

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

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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.

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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.

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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.

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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.

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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.

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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

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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.

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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

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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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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

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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.

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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

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				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>

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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

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					<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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Botolph Claydon House,
 11 H Concept Court,
 Business Park,
 Folkestone,
 Kent,
 CT19 4RG

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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	<p>*Effective monitoring of customers' behaviour by good lines of sight from staff, and well positioned CCTV.</p>	September 2020
				Physical	<p>*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</p> <p>*Weekly collection process in place with cash (notes & coins) identified to each machine present</p> <p>*Staff regularly trained on AML importance, reporting process and potential signs of abuse</p>	September 2020
				Systems	<p>*Fully compliant with LCCP requirements.</p> <p>*Comply with BACTA's P & P in toolkit, in particular the reporting procedure to NCA by way of SARs.</p> <p>*Anti ML systems built into Tito systems</p> <p>*Log book kept on site detailing AML activities</p>	September 2020
Poor security increasing vulnerability to crime.	(A)	Low	Severe to business Severe to customers	Physical	<p>*Static panic alarms.</p> <p>*Staff provided with personal attack alarms.</p> <p>*Intruder alarm installed and regularly serviced.</p> <p>*Effective CCTV coverage with data stored for 31 days.</p>	September 2020
				Exterior Design	<p>*Toughened glass windows and door to limit criminal damage.</p> <p>*Mag-lock entrance/exit with intercom system and CCTV recording</p>	September 2020
				Systems	<p>*Staff personal floats will be limited to £100.00.</p> <p>*Regular liaison with local law enforcement agencies.</p> <p>*Log maintained should police be called to assist.</p> <p>*Keep abreast of local crime trends.</p> <p>*Subscribe to BACTA's crime bulletins.</p> <p>*Attendance to SNT meetings, along with local Business Group meetings</p>	September 2020
Awareness of heightened local crime in the local area.	(A)			Systems	<p>*CCTV cameras will be installed at the front and back of the building to monitor this at all times.</p> <p>*No Lone working will be planned.</p>	September 2020

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					<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 September 2020</p>

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>September 2020</p>
Awareness of gambling care agencies in the local area.	(C)			Systems	<p>None present</p>	<p>September 2020</p>