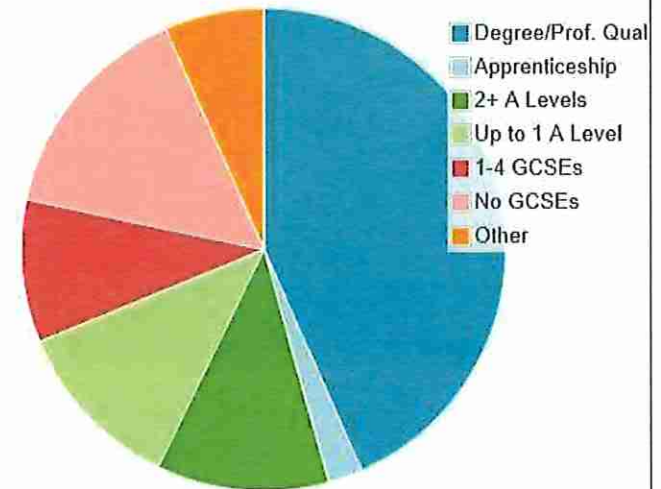
Social Grade

AB - Higher and intermediate managerial, administrative, or professional positions	39
C1 - Supervisory, clerical, and junior managerial/administrative/professional positions	80
C2 - Skilled manual workers	42
DE - Semi-skilled and unskilled manual workers; those on state benefit/unemployed, & lowest grade workers	51
Total	212



Highest Qualification Level Achieved

Degree or Similar <i>e.g. professional qualification (accountancy etc)</i>	150
Apprenticeship	8
2+ A Levels	40
5+ GCSEs, an A-Level or 1-2 AS Levels	40
1-4 GCSEs	33
No GCSEs	52
Other	23
Total	346



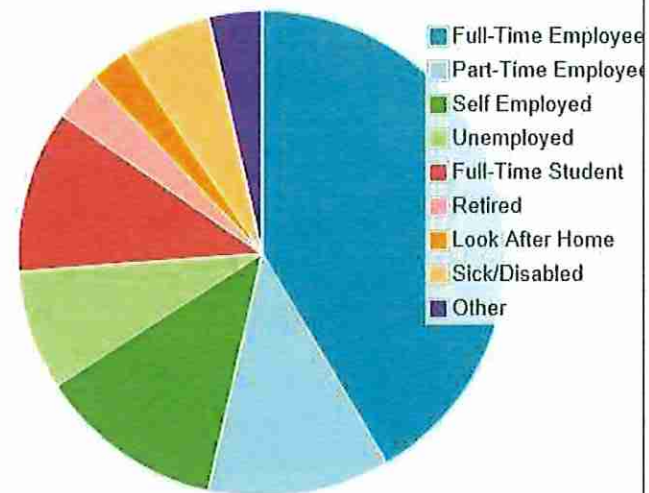
Deprivation Quintile:

2- This LBO is located in an area that is ranked in the 2nd decile of the national Index of Multiple Deprivation (IMD) for England, where 1 denotes the most deprived 10% of areas in the nation and 10 the least.

Employment:

Economic Activity

Full-Time Employee	141
Part-Time Employee <i>(defined as 30 hours or less per week)</i>	41
Self Employed	42
Unemployed	27
Full-Time Student <i>(with or without job)</i>	37
Retired	11
Looking After Home or Family	9
Long-Term Sick or Disabled	20
Other	12
Total	340



Additional Associated Information	
CCTV Camera Views:	To be added

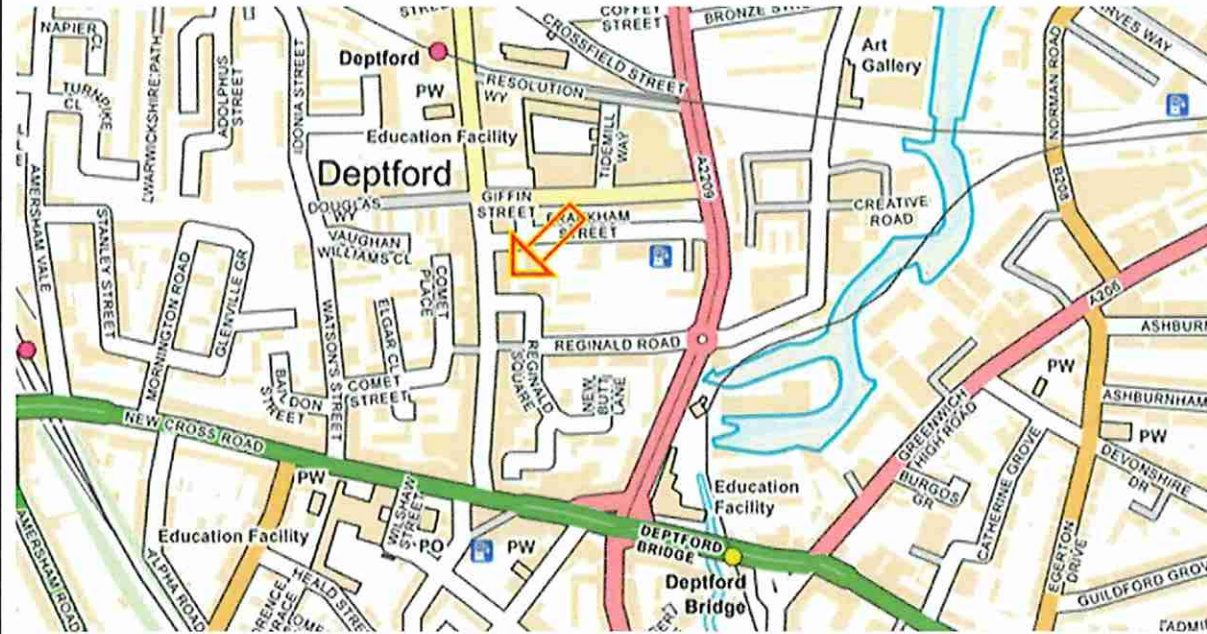
See appendices.

Shop Floor Plan:

Shop Front View:



Street Plan:



Other:

Site Attributes			
Shop Level:	Ground Floor	No. of Entrances:	1
Shape:	Rectangle	Entrance Detail:	To the front of the branch
Size:	Medium	Additional Egress:	None
Counter Position:	To the rear of the shop floor with full sight of the entrance door and machines	Machine Positions:	FOBTs close to the counter on the left hand wall as you enter the premises, SSBTs located on the same wall slightly further from the counter
Hidden Areas :	None	Welfare Facilities :	Staff will have a staff room, kitchen and 2 separate WC.
Miscellaneous:	Bleep activation every time the entrance door is opened and closed. Raises awareness to the shop team of whom is entering the premises.	DVR Located:	Behind the counter

CCTV - COMPLETED BY COMPLIANCE DEPT			
Internal cameras:	There will be approximately 8 internal cameras within the customer area, one will be covert and capture a head & shoulders image of everyone leaving the premises	External Cameras:	1 to capture the external front of the branch
Employee Monitors:	1	Employee Monitor:	Same monitor that provides live images of the shop floor
Public Monitor:	0	Public Monitor:	0
Type of DVR:	Hard drive, accessed via internet for live viewing and further recording by security teams	Type of DVR:	Hard drive, accessed via internet for live viewing and further recording by security teams

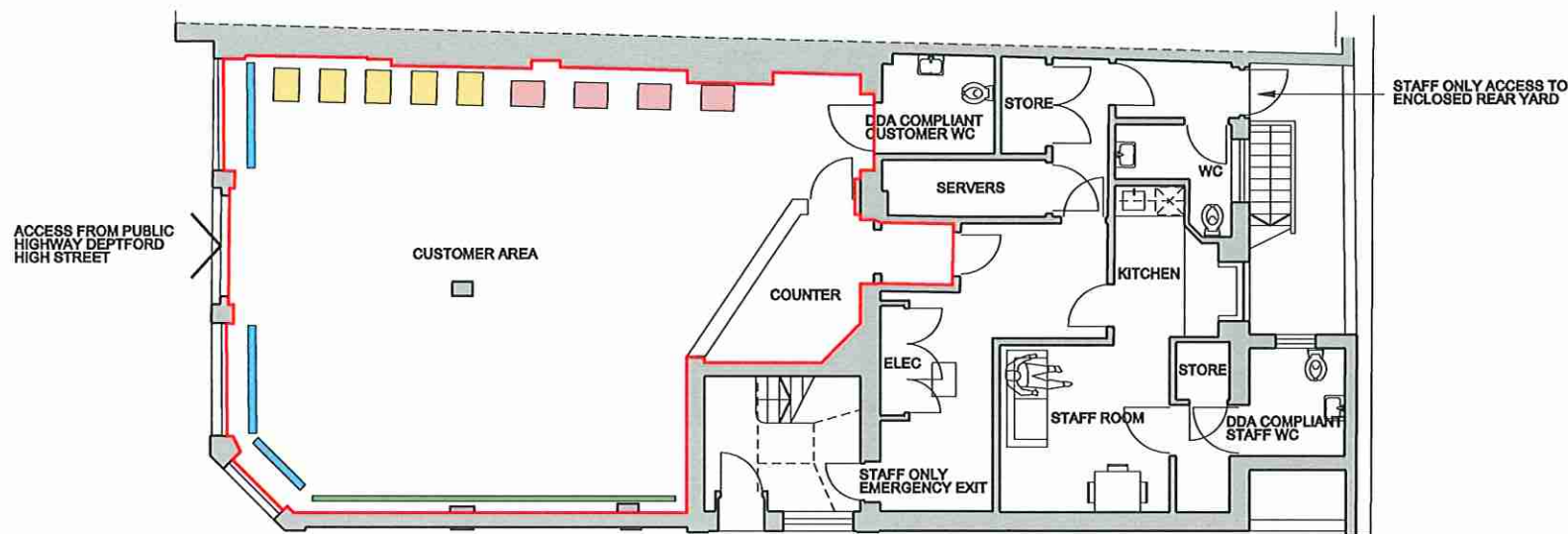
LBO Specific Licence Conditions COMPLETED BY COMPLIANCE DEPT

Licence Conditions	Remarks
TBC	

ALL DIMENSIONS TO BE CHECKED ON SITE.
COPYRIGHT RESERVED.

KEY

- GAMING AREA TO BE LICENCED
- SSBT's
- EGM's (FOBT'S)
- TV BANK
- DIGITAL DISPLAY SCREEN



GROUND FLOOR

REVISIONS			
SCALE	DATE	DRAWN	CHECKED
1:100	14.06.23	SD	SD

PROJECT
JENNINGSBET
 80-82 DEPTFORD HIGH ST.
 LONDON SE8 4RT
 DRAWING
PREMISE LICENCE PLAN

Trinity House, Church Road, Tonbridge Wells TN11 5AG
 +44 (0) 207 205 4994 info@zadarchitects.com

zda Zuber
 Dobson
 Architects

DRAWING No. **22020-L-001** REV

