

## 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 shelter<sup>1</sup>, one outreach day centre for vulnerable adults<sup>2</sup> 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 Offices<sup>3</sup>.

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 statistics<sup>4</sup>, 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 months<sup>5</sup>. 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 adults<sup>6</sup> 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 B3'3, 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.

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"> <li>*All data subject to quarterly review.</li> <li>*Ensure that self-exclusion forms are always available for supply.</li> <li>*File of excluders kept and maintained on premises.</li> <li>*Company keeping abreast of the developments of BACTA's national sector SE scheme</li> <li>*Compliant with P &amp; P and log in BACTA's toolkit.</li> <li>*Regular internal Auditing</li> </ul>	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	<ul style="list-style-type: none"> <li>*Effective monitoring of customers' behaviour by good lines of sight from staff, and well positioned CCTV.</li> </ul>	May 2020
				Physical	<ul style="list-style-type: none"> <li>*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</li> <li>*Weekly collection process in place with cash (notes &amp; coins) identified to each machine present</li> <li>*Staff regularly trained on AML importance, reporting process and potential signs of abuse</li> </ul>	May 2020
				Systems	<ul style="list-style-type: none"> <li>*Fully compliant with LCCP requirements.</li> <li>*Comply with BACTA's P &amp; P in toolkit, in particular the reporting procedure to NCA by way of SARs.</li> <li>*Anti ML systems built into Tito systems</li> <li>*Log book kept on site detailing AML activities</li> </ul>	May 2020
Poor security increasing vulnerability to crime.	(A)	Low	Severe to business Severe to customers	Physical	<ul style="list-style-type: none"> <li>*Static panic alarms.</li> <li>*Staff provided with personal attack alarms.</li> <li>*Intruder alarm installed and regularly serviced.</li> <li>*Effective CCTV coverage with data stored for 31 days.</li> </ul>	May 2020
				Exterior Design	<ul style="list-style-type: none"> <li>*Toughened glass windows and door to limit criminal damage.</li> <li>*Mag-lock entrance/exit with intercom system and CCTV recording</li> </ul>	May 2020
				Systems	<ul style="list-style-type: none"> <li>*Staff personal floats will be limited to £100.00.</li> <li>*Regular liaison with local law enforcement agencies.</li> <li>*Log maintained should police be called to assist.</li> <li>*Keep abreast of local crime trends.</li> <li>*Subscribe to BACTA's crime bulletins.</li> <li>*Attendance to SNT meetings, along with local Business Group meetings</li> </ul>	May 2020
Awareness of heightened local crime in the local area.	(A)			Systems	<ul style="list-style-type: none"> <li>*CCTV cameras will be installed at the front and back of the building to monitor this at all times.</li> <li>*No Lone working will be planned.</li> <li>*Mag locks will be fitted to the lobby doors for the extra security of our staff and customers.</li> <li>*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.</li> <li>*Attendance to SNT meetings to ensure awareness</li> <li>*Regular reviews of Police Crime Stats for local area</li> </ul>	May 2020

Awareness of student learning facilities (schools & colleges) in the local area.	(C)			Systems	<ul style="list-style-type: none"> <li>* 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</li> <li>*Regular Staff training on Think 25 process</li> <li>*Recording of success or unsuccessful Think 25 challenges</li> <li>*Internal Audit process to review performance of Think 25 procedure</li> </ul>	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"> <li>*Regular updates on the Local Gambling Risk Assessment to ensure adhered to LCCP</li> <li>* 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.</li> <li>* The venue toilets will be kept locked at all times, so staff can monitor the use of them, plus an hourly checklist in place.</li> </ul>	May 2020
Awareness of gambling care agencies in the local area.	(C)			Systems	None present	May 2020