City of Westminster

Committee Agenda

Title:	**Licensing Sub-Committee (2)**
Meeting Date:	**Monday 9th November, 2015**
Time:	**10.00 am**
Venue:	**Rooms 1A, 1B & 1C - 17th Floor, City Hall, 64 Victoria Street, London SW1E 6QP**
Members:	**Councillors:** Nickie Aiken (Chairman) Peter Freeman Murad Gassanly

Members of the public are welcome to attend the meeting and listen to the discussion Part 1 of the Agenda

Admission to the public gallery is by ticket, issued from the ground floor reception at City Hall from 9.00am. If you have a disability and require any special assistance please contact the Committee Officer (details listed below) in advance of the meeting.

An Induction loop operates to enhance sound for anyone wearing a hearing aid or using a transmitter. If you require any further information, please contact the Committee Officer, Jonathan Deacon.

Email: jdeacon@westminster.gov.uk Tel: 020 7641 2783
Corporate Website: www.westminster.gov.uk

Note for Members: Members are reminded that Officer contacts are shown at the end of each report and Members are welcome to raise questions in advance of the meeting. With regard to item 2, guidance on declarations of interests is included in the Code of Governance; if Members and Officers have any particular questions they should contact the Head of Legal & Democratic Services in advance of the meeting please.

AGENDA

PART 1 (IN PUBLIC)

1. MEMBERSHIP

The Head of Legal and Democratic Services to report any changes to the membership.

2. DECLARATIONS OF INTEREST

To receive declarations by Members and Officers of any personal or prejudicial interests in matters on this agenda.

Licensing Applications for Determination

1. WILLIAM HILL, 357 HARROW ROAD, W9 **(Pages 1 - 802)**

App No	Ward / Stress Area	Site Name and Address	Application	Licensing Reference Number
1.	Harrow Road Ward / not in stress area	William Hill, 357 Harrow Road, W9	Review a Betting (Other) Premises Licence under the Gambling Act 2005	15/05830/LIREVG

Charlie Parker
Chief Executive
3 November 2015

In considering applications for premises licences under the Licensing Act 2003, the sub-committee is advised of the following:

POLICY CONSIDERATIONS

The City of Westminster statement of licensing policy applies to all applications where relevant representations have been made. The Licensing Sub-Committee is required to have regard to the City of Westminster statement of Licensing Policy and the guidance issued by the Secretary of state under Section 182 of the Licensing Act 2003.

GUIDANCE CONSIDERATIONS

The Licensing Authority is required to have regard to any guidance issued by the Secretary of State under the Licensing Act 2003.

PERMITTED TEMPORARY ACTIVITIES

The licensee of any premises is entitled under the Licensing Act 2003 to apply for permission to hold temporary events, authorising licensable activities instead of or in addition to any activities that may be authorised by a premises licence, subject to the following restrictions:

1) No more than 12 events over a total of 21 days may be held at any one premises in any year

2) Each event must last for no more than 168 hours

3) There must be 24 hours between each event

4) The number of people at each event must be less than 500.

A Temporary Event Notice for each event (a TEN) is required to be given to the licensing authority, the police and environmental health service no later than 10 working days before the event for a ‘standard’ TEN or 5 to 9 working days before the event is due to begin for a ‘late’ TEN. The licensing authority is required to send an acknowledgement by the next working day.

Once a Temporary Event Notice is given the police and environmental health service have a right to object to the event if they are satisfied that the event will undermine any of the licensing objectives of preventing crime and disorder, prevention of public nuisance, protection of children from harm and promotion of public safety. They must serve an objection notice stating their reasons as to why the objectives would be undermined to the licensing authority and the premises user within 3 working days of receiving a copy of the TEN. The licensing authority is required to hold a hearing and may issue a counter notice which will prevent the event taking place.

LIVE MUSIC ACT 2012

The Live Music Act amends the Licensing Act 2003 by:

- removing the licensing requirement for amplified live music taking place between 8am and 11pm before audiences of no more than 200 persons on premises authorised by a premises licence or club premises certificate to supply alcohol for consumption on the premises (at a time when those premises are open for the purposes of being used for the supply of alcohol for consumption on the premises), subject to the right of a licensing authority to impose conditions about live music following a review of a premises licence or club premises certificate

- removing the licensing requirement for amplified live music taking place between 8am and 11pm before audiences of no more than 200 persons in workplaces not otherwise licensed under the 2003 Act (or licensed only for the provision of late night refreshment)

- removing the licensing requirement for unamplified live music taking place between 8am and 11pm in any place, subject to the right of a licensing authority to impose conditions about live music following a review of a premises licence or club premises certificate relating to premises authorised to supply alcohol for consumption on the premises

- removing the licensing requirement for the provision of entertainment facilities

- widens the licensing exemption for live music that is integral to a performance of Morris dancing or dancing of a similar type, so that the exemption applies to both live or recorded music instead of just unamplified live music in that instance.

CORE HOURS WHEN CUSTOMERS ARE PERMITTED TO BE ON THE PREMISES
(As set out in the Council's Statement of Licensing Policy 2011)

- For premises for the supply of alcohol for consumption on the premises:

  Friday and Saturday: 10:00 to midnight
  Sundays immediately prior to Bank Holidays: Midday to midnight
  Other Sundays: Midday to 22:30
  Monday to Thursday: 10:00 to 23:30.

- For premises for the supply of alcohol for consumption off the premises:

  Monday to Saturday: 08:00 to 23:00
  Sundays: 10:00 to 22:30.

- For premises for the provision of other licensable activities:

  Friday and Saturday: 09.00 to midnight
  Sundays immediately prior to Bank Holidays: 09.00 to midnight
  Other Sundays: 09.00 to 22.30
  Monday to Thursday: 09.00 to 23.30.

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City of Westminster

Executive Summary and Recommendations

Licensing Sub-Committee Report

Date: 9th November 2015

Subject: Review of a Betting (Other) Premises Licence under the Gambling Act 2005.

Summary

To consider and determine the initiation by the Licensing Authority of a review of the premises licence held by William Hill at 357 Harrow Road, London, W9 3NA.

Options for Members

Having regard to
a) the matters specified in section153 of the 2005 Act;
b) any representations made in accordance section 200(5) of the 2005 Act, and
c) any representations made at the hearing of the review, the

the Licensing Sub Committee may:

- Revoke the licence
- Suspend the licence for a specified period not exceeding 3 months
- Exclude a condition attached to the licence under section 168 of the 2005 Act (default conditions) or remove or amend an exclusion
- Add, remove or amend a condition under section 169 of the 2005 Act (conditions imposed or excluded by the Licensing Authority)

The authority must specify the time at which any of the above actions shall take effect.

City of Westminster

Licensing Sub-Committee Report

Item No:	
Date:	9th November 2015
Licensing Ref No:	15/05830/LIREVG
Title of Report:	Application to review a Betting (Other) Premises Licence under the Gambling Act 2005 - William Hill 357 Harrow Road, London, W9 3NA.
Report of:	Director of Public Protection and Licensing
Wards involved:	Harrow Road
Policy context:	Westminster City Council's Statement of Principles under the Gambling Act 2005
Financial summary:	None
Report Author:	David Sycamore – Senior Licensing Officer
Contact details	Tel: 020 7641 8556 E-mail: dsycamore@westminster.gov.uk

1. Details of the Review

1.1 On the 20th July 2015 the Licensing Authority gave a notice of intention to hold a review of the betting (other) premises licence for William Hill, 357 Harrow Road, London, W9 3NA. The notice has been given under Section 201 of the Gambling Act 2005. A copy of this notice is attached at Appendix A

1.2 The premises consists of a 3 story building of which the ground floor currently holds the Betting (Other) Premises Licence under the Gambling Act 2005. Photographs of the premises and the general area are attached as Appendix B and C. A plan of the area is attached as Appendix D.

1.3 The Licensing Authority has alleged as part of their application that there has been a breach of the mandatory conditions. The allegation is that alcohol has been taken into the premises and consumed by people taking part in gambling.

1.4 The Licensing Authority also allege that there is reason to believe (through evidence that has been gathered) that the premises are also used by people who are intoxicated due to alcohol and drugs. The Authority have stated that people using the premises may also be involved in the supply of drugs and the buying and selling of stolen goods.

1.5 The Licensing Authority is additionally concerned with the number of people that congregate outside of this William Hill who are under the influence of drink or drugs. These people allegedly threaten and abuse people who pass by on their day to day business.

1.6 The Licensing Authority's supporting evidence is attached as Appendix E.

2. Premises in the Vicinity

2.1 The premises is located in Harrow Road which is a busy residential/commercial high street area of Westminster which has a high foot fall. The businesses in the immediate area include but are not limited to, off licences, take away food premises, fruit and veg sellers, Betting Shops, Money transfer/Cash, Public Houses, Faith Groups, Discount Shops, Charity Shops and Convenience Stores along with a market at the junction with Elgin Avenue.

2.2 Within 500m there are a number of hostels/special needs schemes along with schools and faith groups set out in the map at Appendix D.

2.3 Other Betting Premises with in 500m

- Paddy Power - 345 - 347 Harrow Road
- Coral - 379 Station Rd
- William Hill - 45 Chippenham Rd
- William Hill - 364 Harrow Rd

3. Consultation

3.1 The Licensing Authority gave notice of their intention to hold a review of the licence and published an appropriate notice in accordance with the Gambling Act 2005 (Premises Licences) (Review) Regulations 2007. The 28 day consultation period started from the date on which the notice of the Authority's intention to hold the review was given to the licence holder.

3.2 Local residents and businesses within a 50 metre radius of the premises were written to outlining why the Licensing Authority was intending to hold a review and how they could make representations to the Authority within the statutory period. Letters were also sent to each of the Ward Councillors.

4. Supporting Comments

4.1 The Licensing Authority has received supporting comments and evidence from the Metropolitan Police Service and 50 local residents including 3 Councillors. The Police comments and supporting evidence is attached as Appendix F1 and the local residents comments are attached as Appendix F2.

4.2 These comments highlight a number of areas of concern and are consistent in their comments about certain alleged happenings from persons who have used William Hill and then stand outside, or meet other people outside. Allegations include:

- Anti-social behaviour
- Drug taking and selling
- Aggressive begging
- Threatening vulnerable persons
- Cat-calling to women
- Handling/selling stolen goods
- Alcohol being consumed on the premises and outside.

4.3 Residents report feeling threatened by persons who hang around in the street in front of the premises due to the general behaviour of these persons or by 'cat calling' directed at women walking past.

4.4 The majority of comments submitted by residents repeat the same concerns. The concern is that the majority of people who use the betting shop are under the influence of drink or drugs. These people will then stand out in the street in front of William Hill and cause anti-social behaviour on a daily basis.

4.5 Residents mention that there are many charities located nearby which are specifically designed to help the vulnerable. Some of these specifically treat and help people who have addictions to drink, drugs and gambling.

4.6 Residents report that drink and drugs are consumed at all times of the day at/in front of the premises in full view of the public.

4.7 Aggressive begging from a group hanging outside the front of William Hill intimidate local residents on a daily basis, with some children scared to use that side of the road.

4.8 Some residents have tried to speak and meet with the management but this has not resulted in any changes. The current manager has been in place for some time and is known to some of residents.

4.9 Some comments from residents allege that stolen items are being sold inside the premises, with some residents being offered these items for sale outside the shop.

5. Representations from William Hill

5.1 In response to this review William Hill have submitted supporting documents which are attached as Appendices G1 to G3.

5.2 The documents include:

a) A statement from Brian Minihane, a Senior Planning and Licensing Manager at William Hill
b) Training records, posters and correspondence with officers of Westminster City Council, and
c) Submissions from Adrian Studd, who was instructed to carry out observations.

6. The Gambling Act 2005, Gambling Commission Guidance, Westminster's Statement of Licensing Principles

6.1 Under section 200(2) of the Gambling Act 2005, the licensing authority may review any matter connected with the use of premises in reliance on a premises licence if the authority -

(a) have reason to suspect that the premises may have been used in purported reliance on a licence but not in accordance with a condition of the licence, or
(b) for any reason (which may relate to the receipt of a complaint about the use of the premises) think that a review would be appropriate.

6.2 Any review of a premises licence should be in pursuit of the principles set out in section 153 of the Act, or underpinned by reasonable concerns such as changes to the local environment, or resident complaints (statutory guidance paragraph 10.3).

6.3 Section 153(1) of the Act states:

In exercising their functions under this Part a Licensing Authority shall aim to permit the use of premises for gambling in so far as the authority think it -

(a) in accordance with any relevant code of practice under section 24,
(b) in accordance with any relevant guidance issued by the Commission under section 25,

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

(d) in accordance with the statement published by the authority under section 349 (subject to paragraphs (a) to (c)).

6.4 Westminster City Council Statement of Licensing Principles states the following;

6.4.1 The licensing authority itself, as a responsible authority can initiate a review of a particular premises licence, or any particular class of premises licence, for any reason which it thinks is appropriate. This includes reviewing a premises licence on the grounds that a premises licence holder has not provided facilities for gambling at the premises. This is to prevent people from applying for licences in a speculative manner without intending to use them, or to ensure that the principle of primary use is applied.

6.4.2 The licensing authority may review any matter connected with the use made of a particular premises if it has reason to believe that the premises licence conditions are not being observed, or for any other reason which gives it cause to believe a review may be appropriate

7. Appendices

7.1 Appendix A – Notice of intention to review
Appendix B – Photographs of premises
Appendix C – General Photos of the area
Appendix D – Map of area
Appendix E – Licensing Authority supporting evidence
Appendix F1 – Police supporting representation and evidence
Appendix F2 – Supporting representations from Interested Persons
Appendix G1 – Statement of Brian Minihane
Appendix G2 – Supporting documents from William Hill
Appendix G3 – Statement of Adrian Studd

If you have any queries about this report or wish to inspect one of the background papers please contact David Sycamore on 020 7641 8556 or email dsycamore@westminster.gov.uk

Background Papers

- Gambling Act 2005
- Westminster City Council Gambling Statement of Principles Effective 31st January 2013
- Gambling Act 2005
- The Gambling Act 2005 (Premises Licences) (Review) Regulations 2007

NOTICE OF INTENTION TO HOLD A REVIEW OF A PREMISES LICENCE

This notice is given in accordance with regulations made under section 200 of the Gambling Act 2005

Notice is hereby given that the following licensing authority:
Westminster City Council
whose address is:
4th Floor East
Westminster City Hall
64 Victoria Street
London

Postcode SW1E 6QP
Website www.westminster.gov.uk/licensing
[Insert the address of the authority's principal office, followed by the address of its website]

intends to hold a review under section 201 of the Gambling Act 2005 of the premises licence which is in force at the following premises:
William Hill, 357 Harrow Road, London, W9 3NA

[Give the trading name used at the premises, and the address of the premises (or, if not known, give a description of the premises and their location).]

The following type of premises licence has effect in respect of the premises:
Betting (Other) Premises Licence
[Indicate the type of premises licence which applies to the premises, e.g. bingo premises licence, adult gaming centre premises licence, etc.]

The licensing authority intends to hold the review for the following reasons:
The licensing authority has received a complaint and other information about the premises which indicates that: The premises have breached conditions attached to the premises licence by permitting alcohol onto the premises. The premises are associated with crime and disorder, in that the premises are used by persons who are drunk, under the influence of alcohol or on drugs, and in that drug dealing and the sale of stolen goods have taken place on the premises. That the premises are further associated with crime and disorder, in particular in that groups of people under the influence of drugs or alcohol frequently congregate outside the premises, and abuse and threaten other members of the public and local residents. That there is a risk that vulnerable persons may be harmed by using the premises for gambling due to their impared judgement through alcohol or drugs. That these problems have been brought to the attention of the licence-holder by residents and that no positive action has been taken. In the circumstances the licensing authority considers it appropriate to review the premises licence.

The following person connected with the licensing authority is able to give further information about the review: Mr Kerry Simpkin, Licensing Team Manager.

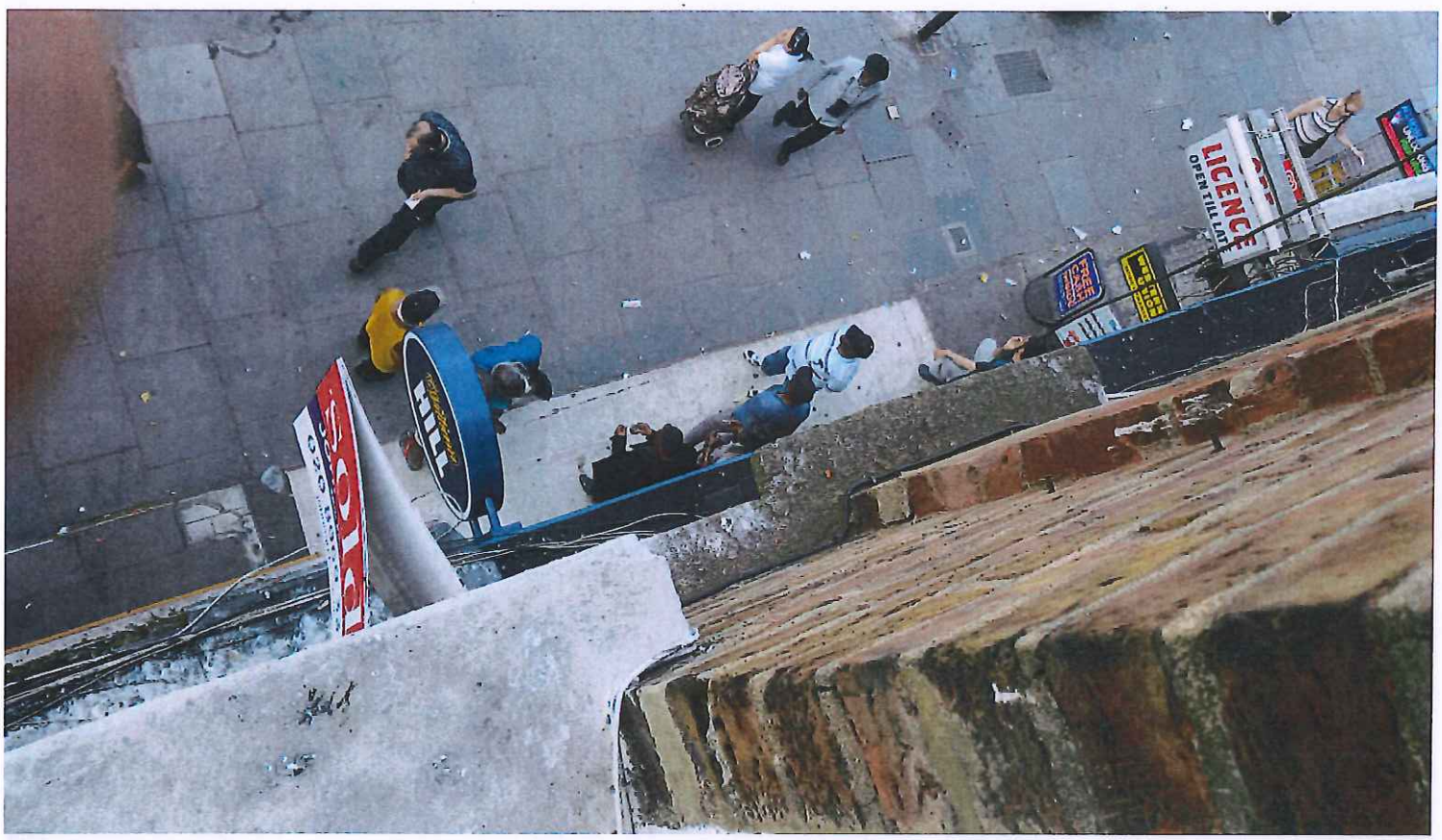
Representations about the proposed review may be made in writing to the licensing authority by the licence holder, a responsible authority or an interested party during the

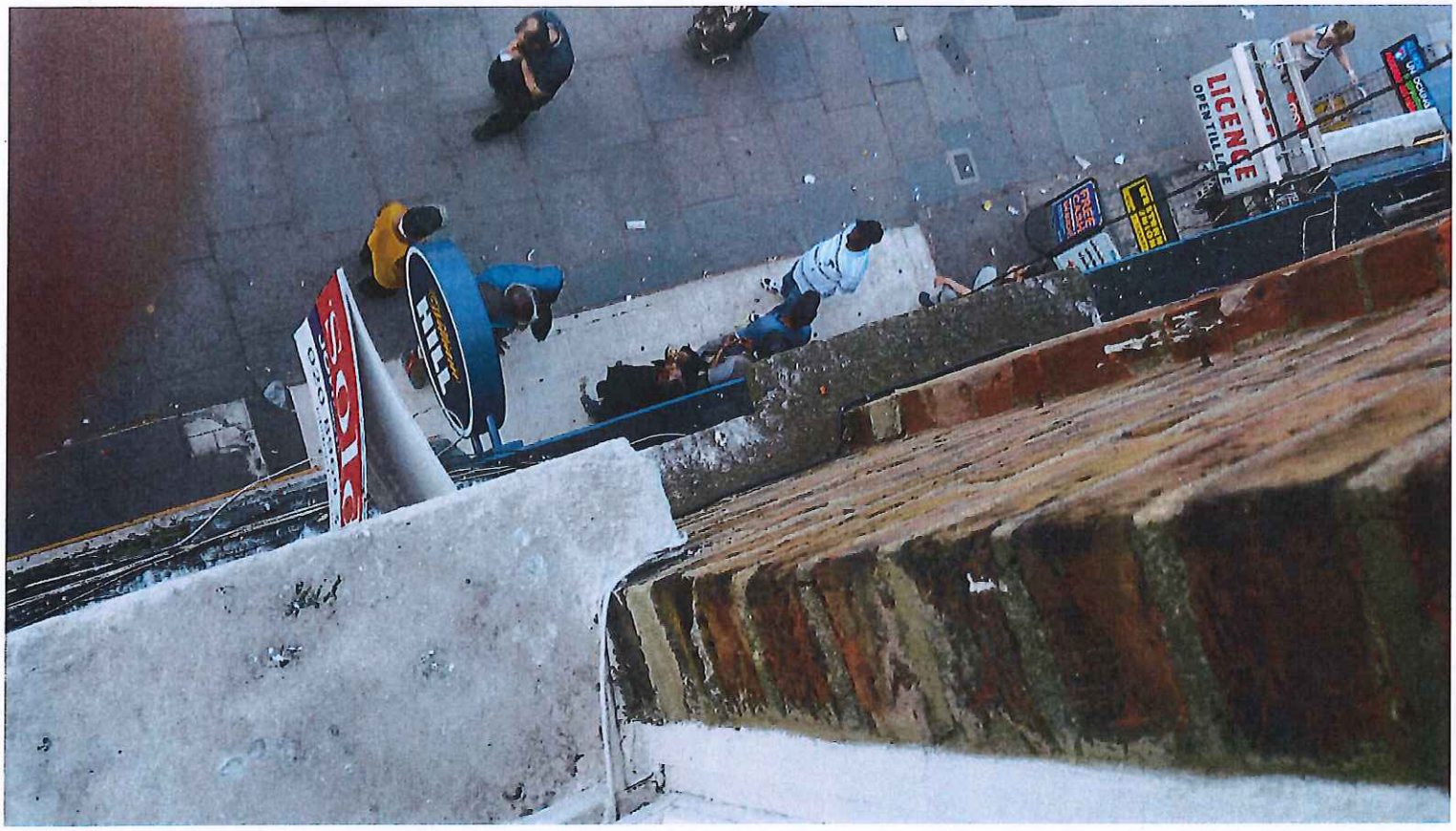
period of 28 consecutive days beginning on the date on which the notice of the authority's intention to hold the review was given to the licence holder. The last day of the period for making representations is: 16/08/2015

Following a review under section 201 of the Gambling Act 2005 a licensing authority may decide to take any of the following kinds of action:

- **revoke the licence**
- **suspend the licence for a specified period not exceeding 3 months**
- **add, remove or amend a condition attached to the licence.**

Appendix B


LICENCE
OPEN TILL LATE
HILL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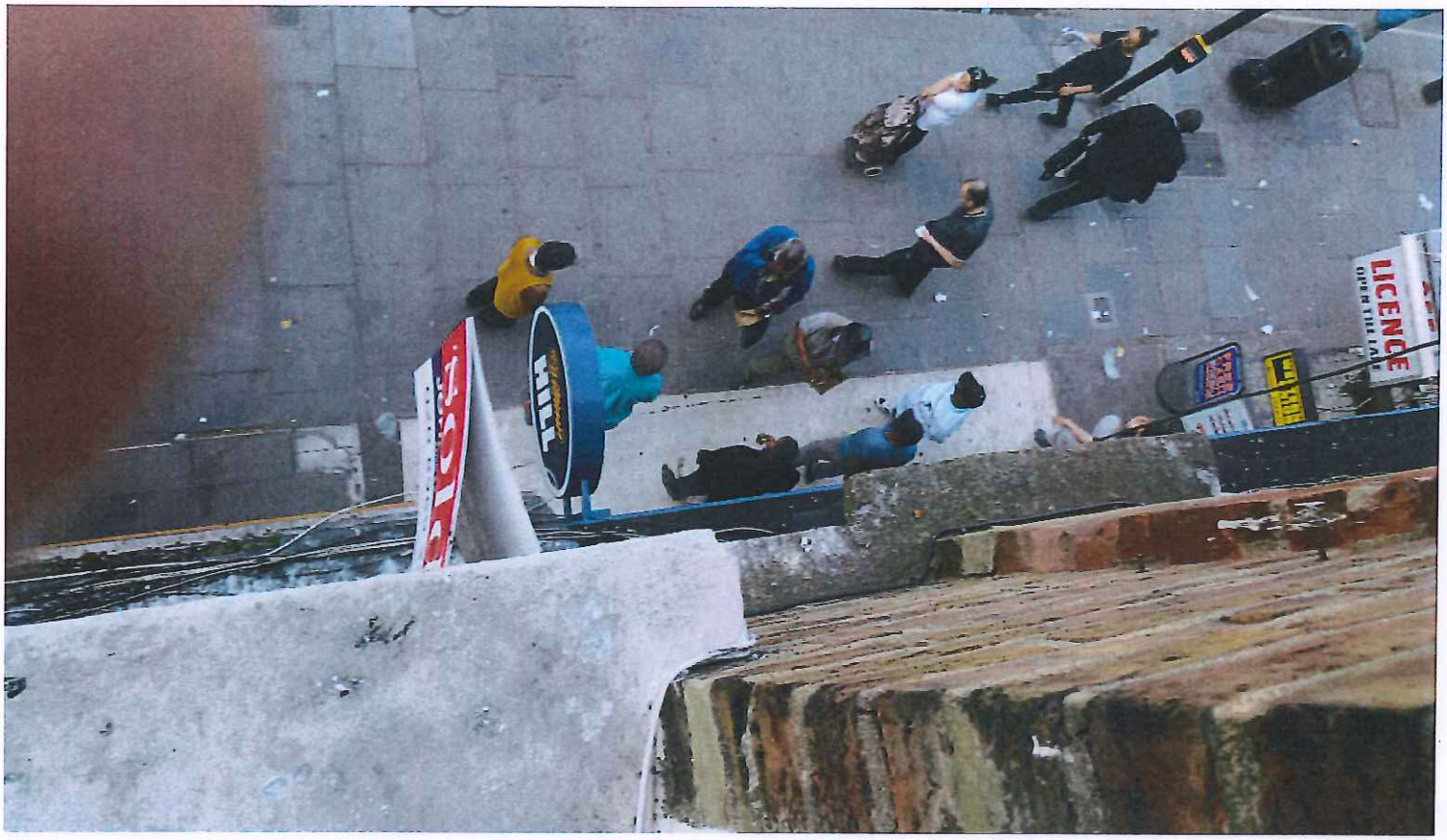
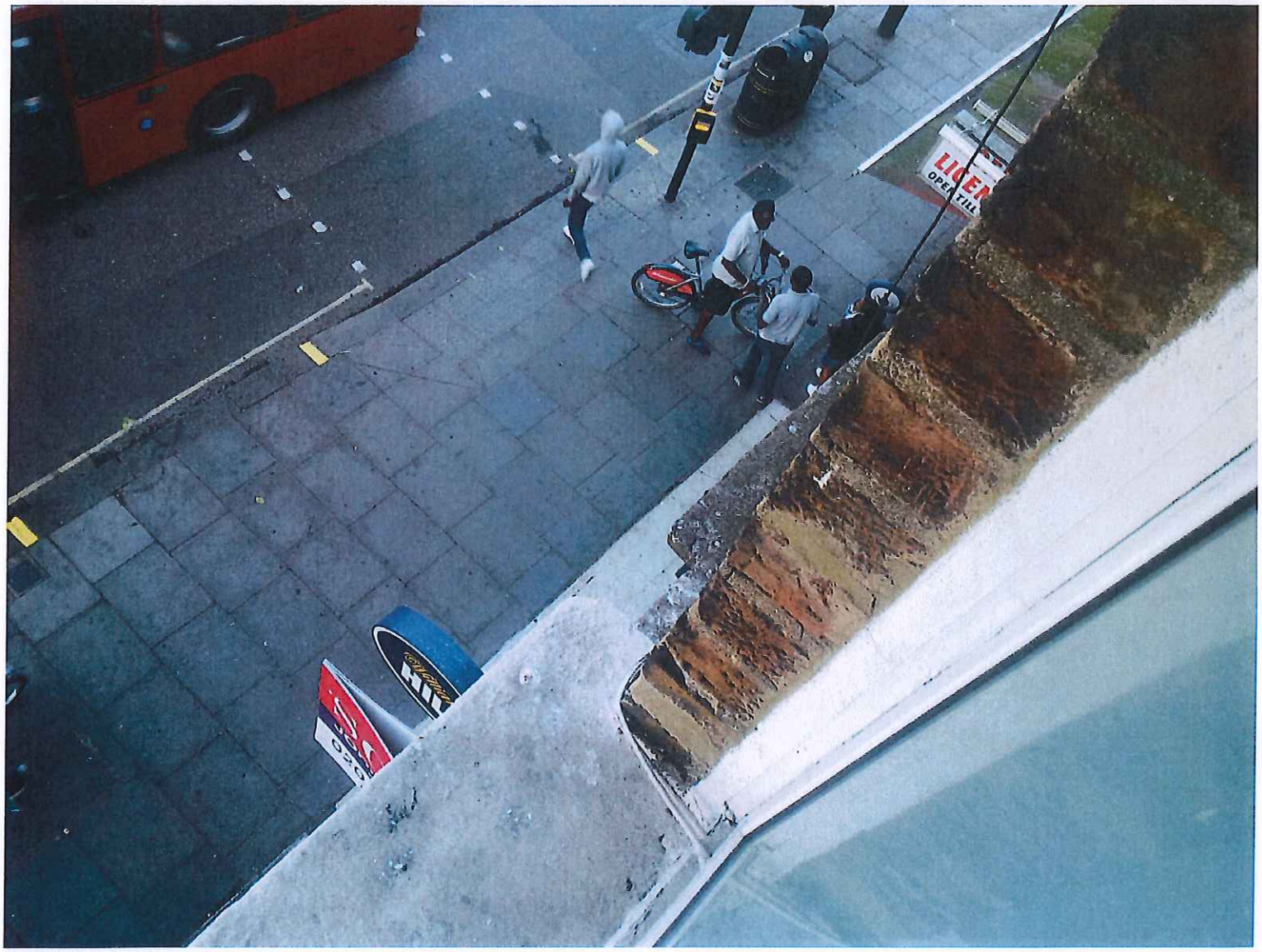
OPEN TILL LATE
UNLEADED
PREM
UNLEADED
DIESEL
HILL
SHOP


LICENCE
HILL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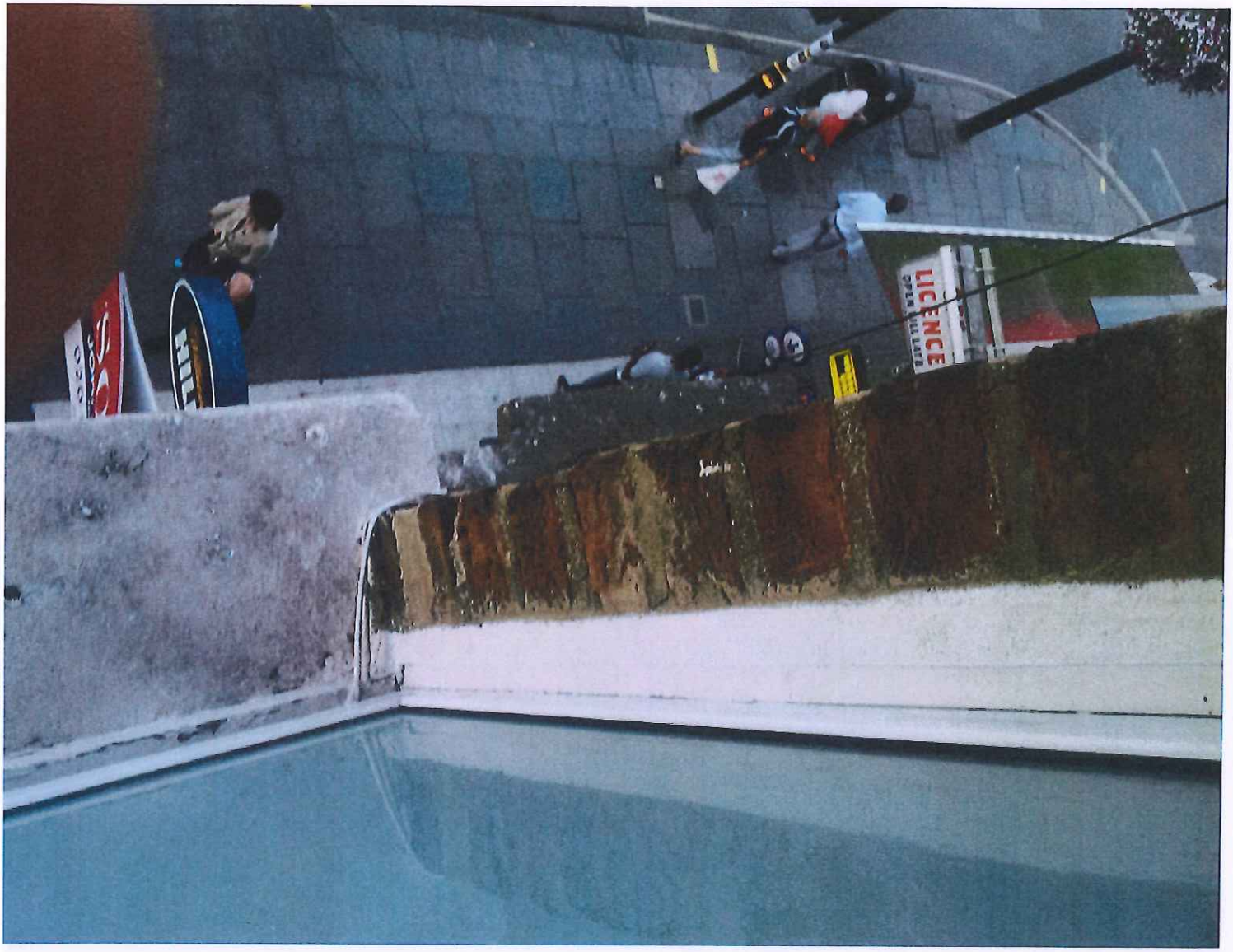
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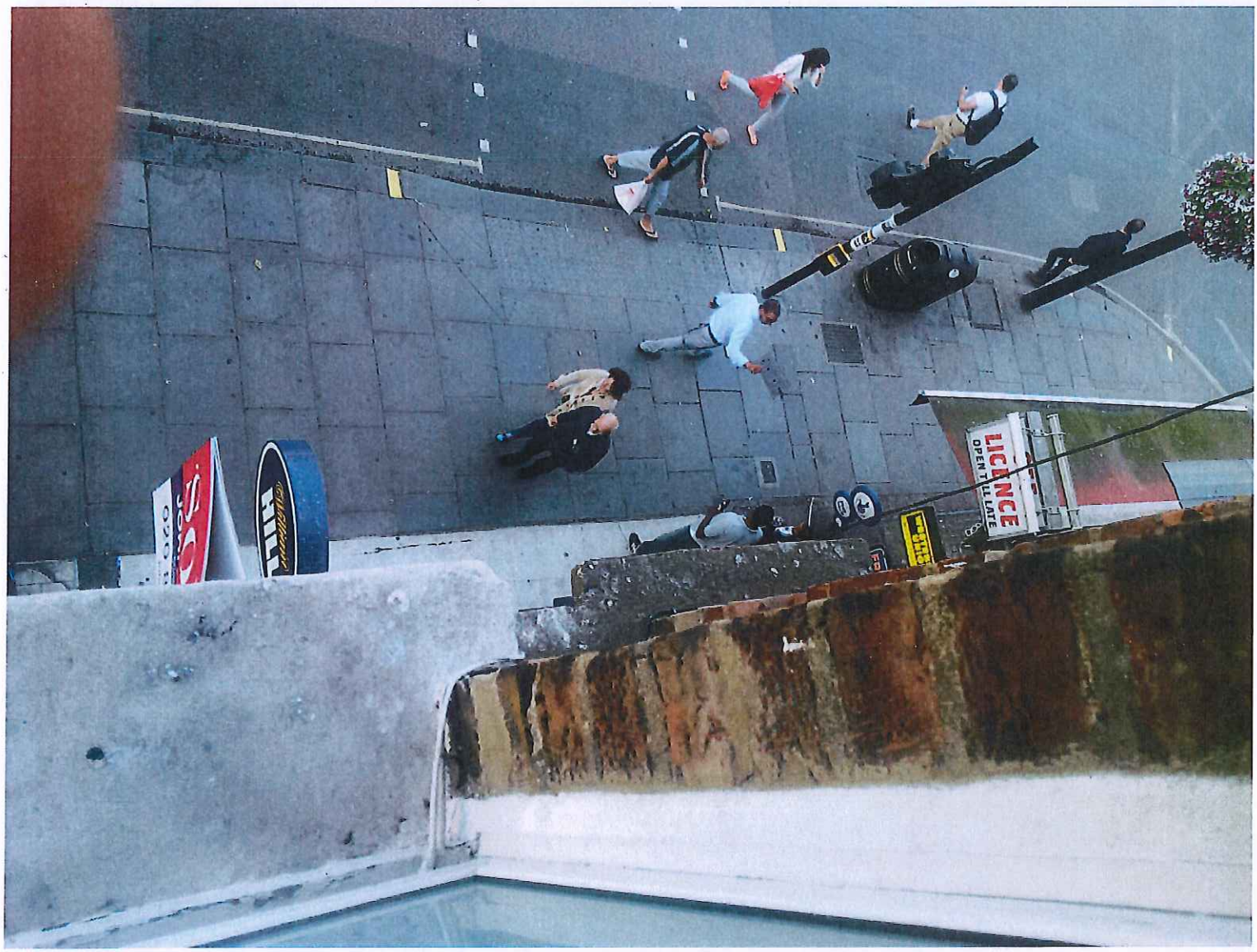
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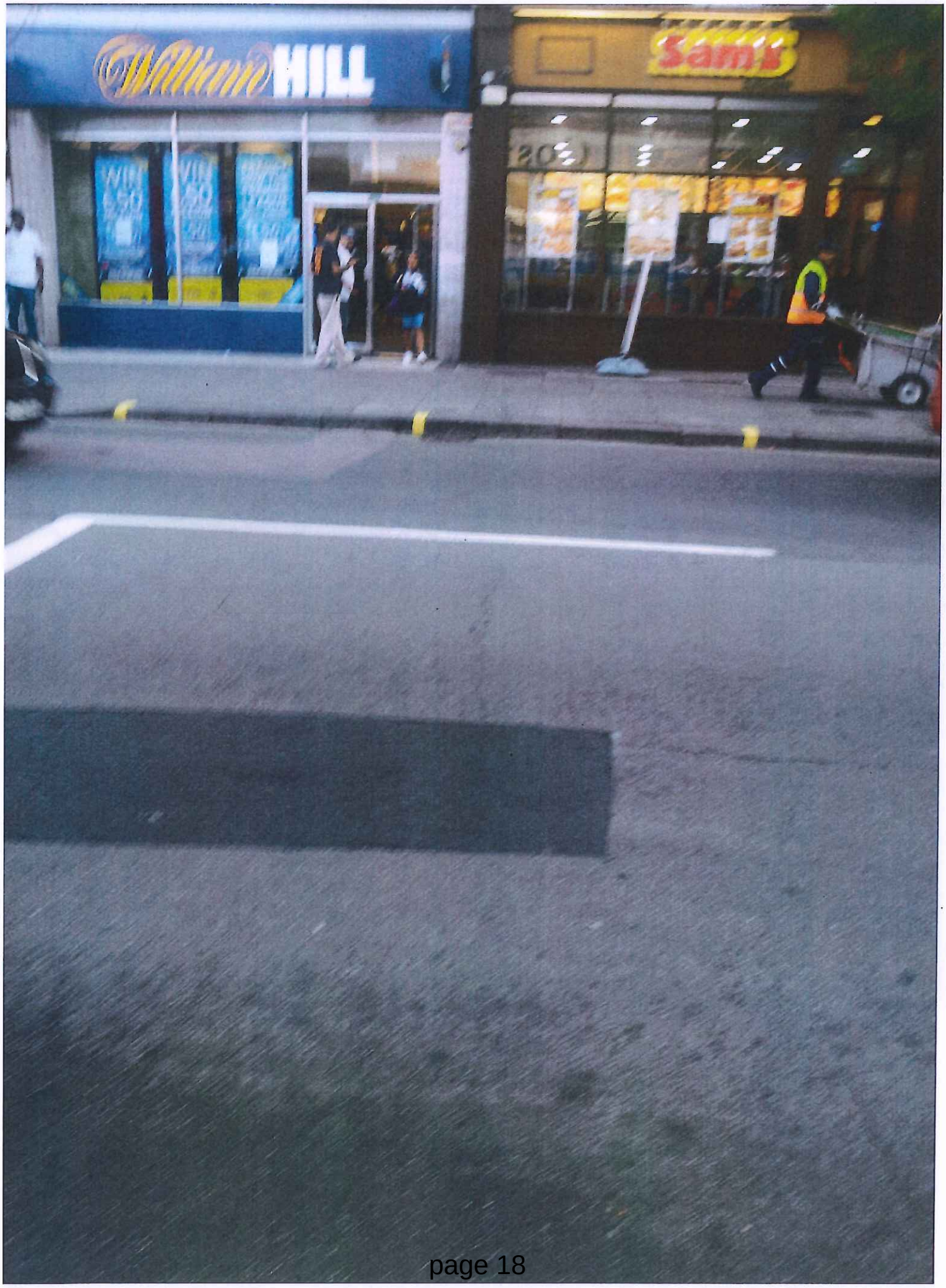
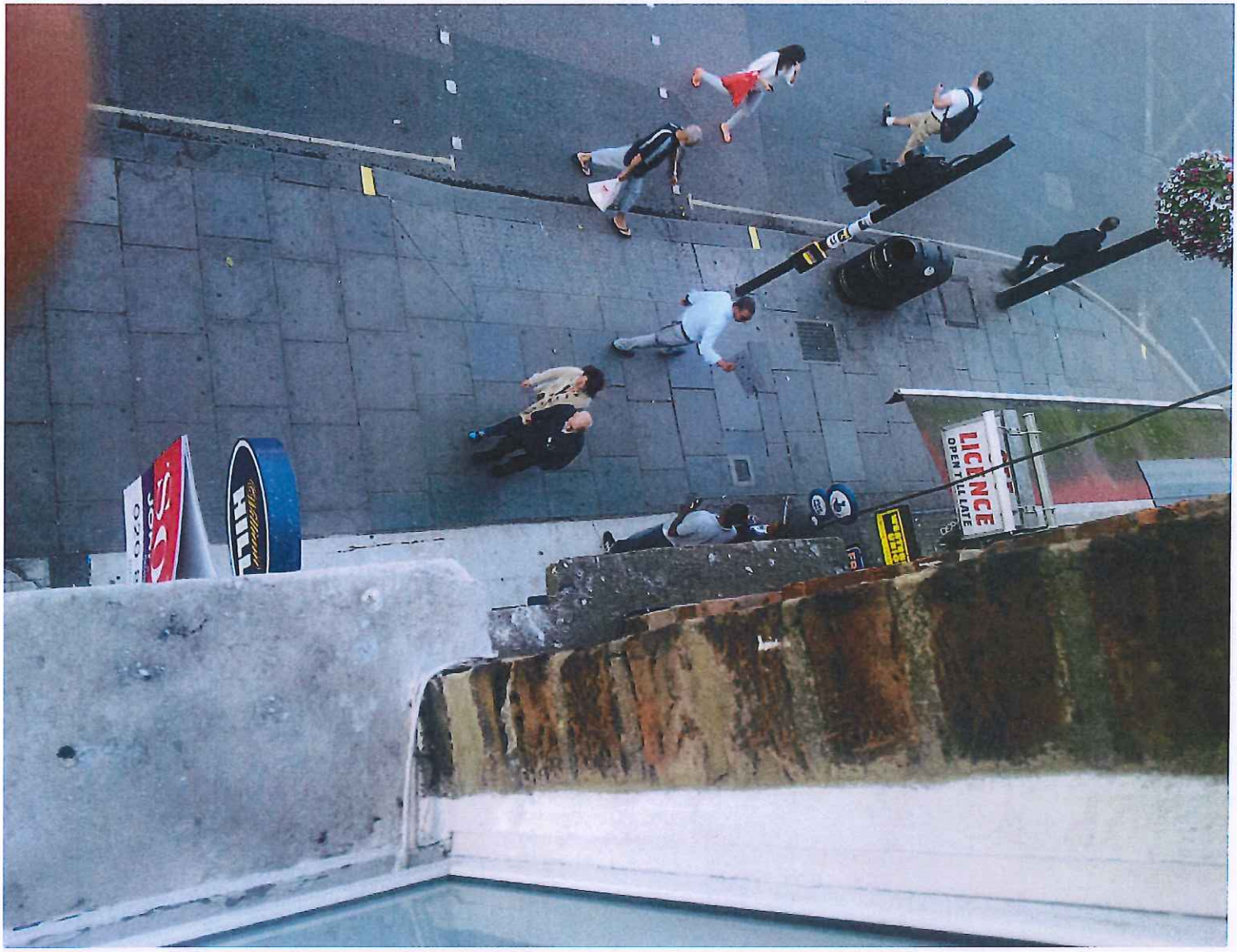
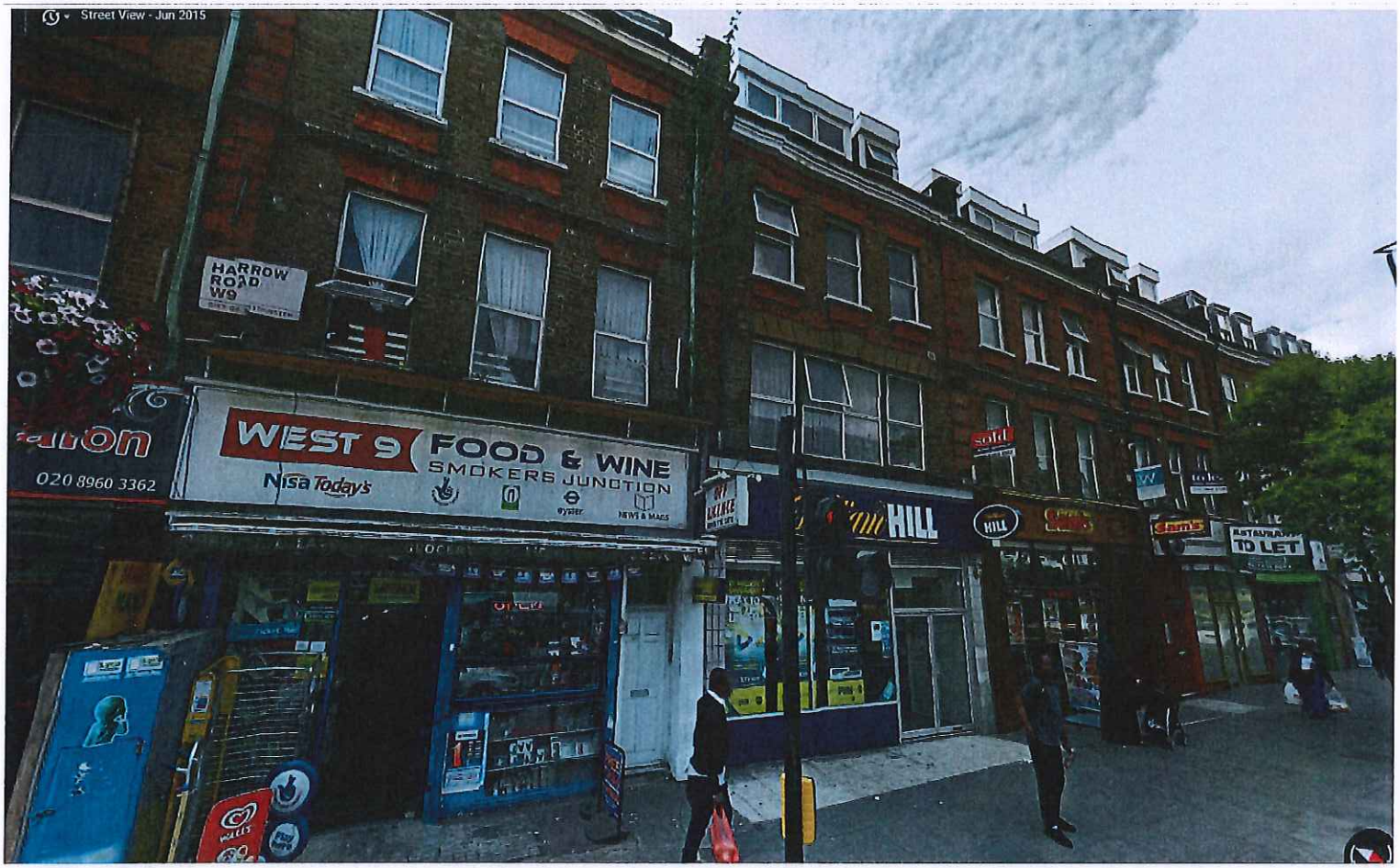
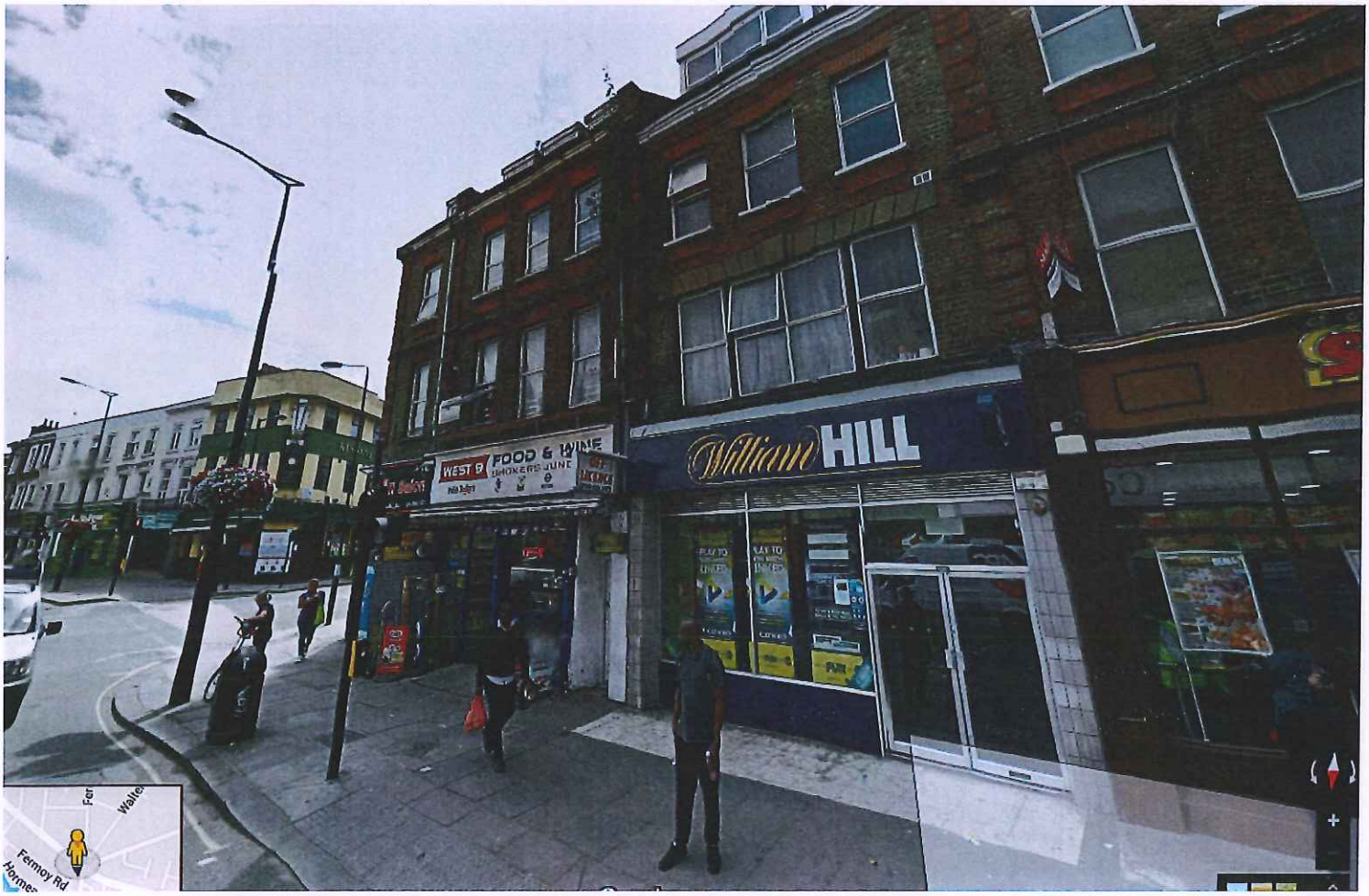
OPEN TILL LATE

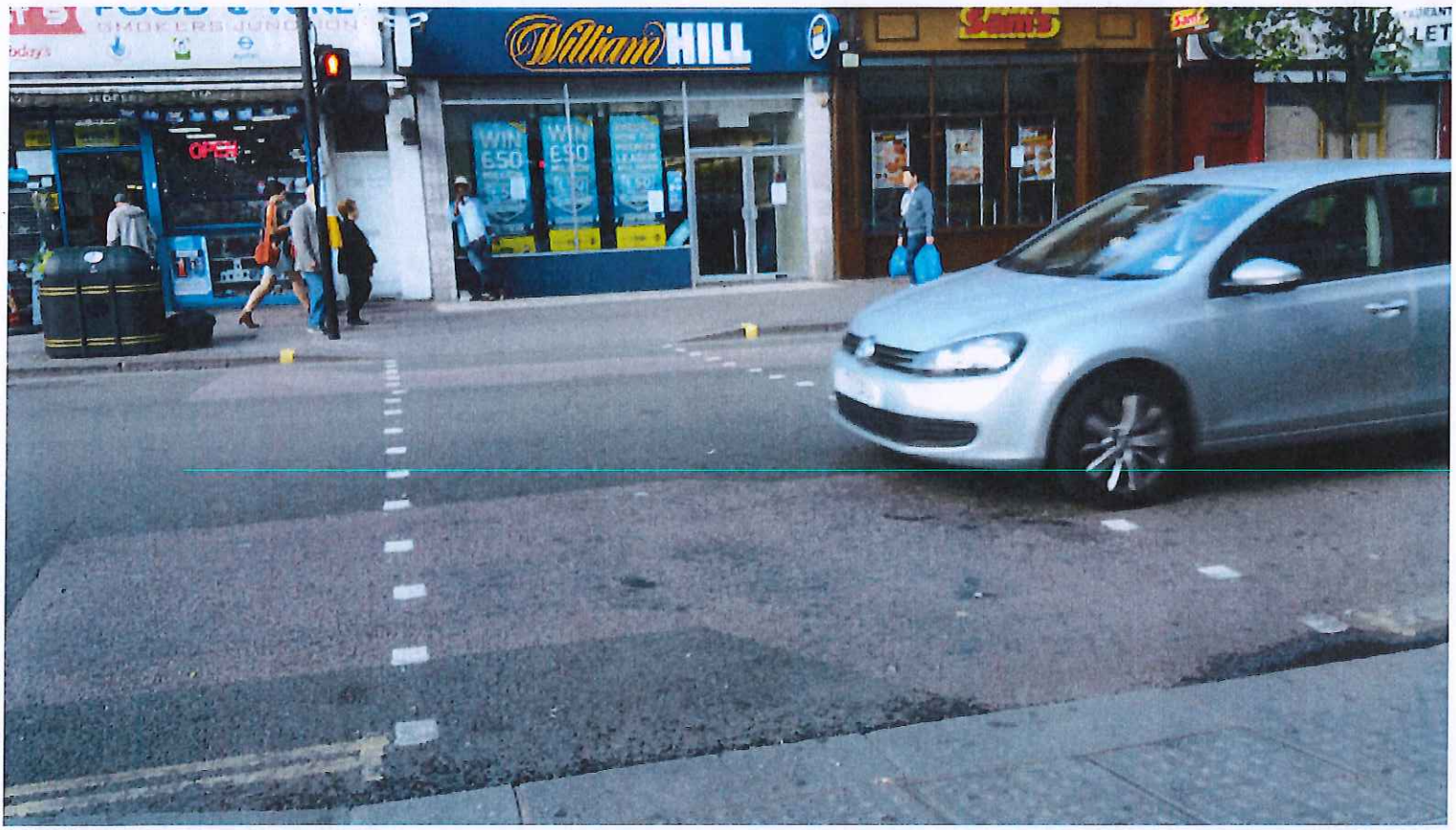

William HILL
Sam's


CASH
CASH


LICENCE
OPEN TILL LATE

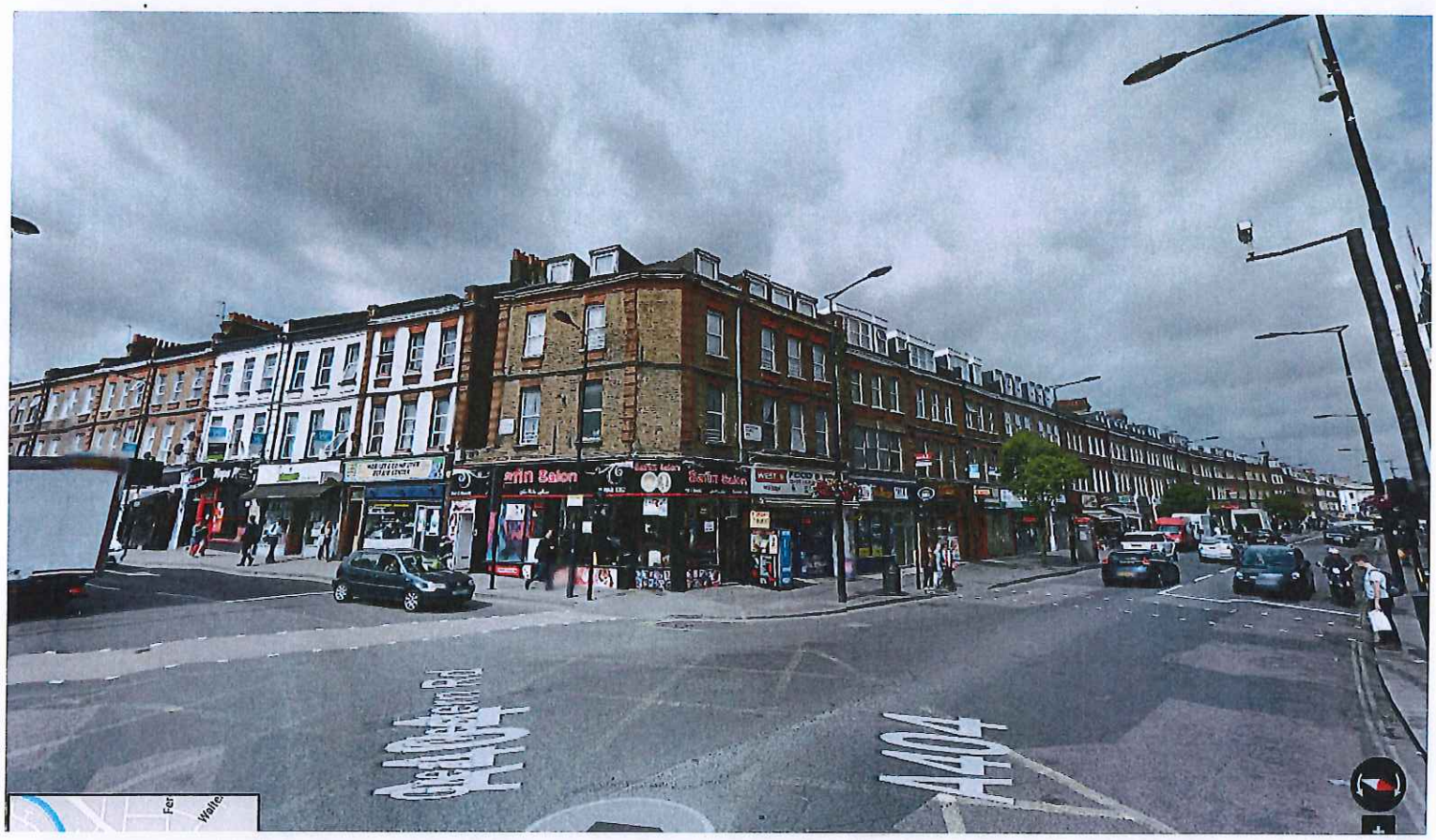

Street View - Jun 2015
HARROW ROAD W9
WEST 9
FOOD & WINE
SMOKERS JUNCTION
Nisa Today's
020 8960 3362
HILL
sold
TO LET


WEST P
FOOD & WINE
William HILL
Fermoy Rd

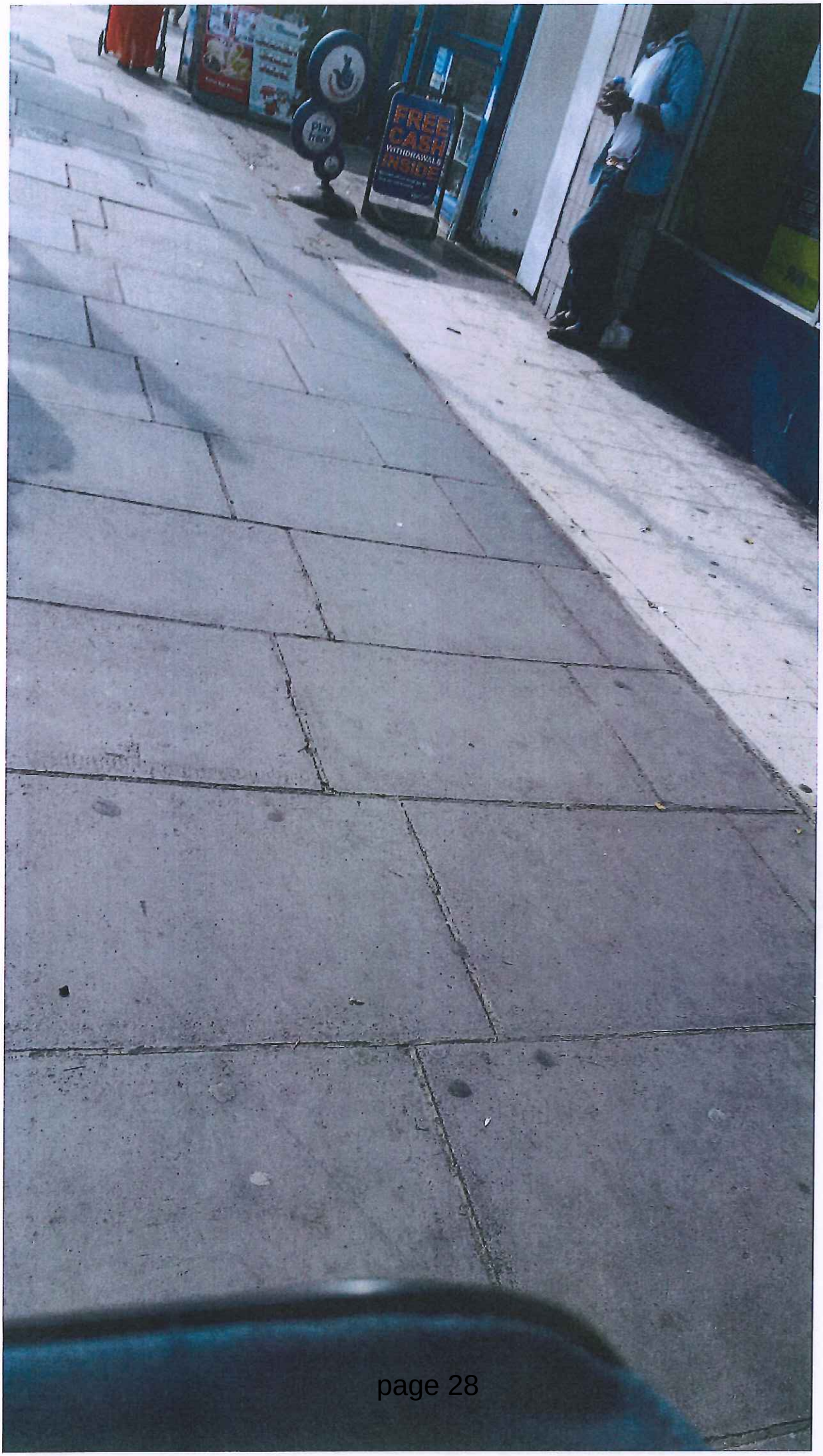

William HILL
WIN £50
WIN £50
Sam's
OPEN


William HILL
WIN £50 MILLION
WIN £50 MILLION
PREDICT NOW THE PREMIER LEAGUE
Sam's
Sam's
RESTAURANT TO LET
PJ54 JFG

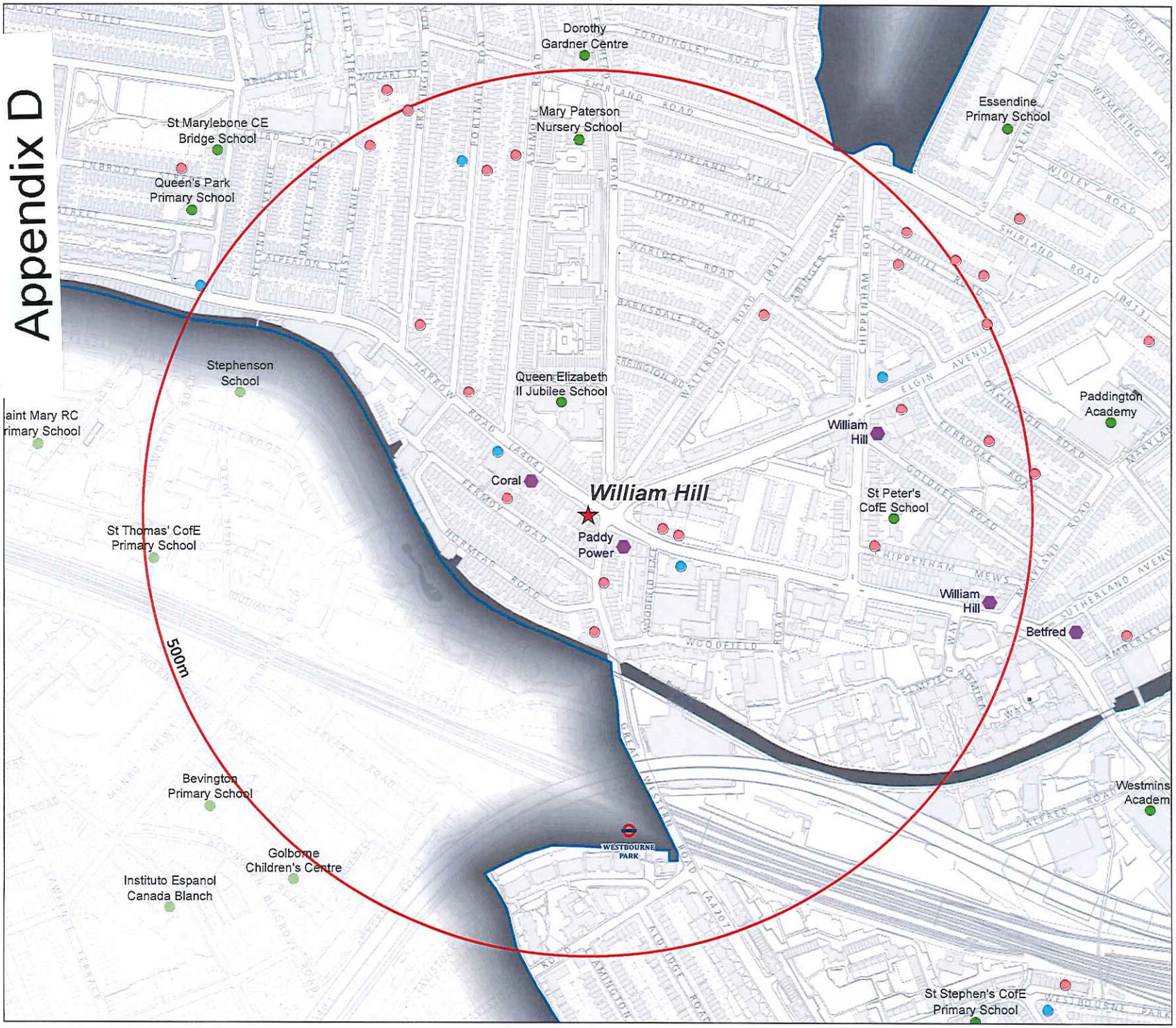
Appendix C




Costcutter
DE1638
A404


FREE
CASH
WITHDRAWALS
INSIDE

Appendix D



City of Westminster

Corporate GIS Team

William Hill
357 Harrow Road

Legend

- Faith Groups
- Hostels Special Needs Schemes
- Schools
- Tube Stations
- Gambling Premises
- William Hill
- William Hill 500m Buffer
- Westminster Boundary

Map produced by:
Westminster Corporate GIS Team

Date: **September 2015** | Ref: **1032**

0 45 90 180 270
Metres

Appendix E

City of Westminster

Review of the Betting (Other) Premises Licence for William Hill, 357 Harrow Road, W9

Licensing Authority Submissions

3rd November 2015

Kerry Simpkin and Nick Nelson
Licensing Team
Public Protection & Licensing

1. Introduction

1.1 There has been a history of concern by local residents relating to customers consuming alcohol inside and outside of the premises, abusive or insulting words or behaviour, allegations of drugs use and supply and other low level criminality at William Hill, 357 Harrow Road. These issues have come to the attention of the Licensing Authority when other applications for Betting Premises have been made in the area.

1.2 The Licensing Authority received a significant number of local resident representations to a new Betting shop application earlier in 2015. A number of these representations referred to William Hill being associated with crime and disorder. These claims had already been brought to the attention of the Licensing Authority in 2011 and 2012 where William Hill made assurances that they would address them. It had appeared that no significant improvement had been made since the Licensing Authority last discussed the issues with William Hill in 2012.

1.3 To assess the residents claims the Licensing Authority carried out observations at the premises and identified breaches in the Mandatory Condition for the licence with respect to permitting the consumption of alcohol on the premises. There was also evidence of groups gathering outside the premises drinking. The findings supported the claims by local residents, the police and other Council officers who work in the area. As no resolution to the issues that local residents and the police were encountering at the premises the Licensing Authority has sought to review the Betting (Other) Premises Licence for William Hill.

1.4 Since the review was made the Licensing Authority has undertaken observations of the premises, reviewed documentation provided by William Hill and has viewed CCTV footage of the exterior of the premises. The Licensing Authority have identified significant failings in William Hill's own operating procedures, that CCTV in the premises was not to the standard expected, that possible drug dealing is being carried out on the premises and that alcohol was being consumed on the premises. All of which support the residents observations and representations relating to these premises.

1.5 This submission brings together the information, actions and evidence that the Licensing Authority has accumulated in support of its review.

2. Background

2.1 William Hill has operated a licensed betting shop (LBO) at 357 Harrow Road for a considerable period. On the 15th June 2007 William Hill applied to convert their Betting Office Licence, issued under the Betting and Gaming and Lotteries Act 1963 to a Betting (Other) Premises Licence under the provisions of the Gambling Act 2005 (the Act). The Betting (Other) Premises Licence (07/07253/WCCGAP) was granted by the Licensing Authority on the 31st August 2007. The Licensing Authority has had no further applications in

relation to these premises since the licence was granted in August 2007. A copy of the current Betting (Other) Premises Licence for William Hill is attached as LA1.

2.2 William Hill came to the attention of the Licensing Authority following the receipt of a new Betting (Other) Premises Licence application made by Coral Racing Limited for 381 Harrow Road on the 22nd July 2011. The application was to create a new betting shop in premises which was previously used as a fast food takeaway. This would have been Coral's first shop in this area.

2.3 During the consultation period a number of local residents made representations identifying existing issues surrounding violence, aggression, street drinking and anti-social behaviour surrounding gambling premises in the area, which were later identified as predominantly associated with William Hill. A copy of the representations that make reference to either William Hill or the issues surrounding betting shops in the area have been provided as LA2.

2.4 The Licensing Authority, who made a representation to this application, sought the views of Ms Caroline Tredwell who was the Neighbourhood Crime Prevention Officer for the Council. She provided information relating to the issues that were occurring around William Hill. The main issues were groups blocking the pavement, intimidation to local residents as they walked past, abusive language which had amounted to harassment in a few cases. Ms Tredwell also confirmed that the police were taking action with these individuals and confirmed that the group outside William Hill were mainly William Hill's customers. The police also identified that customers would come out of the premises to drink [alcohol] and smoke. Ms Tredwell provided a statement for the Licensing Authority setting out these specific issues. Ms Tredwells statement reflected the concerns and observations of the local residents at the time. A copy of Ms Tredwells statement is provided as LA3. The police also made a representation to Coral's application at the time.

2.5 The application for the new Betting (Other) Premises Licence for Coral Racing Limited at 381 Harrow Road went before the Licensing Sub-Committee on Monday 28th November 2011. At that hearing a number of conditions were proposed by Coral to be imposed on the licence if the Sub-Committee were minded to grant the application. These conditions, which had been proposed by Coral and slightly amended by the Licensing Authority and Police, were provided to specifically address the concerns raised about William Hill and to attempt to prevent those issues effecting Coral's premises if they were to operate. A copy of the Licensing Sub-Committee minutes of the decision are provided as LA4.

2.6 Following receipt of these representations the Licensing Authority contacted Clark Dunstan from William Hill on the 1st September 2011 to highlight the issues identified and the concern that the Licensing Authority had concerning the allegations that the their customers may be causing crime and disorder on or outside their premises. Clark Dunstan was the Development Manager for

William Hill and was the contact at a senior level within William Hill relating to these premises.

2.7 A meeting was arranged for the 24th October 2011 where these issues were discussed. A copy of the email exchange relating to arranging this meeting with Clark Dunstan is attached as LA5. It was agreed that William Hill would take away the issues and concerns and make sure that they take appropriate action to address them.

2.8 On the 5th August 2012 a complaint was made to Cllr Dimoldenberg from Dr Dwyer relating to the specific issues that she was experiencing with William Hill. This complaint was provided to the Licensing Authority who investigated it. However, the issues surrounding William Hill were well known by the Council's Anti-Social Behaviour Officers and the Council's Licensing Inspectorate. Accordingly discussions would be instigated with William Hill to try and address the concerns raised by Dr Dwyer. A copy of an email exchange following Dr Dwyer's original complaint and the issues surrounding William Hill is attached at LA6.

2.9 As part of this complaint, the police and the Council's Crime Prevention officers engaged with William Hill. The police crime prevention advisor visited the premises and provided advice on what William Hill could implement to address the issues raised with people drinking outside the premises and causing crime and disorder on and outside the premises. That advice was provided to William Hill for their information and to consider implementing on the premises.

2.10 Officers acting on behalf of the Licensing Authority were not made aware of any further issues with William Hill in Harrow Road until an application was made for a new Betting (Other) Premises Licence for the former Prince of Wales Public House, 351 Harrow Road. The application was made by Done Brothers (Cash Betting) Limited Trading as Betfred on the 26th March 2015. The Licensing Authority received over 70 representations to this application and a large number of these representations made reference to the same issues at other betting shops in the area. This was later confirmed to relate predominantly to William Hill.

2.11 The issues raised by the residents opposing Betfreds application mirrored those raised during the Coral application in 2011 and also Dr Dwyer's earlier complaint in 2012. These issues related to customers of William Hill consuming alcohol in the premises and directly outside it, allegations of drug use and supply from the premises and the sale of stolen goods in the premises. A copy of the representations to the Betfred application that either referred directly to William Hill or the general issues that residents face in and around betting shops in Harrow Road are provided as LA7.

2.12 Dr Dwyer along with a number of other local residents provided evidence both in writing and orally at the hearing to determine the application for Betfred, 351 Harrow Road. It was apparent from local residents that, although the

Licensing Authority was not made aware of any of these issues between 2012 and May 2015 they had continued to occur with no resolution.

2.13 On the ?? 2015 the Licensing Sub-Committee held a hearing to determine the Betfreds application for 351 Harrow Road. At the hearing evidence was presented orally from local residents concerning the issues that surround William Hill and the area is extremely sensitive due to the large numbers of vulnerable people in the area and the facilities for these groups. The Licensing Sub-Committees decision concerning Betfreds application is provided as LA7A.

3. Review Application

3.1 The Licensing Authority has a responsibility under the Act for local gambling regulation. In exercising the authority's functions relating to premises licences the authority shall aim to permit the use of premises for gambling so far as it thinks it is:

3.1.1 in accordance with the Gambling Commissions Licence Conditions and Codes of Practice (LCCP) issued under section 24 of the Act
3.1.2 in accordance with the gambling Commissions Guidance to Licensing Authorities issued under section 25 of the Act,
3.1.3 reasonably consistent with the licensing objectives (subject to 3.1.1 and 3.1.2 above)
3.1.4 in accordance with the council's Statement of Licensing Principles for gambling (subject to 3.1.1 to 3.1.3 above)

3.2 The Licensing Authority whilst considering the representations made relating to the Betfred's new Betting (Other) Premises Licence application started to consider what action it could take to try and resolve the issues identified by residents and William Hill. In considering its options it reviewed the history of the premises. It was clear that the issues originally brought to the attention of the Licensing Authority in 2011 and 2012 were still present.

3.3 The Licensing Authority carried out observations and inspections of the premises in May and June 2015 to establish what was taking place at William Hill. The purpose of these observations was to observe customer and staff interaction, customer behaviour and the operation of the premises.

3.4 There had been a number of comments made by local residents during the Coral and Betfred applications (see LA2 and LA7) that women in particular felt threatened by male customers from William Hill who stood outside the premises drinking and smoking. Dr Dwyer made reference to a particular incident when she experienced alarm, harassment and distress through unwelcome aggressive and sexual comments. Dr Dwyer, in her email dated 23rd June 2015 which is available as LA8 refers to such an incident that took place in 2011or 2012.

3.5 In carrying out their duties two council officers have either received unwelcome or abusive comments or behaviour from customers of William Hill or their acquaintances both inside and outside the premises.

3.6 On the 12th May 2015 Sumeet Anand-Patel and Nick Nelson, Senior Licensing Officers attended William Hill as part of their observations of what was occurring in betting shops in the area. During that visit Mrs Anand-Patel, when she was not standing with Mr Nelson was approached by a male customer who smelt of alcohol. He spoke to her in a way that made her feel very uncomfortable and uneasy. Mr Nelson, whilst in the premises noticed a strong smell of alcohol. He also noticed one customer who appeared visibly drunk. Mr Nelson raised this with shop staff who stated that this was a common occurrence for customers to visit the premises after leaving the local pub and that this was normal. A statement has been provided by Mrs Anand-Patel and Mr Nelson which are provided as LA9 and LA10.

3.7 The Licensing Authority was aware of a previous similar incident to those described above by female residents. Inappropriate and offensive comments were made towards a member of Council staff whilst visiting the premises in November 2014. Ms Klaudija Green was working in the Harrow Road area as part of her duties as a Ward Community Protection Officer when she visited William Hill to speak to staff. Whilst approaching the premises a group of men outside William Hill began to make comments about her physical appearance, whistling at her and making inappropriate comments. A copy of Ms Green's statement is provided as LA11.

3.8 On the 26th June 2015 Paul Green, Senior City Inspector and David Wood, City Inspector visited William Hill to undertake observations and visited William Hill. They observed a large number of men sitting on wooden pallets or standing outside of William Hill. This group were observed pouring drinks from plastic bottles into plastic or polystyrene cups and most were observed drinking. One member of the group who was female was observed to appear drunk and was drinking from a wine bottle.

3.9 At 20:30hrs on the 27th June the two officers returned to William Hill and observed that the glazing to the premises door was smashed and held together with plastic film. This broken glazing panel wasn't seen the previous day. No one was present outside the premises when the officers entered the premises. In William Hill there we five people watching the screens and one on the gaming machine. The officers then left the premises and returned at 21:30hrs that same evening. Upon returning they saw two men standing at the front entrance to William Hill. One of these men was holding a bottle of beer. On entering the premises the officers observed an open Stella Artois can on a table. The number of customers in the premises had increased to about twelve and Mr Green observed an unkempt elderly man who was slurring his speech and had been previously observed staggering across Harrow Road. A copy of Mr Green and Mr Wood's statements are provided as LA12 and LA13.

3.10 As part of the Betfred new Betting shop application papers the Westminster the Police Licensing Team provided a list of intelligence report and a copy of the search results from its Intelligence Information Platform (IIP). A copy of these documents is provided as LA14 and LA15.

3.11 Consideration was given to calling William Hill to account via the review process under the Act. There appeared to a particular failure to address the concerns despite attempts by local residents, police, council officers and the Licensing Authority. Despite assurances from William Hill to take all necessary steps to address these issues it was apparent that nothing has occurred to address them. It appeared to the Licensing Authority that matters had got worse since 2011 when these issues were originally raised with the licensing Authority.

3.12 In addition to calling William Hill to account over their lack of action to address the issues there would be the added advantage of reviewing the premises licence as it would enable local residents and businesses an opportunity to have their voice heard. and propose options to address the significant concerns raised.

3.13 The Act provides that a Licensing Authority can initiate a review of a premises licence in its own right under section 200 of the Act. The Gambling Commissions 5th Edition of its Licensing Authority Guidance states:

'10.5 *S.200 of the Act provides that licensing authorities may initiate a review in relation to a particular premises licence or a particular class of premises licence. Licensing authorities may wish to consider in their scheme of delegations who initiates reviews, and any checking system of that to prevent unwarranted reviews from being conducted.*

10.6 *In relation to a class of premises, the licensing authority may review the use made of premises and, in particular, the arrangements that premises licence holders have made to comply with licence conditions. In relation to these general reviews, it is likely that the licensing authority will be acting as a result of concerns or complaints about particular types of premises, which may result in them looking at, for example, default conditions that apply to that category of licence.*

10.7 *In relation to particular premises, the licensing authority may review any matter connected with the use made of the premises if:*
• it has reason to suspect that premises licence conditions are not being observed
• the premises is operating outside of the principles set out in the licensing authority's statement of policy
• there is evidence to suggest that compliance with the licensing objectives is at risk
• for any other reason which gives them cause to believe that a review may be appropriate, such as a complaint from a third party.'

3.14 A review, initiated by the Licensing Authority would provide the opportunity for local residents to make representation as part of the consultation process for the review. The Licensing Authority also felt that due to the nature of the allegations and that the issues have persisted that a review would enable all parties to express their views on the allegations and appropriate measures imposed, if necessary to address these concerns.

3.15 Paragraph 32.7 of the Council Statement of Licensing Principles for gambling states:

32.7 As a review of a premises licence can lead to its revocation the council will consider whether informal actions to ensure timely or immediate compliance have been exhausted prior to an application being made. The council accepts that an application for review may be appropriate without informal measures being taken, but will seek to establish that all options have been considered in determining review applications.

3.16 The information the Licensing Authority had received from local residents, the Police and its own officers relating to William Hill provided evidence that there was a significant concern that these premises were being operated in a way that didn't meet the main principles of section 153 of the Act. The Licensing Authority had received complaints and relevant information that indicated that:

3.16.1 the premises was breaching the mandatory condition on its licence relating to the prohibition of consuming of alcohol on the premises;

3.16.2 that customers may be under the influence of alcohol and/or drugs and as such were vulnerable to gambling-related harm due to impairment,

3.16.3 that there were allegations of drug dealing on or from the premises;

3.16.4 that there were allegations that the premises was being used to sell stolen goods,

3.16.5 that groups of people including customers of William Hill gather outside the premises and cause alarm, harassment and distress to members of the public passing the premises, particularly women, and

3.16.6 that these issues have been occurring for a number of years and even when these issues had been brought to the attention of William Hill no positive action has occurred to address the issues.

3.17 Due to the history at this premises and that even when William Hill had the issues brought to their attention there appeared that no action had been taken The Licensing Authority decided that a review application was necessary to make an effective change in the operation of this premises and to address the issues.

3.18 The Licensing Authority served the review papers on William Hill on the 20th July 2015 via email. Public notices were displayed at the premises that same

day along with the Council's publishing a notice on its own website. A copy of the review application and photographs of the notices of review displayed at the premises are provided as LA16 and LA17.

4. Alcohol

4.1 The consumption of alcohol inside and outside the premises by William Hill's customers was a significant concern to local residents. In Dr Dwyers email dated 23rd June 2015, referred to as LA8 she recalls an incident relating to alcohol and a conversation with Charles who was the premises manager. She advised Charles that she often saw customers entering the premises with alcohol. He stated to Dr Dwyer that it was a difficult situation for him and that he wasn't complicit in allowing this but was a victim.

4.2 William Hill is subject to a mandatory condition relating to the consumption of alcohol on the premises. This condition states:

The consumption of alcohol on the premises is prohibited during any time which facilities for gambling are being provided on the premises.

4.3 William Hill has a Manual for its Licensed Betting Offices. This manual provides information on all aspects of the operation of the gambling premises. Section 2, part 6.0 details William Hills Drugs and Alcohol Policy, a copy is provided as LA18. In bold at the top of this policy William Hill states:

The consumption of alcohol on Company premises is prohibited and must be discouraged through positive action by Employees when it is either observed or drawn to their notice.

4.4 On the 20th July 2015 David Wood, City Inspector was attending William Hill in Harrow Road to issue the review notices. Upon arrival he saw approximately twelve customers inside the premises. He noticed a man drinking from a can concealed in a brown paper bag. Mr Wood took a photo of this customer within the store. He then proceeded to identify himself to the staff behind the counter. Mr Wood had to wait until one of the members of staff was available to assist him. Whilst he was waiting he observed a man enter the premises drinking out of a small glass bottle. He was able to advise the supervisor when she was available of these people and that they were drinking on the premises. The first customer observed with the can in a paper bag had since left the premises and was outside it drinking out of the can. The customer came back into the premises a few minutes later without the can and Mr Woods went straight to the bin which is just outside the premises next to the pedestrian crossing. In the bin he found a can of super strength Skol and a brown paper bag in it. Mr Woods proceeded to take a photo of this. Mr Wood has produced a statement as LA19.

4.5 A meeting was arranged, at the request of William Hill's legal advisers for the 9th September 2015. That meeting was attended by Richard Taylor (Legal adviser for William Hill) Mr Brian Minihane (William Hill), Mr Kerry Simpkin, Mr Nick Nelson and Mr David Sycamore on behalf of the Licensing Authority.

During that meeting the Licensing Authority explained the concerns that it had in relation to the operation of the premises and the history of inaction to address these issues.

4.6 Prior to this meeting William Hill had been served copies of the representations made to the Licensing Authority concerning the review application. The Licensing Authority presented the statement from Mr Woods dated 20th July 2015 (LA19) to Mr Taylor and Mr Minihane. The Licensing Authority explained that the findings that the Licensing Authority had observed a breach of the mandatory condition of the premises licence. They then stated that observations so far backed up the claims made by local residents. At this point Mr Taylor and Mr Minihane stated that they now understood the concerns of the Licensing Authority and local residents. They confirmed that William Hill would take action to deal with them. The question was posed to Mr Minihane that these issues had been raised with William Hill before and why hadn't they been addressed previously. Mr Minihane explained that the issues were not brought to the attention of senior management at William Hill and now that they are aware they will take action. It was the impression of Licensing Authority officers attending this meeting that prior to the service of Mr Woods statement there was a general view that William Hill were not convinced that the allegations by residents were justified. It was agreed at the end of this meeting that William Hill would go away and assess the operation of the premises in light of the representations and information provided by the Licensing Authority.

4.7 The Licensing Authority has been able to observe CCTV footage from the Council's own street cameras which show the front of William Hill's premises. This CCTV was captured during a period from 22nd July 2015 to the 16th August 2015 and covered the time periods 14:00hrs to 16:00hrs and 19:00hrs to 21:00hrs on each of the days during this period. Mr Nelson, Senior Licensing Officer has reviewed all of the footage taken during this period and has identified a number of clips relating to alcohol consumption outside the premises and customers entering or leaving with what could be alcohol. The CCTV footage clips are provided as LA20 and the synopsis of the CCTV clips is available as LA21. A statement has also been provided by Nick Nelson, Senior Licensing Officer who viewed all of the footage and produced both the CCTV clips and the synopsis for them as LA10.

4.8 It is clear that staff at William Hill have not been robust in preventing customers from drinking inside the premises. This is a breach of the mandatory condition of the premises licence and also a breach of William Hill's own Rules as stated in their Drugs and Alcohol Policy (LA18). There is also the contributing factor of the shop design and layout (see paragraphs 9 below) that affects the staffs ability to manage and enforce this issue, which are in the control of William Hill. It is the lack of staff and management action and practice that has allowed alcohol consumption on the premises to become normal.

4.9 Section 1 of the Act sets out the licensing objectives. The third licensing objective within that section relates to children and the vulnerable. This objective is:

'potecting children and other vulnerable persons from being harmed or exploited by gambling'.

4.10 Vulnerability is not defined within the Act. The Gambling Commission states:

> ***5.17*** *The Act does not seek to prohibit particular groups of adults from gambling in the same way that it prohibits children. The Commission does not seek to define 'vulnerable persons' but it does, for regulatory purposes, assume that this group includes people who gamble more than they want to, people who gamble beyond their means and people who may not be able to make informed or balanced decisions about gambling due to, for example, mental health, a learning disability or substance misuse relating to alcohol or drugs.*

4.11 The Council, in partnership with Manchester City Council and supported by the Local Government Association (LGA) commissioned Geofutures to undertake research into vulnerability which was published in July 2015. The report, titled 'Exploring area-based vulnerability to gambling-related harm: Who is vulnerable? Findings from a quick scoping review' and the aim of this study was to explore who may be vulnerable to gambling-related harm and to assess the strength of the evidence base supporting this. A copy of this report is provided as LA22.

4.12 This research findings identified that there was good evidence to support the view that those who consume alcohol and misuse it are vulnerable to gambling-related harm. The report states (page 50):

Other research has also shown a relationship between gambling problems and alcohol consumption more generally. The BGPS series highlighted that the prevalence of problem gambling was higher among those who consumed the most alcohol on the heaviest drinking day in the past seven days (Wardle et al, 2007). A similar finding was noted by Plant et al (2005) in their (British based) examination of the relationship of multiple risk taking behaviours.

4.13 Alcohol has been identified as a significant risk factor for gambling-related hard within this study and contributed to other vulnerable traits, such as mental health, age, ethnicity, drug abuse, etc then the risk is increased.

4.14 The area surrounding William Hill is known for being an area where street drinking takes place. This has been identified by local residents in their submissions to the Licensing Authority during previous gambling applications for the area. The Council has been working with the Police and other organisations to tackle street drinking in the area and has been proactive in making changes to the local environment to make the area more attractive to residents and businesses whilst attempting to design out areas where street

drinkers can congregate. The Maida Hill Junction improvements are a good example of this.

4.15 However, there are still groups of street drinkers in the area which do cause anti-social behaviour. The main focus of this review relates to those who are customers of William Hill or those who are attracted to outside the premises due to William Hill's presence. It is well known that William Hill does attract a group of people, some of which are customers who consume alcohol outside the premises. This group is predominantly older men of Afro-Caribbean decent. However, there are a number of younger males who gather occasionally with this older group. This is supported by local resident's submissions, the police interaction with this group and council observations.

4.16 The Licensing Authority has a significant concern about the vulnerability of those who are under the influence of alcohol or have alcohol dependency. Alcohol and vulnerability to gambling-related harm has been identified by the Gambling Commission in their guidance, the Council's own Statement of licensing Principles for gambling and within the Geofutures research.

4.17 William Hill's Licensed Betting Office Manual, section 2, part 7 sets out its Social Responsibility policies and procedures which is provided as LA23. William Hill has a responsible gambling interaction process designed to protect vulnerable people from being harmed or exploited by gambling. In part 7.4 it states:

Another vulnerable group of people that you may need to deal with are those who are clearly under the influence of drink or drugs or customers with mental health issues.

Do not accept a bet or allow anyone to play on the Gaming Machines if they are very obviously under the influence of drink or drugs.

4.18 William Hill has also produced a document that complies with the requirements of the Gambling Commission. This document is called the Gambling Commission Manual. Within this document William Hill have set out the approach that must be taken to meet the requirements placed upon the company by the Commission in respect of the three licensing objectives and reporting.

4.19 Within William Hill's Gambling Commission Manual there is also a document relating to training called "Linked Training 2015 – Gambling Regulatory Training". A copy of this document is provided as LA24. Staff are required to interact with customers who are considered to be at risk to being vulnerable to gambling-related harm. Page 10 of this document sets out the potential interaction triggers that staff should be aware of. One of these triggers is clearly intoxicated individuals and in brackets it states '(refuse service and ask them to leave)'.

4.20 It is the Licensing Authority view that customers who are drinking both on and outside the premises are at a significant risk to being harmed by gambling at

William Hill. There has been no obvious positive action taken by William Hill to address the issues of people drinking on or outside the premises prior to the review application even though these concerns have been raised with shop staff by residents, police and council officials in the past.

4.21 It is apparent that it is normal for staff to allow customers to gamble whilst under the influence of alcohol. The shop manager infers to this in his recounted conversation with Dr Dwyer where he states that he is unable to deal with the problem. William Hill staff has confirmed this to Mr Nelson when asked about a visibly drunk customer on the 21st May 2015 (see LA10). There has also been a lack of adherence to William Hills own policies, procedures and staff training as it is clear that William Hill have identified those under the influence of alcohol are an at risk group.

5. Drugs

5.1 Within the representations to Betfred's new Betting (Other) Premises Licence application local residents made reference that William Hill customers have either been under the influence of drugs or participated in drug dealing on the premises. There had also been one police intelligence reports to this effect.

5.2 The Licensing Authority has viewed CCTV images collected during the 22nd July and 16th August 2015 (see paragraph 4.7 above). Whilst viewing this footage 5 clips were identified that could show drug dealing which involved William Hill customers (clips 7, 11, 13, 14 and 18 of LA20). This footage was watched on the 29th October 2015 by PC Ian Armstrong who is the local neighbourhood officer and is very aware of the issues associated with William Hill and the area. PC Armstrong has produced a statement relating to what he observed in the CCTV footage. He has stated that he believes that the footage does show possible drug deals and that if he were to witness this there would be sufficient grounds to undertake a drugs search on all those involved. A copy of PC Armstrong's statement is provided as LA25.

5.3 On the 12th May 2015 Nick Nelson, Senior Licensing Officer visited William Hill. Whilst he was carrying out his visit he witnessed customer behaviour that was consistent with someone being under the influence of drugs (see LA10).

5.4 William Hill has an Alcohol and Drugs Policy which is detailed within their Licensing Betting Office Manual (see LA18). This policy, contained within section 2, part 6.0 of the manual makes it clear that as a company William Hill take drug use and the supply of drugs on their premises very seriously. In the policy all reference to drugs are highlighted as being very important or are in bold and capitals to emphasise the policy points. Under the heading "Very Important Points" William Hill state:

"The Police consider the failure of employees to take reasonable action when they are aware that the use of drugs or the passing of drugs is taking place on Company premises to be grounds for opposing the renewal of our Premises Operating and Personal Licences. This could have very serious

consequences for the Company. Furthermore, the police may bring criminal charges against the Employee."

5.5 It is clear from this statement that the key concern is that if drug use or dealing is occurring on the premises there is a significant risk to William Hills business. Employees are required to report any incidents of use or dealing of drugs on the premises must be reported to William Hill's Central Security and the relevant District Operations Manager. Shop staff must also record the incident in their shop diary and then contact the police immediately.

5.6 William Hill also has a requirement on its employees to report any incidents that may affect one or more of the Licensing Objectives. In William Hill's Licensed Betting Office Manual, Section 2, part 7.6 – Licensing Objectives requires employees to complete an Incident Report Form if any incidents occur that may affect these objectives. This part gives a number of examples and one of which is suspected drug dealing/drug misuse takes place and police were not called. A copy of Section 2, part 7.6 of William Hill's Licensed Betting Office Manual is made available as LA26.

5.7 William Hill has a process for reporting incidents and as mentioned above employees must submit an Incident Report Form (IRF) for certain incidents. The process for this is contained within William Hill's, on page 11 of its Linked Training document (LA24) and also on pages 55 and 56 of its Gambling Commission Manual, which are available at LA27. The Licensing Authority requested information on the number of IRF forms submitted in the past year for this premises. This information was provided on the 29th October. A copy of the email relating to the number of IRF reports is provided as LA37.

5.8 In addition to the processes for reporting drugs William Hill have also establish policies and procedures for identifying drug problems. Section 3, part 13.0 of William Hill's Licensed Betting Office Manual sets out what employees should look for to identify those who are either under the influence of drugs or may be involved in drug dealing. There is also a section on what contractors and cleaners should be aware of when undertaking their roles within a premises. A copy of this document is provided as LA28.

5.9 As part of the police evidence to the Betfred application they provided copies of their Intelligence reports which related to William Hill (see LA14). One entry related to a source which stated that William Hill was the only place in the day time that you could purchase good quality crack. PC Armstrong does comment that the supply of crack is possibly the drugs that are being sold outside the premises (see LA25).

5.10 There is a significant concern that customers under the influence of drugs are visiting William Hill and are permitted to gamble on the premises. Like alcohol drug use is a significant impairment to the individual's cognitive ability and ability to assess risk. The Gambling Commission in their Guidance to Licensing Authorities refer to persons who are under the influence of drugs may be considered vulnerable. The research undertaking on behalf of the

Council by Geofutures, provided as LA22 also identifies that anyone under the influence of drugs is at greater risk of gambling related harm.

5.11 As detailed in paragraphs 9 below the North Westminster Drug and Alcohol Service at 470 – 474 Harrow Road is located a short distance away from this premises. Those attending this treatment centre would be classified as a vulnerable group. The area also has had a history of drug issues and as a result of this the premises must have robust and effective measures in place to identify drug dealing and drug use. These procedures should also make it clear that those who appear under the influence of drugs should not be permitted to gamble. William Hill does have policies and procedures in place but it appears that these policies and procedures have not been adhered to sufficiently on the premises.

5.12 The information provided by local residents, the observations of customers at the premises, the police intelligence report and the CCTV footage indicate that this premises may be being used as a location by drug dealers to supply drugs to both customers and local people. This is a significant concern for the Licensing Authority.

6. Street begging

6.1 Allegations have been made by local residents that street begging occurs outside or near William Hill's premises in Harrow Road. At 14:49hrs on the 26th July 2015 a male was identified begging outside William Hill, see clip 9 of CCTV footage referred to as LA20. In this clip it appears to show a male in a green jacket approaching people in the street begging. This individual is seen to enter and exit William Hill on occasions during a period of one hour. There is a significant concern that this person could be using money he has obtained by begging to participate in gambling.

6.2 PC Armstrong, in his statement relating to this CCTV clip (see LA25) has stated that he views the action of the individual identified in the footage as begging. He also states that it is aggressive street begging and if he had witnessed this he could have arrested this male.

6.2 William Hill should be able to identify this behaviour especially considering the local area and that begging is something that does occur here. The Licensing Authority is concerned that staff in the premises would not be in a position to identify this due to their lack of knowledge of this particular concern, that there isn't any procedure or practice to assist staff deal with these individuals within William Hill's Licensed Betting Office Manual. The design and layout of the premises is a factor as it prevents interaction with customers.

6.3 William Hill, since the review proceeding being lodged have advised the Licensing Authority, via Mr Minihane's statement that they intend to have more than one member of staff at these premises. They also state that during busy times a member of staff will be on the shop floor of the premises. See paragraph 46 of Mr Minihane's statement.

6.4 This will assist in dealing with this particular issue however, there needs to be specific training for staff to enable them to identify and deal with individuals who clearly do not have sufficient funds to gamble and are possibly begging. It is known that those who do beg may suffer from mental health issues or are homeless. The area does have a large number of hostels for both the homeless and those with mental health issues (see paragraphs 9 below). Indicators to identify a person who may have insufficient funds to gamble may be that they approach other customers asking for money, that they frequently enter and leave the premises and when they are in the premises they only stake a small amount using change and individuals who are identified by shop staff or customers as begging outside or near the premises.

7. Crime and disorder

7.1 A theme of criminal and disorderly behaviour has been present since the Licensing Authority was first made aware in 2011. As indicated within the submission above local residents have highlighted the issues surrounding William Hill and the actions of its customers or those it attracts.

7.2 The third licensing objective referred to in section 1 of the Act is:

Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.

7.3 William Hills operation in Harrow Road is to provide gambling facilities in the form of betting and associated ancillary permitted functions, such as gaming machines. The purpose of a betting shop is gambling. The premises and its operation attract people who gather outside the premises. These people are often customers or acquaintances of customers. Unfortunately it is the action of these individuals that has associated William Hill's gambling operation with crime and disorder.

7.4 Local residents have referred to incidents of being harassed when passing the premises. Dr Dwyer has specifically made reference to times when she has been subject to sexually offensive comments and threats. She has also been subject to verbal abuse from those outside the premises. A council officer has also been subject to unwelcome and offensive comments (See statement from Ms Green at LA11).

7.5 PC Armstrong has provided a statement dated the 17th September 2015 in his role as the Dedicated Ward Officer for Harrow Road. In his statement he sets out that the police have had to attend these premises and have seized or de-canned alcohol from those gathered outside the premises. He identifies one person was known to use William Hill to sell stolen goods to customers inside the premises. Although that know individual is now deceased there are still allegations that the sale of stolen goods continues in or outside these premises. PC Armstrong's statement is provided as LA29.

7.6 The Council has identified two pieces of footage taken on the 24th July 2015 and 3rd August 2015 (clips 7 and 16 of CCTV footage provided as LA20).

This footage appears to show the sale or attempted sale of goods outside the premises to customers of William Hill.

7.7 The Council Crime Analyst has conducted a review of all calls to police (CAD) and all crime reports (CRIS) associated with William Hill, 357 Harrow Road. The analyst has provided two maps showing the area of Harrow Road and Maida Hill Junction. The first map shows the location of the betting shops in this area and commercial premises. The second map shows the number of CAD and CRIS records associated with each premises over a two year period. These maps are provided as LA30 and LA31.

7.8 William Hill has 4 CRIS and 23 CAD's recorded against it in the past two years. A table showing the list of CAD and CRIS reports are provided as LA32. Of these 27 records the Licensing Authority and the Police have reviewed them for relevance.

7.9 Out of the four CRIS reports three relate to William Hill's operation and the other is unrelated. Redacted copies of the three relevant CRIS reports are provided as LA33. Twenty three CAD calls are identified at the premises. Out of those three were identified as not relating to William Hill (4317, 7770 and 8777). Copies of the 20 redacted CAD records are provided as LA34.

7.10 Since the list of CAD and CRIS reports were published there have been three further CAD calls and 1 CRIS report recorded which relate to William Hill. These additional 3 CAD calls and 1 CRIS are provided as LA34A.

7.11 Part 5 of the Gambling Commission Guidance to Licensing Authorities (5th Edition) sets out the licensing objective relating to crime and disorder relating to gambling. Paragraph 5.5 of that guidance states:

> ***5.5*** *In the context of gambling premises licences, licensing authorities should generally consider disorder as activity that is more serious and disruptive than mere nuisance. Factors to consider in determining whether a disturbance was serious enough to constitute disorder would include whether police assistance was required and how threatening the behaviour was to those who could see or hear it. There is not a clear line between nuisance and disorder and the licensing authority should take the views of its lawyers before determining what action to take in circumstances in which disorder may be a factor.*

7.12 It is the Licensing Authority's view that these premises are a source of crime and disorder and is associated with crime and disorder. There are numerous references to anti-social behaviour caused by customers and those congregating outside the premises. The Gambling Commissions Guidance does state at paragraph 6.40 that:

... the Act does not include the prevention of public nuisance and anti-social behaviour as a specific licensing objective.

7.13 Although the Act doesn't include anti-social behaviour as a objective it is the Licensing Authority's view that in addition to the crimes and potential criminal activity taking place at these premises the level of anti-social behaviour also amounts to disorder.

7.14 Section 3, parts 5.9 and 5.10 of William Hills Licensed Betting Office Manual makes reference to their Staffsaff system and the use of Magnetic locking devices on entrance doors. The Staffsafe system is a two-way audio communication system which is monitored by William Hill operators if the system is enabled by shop staff. William Hill describes this system as providing assistance in combating burglary and anti-social behaviour. The Maglock system is a magnetic door lock that can be operated by shop staff to secure the entrance/exit door remotely. In describing the "Procedure for Operating Control of Magnetic Door Locks" William Hill provide an example of a reason for when the Maglock may be initiated. It states "The reason may vary from anti-social behaviour to a specific crime prevention recommendation". Parts 5.9 and 5.10 of section 3 from William Hills Licensed Betting Office Manual are provided as LA35.

7.15 Maida Hill Junction and this area of Harrow Road do have a problem with street drinking and anti-social behaviour. The Council has run a number of initiatives in partnership with the Police and other agencies to tackle these issues.

7.16 As referenced by William Hill in paragraphs 21 to 26 of Mr Minihane's statement William Hill were approached by Ms Green, Harrow Road Ward Community Protection Officer in January 2014 concerning anti-social behaviour outside of William Hill premises in Elgin Avenue and Kilburn. It should be noted that officers acting on behalf of the Licensing Authority were not aware of these issues or to the local initiative to tackle them. A meeting took place and a number of action points were agreed with William Hill. In June 2014 Ms Green visited William Hill's premises in Elgin Avenue and Kilburn. She found that the agreed Anti-Social Behaviour (ASB) notices were on display in the Elgin Avenue branch and she didn't witness any ASB at the time of the visit. In the email she also referred to not receiving any further complaints concerning William Hill's premises in Kilburn.

7.17 The Council and its partners are currently working to reduce the local issues through the Street Drinkers – Maida Hill Market project. This project was initiated in August 2015 and is aimed at tackling street drinkers in the area through partnership working with other agencies, such as the police and local residents to tackle these issues.

7.18 The Gambling Commissions Guidance to licensing Authorities does make reference to the use of other powers to tackle issues such as street drinking and anti-social behaviour: Paragraph 36.45 of that guidance states:

36.45 *There are various local authority and police powers to manage issues such as street drinking and anti-social behaviour, and licensing*

authorities should look to these powers in the first instance as being more appropriate remedies than the Act.

7.19 The Council's City Inspectors are taking positive action with local alcohol licensed premises to prevent sale of single cans or high strength alcohol products. The Council is actively doing all it can to tackle street drinking and will take a robust approach to making a positive impact in this area. The Maida Hill Project Initiation Document has been provided at LA36.

7.20 The purpose of the review however, is to specifically tackle the issues associated with William Hill and its customers who commit crime and disorder inside and outside these premises. We acknowledge that similar issues do occur in the area and are not isolated to outside William Hill. However, a certain group of people who cause these issues are attracted to William Hill to participate in gambling or to socialise with others who are customers of William Hill.

7.21 Since the review application was made the Licensing Authority and the Police have been made aware that some of William Hill customers have been banned from the premises. William Hill was requested to provide some further information relating to how many customers they have banned this year. In an email dated the 29th October 2015 William Hill provided this information. Since the review was lodged William Hill has banned 2 individuals from the premises. A copy of this email is provided as LA37.

7.22 We are aware that those banned from William Hill are now meeting in the Maida Hill Market area. These individuals are now mixing with the existing groups in the area. The fact that this group now meets in Maida Hill market indicates that William Hill was the attraction for them and their street drinking prior to them being banned from the premises.

7.23 In Mr Studd's statement, which has been provided by William Hill, sets out a number of recommendations (see part 8). The vast majority of Mr Studds recommendations relate to tackling street drinking as the main solution. As is demonstrated with the current project at the Maida Hill Junction the Council and its partners are actively tackling the issues of street drinking in the area. A number of Mr Studds recommendations are already in place and this may not have been apparent to Mr Studd due to the amount of time that he spent in the area. The area has a history of these issues and the Council has invested a large amount of money in improving the local amenity for residents and to discourage the criminal behaviour that has been present in the area. This is an ongoing piece of work which involves multi agency working and the support and assistance of local residents and businesses.

8. Premises design and layout

8.1 Due to the issues identified at the premises staff are not able to see if people are bringing in alcohol to the premises or carrying out any other form of criminality on our outside the premises due to the shop design and layout. Dr Dwyer, in a conversation on the 23rd June 2015 with Charlie the premises

manager at the time (see LA8) stated that the shop layout, particularly the location of the counter at the rear of the store and the advertising boards in the windows made it difficult for staff to view anyone drinking on or outside the premises. He also advised her that staff could not view the footage from the shop cameras and this was only accessible by William Hill central security.

8.2 This premises is long and narrow with a limited frontage. When looking at the premises the entrance to the premises is via a double set of metal framed double glazed panelled doors. There is one large window which originally had three sets of floor to ceiling advertising boards which took up the majority of the betting shop frontage.

8.3 On entering the premises the main bank of monitors that display the sporting events and relevant betting information is located on the left wall. In front of these displays are a number of fixed desks and seating which face towards the screens. To the right hand side wall immediately on entry are the gaming rules and other information relating to William Hills operation. Directly beyond that and attached to the wall is a shelf that runs along it until it ends prior to the gaming machines. This shelf contains writing implements and betting slips. There are some tall stalls located under the shelf for customers to use. Directly above the shelf are the betting pages and other betting information.

8.4 Directly beyond the bank of monitors, tables and seating are the gaming machines. Two machines are located on each side of the store against the walls of the premises. These machines are located directly in front of the staff counter.

8.5 The staff counter has a full height bandit screen. The counter abuts to the left wall and comes across the store towards the right wall. The counter protrudes two thirds across the store at an angle towards the rear of the premises. The front portion of the counter does have positions for two members of staff. The other part of the counter runs towards the rear of the shop and provides a walkway between it and the right wall. This walkway leads to the customer toilets and staff access door at the rear of the premises. There are also staff positions on this section of the counter for staff. A copy of the plan deposited with the Licensing Authority and as attached to the licence is provided as LA38.

8.6 The counter is the main viewing point for staff to monitor customer behaviour and to enable them to monitor who enters the premises. The main counter positions face towards the front of the store. These positions provide a good view of the gaming machines and those using them. However they are a reasonable distance away from the entrance and their view of the tables and seating area; and entrance can be easily obstructed by customers. The angle of the seating and tables in front of the bank of betting monitors does mean that anyone sitting nearest the counter area can obstruct the view of anyone else sitting in that line of seating.

8.7 The tables and seating area can be very busy and officers of the Council have witnessed the store when it is busy. Due to the narrow confines of the

premises and when the seating area is fully occupied customers will stand behind the seating area and lean against the betting shelf which runs along the wall directly opposite this bank of monitors. Customers will also stand in front of the door either talking to other customers or watching the monitors.

8.8 The current layout of the betting shop is restricted by the narrow nature of the premises. However, by locating the counter at the rear of the premises does create difficulties for staff in monitoring customer's entering the premises and their behaviour whilst sitting or standing in front of the main betting monitors.

8.9 The restricted view of the entrance is also a concern when the shop is busy as staff will be unable to monitor who enters or exists but also whether they should be challenged due to their apparent age. A betting shop is a strictly over 18 environment and it is a breach of the mandatory conditions of the premises licence to let anyone under the age of 18 into the premises. William Hill has a Think 21 policy and their staff receive training on how to effectively challenge customers who appear to be under the age of 21. It is the Licensing Authority's view that the current counter position at the rear of the premises view can be restricted and as a result William Hill are at risk to being unable to identify children or young people or those vulnerable to gambling related harm entering the premises as well as identifying those who commit crime on the premises.

8.10 The advertising displays in the window of the shop did significantly restrict the view outside the front of the shop. William Hill has decided to remove the advertising board nearest the entrance which improves the view of the exterior (see paragraph 51 of Brian Minihane's statement).

8.11 The premises prior to the review did not have external CCTV cameras that could be monitored by members of the staff from the counter. The Licensing Authority requested to view footage taken from inside the premises from 16:30hrs to 17:30hrs on 20th July 2015. William Hill provided this footage which we produce as LA39. We also produce a still from each of the internal CCTV cameras as LA40.

8.12 On viewing this footage the Licensing Authority had immediate concerns over the quality of the footage and the maintenance of the system. The covert camera which was supposed to capture pictures of customers faces as the exit the premises was not facing the right direction so was not fulfilling its task. Camera 3 was not installed during a previous refit and as such there was a gap in coverage. The recording quality of the existing cameras also looked to be not to the standard we are used to seeing in other betting premises within the City.

8.13 Of greater concern was the fact that the CCTV is monitored by William Hill's Central Monitoring office. Staff within the shop were not able to view any CCTV images within the store. They appear to have been unaware of the door camera pointing in the wrong direction and that there was no coverage of the front of the shop. It is unknown how long the CCTV system was operating

like this and it is not clear why these obvious deficiencies were not identified by William Hill and corrected.

8.14 PC Bryan Lewis from Westminster's Police Licensing Team has view the internal CCTV footage provided by William Hill. He has provided his views relating to the CCTV system in a statement which is dated 7th October 2015. This statement is provided as LA41.

8.15 At a meeting on the 9th September with Mr Richard Taylor (Gosschalks Solicitors) and Mr Minihane (William Hill) the CCTV quality, position of the cameras and the number of cameras were raised. It was at this meeting that William Hill agreed to review the current CCTV system at the premises to meet the specification of the Police.

8.16 William Hill have confirmed via Brian Minihane statement (dated 21st October 2015) submitted as part of this review proceedings that the CCTV system for this premises has been upgraded and additional cameras have been installed, including to the exterior of the premises. The CCTV cameras can now be monitored by staff from behind the counter and an additional CCTV monitor has been placed at the entrance so customers can view the CCTV images being recorded which acts as a deterrent.

8.17 William Hill has improved the CCTV system, including the installation of two external cameras and a monitor at the staff counter position. They have also removed one of the advertising displays from the window which now provides improved vision both looking out of the premises and looking in. These measures will improve the ability for staff to monitor what is taking place outside their premises and the behaviour of their customers. However, there is still a concern that staff will have difficulty monitor customers within the main seating area in front of the bank of monitors if staff are behind the counter. William Hill have stated that they will not operate with only one member of staff and that at busy times they will ensure that a member of staff is walking the shop floor.

8.18 The Gambling Commissions Guidance to Licensing Authorities refers to the layout of a premises under the third licensing objective which relates to children and the vulnerable. The guidance states:

> ***5.14*** *Where a licensing authority considers the structure or layout of premises to be an inhibition or potential inhibition to satisfying this licensing objective, the licensee should consider what changes are required to ensure the risk is mitigated. Such changes might include the positioning of staff or CCTV, the use of floor-walkers and the relocation of the staff counter to enable direct line of sight. Licensing authorities will need to consider the proportionality of changes to the physical layout in relation to other measures that could be put in place.*

8.19 The Gambling Commission have brought in a new Social Responsibility (SR) Code for all non-remote betting operators relating to relating to access to

gambling by children and young persons (3.2.7) came into effect in May 2015. Section 3 of this code states:

3. *Licensees must ensure that their policies and procedures take account of the structure and layout of their gambling premises.*

8.20 In addition to the above mentioned SR Code the Commission also introduced SR code provision 3.5.1 concerning self exclusion for all non-remote gambling operators licences. Section 7 states:

7. *Licensees must ensure that their procedures for preventing access to gambling by self-excluded individuals take account of the structure and layout of the gambling premises.*

8.21 The current design and layout of the premises hinders the monitoring of the front entrance and prior to the CCTV system upgrade staff had no way of monitoring the front entrance if it was obstructed by customers. The concern was particularly prevalent relating to access to children and young people and how those who were self excluded would be identified. William Hill's Licence Betting Office Manual contains the relevant policies and procedures to actively prevent under 18's from accessing the premises and gambling. It also contains the procedure and policies associated with self-exclusion. To enable staff to achieve the operator's policies and procedures there was a concern that the layout and CCTV system was not adequate to enable this.

8.22 The current layout of the premises is a contributing factor to the issues that have been identified. It is the lack of visibility out of the premises that has hindered staff from being able to view what is taking place on the street. The counter being located at the rear of the shop and with angle of that counter restricts vision to the front door and to view what customers are doing on the shop floor. The layout of the seating in front of the main bank screens also prohibits the view of customers.

9. Local area

9.1 Harrow Road and the Maida Hill Junction (formerly known as the Prince of Wales Junction) has experienced long term and persistent problems with crime, disorder and vulnerability. The 2010 Index of Multiple Deprivation places 33% of the ward in the top 10% deprived in England. The 2011 Census identified 33% of Harrow Road households as being more likely to have one dimension of deprivation (either employment, education, health and disability or household overcrowding). However, the Harrow Road Workshop Information Pack dated 30 April 2015 focused on a smaller study area, in which 357 Harrow Road is located, and identified 73% of households as shown to be deprived in at least one dimension, higher than the 61% of all Westminster households. The 2010 Income Deprivation Affecting Children Index shows that, on average, 60% of children in the ward live in income deprived households. Similarly, the workless rate in August 2013 was 17.2%, much higher than the Westminster average of 8.6%. Research conducted for Westminster City Council (Exploring area-based vulnerability to gambling-

related harm – 13 July 2015) suggests that whilst those who live in deprived areas may be no more likely to gamble than others, those who do are at greater risk of experiencing some problems with their behaviour.

9.2 It is clear, therefore, that the location in question is a highly sensitive one. The premises is within walking distance of several hostels and schools, as well as other betting shops (although demand for betting premises is not a consideration). The nearest major transport link, Westbourne Park tube station, is located on Great Western Road. Given the limited access as a result of the Grand Union Canal, a larger than average proportion of the local population using this tube station will pass this premises. Whilst this has obvious commercial benefits, it presents a major concern given the large vulnerable population in the area. This is in addition to the draw of the Maida Hill Junction and market area as a natural focal point for the area.

9.3 Research conducted in Westminster in 2014 identified problem gambling rates of 11.6% amongst the homeless population, which is much higher than the 0.7% problem gambling rate amongst the general population. Further, Westminster's Contact and Assessment Service for Rough Sleepers Quarter 4 report (January to March 2015) shows that 20% of 174 rough sleepers assessed identified issues around gambling. Therefore, the Licensing Authority considers the homeless and rough sleeper population to be highly likely to be vulnerable to gambling.

9.4 There are two rough sleeper supported housing services within 500 metres of 357 Harrow Road:

- St Mungo's, 3 – 5 Bravington Road
- St Mungo's, 7 Chippenham Road

9.5 In addition, there are a further three hostels for people with mental health problems within 500 metres of the premises:

- St Mungo's, 58 – 60 Elgin Avenue
- St Mungo's, 32 – 34 Great Western Road
- WAMH, 14 Edbrooke Road

9.6 Officers spoke to a duty manager at St Mungo's on 19 June 2015, who identified a resident at the 32 – 34 Great Western Road site as having a recognisable gambling problem who will spend all available money on slot machines in betting premises in the area.

9.7 And a further two hostels for people with learning disabilities:

- Westminster, 65 Walterton Road
- Westminster, 22 – 24 Great Western Road

9.8 The hostels and housing services listed above are directly commissioned by Westminster City Council. In addition to these, there are other clinics and hostels in the area for people which the Licensing Authority would consider

vulnerable. The most significant of these is the North Westminster Drug and Alcohol Service at 470 – 474 Harrow Road, approximately 100 metres from 357 Harrow Road. This premises is the location to which all Westminster residents north of Oxford Street who suffer from issues around drug or alcohol use are sent for help. This service offers:

- Substitute prescribing;
- Community detox and access to inpatient detox;
- One-to-one sessions and group work;
- Specialist family and substance misuse practitioners;
- Specialist services for alcohol and crack users;
- Open access between Monday to Saturday 12 noon – 5pm;
- Evening sessions by appointment;
- Testing and treatment for HIV and Hepatitis A, B & c;
- Sexual health advice;
- Legal, debt and housing advice;
- Needle exchange; and
- Mutual aid groups – SMART, AA etc.

9.9 Again, the Licensing Authority would consider those with drug and / or alcohol addictions as vulnerable to gambling. The significance of this premises in such a close location to the site at 357 Harrow Road is a real concern.

9.10 A further hostel identified in the 500m radius area includes:

- Genesis, 79 Elgin Avenue – residential units for ex-offenders;

With another hostel lying just outside this radius:

- Wytham Hall, 40 Lanhill Road – a hostel for the homeless with medical needs.

9.11 There are likely to be further hostels within 500 metres of this location catering for the vulnerable population. Harrow Road has one of the largest concentrations of hostels in Westminster which is reflective of the size of the vulnerable population in the area.

9.12 Officers from the Licensing Authority spoke to Patchwork at 9 Mozart Street (roughly 550m from the premises) on 19 June 2015. This hostel offers residential accommodation for up to eight people for a maximum stay of two years for those with mental health needs such as psychopaths. The person officers spoke to was concerned by the number of betting shops in the area.

9.13 Officers identified a strong smell of alcohol upon entering William Hill at 357 Harrow Road during a site visit on 12 May 2015. During the same visit, officers noticed a young male who appeared to be under the influence of drugs. Outside the premises, officers noted an elderly woman was begging passers-by for 50p on the corner of Harrow Road and Great Western Road. Although the purpose of the begging was not clear (e.g. food, alcohol, drugs

or gambling), this is another indicator of the problems with vulnerability experienced by the area.

9.14 Observations of the premises at 357 Harrow Road since the review application was submitted have revealed several concerning aspects regarding the local area. These include:

- Groups loitering outside the premises.
- Street drinking, including customers of William Hill.
- Street begging, one individual in particular who appears to be begging from members of the public and entering and re-entering William Hill on several occasions over the course of an hour.
- Exchanges between members of the public and William Hill customers which appear to be drug deals.
- Exchanges of goods between members of the public and William Hill customers.

9.15 These issues are consistent with those identified by local residents, council officers and Police and have been longstanding issues for the Maida Hill Junction, particularly with the William Hill premises, since at least 2011. Said issues were raised with William Hill in 2011 and an action plan was put in place in order to remedy these issues. In addition, Community Protection Officers and Local Safer Neighbourhood Police Officers have been involved with improving the situation at the premises. Despite initial and temporary improvements, the issues persist and have done so to the detriment of local residents and businesses for a number of years to date. William Hill Organisation Ltd has been given numerous opportunities and ample time to resolve these issues, but has failed to do so effectively.

10. Conclusion

10.1 The Licensing Authority must, in exercising its function aim to permit gambling (section 153). However, this aim to permit principle is only applicable if the premises operate in accordance with the Gambling Commissions Codes of Practice, the Commissions Guidance for Licensing Authorities, reasonably consistent with the Licensing Objectives and in accordance with the Licensing Authority's Licensing Policy.

10.2 As stated within this submission the operation of William Hill, 357 Harrow Road has been subject of concern for a number of years. Residents, police and the Council have raised the issues that occur inside and outside the premises with William Hill. This has been ongoing for a number of years with no effective resolution to the issues from William Hill.

10.3 William Hill has not taken the concerns of local residents, the police and the Council seriously until now and as such the premises have become linked to the issues that it is effected by. These issues are:

10.3.1 groups of people gathering outside the premises drinking alcohol,

10.3.2 criminal and disorderly behaviour by customers and those gathering outside William Hill to socialise with those customers,

10.3.3 drug use and drug dealing, and

10.3.4 customers are under the influence of alcohol or other substances, and

10.4 It is the Licensing Authority's view that William Hill has failed to understand the significance of the abundance of establishments that are provided to assist and house vulnerable people. Coupled to this they have not taken into account the issues of the local area and haven't taken appropriate actions to address these issues and ensure that the operation of the premises licence is done in a manner that is reasonably consistent with the licensing objectives.

10.5 The staff and management of these premises have not complied with William Hill's own procedures and operating manuals. Mr Minihane has stated at a meeting with the Licensing Authority Officers that the issues hadn't been given to the 'right people' within the organisation and that the staff tried to manage these issues locally. If it is the case that these issues haven't been getting to the right people with the interactions with the premises then this raises concerns over how effective these reporting procedures are. However, the police and the council have interacted with William Hill representatives regarding these issues previously.

10.6 William Hill has operated reactively rather than pro-actively in dealing with the issues at the premises. Only after the review application was made and following a meeting with Officers of the Licensing Authority was any action proposed to deal with the concerns raised by local residents, police and the Licensing Authority. These issues have been ongoing for years at these premises as demonstrated with the submissions by local residents to previous applications for betting shops in the area.

10.7 There is a significant concern and mounting evidence to support the view that the premises are being used by criminals to sell drugs and possibly stolen articles. From the limited CCTV footage and observations undertaken by the Licensing Authority, it supports the views of local residents relating to this.

10.8 The design and layout of the premises has been a contributing factor to the ability of staff to adequately identify and enforce William Hill's own polices. This has enable customers to enter the premises and consume alcohol. Customers have been seen to take bottles and cans, which are suspected of containing alcohol into and out of the premises.

10.9 The ability for customers to participate in gambling when they are under the influence of alcohol or drugs is a significant concern. It is well known and indeed documented in William Hill's own Licensing Betting Office manual that those under the influence of alcohol and drugs are potentially vulnerable to gambling related harm. It has become normal for people to be visibly drunk on the premises. Customers will meet outside the premises with friends and

acquaintances and consume alcohol. They then return to William Hill and participate in gambling.

10.10 There have clearly been breaches of the mandatory condition of the betting (Other) Premises Licence for this premises concerning the consumption of alcohol on the premises. This raises concerns that if the Licensing Authority were to impose conditions or William Hill propose their own conditions would William Hill comply with them in the future.

10.11 These premises and how they are run raises a significant concern to the Licensing Authority. It is apparent that William Hill is now looking to try and address these issues. However, the Licensing Authority has no confidence that William Hill will maintain the improvements that it has already proposed.

List of Licensing Authority documents associated with its submission to the William Hill, 357 Harrow Road review application.

Reference	Description	Date (If applicable)
LA1	07/07253/WCCGAP – Betting (Other) Premises Licence issued under the provisions of the Gambling Act 2005 for William Hill, 357 Harrow Road	31st August 2007
LA2	Local resident representations relating to Coral Racing Limited's application for a new Betting (Other) Premises Licence for 381 Harrow Road.	28th July 2011 to 17th August 2011
LA3	Statement of Caroline Tredwell (LA)	17th November 2011
LA4	Licensing Sub-Committee No. 1 Minute of decision from the hearing concerning Coral Racing Limited application for a new Betting (Other) Premises Licence for 381 Harrow Road.	28th November 2011
LA5	Email exchange between Kerry Simpkin (LA) to Clark Dunstan (WH) relating to concerns surrounding William Hill	1st September 2011 to the 29th September 2011
LA6	Email exchange between Council officers relating to Dr Dwyer's complaint concerning William Hill	5th August 2012 to 6th August 2012
LA7	Local resident representations to Betfreds application for a new Betting (Other) Premises Licence for 351 Harrow Road.	2nd April 2015 to 24th April 2015
LA7A	Licensing Sub-Committee No. 2 Minute of decision from the hearing concerning Bone Brothers Limited T/A Betfred application for a new Betting (Other) Premises Licence for 351 Harrow Road.	1st July 2015
LA8	Email from Dr Karen Dwyer to Nicholas Nelson (LA)	23rd June 2015
LA9	Statement of Sumeet Anand-Patel (LA)	19th June 2015
LA10	Statement of Nick Nelson (LA)	1st November 2015
LA11	Statement of Klaudija Green (LA)	18th June 2015
LA12	Statement of Paul Green (LA)	7th July 2015
LA13	Statement of David Wood (LA)	8th July 2015
LA14	Metropolitan Police Service Intelligence Reports relating to William Hill, Harrow Road	18th June 2015
LA15	Metropolitan Police Service IIP search results for William Hill, Harrow Road.	18 June 2015
LA16	Notice of Review application and accompanying documents	20th July 2015
LA17	Photographs of Review Notices in William	20th July 2015

	Hill windows	
LA18	William Hill Licensed Betting Office Manual, section 2, part 6.0 – Drug and Alcohol Policy	January 2014
LA19	Statement of David Wood (LA)	20th July 2015
LA20	Harrow Road/Maida Hill Junction Council CCTV footage – Clips	Between 22nd July 2015 and 15th August 2015
LA21	Synopsis of Harrow Road/Maida Hill Junction Council CCTV footage clips	N/A
LA22	Exploring area-based vulnerability to gambling-related harm: Who is vulnerable? Findings from a quick scoping review - Geofutures	13th July 2015
LA23	William Hill's Licensed Betting Office Manual, section 2, part 7 - Social Responsibility	January 2014
LA24	William Hill's Gambling Commission Manual - Linked Training 2015 – Gambling Regulatory Training.	2015
LA25	Statement of PC Ian Armstrong	29th October 2015
LA26	William Hill Licensed Betting Office Manual, section 2, part 7.6 – Licensing Objectives	January 2014
LA27	55 and 56 of its Gambling Commission Manual	2015
LA28	William Hill's Licensed Betting Office Manual Section 3, part 13.0 - Drugs	January 2014
LA29	Statement of PC Ian Armstrong	17th September 2015
LA30	Map showing Gambling Premises and Commercial Premises in Harrow Road/Maid Hill Junction	29th October 2015
LA31	Map showing the combined CAD and CRIS number per Commercial Premises in Harrow Road/Maida Hill Junction	29th October 2015
LA32	WCC Crime Analysis of CAD and CRIS records for William Hill, 357 Harrow Road	26th October 2015
LA33	CRIS reports relevant to William Hill, 357 Harrow Road	September 2013 to July 2014
LA34	CAD reports relevant to William Hill, 357 Harrow Road	September 2013 and August 2015
LA34A	CAD and CRIS reports relevant to William Hill that aren't listed in LA32	3rd November 2015
LA35	William Hills Licensed Betting Office Manual section 3, part 5.9 – Sitesafe and part 5.10 - Magnetic Door Lock Procedure	January 2014
LA36	WCC Project Initiation Document – Street Drinking - Maida Hill Market	10th August 2015
LA37	Email from Clare Johnson, Gosschalks Solicitors regarding information request	29th October 2015

LA38	Plan of William Hill, 357 Harrow Road	2nd April 2001
LA39	William Hill internal CCTV footage of store	20th July 2015
LA40	Stills of William Hill CCTV cameras	20th July 2015
LA41	Statement of PC Bryan Lewis	7th October 2015

(WH) - William Hill
(LA) - Licensing Authority

City of Westminster

64 Victoria Street, London, SW1E 6QP

No: 07/07253/WCCGAP

BETTING (OTHER) PREMISES LICENCE

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

City of Westminster

Part 1 – Details of person to whom licence is issued

The premises licence is issued to:

William Hill Organization Ltd

of the following address:

Greenside House
50 Station Road
Wood Green
London
N22 7TP

who holds an operating licence which has been given the following operating licence number by the Gambling Commission:

004-002752-N-102413-001

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

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

William Hill
357 Harrow Road
London
W9 3NA

Part 3 – Premises licence details

This licence came into effect on:

01.09.07

This licence is of unlimited duration.

The following conditions have been attached to the licence by the issuing authority under section 169(1) of the Gambling Act 2005:

N/A

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

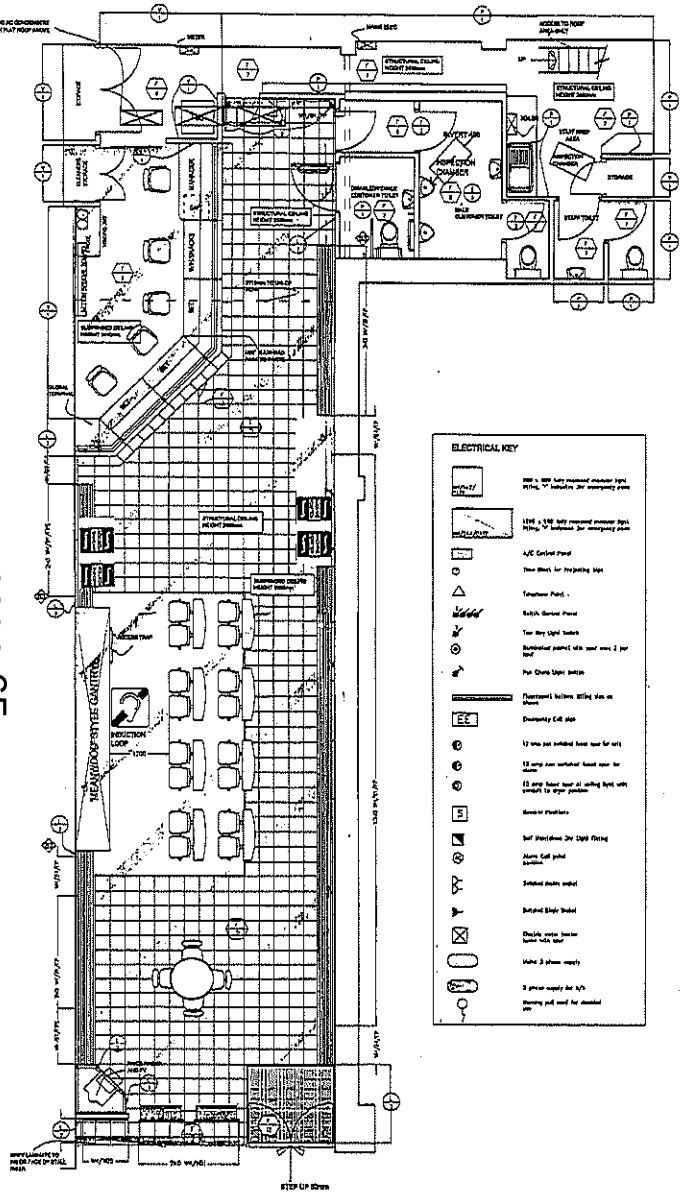
N/A

A scale plan is attached as an annex to this licence.

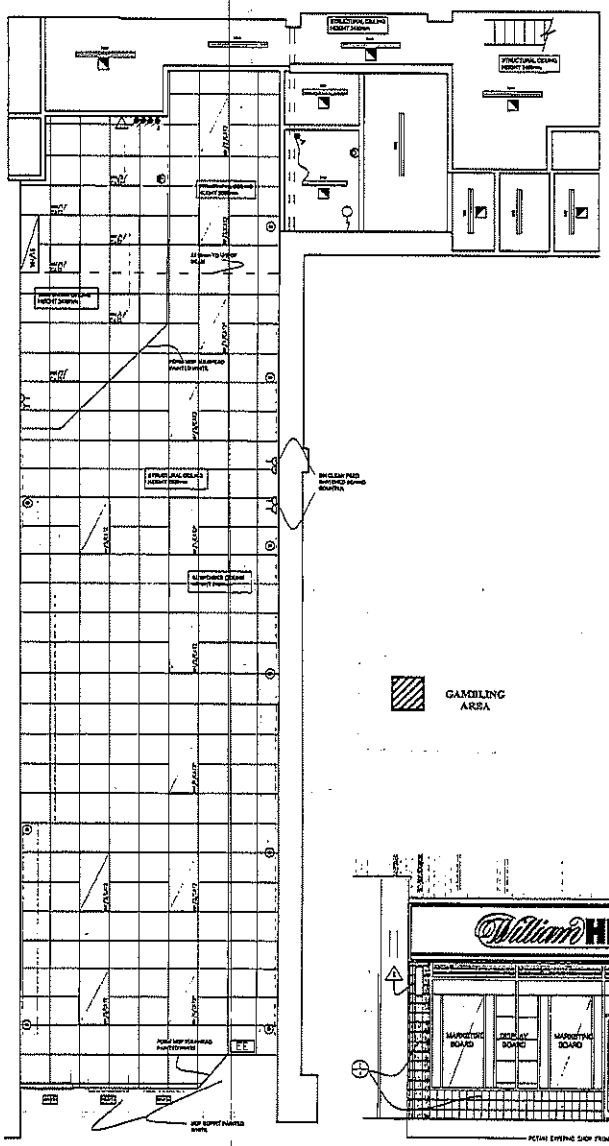
Date: 11/02/08

Signed:

pp **Director of Community Protection**

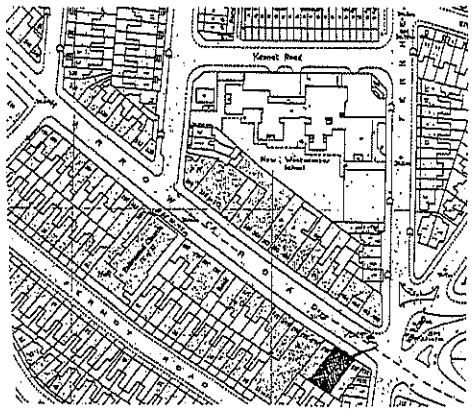


PROPOSED SHOPFITTING PLAN



PROPOSED CEILING PLAN

PROPOSED SHOPFITTING ELEVATION



SITE PLAN : 1 : 1250

Revisions.

	Date.	Approved.
A) VERSATILE PITTHOS REVISED, SKG, GLOBAL MACHINES ADDED AND ADDITIONAL POWER POINTS SHOWN.	17/12/2002 CDN	

CITY OF WESTMINSTER
18 JUN 2007
W.C. LICENSING SERVICE

DO NOT SCALE OFF THIS DRAWING

William HILL ORGANIZATION Ltd.

Site. 357 HARROW ROAD
LONDON W9
3NA
LBO 'Exits'

Description. PROPOSED SHOPFITTING PLAN AND ELEVATION AND CEILING AND ELECTRICS PLAN

Date. 03/04/2001 | Scale. 1:50

Drawn. SIMON LOVELOCK | Checked.

Drawing Number. AGR/LS/RF/529916/02 A

PROJECT MANAGER: GRAHAM BADLEY

73

From: Ruth Bush
To: Gambling
Cc: Mukerji , Nilavra (Cllr); McKie, Guthrie
Subject: Fw: objection
Date: 05 August 2011 11:31:06

I also wish to add my objection to those of my fellow Harrow Road ward councillors. In addition to Cllr McKie's concern about the impact on vulnerable adults attending the project at 389a Harrow Road, I would add the following:

- There is potential negative impact on young people at this time of redundancies, when jobs are not easy to come by. Our concern as ward councillors is that people should be assisted into work and education, and not be deflected by yet another source of a potentially addictive activity.
- Much multi-agency money, time and effort has gone into making the area on and around the Maida Hill marketplace (the former 'Prince of Wales junction' a better place, to reduce crime and anti-social behaviour. However, many people still 'hang around' the William Hill betting shop a few doors away from the proposed site of this application (and there are other betting shops nearby). The last thing we need is yet another place where anti-social behaviour, even if only at a low level, can develop.

Ruth Bush
Cllr, Harrow Road Ward
----- Original Message -----
From: Nilavra Mukerji
To: gambling@westminster.gov.uk
Cc: rb@bushparl.demon.co.uk ; Guthrie McKie
Sent: Friday, August 05, 2011 10:01 AM
Subject: Re: objection

I would like to add my objection to this with Cllr McKie

Regards

Nilavra Mukerji

Councillor for Harrow Road Ward

On 04 Aug, 2011,at 03:37 PM, gkmck@aol.com wrote:

Re: Planning Reference: 11/07564/LIGN
Coral, 381 Harrow Road, W9

I wish to object to this application for a betting shop at 381 Harrow Road.
Currently there are 2 licensed betting shops in Harrow Road - Paddy Power at 345 and William Hills at 353. More importantly is the Westminster Society for People with Learning Difficulties which is at 389a Harrow Road. This has a drop in facility for people with learning difficulties and consequently the application will put at risk vulnerable adults.

Councillor Guthrie McKie
Harrow Road Ward Councillor

From: Rowe, Steven
To: O"Leary, Darren
Subject: FW: Ref:C466544 Contact the Licensing Service - OBJECTION TO CORAL HARROW ROAD
Date: 28 July 2011 15:42:05

Please see objection attached. Attach to IDOX and update the representation screen in UNIFORM.

Thanks

Steve Rowe
Environmental Health Consultation and Licensing
Premises Management Delivery Unit
Westminster City Council
4th Floor South
Westminster City Hall
64 Victoria Street
London SW1E 6QP

Tel: 020 7641 7825
Fax: 020 7641 7815
Email: srowe@westminster.gov.uk
Team E-mail: generallicensing@westminster.gov.uk
Web: www.westminster.gov.uk
You can now apply online for the majority of licensing regimes that the authority is responsible for. Please visit www.westminster.gov.uk/licensing and follow the relevant links to apply.

-----Original Message-----
From: webserver@westminster.gov.uk [mailto:webserver@westminster.gov.uk]
Sent: 28 July 2011 14:47
To: Licensing Vertex
Cc: Webmaster
Subject: Ref:C466544 Contact the Licensing Service

The following person has submitted the information below via the Council's website. They are either contacting you for information, reporting a problem or requesting a form relating to the matter contained in the email subject field.

First Name: Maya
Surname: Vuksa
Email: mayavuksa@googlemail.com
Phone:
Fax:
Address: 66 Fermoy Road
City: London
Postcode: W9 3NJ
Country: England
Comments: I strongly object to this New Premises Licence Application made by Coral for the purpose of opening a new betting shop on Harrow Road. The reason for this is that the immediate vicinity of these promises is home to several other betting shops which is already more than average. There are already far too many betting shops within a very small stretch of Harrow Road, including William Hill, Paddy Power and Tote. These betting shops encourage anti-social behaviour and street drinking which are intimidating to members of the community not involved in the use of these establishments. I have lived in this area for 7 years and have witnessed many occasions when there have been incidents and intimidation outside these shops. This community requires a more varied selection of shops and services which cater to other members of the public, including children and the elderly, and contribute to the improvement of the area in a positive way. Another betting shop will not achieve this and will simply place a greater strain on policing and public safety.
Reference: C466544

From:	Amanda Evans
To:	Gambling
Cc:	"Elaine Arthur"
Subject:	381 Harrow Road
Date:	05 August 2011 16:09:43

To whom it may concern,

I understand that Coral have applied to open a betting shop at 381 Harrow Road, W9. I live at 48 Hormead Road, just around the corner from the proposed new betting shop.

I am appalled at the prospect of this application being allowed. There are already a number of betting shops along this stretch of the Harrow road, plenty to satisfy the demand. The existing shops seem to attract undesirable elements; there are often drunk people hanging around outside the betting shops, or even just large gangs of men hanging around them, which can feel extremely intimidating for me and other locals. Our children are exposed to the aggression that is so often displayed outside these shops, on a daily basis. I would like our children to be protected by our local council, not for their limited freedoms to be further restricted.

It is accepted that betting is often connected with other criminal activity; I am horrified that Westminster council is even considering exposing its residents to more of this undesirable behaviour, rather than take responsibility for helping to rid us of it.

Yours sincerely

Amanda Evans
Resident
48 Hormead Road
London
W9 3NQ

From: Nelson, Nicholas
To: O"Leary, Darren
Cc: Rowe, Steven
Subject: FW: ref 11/07564/LIGN CORAL BETTING SHOP
Date: 09 August 2011 10:05:26

Please find rep attached.

From: Gillbob Gillbob [mailto:smorkelbabe@googlemail.com]
Sent: 06 August 2011 01:08
To: Gambling
Subject: ref 11/07564/LIGN CORAL BETTING SHOP

I am horrified to see AGAIN that westminster council wants to give license to another betting shop in this area.
We have two already and this proposed one is only 100yds away from the other ones.This area already suffers the antisocial gathering of mostly men at the prince of wales corner along with the drinking in the street ,difficulty using the crossing and a nasty feelling of vunerablity being a woman having to endure leering and suggestive remarks.How bad would the council like this area to become.?????

From:	Nelson, Nicholas
To:	O"Leary, Darren
Cc:	Rowe, Steven
Subject:	FW: Proposed Licensing Application 11/07564/LIGN
Date:	09 August 2011 10:06:14
Importance:	High

Please find rep attached.

From: Mick McArdle [mailto:Mick@TotalProtection.co.uk]
Sent: 08 August 2011 14:58
To: Gambling
Subject: Proposed Licensing Application 11/07564/LIGN
Importance: High

Dear Sir,

I write in reference to the licensing application 11/07564/LIGN for the proposed betting shop at 381 Harrow Road. As a resident of Hormead Road, the Harrow Road high street area around this site is my local shopping and leisure precinct and I use it on a daily basis.

This section of the high street has two betting shops situated on it already and these cause a number of problems to the area, especially in relation to pedestrian access and the sometimes threatening attitude of the patrons and the general disorder that is caused by those congregating outside the shops. These shops are a major source of disorder in the area.

Another concern with the current betting shops is in relation to the high prevalence of premises licensed to serve alcohol in such close proximity to these venues. Obviously the mixture of intoxication and gambling can lead to some people, especially the vulnerable being harmed by partaking in gambling whilst under the influence of alcohol.

The introduction of yet another betting shop to the area will only serve to increase the general disorder caused by the patrons congregating outside these establishments, inclusive of the threatening language and demeanour sometimes employed. The increased risk of vulnerable people, especially those under the influence of alcohol, being harmed by gambling whilst in their vulnerable state is another unacceptable risk for the area to suffer in the interest of the obvious commercial gains achieved by another betting establishment.

In addition to these very important concerns I have for the proposed license application, an addition of another betting shop to the area will further skew the balance of premises along this stretch of the road in favour of licensed premises. This stretch of Harrow Road is a developing area and could be severely impeded by the introduction of an unconsidered tenant to one of the premises that could be better used to serve the community as a whole.

If you would like to discuss any of my particular concerns in greater detail, please contact me via the means listed below.

Kind Regards

Mick McArdle
Landscape Director

Total Protection (GB) Ltd
Unit 4, Brocks Farm, Ingatestone Road,
Stock, Essex, CM4 9PD
T 01277 841 415
F 01277 829 716
M 07919 382 229

From:	Nelson, Nicholas
To:	O"Leary, Darren
Cc:	Rowe, Steven
Subject:	FW: application 11/07564/LIGN
Date:	09 August 2011 10:07:50

Please find rep attached.

From: BThor49450@aol.com [mailto:BThor49450@aol.com]
Sent: 08 August 2011 21:43
To: Gambling
Subject: application 11/07564/LIGN

We need to oppose the application 11/07564/LIGN for a new betting shop at 381 Harrow Road.

At the Prince of Wales Junction there is already two betting shops along with two more William Hills within 200 metres.

There is no need for more than four betting shops in this area.

There are also several social disorder & crime issues at this junction. The local Safer Neigbourhoods team have been working with local residents to address these issues. Police have been given permission to disband groups at this junction and there are also a few ASBOS in the area. The William Hill Betting Shop at the junction has particular problems with customers drinking in the streets and selling drugs. Police have asked us to call if we notice drinking and drugs. Last week the police and ambulance were called to resuscitate a customer using this William Hill. This customer had been drinking and was with customers known to sell drugs. Unfortunately there is plenty of evidence of the social and crime problems in the area which can specifically be attributed to the local betting shops. Another betting shop will add to these problems.

If Westminster council is working to make this area 'safer' it would be directly against this goal to grant another license for a betting shop.

We would be grateful if you could confirm receipt of this opposition as the link 'view the licensing registers' on the council website was not apparent.

Many thanks
Sergio Guazzelli
Blair Thorburn
Harrow Road Residents

From:	Antonietta Fishta
To:	Gambling
Subject:	Subject: application 11/07564/LIGN
Date:	10 August 2011 10:57:03

Subject: application 11/07564/LIGN

We need to oppose the application 11/07564/LIGN for a new betting shop at 381 Harrow Road.

At the Prince of Wales Junction there is already two betting shops along with two more William Hills within 200 metres.

There is no need for more than four betting shops in this area.

There are also several social disorder & crime issues at this junction. The local Safer Neigbourhoods team have been working with local residents to address these issues. Police have been given permission to disband groups at this junction and there are also a few ASBOS in the area. The William Hill Betting Shop at the junction has particular problems with customers drinking in the streets and selling drugs. Police have asked us to call if we notice drinking and drugs. Last week the police and ambulance were called to resuscitate a customer using this William Hill. This customer had been drinking and was with customers known to sell drugs. Unfortunately there is plenty of evidence of the social and crime problems in the area which can specifically be attributed to the local betting shops. Another betting shop will add to these problems.

If Westminster council is working to make this area 'safer' it would be directly against this goal to grant another license for a betting shop.

We would be grateful if you could confirm receipt of this opposition as the link 'view the licensing registers' on the council website was not apparent.

Many thanks
Antonietta Fishta
Edith Fishta
Harrow Road Residents

From:	Antti Keskisaari
To:	Gambling
Subject:	Objection to betting shop proposal 11/07564/LIGN
Date:	17 August 2011 17:24:14

Dear Sir / Madam,

We understand that Coral have applied to open a betting shop at 381 Harrow Road. Their licensing application reference is: 11/07564/LIGN.

We object the application on the following grounds: preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime; protecting children and other vulnerable persons from being harmed or exploited by gambling.

We live very close to the location. We strongly object to the proposal. We understand a nearby betting shop on Mozart Street was closed after violence had taken place on more than one occasion. There are already a number of betting shops on Harrow Road, plenty to satisfy the demand. From the Police Station to the Cemetery Harrow Road has already about four betting shops just on one side of the road. We do not see any need for more betting shops in the area. We find it strange and concerning that in an area with much poverty there are so many betting shops. This raises a serious concern that aggressive businesses are taking money from the vulnerable. The existing betting shops should be closing rather than a new one opening.

As we have been able to observe for the many years we have been living here, the betting shops clearly attract to their door groups of drunk people swearing, making noise, disturbance and aggression. Walking past these betting shops can be intimidating, especially to the more vulnerable members of our community.

Our children are exposed to all that plus the aggression that is so often displayed outside these shops - on a daily basis. We would like our children to be protected by our local council, not for their already limited freedoms to be further restricted.

We are concerned that Westminster Council may expose its residents to more undesirable and dangerous behaviour, rather than take responsibility for helping to rid us of it.

Yours faithfully,

Mr Antti de Ruano-Keskisaari
Mrs Maria Cristina Ruano

Residents

52/2 Hormead Road, London W9 3NQ

STATEMENT OF WITNESS

Statement of: **Caroline Tredwell**

Age of Witness (if over 18 enter "over 18"): **OVER 18**

Occupation of Witness: **Neighbourhood Crime Reduction Officer**

This statement is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe to be true.

Dated the 17th day of November 2011

Signed:.....

I am a Neighbourhood Crime Reduction Officer (NCRO) employed in the Street Management Department of Westminster City Council. I am particularly responsible for liaising with the Police and dealing with community concerns relating to crime and anti-social behaviour in the Queens Park and Harrow Road wards.

I have been in this role for five and a half years. I have been responsible for the Queens Park and Harrow Road wards since January 2011. As part of my role, I attend quarterly ward panel meetings which are attended by community representatives of the wards. Concerns around crime and anti-social behaviour relating to betting shops, particularly around the Maida Hill junction have regularly been raised at these meetings. I have also received emails directly from residents and also via local ward councillors expressing concerns about disorder relating to betting shops. As a NCRO, I run a weekly partnership meeting on Harrow Road ward attended by the Police Safer Neighbourhoods Team, representatives from relevant housing associations, local councillors and on occasion, representatives from the noise team or environmental health department. Again, concerns about street drinking and anti-social behaviour in and around betting shops is regularly discussed at these meetings.

The main concerns expressed are groups of rowdy older men, drinking on the street directly outside the William Hill at 357 Harrow Road. We have received reports of this group blocking the pavement, intimidating residents as they walk past, using abusive language which has amounted to

harassment in a few cases. Residents report they feel unsafe walking past and feel the need to cross the road or change their route to avoid walking past these groups. Police have reported that these groups consist mainly of customers of the betting shops and they have been observed coming out of the shop for a drink or a cigarette and then going back into the shop. I am aware that the Police have regularly issued fixed penalty notices for street drinking to groups outside these premises.

There has been a huge amount of investment from the Council and the Police in the Maida Hill junction including installation of CCTV, proactive undercover police operations and ASBOs being sought on key problematic individuals. Residents have reported that this work has resulted in a marked improvement in the area. The Neighbourhood Crime Reduction Service and the police Safer Neighbourhoods team are trying to build on this by tackling any issues of disorder on the junction, one of which is disorder linked to betting shops. In recent months we have been working with Licensing Inspectors to seek compliance with the various off-licences to try to drive down street drinking in the area. This work has led to create a positive communal use for the area after decades of the area being renowned for drug use, drug dealing and related disorder.

Date: 17.11.11
Signed:
Print: CAROLINE TREDWELL.

LICENSING SUB-COMMITTEE No. 1
Monday 28 November 2011

Membership: Councillor Audrey Lewis (Chairman), Councillor Harvey Marshall and Councillor Aziz Toki

Legal Adviser: Barry Panto
Policy Adviser: Chris Wroe
Committee Officer: Jonathan Deacon

Relevant Representations: Metropolitan Police, 3 Ward Councillors for Harrow Road, Neighbourhood Crime Reduction Officer and 17 x local residents (including 1 from the Vicar of Emmanuel Church).

Present: Mr Philip Kolvin QC (Counsel, representing Applicant), Mr Ewen Macgregor (Gala Coral Group Legal Counsel), Mr Bernard Dimmock (Senior Development Manager, Coral Racing Ltd) and Mr Peter Meacock (Head of Risk and Security, Coral Racing Ltd), Sergeant Cherie Whiteley (Metropolitan Police Licensing Team), PC Ian Armstrong (Harrow Road Safer Neighbourhood Team, Metropolitan Police), Councillor Ruth Bush and Councillor Nilavra Mukerji (Ward Councillors for Harrow Road), Mr Kerry Simpkin (Westminster City Council Licensing Authority), Ms Caroline Tredwell (Neighbourhood Crime Reduction Officer, Westminster City Council), Ms Amanda Evans, Mr Danny Webb and Ms Leila Bertrand (Local Residents) and Reverend Jackie Barry (Vicar of Emmanuel Church and Local Resident).

Application for a New Betting (Other) Premises Licence under the Gambling Act 2005 for Coral, 381 Harrow Road, W9
11/07564/LIGN

Summary:

To consider and determine the application made by Coral Racing Limited for a new Betting (Other) Premises Licence under the Gambling Act 2005.

Decision (including reasons):

The application was granted. The policy presumption for gambling applications is that the Committee should aim to permit the use of the premises for gambling provided the application is in accordance with the code of practice, Gambling Commission's guidance, Westminster's Statement of Principles and reasonably consistent with the licensing objectives. The Sub-Committee granted the application as Members considered that the application met these criteria, however sympathetic they might be to the concerns raised at the hearing and in writing by local residents and representatives of the community in relation to an additional bookmaker operating in Harrow Road.

In reaching this decision, the Sub-Committee noted the steps taken by the Applicant as stated by the Applicant's Representative, Mr Kolvin. He made the point that betting offices were already the heaviest regulated licensing environments in the country, were for adults only and there was not a problem with children having access to these premises. It was against the law to sell alcohol in betting offices. It was necessary to obtain an operating licence from the Gambling Commission to run fair games and protect the vulnerable. Coral was also accredited by Gamcare to protect the vulnerable. In addition sited gambling machines at the premises in 381 Harrow Road would be under the counter away from the doors and would be easily observable by staff. Coral would be content for local members of the community to observe staff training in the event the application was granted.

Mr Kolvin stated that he recognized that the meat of the objection was on crime and disorder grounds. There had been no reported crimes at the Paddy Power premises at 345 Harrow Road. In the report was the list of Coral's proposed security measures for 381 Harrow Road. These included a full counter screen, a safe haven with a secure lockable door, CCTV monitor and an external telephone line, a multi camera CCTV system with two external cameras, covert on the front door and domes covering the shop floor. From 1pm there would be no lone workers operating the premises. The front window would be 50% clear so that staff could see any problems outside the shop and Police could see inside. These security measures were incorporated into the proposed conditions. The Sub-Committee noted the point made by Mr Kolvin that his clients had been asked by the Licensing Authority to take into account local concerns and this had resulted in an extensive list of conditions which had been agreed with the Licensing Authority prior to Members considering the application. Training would need to be recorded, if the Police advised Coral to ban someone from the betting office they would do so, prior to opening the licensee would meet with the Crime Prevention Officer in order to discuss any additional measures to reduce or prevent crime and disorder and a telephone number and e-mail address for a designated Police and Community Liaison Officer would be supplied to police and licensing officers and to community representatives upon request. Mr Kolvin commented that an even more extensive list of conditions had been provided to the Licensing Authority in the first instance and his client would look to implement additional measures to those agreed whether legally compelled or not. The original list of conditions had included one that the police and community liaison officer would use all reasonable endeavours to establish a Betwatch scheme with the licensees of other betting offices in the locality so as to formulate joint plans for the promotion of the licensing objectives, including sharing of information in relation to banned individuals and implementing a 'banned from one banned from all' policy.

Mr Kolvin referred briefly, whilst addressing the Sub-Committee, to the submissions from Professor Mark Griffiths and Terry Davies. Professor Mark Griffiths is the Professor of Gambling Studies at Nottingham Trent University and Director of the International Gambling Research Unit and had been asked by the Applicant Company to write a report as to whether the opening of the betting office in Harrow Road was likely to increase crime and disorder or otherwise fail to promote the gambling licensing objectives. Mr Kolvin drew Members'

attention to Professor Griffiths' evidence that betting offices were subject to a high degree of regulation which protects against harm to the licensing objectives and that the protective measures proposed at 381 Harrow Road in terms of office design, facilities and procedures went well beyond the norm in the industry. Mr Davies was a retired Metropolitan Police Superintendant, who had been involved in licensing matters for 40 years and had been instructed by a number of large and small independent bookmakers. He had been instructed by Coral Bookmakers to undertake observations and enquiries in regard to the application at 381 Harrow Road. He had spent time on Wednesday 14th, Saturday 17th and Saturday 24th September 2011 examining the local area including outside the Paddy Power and William Hill betting offices in Harrow Road and had found no evidence of prostitution, drug dealing, drug abuse or anti-social behaviour. The Sub-Committee expressed concerns when announcing the decision that the report did not specify the times of when Mr Davies had been in the Harrow Road area on those three days.

Those objecting to the application also commented on Professor Griffiths' and Mr Davies' submissions. Councillor Bush made the point that Professor Griffiths had dismissed that betting offices caused crime and disorder. However, she was making the case that such premises attracted it rather than caused it. People did not hang around other types of shops or stores. Betting offices tended to attract people who were vulnerable. All 3 Ward Members shared concerns about having a betting office at this location. She did not believe that the application had fully taken into account the vulnerable who had access to the Westminster Society for People with Learning Disabilities which was close by at 389A Harrow Road. There were not any schools in close proximity to the bookmakers but there were younger people along Harrow Road. There was poverty, unemployment and low paid work in the Harrow Road Ward. Gambling provided an allure of hope to the vulnerable and was not harmless fun. Councillor Bush stated that she had lived nearby for 40 years and that if Mr Davies had spent more than 3 days in the locality he would have witnessed evidence of drug dealing or anti-social behaviour. She had not been contacted by the Applicant Company prior to the application being submitted. Councillor Bush and Councillor Mukerji both referred to the work in the community and the massive investment that had been made to improve the Harrow Road area. Councillor Mukerji added that it was still a crime hotspot but progress had been made and there needed to be an environment in place where this continued to happen. It was unlikely that there would be crime inside the bookmakers but the betting office would attract crime and anti-social behaviour.

The Sub-Committee asked the objectors to be specific about any cases of crime and disorder near the betting shops in the area and whether they had reported any incidents to the Police. Mr Danny Webb stated that there had been a lot of anti-social behaviour around the William Hill bookmakers at 417 Harrow Road before it had closed down. That particular part of the area had been quieter and there had been less drug dealing since this had occurred. Betting shops encouraged a certain type of people to remain outside and this encouraged a threatening atmosphere. Mr Webb and Ms Amanda Evans both commented that they had witnessed incidents but not reported them. Ms Evans and Reverend Barry both referred to people feeling threatened by individuals outside

the current William Hill bookmakers at 357 Harrow Road. Ms Evans commented that the groups of older men were aggressive and affected the freedom of her sons. Three days of observation were not sufficient for Mr Davies to get a clear idea of the local area. She added that William Hill should be shut down. The Chairman responded that it was possible for residents or the Responsible Authorities to submit a review application of the premises if the necessary evidence was provided. Councillor Bush made an additional point that whilst she had not reported any incidents at the time the issues had been raised with Civic Watch, the Police and Ms Tredwell. She did not want to report vulnerable West Indian individuals outside William Hill to the Police. Councillor Mukerji made the additional point that when people lived in an area of disorder on a daily basis they tended to tolerate it and would not stop and challenge every incident of disorder.

Ms Tredwell, the Neighbourhood Crime Reduction Officer informed Members that she had worked in the ward since January 2011 and had looked to deal with community concerns regarding crime and disorder. There were still issues with anti-social behaviour outside betting shops in the locality. People had stated to her that they crossed the road to avoid the groups of people outside betting shops and that there was street drinking and alcohol being drunk from non-alcoholic vessels. There were intimidating insults from individuals and people felt unsafe. She was working with premises including William Hill and there had been recent crime prevention meetings where recommendations had been given to them.

Sergeant Whiteley for the Metropolitan Police stated that evidence had been provided in the report regarding incidents which had been reported within 200 metres of 381 Harrow Road. There were a group of older men outside William Hilll drinking from Lucozade bottles but was likely to be alcohol. The Sub-Committee expressed concerns when announcing the decision that the Police did not challenge the groups on street drinking because they were drinking out of soft drinks vessels and considered that this needed to be looked at. Sergeant Whiteley added that there had been lower level drug dealing at the former William Hill premises. Whilst there were very detailed conditions from Coral, there were concerns that problems could potentially resurface. Professor Griffiths had referred to the potential for creating a displacement of issues and this was possible.

PC Armstrong of the Harrow Road Safer Neighbourhood Team stated that he had been in his current role for approximately a year. As part of the foot patrols he had come across the groups outside William Hill. He had asked them not to drink there and they had complied with this request. This was an issue which affected the community as a whole and he was regularly asked what was being done about street drinking in Harrow Road. If they saw him coming they would desist from drinking. He did see them however on the way to work when he was not wearing his uniform. The groups tended to drink from soft drink vessels. Any disorder tended to take place from afternoon to evening time.

Mr Simpkin addressed the Sub-Committee on behalf of the Licensing Authority. They had raised additional concerns due to the location of the betting shop. The

conditions provided however did now meet the Licensing Authority's original concerns. The Licensing Authority had met with William Hill at 357 Harrow Road and an action plan had been drawn up with them. This would either resolve the problem or a review application of the premises would be considered. Mr Simpkin added that the conditions which had been agreed with Coral meant that there was a shift towards the Applicant Company having to provide information to the Licensing Authority and the Police rather than all the parties having to meet regularly.

Mr Kolvin responded to a number of the points raised by the objectors to the application. These included that the named liaison officer would be able to deal with issues before problems arose. Councillor Bush had requested that there was no cash point or ATM in the betting office and his clients were prepared for this to be attached in the form of a condition to the licence. The Police statistics did not demonstrate that there were crimes in the vicinity of betting offices. He re-iterated the measures that had been taken by Corals to prevent issues occurring including CCTV.

When announcing the decision, the Chairman stated that the Sub-Committee considered that the conditions offered by the Applicant would set a standard for bookmakers in the area and was likely to have a significant effect in handling the William Hill premises at 357 Harrow Road. Members did not believe that problems at one betting office should result in penalising another such premises in the same area. The Chairman urged residents who experienced problems with premises, whether they were licensed under the Licensing Act or the Gambling Act, to keep a record when any incidents happened. Problems with existing premises could be submitted by local residents on the Council website or raised via Environmental Health/Enforcement Team.

The Sub-Committee had asked questions of the Applicant Company's representatives as to what hours they intended to operate. Members were informed that whilst they wished to adopt the 'default' hours under the Gambling Act of 7am to 10pm, they were likely to operate from 8.30am to 10pm Monday to Saturday and shut at 6pm on Sundays. The Sub-Committee requested that this was included as a condition on the licence and the Applicant Company's representatives advised that this was acceptable to them provided that they were allowed to continue on Sundays past 6pm on a few Sundays during the year when specific events were held. It was agreed that the Applicants would be required to give the Police and the Licensing Authority at least 7 days notice if they wished to operate beyond 6pm on Sundays.

Conditions attached to the Licence at the hearing (not including the mandatory and default conditions attached to betting premises licences)
1. The premises shall install and maintain a comprehensive CCTV system as per the minimum requirements of a Metropolitan Police Crime Prevention Officer. All entry and exit points will be covered enabling frontal identification of every person entering in any light condition. The CCTV system shall continually record whilst the premises is open for licensable activities and during all times when customers remain on the premises. All recordings shall be stored for a minimum period of 31 days with date and time stamping. Recordings shall be made available immediately upon the request of Police or authorised officer throughout the preceding 31 day period. 2. A staff member from the premises who is conversant with the operation of the CCTV system shall be on the premises at all times when the premises are open to the public. This staff member must be able to show a Police or authorised council officer recent data or footage with the absolute minimum of delay when requested. 3. Notices indicating that CCTV is in use at the Premises shall be placed at or near the entrance to the Premises and within the Premises. 4. A monitor shall be placed inside the Premises above the front door showing CCTV images of customers entering the Premises. 5. The front window shall be kept 50% clear of all advertising material. 6. The licensee shall place and maintain a sign at the entrance to the Premises stating that access to the premises will be excluded to the following people: • Anyone who is under the age of 18; • Anyone who appears to be under the age of 21 and is unable to provide proof of age that they are over the age of 18; • Anyone who is barred from the premises; • Anyone who has alcohol on their person. 7. The licensee shall install and maintain a full counter screen at the Premises. 8. The licensee shall install and maintain a "safe haven" to the rear of the counter. 9. The licensee shall install and maintain a magnetic door locking system for the customer toilet operated by staff from behind the Counter. 10. The licensee shall install and maintain an ultra violet lighting system in the customer toilet. 11. The licensee shall install and maintain a magnetic door locking system on the front door.

12. 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.

13. The licensee shall place a notice visible from the exterior of the Premises stating that drinking of alcohol outside the Premises is forbidden and that those who do so will be banned from the Premises.

14. The licensee shall implement a policy of banning any customers who engage in crime or disorder within or outside the premises and notices to that effect shall be displayed inside and outside the premises.

15. The licensee shall appoint a named Police and Community Liaison Officer with the authority to implement change at the premises.

    The licensee shall provide the Police and Licensing Authority with the following information as soon as practicable after the elapse of each quarter and for such a time as the Police and Licensing Authority deem it necessary:

    - A copy of the incident log and "Think 21"for that period,
    - A list of those customers banned and the reasons for banning,
    - Any issues that Coral have identified that should be brought to the attention of both authorities, and
    - Such other information or documentation as required by the Police or Licensing Authority.

    Note: In this condition "quarter" means the period of 3 months from 1st April, 1st July, 1st October and 1st January.

16. The licensee shall train staff on specific issues relating to the local area and shall conduct periodic refresher training. Participation in the training shall be formally recorded and the records produced to the police or licensing authority upon request.

    The licensee shall maintain a bound and paginated incident log at the Premises in which shall be recorded all incidents of crime and/or disorder (whether on or associated with the premises), attempts by underage persons to gain access to the premises, or any other incidents relevant to the licensing objectives. The log shall be maintained at the premises and produced to the police or licensing authority forthwith on request.

    The licensee shall also maintain a bound and paginated "Think 21 Refusals" register at the Premises. The register shall be maintained at the premises and produced to the police or licensing authority forthwith on request.

17. If at any time (whether before or after the opening of the premises), the police or licensing authority supply to the premises names and/or photographs of individuals which it wishes to be banned from the premises, the licensee shall use all reasonable endeavours to implement the ban including through staff training.

18. The licensee shall develop and agree a protocol with the police as to incident reporting, including the type and level of incident and mode of communication, so as to enable the police to monitor any issues arising at or in relation to the premises.

19. Prior to opening the licensee shall meet with the Crime Prevention Officer in order to discuss any additional measures to reduce or prevent crime and disorder.

20. A telephone number and e-mail address for the Police and Community Liaison Officer shall be supplied to police and licensing officers and to community representatives upon request.

21. The licensee shall provide its staff and management with telephone numbers for the Safer Neighbourhood Team.

22. The licensee shall place and maintain a sign at the entrance which states that "Only drinks purchased on the premises may be consumed on the premises".

23. There shall be no cashpoint or ATM facilities on the premises.

24. The premises are permitted to operate between the hours of 08:30 hours and 22:00 hours from Monday to Saturday. On a Sunday, the premises are permitted to operate between the hours of 08:30 hours and 18:00 with the ability to operate until 22.00 hours on no more than 6 occasions during the calendar year. The premises cannot operate after 18.00 on a Sunday unless 7 days written notice is given in advance to both the Metropolitan Police and the Licensing Authority. During that 7 day period, a notice shall also be placed in the front window of the premises, so as to be clearly visible from outside, indicating that the premises will be opening for extended hours on the following Sunday. The premises must permanently keep a written record of all dates when the premises operate after 18.00 hours on a Sunday.

Simpkin, Kerry

From: Simpkin, Kerry
Sent: 29 September 2011 15:33
To: 'Clark Dunstan'
Subject: RE: William Hill, Harrow Road, London

Hi Clark

How about the 24th October at 11am at Westminster City Hall, 4th Floor, 64 Victoria Street?

Thanks
Kerry

From: Clark Dunstan [mailto:cdunstan@williamhill.co.uk]
Sent: 28 September 2011 10:27
To: Simpkin, Kerry
Subject: Re: William Hill, Harrow Road, London

Kerry,

Any dates after the 19th October?

Regards,

Clark
Clark Dunstan
Development Manager
William Hill

07740 735471
F Net 7371 (Mobile)
0208 918 3912
F Net 3912 (Office)

From: Simpkin, Kerry <ksimpkin@westminster.gov.uk>
To: Clark Dunstan
Sent: Mon Sep 26 16:19:49 2011
Subject: RE: William Hill, Harrow Road, London

Hi Clark

Yes we do need to have a meeting re this premises. Sorry I was on leave for the last few weeks too. When are you free? Could you give me some dates when you are all available? I will find out when the Police are available and confirm the time, date and location.

Thanks
Kerry

Mr Kerry Simpkin
Assistant Service Manager

Environmental Health Consultation and Licensing
Premises Management Delivery Unit

Westminster City Council
4th Floor South
64 Victoria Street
London SW1E 6QP

Tel: 020 7641 1840
Fax: 020 7641 7815
E-mail: ksimpkin@westminster.gov.uk
Team E-mail: generallicensing@westminster.gov.uk
Web: www.westminster.gov.uk

You can now apply online for the majority of licensing regimes that the authority is responsible for. Please visit www.westminster.gov.uk/licensing and following the relevant links to apply.

please don't print this e-mail unless you really need to

From: Clark Dunstan [mailto:cdunstan@williamhill.co.uk]
Sent: 26 September 2011 16:18
To: Simpkin, Kerry
Subject: RE: William Hill, Harrow Road, London

Kerry,

I am now back off annual leave and wondered if a meeting was still required.

Kind Regards,

Clark Dunstan
Development Manager

T: 020 8918 3912
M: 07740 735471
E: cdunstan@williamhill.co.uk

William Hill, Greenside House 50 Station Road London N22 7TP

From: Simpkin, Kerry [mailto:ksimpkin@westminster.gov.uk]
Sent: 05 September 2011 10:06
To: Clark Dunstan
Subject: RE: William Hill, Harrow Road, London

Hi Clark

I know you haven't responded to this email yet but the date I've stated is no longer possible for us. Can you let me know if you or your colleagues could make a meeting week commencing 12th September?

Thanks
Kerry

From: Simpkin, Kerry
Sent: 01 September 2011 10:50

To: 'cdunstan@williamhill.co.uk'
Subject: William Hill, Harrow Road, London

Hi Clark

I hope you are well? We are currently dealing with an application for a betting shop in Harrow Road. As part of the issues identified relating to the location for that particular premises a significant amount of concern has been raised relating to your premises in Harrow Road. I have had a discussion with the Neighbour Policing Team and we would like to me with representatives of William Hill to discuss the issues next Friday (9th September) if possible.

The main issues relate to the customers of William Hill standing outside that particular premises drinking and on a number of occasions causing issues with local residents. I have copied some of the comments made by the Police Neighbourhood team relating to the issues outside your premises.

We currently have issues with People drinking out the front of William Hill 357 HARROW ROAD W9 they have in turn caused ASB with local residents.

People have been De-Canned / issued with a PND and this has been CRIMINT'ed. There is also a Harassment CRIS with regards to a Victim that lives above WILLIAM HILL where by a Customer (Drinking in front of the shop) has been harassed by this person.

I appreciate that it can be difficult to manage these types of issues and will need a joint approach with the Police. Obviously as a Licensing Authority we are concerned that customers from your premises may be causing crime or disorder and as such we would like to arrange this meeting to discuss the issues and how we can all try to address them.

Could you let me know if you and your colleagues are available to attend a meeting at either Westminster City Hall, Victoria Street or Harrow Road Police Station on the 9th September. If you can attend then I will confirm the location and time of the meeting.

Kind regards

Kerry

Mr Kerry Simpkin
Assistant Service Manager

Environmental Health Consultation and Licensing
Premises Management Delivery Unit
Westminster City Council
4th Floor South
64 Victoria Street
London SW1E 6QP

Tel: 020 7641 1840
Fax: 020 7641 7815
E-mail: ksimpkin@westminster.gov.uk
Team E-mail: generallicensing@westminster.gov.uk
Web: www.westminster.gov.uk

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www.westminster.gov.uk
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You should not disclose the contents to any other person or take copies.
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LA6

Simpkin, Kerry

From:	Cleary, Gareth
Sent:	06 August 2012 21:37
To:	Howard, Jim; Ingledew, Dean
Cc:	Mason, Kevin; Simpkin, Kerry
Subject:	RE: 357 Harrow RoadIngledew, Dean

Jim,

My initial view is that I am aware of this premises and previous crime and disorder issues and accordingly I discussed this matter with the Met Police based in Harrow Road and also William Hill, who dealt with the issues, by way of several meetings between the two parties.

I, myself have contacted the security manager responsible for the William Hill branch, Mr Stuart Ewen, with regards to previous crime and disorder issues. His full email address is sewen@williamhill.co.uk. He is aware of previous issues and would be a good starting point for the complaint.

I will need to discuss further with Kerry Simpkin to establish what the terms and conditions are of the 'Policy' referred to in the below email, before I form an opinion on how to take this forward from a licensing perspective, however it would appear to be a crime and disorder primarily.

I am working nights this week, however please do keep me informed by way of email.

Regards

Gareth Cleary
0207 641 7076

From: Howard, Jim
Sent: 06 August 2012 10:10
To: Cleary, Gareth
Subject: FW: 357 Harrow RoadIngledew, Dean

Gareth

Do you deal with the bookies as well?

Jim

From: Howard, Jim
Sent: 06 August 2012 10:04
To: Ingledew, Dean; Pickup, Darren; Ralph, Andrew
Cc: Nelson, Nicholas
Subject: RE: 357 Harrow RoadIngledew, Dean

Historically a well known problem. Happy to work with the SNT and licensing and the complainant. The policy is being re-written regarding bookies and this should feature. [Nick Nelson]

Nick, have you had any more information regarding these premises at all please?

Thanks
Jim

From: Ingledew, Dean
Sent: 06 August 2012 09:54
To: Pickup, Darren; Howard, Jim; Ralph, Andrew
Subject: FW: 357 Harrow RoadIngledew, Dean

Any ideas ?

Andy Any noise/nuisance calls ?

From: Sam.Spencer2@met.pnn.police.uk [mailto:Sam.Spencer2@met.pnn.police.uk]
Sent: 06 August 2012 07:26
To: Simon.Bray@met.police.uk; pdimoldenberg@hotmail.co.uk
Cc: Rosie.McLean@met.police.uk; Ingledew, Dean; Iain.Armstrong@met.police.uk
Subject: RE: 357 Harrow RoadIngledew, Dean

Sir/Paul,

This isn't an issue I've previously been made aware of.

I recently looked through each of the wards top ASB issues by top repeat callers to police and by asking the SNT sergeants to identify the issues they felt were most prevalent on their wards. If this issue has been as bad as this for so long it should have been flagged up.

That being said residents don't always inform police of these issues.

Dean - would you please either send me any information you have on this eg. records of any complaints you've had, or let me know the best person to get this information from?

Harrow Road SNT are off today but I'll speak to them tomorrow to find out if they're aware of this issue. I'll also get them to contact Karen Dwyer and meet with her.

Just FYI as a cluster we have recently been doing some work around the betting shops under Op Condor.

I'll get back to you with further information.

Kind regards

Sam

Inspector Samantha Spencer
Metropolitan Police Service
Community Inspector, Westminster North
Met phone 49827 | Telephone 0207 321 9827
Address Harrow Road Police Station, 325 Harrow Road, London, W9 3RD

From: Bray Simon - Westminster
Sent: 05 August 2012 23:41
To: Spencer Samantha - Westminster
Cc: McLean Rosie - Westminster; 'dingledew@westminster.gov.uk'
Subject: Fw: 357 Harrow Road

Hi Sam

Are you able to assist in relation to this question?

Simon

From: paul dimoldenberg <pdimoldenberg@hotmail.co.uk>
To: Bray Simon - Westminster; dingledew@westminster.gov.uk <dingledew@westminster.gov.uk>
Cc: hvidago@westminster.gov.uk <hvidago@westminster.gov.uk>; karen.buck.2nd@parliament.uk <karen.buck.2nd@parliament.uk>
Sent: Sun Aug 05 23:16:29 2012
Subject: 357 Harrow Road

Simon and Dean

Are you aware of this location being the problem that is described below?

Thanks

regards

Paul

Date: Sun, 5 Aug 2012 03:36:20 -0700
From: kadwyer@yahoo.com
Subject: Re:
To: pdimoldenberg@hotmail.co.uk

Dear Paul

Thank you for your recent update.

I would like to make a complaint about the anti-social behaviour on 357 Harrow Road outside William Hil This has become a meeting point for drinkers and cannabis smokers to gather. They stand outside William Hill drinking cans wrapped in brown bags or drink spirits from Lucazade or coke bottles. This drinking starts from early morning until closing time at 9pm. William Hill legitimises their presence by giving them reason for essentially just hanging out getting drunk on the street. William Hill are aware of this problem but refuse to address it. The majority of these people use William Hill as a meeting point. It is also not unusual to see these people taking drink into William Hill.

The problem with this drinking (beside the obvious point that it is illegal to drink alcohol in the street in Westminster) is that the result is a large gathering of men getting drunk on the street, making inappropriate sexual comments towards women, and generally intimidating the local community.

This gathering point has also come to attract drug users, dealers and prostitutes. All of which create an unsafe environment and a fearful community. It is apparent that the number of people who gather outside William Hill has increased significantly recently, much to the despair of local residents.

The view in this area is that the police and the Westminster council have no interest in the issue as you hav both failed to address this problem in any meaningful or effective way. I am not reporting a recently occurring issue, but one that has been present within the area since I moved here in 2003. I feel that we as community should no longer be subjected to a dimished quality of life within the area simply as a result of Westminster council's negligence in dealing with a well-known and deep-rooted issue.

It is unclear why Westminster refuses to address this problem. The general consensus amongst residents is that Westminster council and the police view 357 Harrow road as a dumping ground for known perpetrato of anti-social behaviour, which allows a clean-up of anti-social behaviour in other areas. We as a community are tired of being a dumping ground and feel that we too are entitled to the same police and council action that other streets in the borough have been granted.

On a final note, I have been threatened by a number of these individuals who congregate on this spot, and have become quite fearful of the continued threat that such a volatile zone creates. I am certainly not alone

in this experience or these fears. William Hill is not able, or perhaps refuses, to police the degree of anti-social behaviour that it attracts. It is time that they are held accountable for the problem that they create through the implementation of measures available to the council.

For these reasons, I requests that Westminster finally begins to demonstrate some interest in the residents (the Harrow road/ Elgin Avenue junction. To date, Westminster council has been negligent and irresponsib This negligence violates my entiltment to live a safe life without fear of violence. With the continued ignoring of this issue, Westminster council fails to grant our community this basic Human right. It is on these grounds that I request swift and effective council action.

I would like to arrange a meeting to discuss this further. Would you tell me how I can go about arranging one with my local MP and with Westminster council?

Regards
Karen Dwyer

Simpkin, Kerry

From:	Simpkin, Kerry	
Sent:	06 August 2012 12:15	
To:	Mason, Kevin	
Cc:	McVitie, Martin; Nelson, Nicholas; Hayes, Deirdre	
Subject:	FW: 357 Harrow RoadIngledew, Dean	
Tracking:	**Recipient**	**Read**
	Mason, Kevin	
	McVitie, Martin	
	Nelson, Nicholas	
	Hayes, Deirdre	Read: 06/08/2012 13:16

Hi Kevin

I mentioned the other week that we would like to work more closely with your team relating to general licensing matters. In particular trialling working together to gather specific information that would assist in the development of policies and also to consider directed actions relating to specific concerns. One of the big ones we have relates to gambling premises, namely bookies. Betting premises are becoming an issue to members, the recent decision relating to longer hours is evidence of that.

One of the areas of joint working was on the primary gambling activity for betting shops. I would like to work up a way of accessing this within the area around China Town. The data collected would enable us to take the necessary action relating to these premises and any new applications or applications to extend hours, etc.

Then other point, to which this email chain below relates is the perceived issue of betting premises causing public nuisance, crime and disorder. We did some work last year with the NCRS and SNT relating to Coral in Harrow Road. It appears that the issues in that area continues even though we met with William Hill relating to this premises. It would be good to do some work with the NCRS, SNT and yourselves to try and deal with this issue. We are responding to the complainants email below directly but it would be good to discuss how we could address the issues in Harrow Road through this multi agency approach.

Would it be possible to meet after the Olympics finish to discuss how we can ok together to look at these key points and how we can pass on enquiries to your team.

Kind regards
Kerry

From: Nelson, Nicholas
Sent: 06 August 2012 11:53
To: Simpkin, Kerry
Subject: FW: 357 Harrow RoadIngledew, Dean

From: Howard, Jim
Sent: 06 August 2012 10:04
To: Ingledew, Dean; Pickup, Darren; Ralph, Andrew
Cc: Nelson, Nicholas
Subject: RE: 357 Harrow RoadIngledew, Dean

Historically a well known problem. Happy to work with the SNT and licensing and the complainant. The policy is being re-written regarding bookies and this should feature. [Nick Nelson]

Nick, have you had any more information regarding these premises at all please?

Thanks
Jim

From: Ingledew, Dean
Sent: 06 August 2012 09:54
To: Pickup, Darren; Howard, Jim; Ralph, Andrew
Subject: FW: 357 Harrow RoadIngledew, Dean

Any ideas ?

Andy Any noise/nuisance calls ?

From: Sam.Spencer2@met.pnn.police.uk [mailto:Sam.Spencer2@met.pnn.police.uk]
Sent: 06 August 2012 07:26
To: Simon.Bray@met.police.uk; pdimoldenberg@hotmail.co.uk
Cc: Rosie.McLean@met.police.uk; Ingledew, Dean; Iain.Armstrong@met.police.uk
Subject: RE: 357 Harrow RoadIngledew, Dean

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Metropolitan Police Service
Community Inspector, Westminster North
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To: Bray Simon - Westminster; dingledew@westminster.gov.uk <dingledew@westminster.gov.uk>
Cc: hvidago@westminster.gov.uk <hvidago@westminster.gov.uk>; karen.buck.2nd@parliament.uk <karen.buck.2nd@parliament.uk>
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To: pdimoldenberg@hotmail.co.uk

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Regards
Karen Dwyer

Simpkin, Kerry

From: Simpkin, Kerry
Sent: 14 September 2012 06:31
To: Nelson, Nicholas
Subject: FW: Costcutters, Prince Of Wales Junction, 480 - 482 Harrow Rd W9

FYI

Kerry

From: Cleary, Gareth
Sent: 13 September 2012 15:12
To: Simpkin, Kerry
Subject: FW: Costcutters, Prince Of Wales Junction, 480 - 482 Harrow Rd W9

Good afternoon Kerry,

Thought the email string below might be of interest.....

Regards

Gareth

From: gkmck@aol.com [mailto:gkmck@aol.com]
Sent: 13 September 2012 14:58
To: Howard, Jim; Cleary, Gareth; Richard.O.J.Compton@met.pnn.police.uk; Bush, Ruth (Cllr); McKie, Guthrie (Cllr); Mukerji, Nilavra; Mukerji , Nilavra (Cllr)
Cc: Mason, Kevin; Pickup, Darren; Lawrence.P.J.Knight@met.pnn.police.uk; julie@westminsterartisans.co.uk; miles.lanham@genesisha.org.uk; anthony@wech.org.uk; Reis, Nuno; Walsh, Thomas; Brown, Daniel; Carrick, Tim; Iain.Armstrong@met.pnn.police.uk
Subject: Re: Costcutters, Prince Of Wales Junction, 480 - 482 Harrow Rd W9

I don't return to London until the afternoon of the 20th September. My view is that we need to take whatever measures we are able to to stabilise the area. If we can close Costcutters I wouldn't shed a tear, nor would many residents. After all we now have Sainsbury and the Co-op open till 11pm should people need late night groceries.
The local Councillors have consistently brought up the issue of people hanging around outside William Hill's. Whilst some do so without any anti social intent, others use them as a front to carry on their anti social and sometimes illegal activity. We should look again at the legal licensing arrangements for William Hill. As I understand it a licence can be refused or revoked if there is evidence of the establishment contributing to crime in the area. The failure of William Hill to manage their outside area contributes to crime in the area.
Guthrie McKie

-----Original Message-----
From: Howard, Jim <jhoward@westminster.gov.uk>
To: Cleary, Gareth <gcleary@westminster.gov.uk>; Richard.O.J.Compton <Richard.O.J.Compton@met.pnn.police.uk>; Bush, Ruth (Cllr) (Cllr) <rbush@westminster.gov.uk>; McKie, Guthrie (Cllr) (Cllr) <gmckie@westminster.gov.uk>; Mukerji, Nilavra <nilavra@me.com>; Mukerji , Nilavra (Cllr) <nmukerji@westminster.gov.uk>
Cc: Mason, Kevin <kmason@westminster.gov.uk>; Pickup, Darren <dpickup@westminster.gov.uk>; Lawrence.P.J.Knight <Lawrence.P.J.Knight@met.pnn.police.uk>; Julie Bundy <julie@westminsterartisans.co.uk>; Miles Lanham <miles.lanham@genesisha.org.uk>; Anthony Gold <anthony@wech.org.uk>; Reis, Nuno <nreis@westminster.gov.uk>; Walsh, Thomas <twalsh@westminster.gov.uk>; Brown, Daniel <dbrown@westminster.gov.uk>; Carrick, Tim <tcarrick@westminster.gov.uk>; Iain.Armstrong

<Iain.Armstrong@met.pnn.police.uk>
Sent: Thu, Sep 13, 2012 9:23 am
Subject: RE: Costcutters, Prince Of Wales Junction, 480 - 482 Harrow Rd W9

Dear all

With reference to the below it has become apparent that we are experiencing some problems at the Maida Hill Piazza/Prince of Wales which at one stage we hoped had disappeared.

There are issues with Sam's chicken shop at 359 which has a planning inspectorate appeal on Tuesday 18th where they are asking for an extension until 2am, William Hills or some of its customers are causing problems with their behaviour outside the premises and as can be seen below Costcutters is certainly still an issue.

After discussions with several people it would appear prudent to hold a meeting to discuss what is being or can be done about the issues at the location. To that end we will be holding a meeting next Thursday 20th September at 1.00pm at Genesis' office at 421 Harrow Road. I would be grateful to see you there where hopefully we can arrive at some consensus over actions we can or should be taking. If you know of anybody else you think should be there please let me know and we can consider inviting them as well.

Many thanks
Jim

Jim Howard
Neighbourhood Crime Reduction Officer
Street Management
Westminster City Council
5th Floor
Westminster City Hall
64 Victoria Street
London SW1E 6QP
Tel: 020 7641 4474
email: jhoward@westminster.gov.uk
neighbourhoodcrimereduction@westminster.gov.uk

From: Cleary, Gareth
Sent: 07 September 2012 11:15
To: Richard.O.J.Compton@met.pnn.police.uk; Bush, Ruth (Cllr); McKie, Guthrie (Cllr); Tabari, Sharan (Cllr); Iain.Armstrong@met.pnn.police.uk
Cc: Howard, Jim; Leng, Matthew; Hardy, Claire; Brown, Marie-Teresa; Mason, Kevin
Subject: Costcutters, Prince Of Wales Junction, 480 - 482 Harrow Rd W9

Dear all,

You may or may not be aware of the above premises, which has been subject to various enforcement by WCC over recent years.

The premises had previously held a premises licence which allowed the sale and supply of alcohol, however following a number of sales after the terminal hour of the licence coupled with sales of alcohol and cigarettes to underage persons, the premises were stripped of the premises licence and have remained unlicensed since approximately 2009.

During the weekend of the Carnival (26th August), two Police Licensing Officers entered the premises and were able to purchase alcohol, therefore providing evidence of an unlicensed sale. The two initial officers were then joined by local PC's who conducted a full search of the premises including the basement and found approximately £7000 worth of alcohol in total

comprising of spirits, wine and beer, indicating that the premises had been selling and supplying alcohol for some time and would potentially continue to do so.

The case papers are being prepared by myself in co-operation with the Police Licensing Team with a view to prosecute the premises for the unlicensed sale of alcohol, however due to the history of the premises, I feel that we should go one step further and seek closure of the premises under the umbrella of anti social behaviour.

Therefore, I would like to seek advice on what further evidence I, along with the Police Licensing Team would need to 'bring to the table' in order to secure closure of the premises. I would also welcome comment by the Local Police and/or residents within Harrow Road who may already have evidence of anti social behaviour at the premises.

I would appreciate any assistance provided to me in this matter.

Regards

Mr Gareth Cleary
Licensing Inspector
Premises Licensing Team
Westminster City Council
4th Floor
City Hall
64 Victoria Street
London SW1E 6QP
Tel: 020 7641 7076
Fax: 020 7641 3436
gcleary@westminster.gov.uk
www.westminster.gov.uk/environment

Simpkin, Kerry

From: Howard, Jim
Sent: 27 September 2012 14:03
To: Simpkin, Kerry
Subject: RE: Bookies - Queen's Park Harrow Road Westbourne wards

I'm okay Thursday next week.

Jim

From: Simpkin, Kerry
Sent: 27 September 2012 13:26
To: Howard, Jim
Subject: RE: Bookies - Queen's Park Harrow Road Westbourne wards

Jim

Just so you know I have a meeting at 2pm but should be back at my desk at 3pm if you cannot get down here before 2pm.

Kind regards
Kerry

From: Howard, Jim
Sent: 27 September 2012 12:12
To: Simpkin, Kerry
Cc: Cleary, Gareth
Subject: Bookies - Queen's Park Harrow Road Westbourne wards

Kerry

I'm the Neighbourhood Crime Reduction Officer for QP and HR wards. As you know we've got some issues certainly at William Hills at 2 identified locations and I have no doubt there will be similar at the other locations.

As a result of a couple of conversations with different people it's become apparent that from the C&D aspect we need more information than we've currently got to enable us to deal with them on the enforcement angle – notwithstanding Gareth's dealings with them. For example we, including the local police are quite hung up on the Prince of Wales William Hills having customers drinking inside the premises and yet I now learn that they may well be allowed to do just that.

I'd like to start a BetWatch across the 3 wards, demographically they're very similar and I have no doubt the same issues will arise in each.

If you've got a ward based data system which shows where the bookies are across the 3 wards which will allow us to see what conditions are on each of the licenses that will give us a starting place on how best to deal with them, where appropriate on the crime and disorder front.

So, can I come and speak to you and see where we are and where we can go with the above?

Many thanks
Jim

Jim Howard
Neighbourhood Crime Reduction Officer
Street Management
Westminster City Council
5th Floor
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Details of public representations relating to 15/02232/LIGN

- **Mrs Adriana Bennett - Fermoy Road, Fermoy House, London**
  Received: 04.05.2015
  OBJECTION

  4:30 PM on 04 Apr 2015 There are already three betting shops along that section of Harrow rd within close proximity. We are already already experiencing many serious problems such as possible drug dealings, use of foul language as people are loitering around the shops, over consumption of alcohol leading to antisocial behaviour and crime such as robbery. Adding another betting shop will give the area a more negative image and cause more antisocial behaviour. Having three betting shops in close proximity is more than sufficient to satisfy gambler's needs. More positive things should be introduced rather than betting shops. Something that may benefit more people rather than just gamblers. e.g restaurant , coffee shops. This will encourage development in the area in a positive way, helping to reduce the negative factors listed above.

- **Mr Edward Montomery - 229B Shirland Road, London, W9 3JW**
  Received: 16.04.2015

  I am writing to object to a gambling license to be awarded for the Prince of Wales establishment, reference number 15/ 02232 /LIGN

  My key reasons for a strong objection to a granting of a gambling license to this establishment is for the three key reasons.

  1. By having another gambling establishment in the area would only increase the already poor anti-social and crime in the area. That corner and the market area have a long history of antisocial activity which the council and police have been endeavouring to deal with. I have personally seen fights in broad daylight near that corner, and antisocial behaviour of drinking, littering and loitering at the market and outside the already three gambling establishments within 10-50mtrs of the Prince of Wales. I constantly tell my wife and young daughter to stay vigilant should that go near that area and the gambling establishments. Having yet another gambling establishment that would attract even more anti-social and dangerous behaviour I strongly object to and believe would be materially detrimental to the large amount of work the council, police and local residence are endeavouring to do to improve the area and it's safety.

  2. There are schools near this area being the St Peters Church Primary school and the Queen Elizabeth Jubilee school. As per above the area outside the existing betting shops and on that corner are a haven for anti-social activity and make those children venerable as they walk to school and in the area. Having yet another betting shop attracting yet more anti-social activity in the area would be hugely detrimental to the well-being and safety of the pupils at that school.

  3. The location of the proposed betting establishment I also strongly object to. As per above there are already three gambling establishments within 10-50mtrs of the Price of Wales with Paddy Power only a few shops away. I object strongly seeing the gentrification of Harrow road into a line of betting establishments, which would detract the potential for more social and less anti-social attracting establishments in the area.

- **Mr Jonathan Rosenberg - 49A Fernhead Road, London, W9 3EY**
  Received: 16 Apr 2015

  I am writing to object to the application to convert the Prince of Wales pub into a gambling establishment.

  Given there are already several betting shops close by, I think that to add another one would mean there is a concentration of such establishments on this part of the Harrow Road and that this could lead to disorder. This part of the Harrow Road already has a lot of people hanging around. Another betting shop would make it intimidating for people like me who use the junction a lot. Even more people would hang around the betting shop getting angry when they lose money.

  This is a major crossroads used by the community including many children. Another betting shop would tip the scales too much and mean that children could not avoid the lure of gambling. This is therefore a vary bad location for yet another betting shop.

- **Miss Jennifer Dyne - 24C Fermoy Road, London, W9 3NH**
  Received: 20.04.2015
  OBJECTION

  11:19 AM on 20 Apr 2015 I would like to object this license. The Prince of Wales site is of important use to the neighbourhood of Maida Hill around the Harrow Road junction. A lot of work has gone into improving the area, with a regular market held opposite and a generally improved street environment. ANOTHER betting shop is not required in this area, and would put an important neighbourhood building to waste. I walk past the building on a regular basis, and as a young woman living in the area, I find betting shops to create a poor neighbourhood atmosphere. I can understand that one or two can form an integral part of the street scene - but we are risking over saturating the area with fast-food chains, betting shops and not much else. This area would benefit from a different use, and something that would be much used by the whole neighbourhood.

- **Mr Robert Ward - 43c Fernhead Road, London, W9 3EX**
  Received: 21.04.2015
  OBJECTION

  3:12 PM on 21 Apr 2015 I feel that another betting shop, to add to several already in close proximity, can only make it more likely that more gambling outlets in such a close proximity to the existing ones, will become a source of crime or add to the current disorder often witnessed outside the existing betting offices close by.
  We have big, and growing, problem with anti-social drinking, plus anti-social behavior. There are already large groups of men congregating outside the two existing betting shops and drinking all day on the street outside. I've often been pestered when passing, being asked for money. I feel that this problem will only increase with another large betting shop within a few yards of the Paddy Power, William Hill and Coral's.
  I have recently written to our MP and local councilors about the increased level of anti-social behavior, and fear of crime outside the existing betting offices and Maida Hill market, plus Fernhead Road (both directly opposite the proposed Betfred site). I believe that the increased crime levels in the Maida Hill area have a direct correlation with the increase in gambling here. I understand that last year burglaries increased in the area by 20% compared to 2013, whereas it actually decreased in Westminster as a whole. Another betting shop offering greater opportunity for gambling debts and increase in poverty as a result of gambling, will only make us as residents more vulnerable to burglary and physical crime.

- **Dr Karen Dwyer – continued..**
  Received: 18.04.2015
  OBJECTION

  8:00 PM on 18 Apr 2015 A final comment in my opposition to the opening of Betfred.
  It has long been established that a secure, comfortable and pleasant environment has a significant impact on good mental health. The presence of an excessive number of betting shops in a community not only limits the opening of more beneficial and inclusive businesses but also draws in a concentrated pattern of ASB and crime. Importantly, this results in the residents suffering by being confronted by criminal behaviour and being intimidated and harassed by the betting shop clientele. This creates an unsafe, unpleasant environment. As I have pointed out in my previous comment, the opening of betting shops in this area has, in all cases, led to a significant number of reported cases of ASB and crime. There are a number of mental health services users living in this community and a number of local mental health support services. A number of these people have reported to me how they feel incredibly intimidated and scared by the crowds that hang outside these betting shops on the Harrow Road and how they plan their journeys to avoid interacting with these people. I have on a number of occasions seen these people being the victim of bullying and aggression from the William Hill crowd, a few shops down from the proposed Betfred. This in no way constitutes a secure, comfortable and pleasant environment for these people. A street with yet another betting shop that would boast 4 betting shops within approx. 100 metres of each other, dominated by intimidating men getting drunk and high outside them, and bullying our most vulnerable people is not in anyway facilitating good mental health of Westminster residents.
  Until Westminster Council can demonstrate its ability to manage the ASB and crime associated with the present betting shops, which is proving to be a significant challenge, I would suggest that it is not appropriate or reasonable to opening another one.

- **Ms Vera Hegarty - 28 Hormead Road, London, W9 3NG**
  Received: 12.04.2015
  OBJECTION

  7:17 PM on 12 Apr 2015 Yesterday, walking to the Co-op, I was asked for money by a respectable looking, pleasant, sober, articulate woman standing outside William Hill. What is it that brings a woman like that to be begging in the street? I can only assume that she has a gambling addiction that she can't manage. With two betting shops (Paddy Power and William Hill) within a stone's throw of each other, I felt for her. This is a catchment area with higher than borough average rates of unemployment, and a high concentration of mood and anxiety disorders ? within the top 3% of such areas in England. There are already too many vulnerable people here at risk from the misery of gambling losses and addiction. The existing betting shops visibly attract vulnerable people - those with evident drink and drug problems, and, sadly, some aggressive and anti-social behaviours that can go along with that. To me it would be irresponsible and uncaring to add another betting shop to the problems that these people, and those of us in the neighbourhood, like myself, who have to run the gauntlet just to go to the supermarket. Please do not add to these problems. Thank you.

- **Miss M Odusanya - 106 elgin avenue, london, w92hd**
  Received: 16.04.2015
  OBJECTION

  3:01 PM on 16 Apr 2015 I strongly object to this application on the basis that
  a) protecting children and other vulnerable persons from being harmed or exploited by gambling should be a priority in this area of North Westminster. There are several schools nearby and the premises is at a key pedestrian junction
  b) I believe it is also contrary to the Council?s Statement of Principles, particularly regarding the location

- **Dr Karen Dwyer - 357-361 Harrow road, London, w9 3na**
  Received: 18.04.2015
  OBJECTION

  5:04 PM on 18 Apr 2015 I oppose the opening of Betfred for the following reasons:
  (i) It provides no new amenity to the Harrow Road and thus no benefit to the local community.
  (ii) It has the very real and serious potential to invite a significant increase in anti-social behaviour, and to impact adversely on the lives of Harrow Road residents.
  (iii) The historical and contemporary presence of betting shops on the Harrow Road have taught us that they only serve to the detriment of the poor community, the over-stretching of police resources, and to the intimidation of local residents.
  (iv) It wastes an opportunity for the community to grow and develop from a more positive and inclusive business opening up (such as a new bar, flats, a florist, a hairdressers, a café, etc?)
  (v) The incident that took place in the Prince of Wales pub last year has hurt the community. Taking the opportunity to do something positive with the property that actually benefits the residents would go some way to healing the community.
  I live above William Hill (WH) betting shop on 357 Harrow road. Outside congregates a large crowd of men. They drink alcohol, smoke drugs and harass passersby. Many use WH as a meeting place to buy/sell stolen goods, buy/sell drugs and cheap alcohol and organise prostitution. The betting shop legitimises their presence. I hear shouting, swearing, fighting, police sirens throughout the day. I am constantly stressed by the aggression and the constant drama. It makes it impossible for me to sell my property. If another Betfred opens, the very same situation would arise on another part of the same road. BetWatch scheme of recent years has proved limited in its powers to impact on these ASB and crime issues (as evidence by the problems with Coral and Paddy Power).
  The closing down of the Prince of Wales pub in such sad circumstances has allowed us to do something positive to the area. To open another betting shop is a cynical and callous marking of the events.

- **Dr Karen Dwyer continued..**
  Received: 18.04.2015
  OBJECTION

  5:43 PM on 18 Apr 2015 I oppose the opening of Betfred for the following reasons:
  (i) It provides no new amenity to the Harrow Road and thus no benefit to the local community.
  (ii) It has the very real and serious potential to invite a significant increase in anti-social behaviour, and to impact adversely on the lives of Harrow Road residents.
  (iii) The historical and contemporary presence of betting shops on the Harrow Road have taught us that they only serve to the detriment of the poor community, the over-stretching of police resources, and to the intimidation of local residents.
  (iv) It wastes an opportunity for the community to grow and develop from a more positive and inclusive business opening up (such as a new bar, flats, a florist, a hairdressers, a café, etc?)
  (v) The incident that took place in the Prince of Wales pub last year has hurt the community. Taking the opportunity to do something positive with the property that actually benefits the residents would go some way to healing the community.
  I live above William Hill (WH) betting shop on 357 Harrow road. Outside congregates a large crowd of men. They drink alcohol, smoke drugs and harass passersby. Many use WH as a meeting place to buy/sell stolen goods, buy/sell drugs and cheap alcohol and organise prostitution. The betting shop legitimises their presence. I hear shouting, swearing, fighting, police sirens throughout the day. I am constantly stressed by the aggression and the constant drama. It makes it impossible for me to sell my property. If another Betfred opens, the very same situation would arise on another part of the same road. BetWatch scheme of recent years has proved limited in its powers to impact on these ASB and crime issues (as evidence by the problems with Coral and Paddy Power).
  The closing down of the Prince of Wales pub in such sad circumstances has allowed us to do something positive to the area. To open another betting shop is a cynical and callous marking of the events.

through the temptation of so many betting shops in one location. To help the pain of the losses - many of the people standing outside the betting shops appear to be drunk/high. Do we a)want to make these people even more vulnerable by throwing more temptation in their way b)increase the disorder that is associated e.g hassling females walking past the betting shops. For that corner we need something that's going to bolster the community like a community centre or somewhere that sells healthy, reasonably priced meals. I don't mean another fried chicken shop. I'm talking about affordable meals - soup/bread, pasta dishes. Or a tuition centre that local people could hire to teach things to other people in the community. Or a hub like bathroom2boardroom which will help people start businesses. Please help this corner, please help this community.

- **Mr Blair Thorburn - 361 Harrow Road, London, W9 3NA**
  Received: 13.04.2015
  OBJECTION

  3:24 PM on 13 Apr 2015 I am writing to oppose this Licence application. The junction of the Harrow Road has long been identified as a high risk area for crime & disorderly behaviour. There are notices of local residents with ASBOS. The area has a long history of drug dealing and for this reason Westiminster council has focused resources to clean up the areas with the Police safer neighbourhood team & the Piazza market. Both are achieving great results. Allowing this application to go ahead would be in contradiction to all the work that has been done to improve the area. Within 150 metres of the same area there are already 3 betting shops and another 2 which are within 500 metres. Crowds gather outside these shops and there is street drinking, criminal activity and aggressive behaviour thorough documented by the police. Adding another betting shop would negatively contribute to this. In addition the actual premise in question is at the centre of a criminal investigation involving a youngster making this area a high risk for children. Finally with 5 betting shops in the local area this proposed plan offers no added benefit to the local area.

- **Ms Paula Trimmer - 53A Portnall Road , London, W9 3BA**
  Received: 22 Apr 2015

  As a local resident I am very concerned that another gambling shop may open in the Harrow Road area in addition to the existing three.
  There is antisocial behaviour outside the betting shops, including litter and drunken behaviour. Gambling has been proven to be an addictive activity and I am concerned about the effect that having so many betting shops in the area will have on vulnerable people including the young and those with mental health problems.
  I recently attended an event at Maida Hill place where Council Officers assured us that there was a plan in place to improve the Prince of Wales junction and the Harrow Road. Another betting shop will be detrimental and may discourage customers for other local businesses.
  I look forward to hearing from you.

- **Ms Maureen Pepper - 26 Riverton Close, London, W9 3DS**
  Received: 22 Apr 2015

  I live near the above premises and I am writing to make a relevant representation objecting to the grant of a betting shop license for the 351 Harrow Road. I object on the basis that the application is not consistent with the "licensing objectives" for gambling premises, particularly:
  1. Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime
  Harrow Road Ward is one of the poorest areas in Westminster and London- a third of local households are in the top 10% most deprived in England; in 2013 the workless rate was 17.2.% (more than double the Westminster average of 8.8%); the Employment Support Allowance/ Incapacity Benefit claim rate is 10.5% (compared to Westminster average of 5.5%- almost double); in 2013 the Job Seekers Allowance claimant rate was 4.2%, (more than double the average for Westminster which is 2%)

c) other betting shops in the vicinity have caused problems previously connected with the licensing objectives, including street drinking and 'hanging around' at all times of the day
d) high-stakes gaming machines in betting shops are regularly featured in the press as being highly addictive. This will impact on children and families who use this busy area of the Harrow Road every day
e) vulnerable members of the local community will be affected - there is a drug & alcohol project across the road, ANOTHER gambling outlet nearby could be a risk factor for these service users
e) the application could lead to gambling being a source of crime or disorder which is already rife in that area, particularly in the evening. The proposed opening times of 7am to 10pm are shockingly innappropriate for this location.
f) The area does not need a betfred next to a paddy power. Surely this is against council planning objectives. I do not wish to walk past 2 betting offices in a row with my child when travelling to school, local shops and amenities, or elsewhere

- **Mr Simon Walton - 116 Fifth Avenue, London, W10 4DS**
  Received: 01.04.2015
  OBJECTION

  11:14 AM on 01 Apr 2015 I write as Chairman of Queens Park Safer Neighbourhoods Ward Panel. The anti-social behaviour generated by betting shops in the area is a regular subject at our meetings. This consists of smoking marijuana, drug taking, drinking and making a noise and disturbs nearby residents.

- **Mr David Robertson-Campbell - Flat 3, 476 Harrow Road, London**
  Received: 21.04.2015
  OBJECTION

  1:35 PM on 21 Apr 2015 I oppose this Application because I feel that the last thing this area needs is another betting shop.there are already three betting shops in the area and another added to such a short stretch of road represents an unacceptable concentration of this kind of gambling business. The facilities have been improving in this part of Harrow Road for some time and this betting shop will go against everything that we in the local community have been working to achieve.I believe that the prevention of public nuisance, crime and disorder will be hampered by this unnecessary new addition, because the punters hanging out in front of the shops are already intimidating local women and children there with their smoking, drinkingand shouting on the pavement.

- **Miss Elizabeth Trafford-Owen - 20 Hormead Road, London, W9 3NG**
  Received: 12.04.2015
  OBJECTION

  11:43 AM on 12 Apr 2015 I live seconds from the site in question and walk past it several times a day. It's on a corner where there has been trouble with people loitering and disorder - putting another betting shop there is the last thing needed. There are already several betting shops near by and people hang about outside and often when you walk past as a female the men make suggestive comments and make you feel very uncomfortable. You can tell they don't have much and what they do have they are being encouraged to gamble away by what is fast becoming a gambling strip - I can't believe this is something the council wants to be a part of? That corner is close to churches, a school, an addiction centre.....how would putting a betting shop in that location be appropriate? These places are trying to help vulnerable people and then you would put a betting shop there which encourages gambling in a sector of people who clearly already don't have much. From the men hanging around outside the existing betting shops - I'd say they are gambling beyond their means and unable to make a proper decision about whether to gamble

They can then collect a printed ticket showing they have gambled that day - meaning that if stopped by police, they can answer questions about why an apparently unemployed young man carries hundreds of pounds in rolled-up cash.
There are several hostels for the homeless located near 351 Harrow Road as well as Westminster Society for People with Learning Disabilities. These people need to be protected from the influence of anti-social behaviour, harm or being exploited by gambling.
The main road from Notting Hill to the Harrow Road ward is the Great Western Road which runs directly past 351 Harrow Road as does the main route from Westbourne Park underground station. Betfred plans to open 7am-10pm which means that people walking and cycling to and from Harrow Road Ward will have to pass a large betting shop being exposed to gambling, street drinking, begging and other anti-social behaviour.
Finally, I believe that the granting of a betting shop license would go against the Council's Statement of Principles, particularly regarding the location of the building.

- **Ms Maya Vuska - 66 Fermoy Road, London, W93NJ**
  Received: 22 Apr 2015

I am a resident of Fermoy Road and I write to object in the strongest possible terms to the grant of a betting premises licence for 351 Harrow Road. It is my understanding that the application is not consistent with the 'licensing objectives' for gambling premises, in particular the following:

1- Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime
There are several gambling premises in this area within close proximity of this site. The level of antisocial behaviour which these premises attract is completely intolerable. I have witnessed regular incidents of street drinking, spitting, cursing and brawling outside the existing gambling premises.

2-Protecting children and other vulnerable persons from being harmed or exploited by gambling. Another betting shop will simply exacerbate the antisocial behaviour leaving the very young, elderly and infirm feeling threatened and even more vulnerable. This is a particularly prominent site which is impossible for residents of the area to avoid. We will be hemmed in by betting shops. It is also completely insidious that gambling companies appear target areas where there are known to be higher levels of poverty, thus they are, whether knowingly or unknowingly, exploiting communities with higher numbers of the vulnerable and poor.

I also object to this application on the basis that there has not been an appropriate level of public consultation. I have not received any written postal notification of this application and am only aware of it via word-of-mouth. In the past I have received written notice of applications for such license applications in this area and was thus been able to comment promptly. Fermoy Road is one of the closest residential streets to this site, so surely we should have been given postal notice? A small notice taped to the wall of a boarded-up pub is simply not enough and most residents would has missed it.

This is a shocking oversight and if the Council do not receive many objections to this license, I have no doubt it is due to the fact that many residents are unaware of the proposals.

I believe that granting of a gambling license would also go against the Council's Statement of Principles, particularly regarding the location. It would be an appalling act of irresponsible governance if the Council grants this license. This site is extremely important and pivotal in the attempts being made by the local community to regenerate this area, reduce crime and improve conditions for local residents. The appearance of yet another betting shop, particularly in such a sensitive and prominent location will be 'the nail in the coffin' for these endeavours. This pocket of North Westminster is fast becoming a neglected and lawless ghetto. The Council has a duty to prevent the situation becoming worse by refusing to grant licenses to businesses which attract anti-social behaviour and have such a clear adverse affect on the quality of life and safety of residents and visitors to the area. Not only should this license be refused, but, given it's sensitivity and prominence, this site should be given special consideration and extreme care should be

There are already six betting shops in close proximity to this newly proposed one. The current betting shops are already a source of crime and disorder as large groups of men (and some women) gather outside these shops drinking alcohol on the streets, being drunk and disorderly, swearing, shouting and harassing local shoppers for money. As a woman, I find it quite frightening at times to walk past these betting shops and this effect the local economy as women and families seek to do their shopping elsewhere.
A good example of disorder is the incident which happened at the ceremony to switch on the Christmas tree lights at the Prince of Wales piazza last Christmas; a performance by the local community choir was interrupted and ruined by men from the William Hill Betting Shop who waded into the middle of the choir and started bellowing which sent the choir, audience and parents of young children running. An event planned by volunteers to bring the community together was ruined by a gang from the betting shop who were drunkenly running amuck.

Unfortunately a similar incident occurred a few years earlier which means the community choir is now reluctant to perform and a nice community event may now be cancelled.
Local people, voluntary organisations and Westminster Council have put a huge amount of money into improving the Prince of Wales Junction Piazza which was previously a drug dealing, drinking, begging and crime hot spot. A huge amount of community effort has gone into transforming this area into a market with a nice coffee shop, a food start-up premises and benches where shoppers can rest in the sun. However, recently groups of street drinkers and clients from the betting shops sometimes take over the benches driving shoppers away. 351 Harrow Road is just opposite this piazza and if it is allowed to become a betting shop, the piazza will be a triangle in the middle of three betting shops and this will only make the current problem worse. In addition, the local police station was recently closed so there is a much reduced police presence in the area and thus fewer opportunities for officers to have a word with those intent on anti-social behaviour. Another betting shop attracting more street drinkers will add to the sense of lawlessness in the area and will the community more vulnerable.
Household burglaries in the Harrow Road Ward increased 20% in the year to March 2014 (while on average the borough of Westminster saw a 7% decrease). Another betting shop encouraging gambling debts and an increase in poverty as a result of gambling, will only make residents more vulnerable to burglary.
The proposed betting shop will include up to four high stakes gaming machines (fixed odds betting terminals or FOBTs). These have been described by The Fair Gambling Campaign as the "crack cocaine" of gambling as they are highly addictive and people can lose hundreds of pounds a minute when playing them.

Each of these machines makes over £900 a week in profit and £5 million pounds was lost in FOBTs in North Westminster last year. This is a great concern in an area of poverty as Harrow Road Ward is one of the poorest areas in Westminster and London.
2. Protecting children and other vulnerable persons from being harmed or exploited by gambling.
In Harrow Road Ward, on average 60% of children live in "income deprived" households. Another betting shop luring their parents to gamble the little money they have in hopes of a win will make their home situation worse. There are a number of primary and secondary schools located near 351 Harrow Road and the school children walk down the road to get to school, access their PE activities, swimming and after school activities. At present they have to "navigate" groups of street drinkers outside the present betting shops and are exposed to the large and tempting adverts in the betting shop windows. In addition children can look straight through the windows to see gambling in action-not a life lesson appropriate to young children. The Kennet West Skills Centre for young adults in located nearby and they try to sell their products at the Prince of Wales piazza as part of their enterprise programme. They should be able to do this without being harassed by street drinkers and the other anti-social behaviour that the betting shops attract.
Harrow Road Ward has higher than the Westminster average of people being supported in the community. The Westminster Drug Project and the North Westminster Drug and Alcohol Service is located almost opposite 351 Harrow Road. The Guardian Newspaper did an investigation showing how drug dealers use betting shops to launder their drugs money. Dealers feed their drug money through the machines, losing a little and then cashing out with the vast majority of their stake.

We need other alternatives to betting shops The pub is in a cultural no man's land between Notting Hill Gate & Kensal Rise which at the moment is being overlooked for far too long. For this area to improve and serve the local community we need a more positive and far-reaching approach to shop usage. The experience of other areas in London which have introduced creative enterprises has only led to the enhancements of the local boroughs.

Recent press coverage of the presence of betting shops on the high street has stressed that when these are removed the area is improved. Examples of this can be seen on Chamberlayne Road in Kensal Rise where a William Hill shop has been removed. Gambling industry targets poor areas, this has been widely documented with academic evidence. Gambling industry does not target the affluent areas.

We implore you to seriously consider rejecting Betfred's application and to give our community a chance to develop and thrive and reach its potential. The majority of our community are decent hard working family people and we need all your assistance to maintain family values. Another betting shop does not help.

I write as an 'interested party' to make a relevant representation objecting to the grant of a betting shop licence for 351 Harrow Road.

I object on the basis that the application is not consistent with the 'licensing objectives' for gambling premises, particularly:

Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime

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

I believe it is also contrary to the Council's Statement of Principles, particularly regarding the location.

- **Mr Nicholas Hall,**
  Received: 21 Apr 2015

  Re: Betfred, 351 Harrow Road, London W9 3RA
  Application for new betting (other) premises licence

  I write as a local resident to make a relevant representation objecting to the grant of a betting shop licence for 351 Harrow Road.

  I object on the basis that the application is not consistent with the 'licensing objectives' for gambling premises, particularly:
  1. Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime
  This junction has long been a source of difficulty and attracts people hanging around the several existing betting shops. It is unpleasant and threatening for local residents and especially children. We have lost our police station and now are offered another betting shop. This makes long time residents like myself feel depressed and unrepresented.

  I object strongly to granting BetFred a licence on these premises.

- **Ms Petra Kauraisa**
  Received: 21 Apr 2015

  Re: 351 Harrow Road, London W9 3RA
  Application for new betting (other) premises license by Done Brothers (Cash Betting) Limited T/A Betfred

taken when decisions are made relating to it's future use. Only uses which serve to benefit a considerably broader cross-section of the local community should be considered.

On 19.06.2015 Ms Vuska added:
I would add that my objection to the grant of a licence for another betting shop on Harrow Road is primarily based on my concerns as a parent of 2 young children aged 7 and 9. My eldest is of an age which, in any reasonable community environment, I should be happy to send him out to run short errands. This is a normal part of any child's development. However my experience of the environment around the existing betting shops on Harrow Road where street drinking, foul language, shouting and obstruction of the public footpath by large groups of inebriated men and women are encountered on a regular basis, means that I don't feel safe, I don't like walking past these premises with my children and I certainly would not send them out on their own. I know my view is shared by many parents in the area.

I would also add that I have been sent a copy of an apparently revised plan of the proposed premises by Betfred management, however the accompanying letter gives no explanation of the scheme or how the revisions might be an improvement on the original. I have heard from neighbours that reducing the visibility of the interior may have been the reason for the revisions. However the nature of the proposed layout of the shop or even how much of the activity within the premises is visible from the street is not the real issue here, so no amount of alteration to the design will alter my view. This shop will be called ***Bet****fred. The name itself is an advertisement for the activities within the premises. There will be no doubt that it is a betting shop. It will be in the most prominent commercial location in this area which is distinct from all the other betting shops in that it has two large street frontages. It will dominate the junction which is historically named after the pub that occupied this building.*

I must restate my view that i
It would be an appalling act of irresponsible governance if Westminster City Council grants this license. The vulnerable members of our community and those living on very low incomes literally cannot afford to be exposed to bigger and brighter ways of being drawn into the addictive habit of gambling. ***The application for a gambling license for these premises by Betfred is obvious and unequivocal exploitation of this area and its many vulnerable residents.***

- **Ms Leila Bertrand - 53 Hormead Road, London, W9 3NQ**
  Received: 22 Apr 2015

My family and I have lived on Hormead Road for 20 years and were sadden to hear the possibility of the Prince of Wales pub turning into another betting shop.
This particular stretch of the Harrow Road does not need another betting shop one door down from Paddy Power and two shops from William Hill and 10 yards from there, Coral Bookmakers. We certainly don't need another BetFred when there already is a BetFred further down the Harrow Road.

We are very concerned about the high-stakes gaming machines in betting shops, which is highly addictive and has been recently criticized in the Parliament.

Gambling in the area has been associated with anti-social behavior and drinking alcohol - disguised in Lucazode and soft drinks bottles - takes place on the premises and on the streets and cross the road on the piazza opposite.

Another betting shop along with all the others is a bad influence on children and teenagers in the area. It seems we close Libraries and open betting shops.

The suggested opening times from 7am-10pm is a cynical move to remove money from the pockets from the poor and the vulnerable who frequent this area

There is currently a drop in centre for people with drug and alcohol problems, in sight of 25i Harrow Road. There are several hostels for the homeless in our area. There is supported accommodation at the Westminster Society for People with Learning Disabilities in sight of the location. These people need to be protected from the negative influences of betting shops.
I believe the granting of a betting shop license would also go against the Council's Statement of Principles, particularly regarding the location.

On 22.06.15 Ms Kauraisa submitted a statement from the manager at the local Sainsbury's store located at 478 Harrow Road in support of her representation:

The statement is as follows:

I manage Sainsbury's (478 Harrow Road, W9 3RU), which located directly is across the street from the proposed location of Betfred (351 Harrow Rd, W9 3RA).

As a business-owner, I'm concerned about a new betting shop in the local area. We witness daily how the existing betting shops inspire vulnerable local residents to anti-social behaviour and criminal activity, which is detrimental to both residents and businesses. Vulnerable people also need to be protected from harm. The risk is heightened in this particular location because our next-door neighbour, The Westminster Drug Project, which is also across the street from Betfred's proposed location, works with at-risk individuals with addictive behaviours. We have no way of proving that items shoplifted from our and other stores along Harrow Rd are sold in existing betting shops, but we've had indications that this is the case. We think that another betting shop will increase the crime rates in our store and others in the area.

For the reasons stated above, I would like this statement to be taken into consideration at the licensing hearing on July 1.

With kind regards,

Paulina Tutalak

Manager, Sainsbury's

- **Mr Inigo Patten - 24 Hormead Road, London, W9 3NG**
  Received: 22.04.2015
  OBJECTION

  11:54 PM on 22 Apr 2015 I wish to object to this application for a gambling license. This part of the Harrow Road already has three betting shops in very close proximity. We already have an issue with street drinking here outside these existing premises. The betting shops are a focus for groups of people to gather and drink on the pavement and it can be quite intimidating. Another betting shop will merely cement in this immediate area as a focus for this anti social behaviour. This will also undermine efforts by the local community to improve the Prince of Wales piazza, opposite this site, which historically has had many problems with crime, drugs, prostitution and anti - social behaviour.

- **Ms Elaine Arthur - 35 Hormead Road, Westbourne Park, London**
  Received: 17.04.2015

  Dear Sir/Madam

  Re: Betfred, 351 Harrow Road, London W9 3RA
  Application for new betting (other) premises licence

  I write as a close neighbour to make a relevant representation objecting to the grant of a betting shop licence for 351 Harrow Road.

Application reference: 15/02232/LIGN

As a resident of Harrow Road I object to the grant of a betting shop license for 351 Harrow Road, on the basis that the application is not consistent with the licensing objectives for gambling premises.
Granting permission to this betting shop will drastically increase public nuisance, lead to an increase of crime in the are area, invite public disorder, and pose a threat to public safety. Given the many at-risk families in the area, it will also expose children to harm.
The area has several betting shops already, and they strongly contribute to the anti-social behavour which is rampant on this stretch of Harrow Rd. Men congregate outside each betting shop to drink in the street, and as a woman it makes it unsafe to walk down the street to my home, because they often catcall and approach me in a threatening manner. I have also noticed that drugs are frequently being smoked outside the current betting shops. All of these problems will be multiplied if yet another betting shop opens in the area.
As you're surely already aware, Maida Hill (Harrow Road Ward) has some of the highest levels of poverty and unemployment in the country, with levels almost double that of the Westminster average (17.2% unemployment vs the Westminster average of 8.6 %) (2014 Harrow Road Ward Profile). This means that the risk of gambling being a source of crime or disorder, being associated with crime or disorder or being used to support crime is much higher here than in other parts of the city, and another betting shop would exacerbate the problem.

The proposed location location of the Betfred is a key location social and shopping hub of Maida Hill/Harrow Road - directly opposite Maida Hill piazza. There are community efforts underway to regenerate this part of the Harrow Road, and a betting shop will have an adverse effect. Anti-social drinking is a very common sight on the piazza, and if another betting shop is allowed we will end up with the piazza between at least three locations of anti-social drinking and anti-social behaviour, which will increase the public nuisance. The drinking spills into fights, begging, threatening behaviour, theft and drug dealing. Since our local police station has been closed the community has been left with few police officers coming through, and less of a police presence. Another betting shop, attracting more street drinking, will add to a sense of lawlessness in the area and will leave the community feeling more vulnerable.
The main route into Maida Hill, from Notting Hill runs directly past the proposed location of the Betfred, as does the only route from tube station (Westbourne Park). With the planned opening hours being from 7am to 10pm, everyone walking to and from Maida Hill will be exposed to gambling, drinking and other potentially anti-social behaviour, and it will pose a great safety risk, especially after dark. This also has a negative impact regarding anti-social drinking behaviour already mentioned.
Residential burglaries increased by 20% in the year to March 2014 compared to 2013 (Harrow Rd Ward Profile 2014), compared to the whole of Westminster which had a 7% decrease in burglaries. Another betting shop offering greater opportunity for gambling debts and increase in poverty as a result of gambling, will definitely make residents much more vulnerable to burglary and a general increase in crime in the area.

In Harrow Road Ward, on average 60% of children live in 'income deprived' households (Harrow Rd Ward Profile 2014); and we have higher than the Westminster average rate of people being supported in the community. Children play in the piazza, and the children of the local schools walk along the Harrow Road to the Jubilee Sports Centre, as well as on their way to and from school. Many of these children are from at-risk families, and they will be exposed to even more anti-social behaviour and they will also witness more gambling - not a life lesson appropriate to vulnerable young children and impressionable teens.
The high stakes gaming machines in betting shops have been described as "the crack cocaine of gambling" as they are highly addictive. Furthermore, people can easily lose hundreds of pounds a minute by playing them. This is obviously of great concern in an area of poverty such as ours, where many live off public assistance. In Maida Hill, Employment Support Allowance/Incapacity Benefit claim rate is 10.5%, which is much higher than the Westminster average of 5.5%. In 2013 the Job Seekers Allowance claimant rate was 4.2%, much higher than the city rate of 2% (2014 Harrow Road Ward Profile). This essentially means that public funds will be used directly to increase Betfred's profits.

I believe it is also goes against the Council's Statement of Principles, particularly regarding the location.

I live in Hormead Road, a stone's throw from the proposed premises.

On 20.06.2015 Ms Arthur added the following comments:

Recently I received a layout for the proposed betting shop from Betfred - their effort to persuade local residents that the betting shop would not be a source of crime and disorder, associated with crime and disorder, or be used to support crime. Their layout does nothing to mitigate these dangers. The size of the betting shop, along with its position on the corner of two busy roads will attract customers likely to hang around the shop. The Harrow Road side of the building has always had tables and chairs outside for pub customers. This memory and the wide pavement, will mean local gamblers are likely to congregate there. This adds to the likelihood of anti-social behaviour, drunkenness, crime and disorder. There are already longstanding problems of anti-social drinking, street violence, and aggressive begging on the market space directly opposite 351 Harrow Road, a new betting shop will only exacerbate these dangers.

Screening off the inside of the betting shop also does nothing to prevent it from causing harm to vulnerable people, who gamble more than they want to, beyond their means, and who may have mental impairment, alcohol or drug problems. We have a higher number of people who are vulnerable in our area, and they need to be protected not exploited.

- **Ms Sarah Seisay - 6 Athens Gardens, Harrow Road, London**
  Received: 22.04.2015
  OBJECTION

  6:53 AM on 22 Apr 2015 As a local resident and mother to 3, I am writing to object the application of a betting shop at 351 Harrow Rd. The area statistically is one of high poverty along with anti social behaviour and crime. We already have other betting shops in close proximity, which attract a group of drunk individuals. This problem will only become greater with another betting shop added to the vicinity. My children have to walk along these areas where they are constantly presented with anti social behaviour.

- **Mr Simon Jason Swerling - 2nd Floor, 7 Great Western Road, Westminster**
  Received: 22.04.2015
  OBJECTION

  11:44 PM on 22 Apr 2015 As a near neighbour from a few doors down at 7 Great Western Road from the Prince of Wales Public House, I would like to object to the application for a gambling license at The Prince of Wales pub. This building should be left as a public house as it is a pillar of the local community.

  We have already lost too many other local pubs, such as the Windsor Castle, The Elephant & Castle, The Neeld, The Chippenham, and the recently demolished Carlton Tavern was within walking distance. These local pubs provide a useful service to sections of the local community,and the closure must result in a considerable impoverishment of social life/social exchanges.

  A change of use from a pub would be detrimental to the local community as it provided a focus for what had become widely known as the Prince of Wales Junction. Not having a pub on the site would lower the amount of public in the whole area during the evening, increasing the amount of anti social activity across the road on Maida Hill Plaza. and making that particular corner of Harrow Road seem less safe. Consequently it is likely to reduce trade in the area.

I object on the basis that the application is not consistent with the 'licensing objectives' for gambling premises, particularly:

Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime -

In Maida Hill (Harrow Road Ward) we have high levels of poverty and unemployment (2014 Harrow Road Ward Profile). Another betting shop, to add to several already in close proximity, can only make it more likely that gambling will become a source of crime or disorder, be associated with crime or disorder or be used to support crime. We have big, and growing, problem with anti-social drinking and behaviour. Already quite a number of men congregate outside two of the betting shops nearby, drinking on the street. This problem will become greater with another large betting shop within metres of the other two.

The location of the Prince of Wales pub, where the Betfred is to be located, is key to the future of the shopping and social hub of Maida Hill/Harrow Road - directly opposite Maida Hill piazza. There are community efforts underway to regenerate this part of the Harrow Road, and a betting shop will have an adverse effect. We are trying to counter anti social drinking on the piazza, and if another betting shop is allowed we will end up with the piazza between at least three locations of anti social drinking and anti-social behaviour. The drinking has spilled into fights, begging, aggravated begging and theft. Our local police station has been closed, which leaves the community with fewer police officers coming through, and less of a police presence.

Another betting shop potentially attracting more street drinking will add to a sense of lawlessness in the area and will leave the community feeling more vulnerable.

Residential burglaries increased by 20% in the year to March 2014 compared to 2013 (Harrow Rd Ward Profile 2014), compared to the whole of Westminster which had a 7% decrease in burglaries. Another betting shop offering greater opportunity for gambling debts and increase in poverty as a result of gambling, will only make residents more vulnerable to burglary.

The high stakes gaming machines in betting shops have been described as "the crack cocaine of gambling" as they are so highly addictive that people can lose hundreds of pounds a minute. This is of great concern in an area of poverty such as ours.

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

In Harrow Road Ward we have higher than the Westminster average of people being supported in the community. The index of Multiple Deprivation places 33% of the ward in the top 10% most deprived in England, on average 60% of children live in income deprived households. Another betting shop will increase the vulnerability of these individuals to anti-social behaviour, harm, and to being exploited by gambling. Children play in the piazza, and the children of one of the local schools walk along the Harrow Road to the Jubilee Sports Centre. They will be exposed to anti-social behaviour associated with betting shops, they will also witness more gambling - not a life lesson appropriate to young children.

There is a drop in centre for people with drug and alcohol problems, in sight of the Prince of Wales pub. There are several hostels for the homeless in our area. There is supported accommodation at the Westminster Society for People with Learning Disabilities in sight of the Prince of Wales. These people need to be protected from the negative influences of betting shops.

There is also a Muslim Prayer Room opposite the Prince of Wales pub.

The main route into Maida Hill, from Notting Hill, runs directly past the Prince of Wales, as does the main route from Westbourne Park tube. With the planned opening hours being from 7am to 10pm, people walking to and from Maida Hill will have to pass a large betting shop, being exposed to gambling, drinking and other potentially anti-social behaviour. This also has a negative impact regarding anti-social drinking behaviour already mentioned.

I believe it is also contrary to the Council's Statement of Principles, particularly regarding the location.

- **Mr Danny Webb - 53 Hormead Road, London, W9 3NQ**
  Received: 21 Apr 2015

My family and I have lived on Hormead Road for 20 years and were sadden to hear the possibility of the Prince of Wales pub turning into another betting shop.

This particular stretch of the Harrow Road does not need another betting shop one door down from Paddy Power and two shops from William Hill and 10 yards from there, Coral Bookmakers. We certainly don't need another BetFred when there already is a BetFred further down the Harrow Road.
We are very concerned about the high-stakes gaming machines in betting shops, which is highly addictive and has been recently criticized in the Parliament.
Gambling in the area has been associated with anti-social behavior and drinking alcohol - disguised in Lucazode and soft drinks bottles - takes place on the premises and on the streets and cross the road on the piazza opposite.
Another betting shop along with all the others is a bad influence on children and teenagers in the area. It seems we close Libraries and open betting shops.
The suggested opening times from 7am-10pm is a cynical move to remove money from the pockets from the poor and the vulnerable who frequent this area
We need other alternatives to betting shops The pub is in a cultural no man's land between Notting Hill Gate & Kensal Rise which at the moment is being overlooked for far too long. For this area to improve and serve the local community we need a more positive and far-reaching approach to shop usage. The experience of other areas in London which have introduced creative enterprises has only led to the enhancements of the local boroughs.

Recent press coverage of the presence of betting shops on the high street has stressed that when these are removed the area is improved. Examples of this can be seen on Chamberlayne Road in Kensal Rise where a William Hill shop has been removed. Gambling industry targets poor areas, this has been widely documented with academic evidence. Gambling industry does not target the affluent areas.

We implore you to seriously consider rejecting Betfred's application and to give our community a chance to develop and thrive and reach its potential. The majority of our community are decent hard working family people and we need all your assistance to maintain family values. Another betting shop does not help.
I write as an 'interested party' to make a relevant representation objecting to the grant of a betting shop licence for 351 Harrow Road.

I object on the basis that the application is not consistent with the 'licensing objectives' for gambling premises, particularly:

Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime

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

I believe it is also contrary to the Council's Statement of Principles, particularly regarding the location.

- **Mr Rob Cope - 26 Riverton Close,, London, W9**
  Received: 21 Apr 2015

If a pub is not an option then some sort of public venue such as a restaurant, cafe or community hub would be better than a betting office which are already in oversupply in the area as two are located in the immediate vicinity and there are several others within a short walk. Another betting office would lead to further deterioration in the area that is considered by many standards as deprived and like many similar communities would consider another betting office in the vicinity damaging.

The current betting offices on either side often have people hanging around outside and causing distress to those who want to pass by. Another betting office between them will increase the problems already caused by the other two and will encourage that junction to become inhospitable and almost a no go area.

- **Ms Lily Bertrand-Webb - 53 Hormead Road, London, W9 3NQ.**
  Received: 21 Apr 2015

My family and I have lived on Hormead Road for 20 years and were sadden to hear the possibility of the Prince of Wales pub turning into another betting shop.

This particular stretch of the Harrow Road does not need another betting shop one door down from Paddy Power and two shops from William Hill and 10 yards from there, Coral Bookmakers. We certainly don't need another BetFred when there already is a BetFred further down the Harrow Road.
We are very concerned about the high-stakes gaming machines in betting shops, which is highly addictive and has been recently criticized in the Parliament.
Gambling in the area has been associated with anti-social behavior and drinking alcohol - disguised in Lucazode and soft drinks bottles - takes place on the premises and on the streets and cross the road on the piazza opposite.
Another betting shop along with all the others is a bad influence on children and teenagers in the area. It seems we close Libraries and open betting shops.
The suggested opening times from 7am-10pm is a cynical move to remove money from the pockets from the poor and the vulnerable who frequent this area
We need other alternatives to betting shops The pub is in a cultural no man's land between Notting Hill Gate & Kensal Rise which at the moment is being overlooked for far too long. For this area to improve and serve the local community we need a more positive and far-reaching approach to shop usage. The experience of other areas in London which have introduced creative enterprises has only led to the enhancements of the local boroughs.

Recent press coverage of the presence of betting shops on the high street has stressed that when these are removed the area is improved. Examples of this can be seen on Chamberlayne Road in Kensal Rise where a William Hill shop has been removed. Gambling industry targets poor areas, this has been widely documented with academic evidence. Gambling industry does not target the affluent areas.

We implore you to seriously consider rejecting Betfred's application and to give our community a chance to develop and thrive and reach its potential. The majority of our community are decent hard working family people and we need all your assistance to maintain family values. Another betting shop does not help.
I write as an 'interested party' to make a relevant representation objecting to the grant of a betting shop licence for 351 Harrow Road.

I object on the basis that the application is not consistent with the 'licensing objectives' for gambling premises, particularly:

Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime

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

- **Mr James O'Connell - Saltram Crescent, London , W9 3HR**
  Received: 22 Apr 2015

I am James O'Connell of Saltram Crescent, London W9 3HR.
I write as a local resident to make a relevant representation objecting to the grant of a betting shop licence for 351 Harrow Road.
I object on the basis that the application is not consistent with the 'licensing objectives' for gambling premises, particularly:
Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime
The crossroads on which the intended premises is situated is already dangerous and intimidating. It already attracts drunks, drug sellers and users and others who have nothing to do and gravitate towards places where "action" (of an excitingly anti-social nature) is likely to occur. Being a major intersection it is impossible for pedestrians to avoid using (unless going via Royal Oak or Notting Hill). I frequently have to take my children through there and it is always stressful as one never knows who or what (situation) one is likely to encounter.
We have a betting shop near us (corner of Malvern and Shirland) and it is a magnet for anti-social behaviour. Please don't let that happen to Harrow Road too.
Also the area is poor: in Maida Hill (Harrow Road Ward) we have high levels of poverty and unemployment - a third of households are in the top 10% most deprived in England; in 2013 the workless rate was 17.2% - much higher than the Westminster average of 8.6 %; the Employment Support Allowance/Incapacity Benefit claim rate is 10.5%, which is much higher than the Westminster average of 5.5%; in 2013 the Job Seekers Allowance claimant rate was 4.2%, much higher than the city rate of 2% (2014 Harrow Road Ward Profile).
The betting shop appears to be targeting these vulnerable people.
Another betting shop, to add to several already in close proximity, can only make it more likely that gambling will become a source of crime or disorder, be associated with crime or disorder or be used to support crime.

We have big, and growing, problem with anti-social drinking and behaviour. Already quite a number of men congregate outside two of the betting shops nearby, drinking on the street. This problem will become greater with another large betting shop within metres of the other two.
The location of the former Prince of Wales pub, where the Betfred is planned to be, is key to the future of the shopping and social hub of Maida Hill/Harrow Road - directly opposite Maida Hill piazza. There are community efforts underway to regenerate this part of the Harrow Road, and a betting shop will have an adverse effect. We are trying to counter anti social drinking on the piazza, and if another betting shop is allowed we will end up with the piazza between at least three locations of anti social drinking and anti-social behaviour. The drinking has spilled into fights, begging, aggravated begging and theft. Our local police station has been closed, which leaves the community with fewer police officers coming through, and less of a police presence. Another betting shop potentially attracting more street drinking will add to a sense of lawlessness in the area and will leave the community feeling more vulnerable.
Residential burglaries increased by 20% in the year to March 2014 compared to 2013 (Harrow Rd Ward Profile 2014), compared to the whole of Westminster which had a 7% decrease in burglaries. Another betting shop offering greater opportunity for gambling debts and increase in poverty as a result of gambling, will only make residents more vulnerable to burglary.
The high stakes gaming machines in betting shops have been described as "the crack cocaine of gambling" as they are so highly addictive that people can lose hundreds of pounds a minute. This is of great concern in an area of poverty such as ours.
Please do not allow these greedy people to make blighted lives worse.

I write as a local resident to make a relevant representation objecting to the grant of a betting shop licence for 351 Harrow Road. I object on the basis that the application is not consistent with the 'licensing objectives' for gambling premises, particularly:
(1) Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime
Maida Hill (Harrow Road Ward) is one of the poorest areas in Westminster and London - a third of households are in the top 10% most deprived in England; in 2013 the workless rate was 17.2% (Westminster average 8.6 %); the Employment Support Allowance/Incapacity Benefit claim rate is 10.5%, (Westminster average of 5.5%); in 2013 the Job Seekers Allowance claimant rate was 4.2%, (Westminster 2%)
Another betting shop, to add to several already in close proximity, can only make it more likely that gambling will become a source of crime or disorder, be associated with crime or disorder or be used to support crime. Already a number of men gather outside two of the existing betting shops nearby, drinking on the street, swearing, arguing and harassing local shoppers. This problem will become greater with another large betting shop within metres of the other two.
The location of the former Prince of Wales pub, where the Betfred is planned to be, is key to the future of the Maida Hill/Harrow Road area. It is right opposite Maida Hill piazza which was once largely abandoned to drinking, drug dealing and crime. Huge community efforts in recent years have transformed this site with a coffee shop and regular markets. But it remains vulnerable to a return to past problems. If another betting shop is allowed the piazza will be between at least three locations of anti social drinking and anti-social behaviour. The drinking has spilled into fights, begging, aggravated begging and theft.

The local police station on Harrow Road has been closed, so fewer police officers come through, and less of a police presence. Another betting shop potentially attracting more street drinking will add to a sense of lawlessness in the area and will leave the community feeling more vulnerable. Residential burglaries in Harrow Road ward increased 20% in the year to March 2014 (Westminster had a 7% decrease). Another betting shop offering greater opportunity for gambling debts and increase in poverty as a result of gambling, will only make residents more vulnerable to burglary.
The proposed betting shop will include up to four high stakes gaming machines (fixed odds betting terminals). These have been described as "the crack cocaine of gambling": so highly addictive that people can lose hundreds of pounds a minute. Each makes over £900 a week profit and £5m was spent in FOBTs in N Westminster last year. This is of great concern in an area of poverty such as ours.
(2) Protecting children and other vulnerable persons from being harmed or exploited by gambling. In Harrow Road Ward, on average 60% of children live in 'income deprived' households and we have higher than the Westminster average of people being supported in the community. Another betting shop will increase their vulnerability of these individuals to anti-social behaviour, harm, and to being exploited by gambling. Children play in the piazza, and the children of one of the local schools walk along the Harrow Road to the Jubilee Sports Centre. They will be exposed to anti-social behaviour associated with betting shops, they will also witness more gambling - not a life lesson appropriate to young children.

The North Westminster Drug and Alcohol Service is the main support service to people affected by drugs and/or alcohol in N Westminster - its front door is in sight of the proposed betting shop. There are also several hostels for the homeless nearby. There is supported accommodation at the Westminster Society for People with Learning Disabilities in sight of the building. The Kennet West Skills Centre for young adults with learning difficulties is nearby. These people need to be protected from the negative influences of betting shops. There is also a Muslim Prayer Room opposite the Prince of Wales site.
The main way into Maida Hill, from Notting Hill, runs directly past the building, as does the main route from Westbourne Park tube. With the planned opening hours being from 7am to 10pm, people walking to and from Maida Hill will have to pass a large betting shop, being exposed to gambling, drinking and other potentially anti-social behaviour. They will also be affected by the anti-social drinking behaviour already mentioned.
I believe the granting of a betting shop licence would also go against the Council's Statement of Principles, particularly regarding the location.

The main route into Maida Hill, from Notting Hill, runs directly past the Prince of Wales, as does the main route from Westbourne Park tube. With the planned opening hours being from 7am to 10pm, people walking to and from Maida Hill will have to pass a large betting shop, being exposed to gambling, drinking and other potentially anti-social behaviour. This also has a negative impact regarding anti-social drinking behaviour already mentioned.

I believe it is also goes against the Council's Statement of Principles, particularly regarding the location.

I live in Hormead Road, a stone's throw from the proposed premises.

- **Mr Jonathan Lass - 21 Chippenham Mews, London, W9 2AN**
  Received: 22.04.2015
  OBJECTION

  4:30 PM on 22 Apr 2015 I live and work in Maida Vale, nearby to 351 Harrow Road. I strongly object to the proposal to grant a betting license for the above property for the following reasons:
  1. There has been a history of anti-social and criminal behaviour, much of it drug-related, in this area. The police and local community have worked hard to contain and improve the situation. There are already betting shops nearby which act as a focus for begging, fights over money, robbery, street drinking and drug taking. Another one will only add to the problems.
  2. The local area has a significant number of vulnerable people - e.g., people with drug and alcohol and gambling problems and their children. The presence of another betting shop is hardly conducive to the recovery of people suffering from addictive behaviour. There is also housing for people with learning disabilities very close by - again, the disturbance that tends to be found around betting shops is likely to cause difficulties for this group of people.

- **Ms Alison Sage**
  Received: 21.04.2015

  As a resident of Harrow Road I object to the grant of a betting shop license for 351 Harrow Road, on the basis that the application is not consistent with the licensing objectives for gambling premises.
  Granting permission to this betting shop will drastically increase public nuisance, lead to an increase of crime in the are area, invite public disorder, and pose a threat to public safety. Given the many at-risk families in the area, it will also expose children to harm.
  The area has several betting shops already, and they do not help the majority of residents to feel proud of their environment or their community in Harrow Rd. Men spill out of the betting shops, drinking in the street, and it is unpleasant and threatening to walk down the street. I have also noticed that drugs are frequently being smoked outside. All of these problems will be multiplied if yet another betting shop opens in the area. What is more, it means that more and more people will come here for drugs and betting - and itwill discourage any efforts the rest of the residents make to make this a pleasant, friendly place to live.
  Maida Hill (Harrow Road Ward) has some of the highest levels of poverty and unemployment in the country, with levels almost double that of the Westminster average (17.2% unemployment vs the Westminster average of 8.6 %) (2014 Harrow Road Ward Profile). This means that the risk of gambling being a source of crime or disorder, being associated with crime or disorder or being used to support crime is much higher here than in other parts of the city, and another betting shop would exacerbate the problem. Vulnerable people are tempted to solve their problems in stupid and violent ways.

  The proposed location location of the Betfred is a key location social and shopping hub of Maida Hill/Harrow Road ¬ directly opposite Maida Hill piazza. There are community efforts underway to regenerate this part of the Harrow Road, and a betting shop will have an adverse effect. Anti-social drinking is a very common sight on the piazza, and if another betting shop is allowed we will end up with the piazza between at least three locations of anti-social drinking and anti-social

- **Ms Elaine Arthur - 35 Hormead Road, Westbourne Park, London**
  Received: 17.04.2015

I write as a close neighbour to make a relevant representation objecting to the grant of a betting shop licence for 351 Harrow Road.

I object on the basis that the application is not consistent with the 'licensing objectives' for gambling premises, particularly:

Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime -

In Maida Hill (Harrow Road Ward) we have high levels of poverty and unemployment (2014 Harrow Road Ward Profile). Another betting shop, to add to several already in close proximity, can only make it more likely that gambling will become a source of crime or disorder, be associated with crime or disorder or be used to support crime. We have big, and growing, problem with anti-social drinking and behaviour. Already quite a number of men congregate outside two of the betting shops nearby, drinking on the street. This problem will become greater with another large betting shop within metres of the other two.

The location of the Prince of Wales pub, where the Betfred is to be located, is key to the future of the shopping and social hub of Maida Hill/Harrow Road - directly opposite Maida Hill piazza. There are community efforts underway to regenerate this part of the Harrow Road, and a betting shop will have an adverse effect. We are trying to counter anti social drinking on the piazza, and if another betting shop is allowed we will end up with the piazza between at least three locations of anti social drinking and anti-social behaviour. The drinking has spilled into fights, begging, aggravated begging and theft. Our local police station has been closed, which leaves the community with fewer police officers coming through, and less of a police presence. Another betting shop potentially attracting more street drinking will add to a sense of lawlessness in the area and will leave the community feeling more vulnerable.

Residential burglaries increased by 20% in the year to March 2014 compared to 2013 (Harrow Rd Ward Profile 2014), compared to the whole of Westminster which had a 7% decrease in burglaries. Another betting shop offering greater opportunity for gambling debts and increase in poverty as a result of gambling, will only make residents more vulnerable to burglary.

The high stakes gaming machines in betting shops have been described as "the crack cocaine of gambling" as they are so highly addictive that people can lose hundreds of pounds a minute. This is of great concern in an area of poverty such as ours.

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

In Harrow Road Ward we have higher than the Westminster average of people being supported in the community. The index of Multiple Deprivation places 33% of the ward in the top 10% most deprived in England, on average 60% of children live in income deprived households. Another betting shop will increase the vulnerability of these individuals to anti-social behaviour, harm, and to being exploited by gambling. Children play in the piazza, and the children of one of the local schools walk along the Harrow Road to the Jubilee Sports Centre. They will be exposed to anti-social behaviour associated with betting shops, they will also witness more gambling - not a life lesson appropriate to young children.

There is a drop in centre for people with drug and alcohol problems, in sight of the Prince of Wales pub. There are several hostels for the homeless in our area. There is supported accommodation at the Westminster Society for People with Learning Disabilities in sight of the Prince of Wales. These people need to be protected from the negative influences of betting shops. There is also a Muslim Prayer Room opposite the Prince of Wales pub.

behaviour. Since our local police station has been closed the community has been left with few police officers coming through, and less of a police presence.
The main route into Maida Hill, from Notting Hill runs directly past the proposed location of the Betfred, as does the only route from tube station (Westbourne Park). With the planned opening hours being from 7am to 10pm, everyone walking to and from Maida Hill will be exposed to gambling, drinking and other potentially anti-social behaviour, and it will pose a great safety risk, especially after dark.
In Harrow Road Ward, on average 60% of children live in Œincome deprived[1] households (Harrow Rd Ward Profile 2014); and we have higher than the Westminster average rate of people being supported in the community. Children play in the piazza, and the children of the local schools walk along the Harrow Road to the Jubilee Sports Centre, as well as on their way to and from school. Many of these children are from at-risk families, and they will be exposed to even more anti-social behaviour and they will also witness more gambling ¬ not a life lesson appropriate to vulnerable young children and impressionable teens.

The high stakes gaming machines in betting shops have been described as [3]the crack cocaine of gambling[2] as they are highly addictive. Furthermore, people can easily lose hundreds of pounds a minute by playing them. This is obviously of great concern in an area of poverty such as ours, where many live off public assistance. In Maida Hill, Employment Support Allowance/Incapacity Benefit claim rate is 10.5%, which is much higher than the Westminster average of 5.5%. In 2013 the Job Seekers Allowance claimant rate was 4.2%, much higher than the city rate of 2% (2014 Harrow Road Ward Profile). This essentially means that public funds will be used directly to increase Betfred[1]s profits.
There is currently a drop in centre for people with drug and alcohol problems, 251 Harrow Road. There are several hostels for the homeless in our area. There is supported accommodation at the Westminster Society for People with Learning Disabilities in sight of the location. These people need to be protected from the negative influences of betting shops.
Granting of a betting shop license would also go against the Council[1]s Statement of Principles, particularly regarding the location.

- **Dr Naomi Katz - New Elgin Practice, 44 Chippenham Road, London**
  Received: 21.04.2015

We don't need another betting shop on Harrow road Bad for residents

Dr Naomi Katz
New Elgin Practice
44 Chippenham Road
London W9 2AF

LICENSING SUB-COMMITTEE No. 2
Wednesday 1 July 2015

Membership: Councillor Nickie Aiken (Chairman), Councillor Nick Evans and Councillor Aziz Toki

Legal Adviser: Barry Panto
Committee Officer: Joe McBride

Representations: The Metropolitan Police Service, the Licensing Authority, 68 local residents, one local business owner and four local councillors.

Present: Mr Mark Owen (Solicitor, representing the Applicant), Mr David Wheeler (On behalf of the Applicant), PC Bryan Lewis (Metropolitan Police Service), PC Ian Armstrong (Metropolitan Police Service), Mr Nick Nelson (Licensing Authority), Councillor Adam Hug (Westminster City Council), Councillor Guthrie McKie (Westminster City Council), Mr Richard Brown (Citizens Advice Bureau, representing a number of the local residents), Mr Andy Watson (North Paddington Society and local resident), Ms Julie Bundy (local Business Owner and resident) with witness Jacqui Hayes, Ms Karen Dwyer (local resident), Elizabeth Trafford-Owen (local resident), Petra Kaurasia (local resident) Ms Emily Hoffnung (local resident), Ms Maya Vuksa(local resident), Rob Cope (local resident) and Axel Michel (local resident).

Done Brothers (Cash Betting) Limited T/a Betfred, 351 Harrow Road, London, W9 3RA
15/02232/LIGN

Summary:

To consider and determine the application made by Betfred Bookmakers Ltd for a new Betting (Other) Premises Licence under the Gambling Act 2005.

Options:

1) grant the application
2) grant the application with conditions
3) refuse the application.

Decision (including reasons if different from those set out in report):

Mr Mark Owen, representing the Applicant, introduced the application and referred the Sub-Committee to paragraph 8.7 on page nine of the report that states,

"the authority will have to be satisfied that the Applicant has appropriate measures in place to prevent gambling at the premises being a source of crime and disorder, being associated with crime and disorder or being used to support crime and to protect

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

He explained that he and the Applicant had met with Mr Nick Nelson, Senior Licensing Officer at Westminster City Council, the Police and others on June 4th and had a very productive discussion. Following the meeting, Mr Owen told Members that he and the Applicant considered very carefully the letters of representation submitted as well as reviewing the Council's Statement of Principles. A detailed and thorough response to all the issues raised was then submitted to the Licensing Authority for the consideration of the Sub-Committee. This appeared as appendix A9 in the report together with proposed conditions at Appendix A10. Mr Owen hoped that this response and the strong set of conditions put forward by the Applicant would satisfy the Sub-Committee that granting the application would be reasonably consistent with the licensing objectives.

Mr Owen stressed that he did not intend to review all the information contained in his written response. He did, however, feel that it was necessary to address some of the issues that had arisen since the initial response was drafted due to the volume of late representations received. Mr Owen first referred to the crime and disorder licensing objective and invited the Sub-Committee to examine the Metropolitan Police's intelligence and crime reports for betting shops in the vicinity of the Prince of Wales Junction, listed on pages 200 and 202 of the report, as well as the Investors in People (IIP) check for the same premises, listed on page 204 of the report. Mr Owen asked the Sub-Committee to consider why the premises listed on these reports have not been the subject of a review from the Licensing Authority or from local residents. After examination of the report, he contended that they have not been the subject of a review because the instances listed on each of the reports fall short of demonstrating that any of these premises are operating contrary to the crime and disorder licensing objective. Mr Owen drew particular attention to Intelligence Report CWRT00901219, located on page 202 of the report, which stated that all the betting shops in the area were "switched on, and knew their responsibilities". He Submitted that this was proof of operators working in accordance with the licensing objectives.

Mr Owen reminded the Sub-Committee that a licence was granted to Coral Bookmakers in 2011 against the wishes of many local residents who voiced similar concerns to those raised in the current application. He noted that Intelligence Report CWRT89970, on page 201 of the report, alleges that a man bought cannabis for £5 from another man within the premises on 01/02/14. Mr Owen stated that this complaint was in no way sufficient to imply that the decision to grant a licence to Coral Bookmakers was flawed. He emphasised that the purpose of the licensing objectives are not to ensure that all betting shop premises are crime free but to use a sense of balance and perspective when determining the effects of a decision to grant a licence. Mr Owen admitted that he could not guarantee that the premises would be crime free for the next 10 years but committed to the premises operating responsibly in a similar

manner to the existing betting shops in the vicinity. He reminded the Sub-Committee that none of these premises have ever been the subject of a review of their licence.

Mr Owen then examined the Police crime reports, listed on pages 202 and 203 of the report, and claimed that there was no evidence to suggest that gambling was the source of crime and disorder in any of the instances listed. He suggested that the instances listed in the report are proof that the existing premises are operating responsibly, highlighting 6513000/15 on page 203, where a barred customer damaged a machine in the store. Mr Owen felt that staff in this case were clearly acting responsibly in barring a problem customer from the store. He stressed that the consequent criminal damage was not the fault of staff failing to follow correct procedure. Mr Owen argued that this is further proof that the existing premises are operating within the licensing objectives and that the Applicant would be similarly robust when dealing with potential problems.

Mr Owen then drew the Sub-Committee's attention to the statement from Ms Anna Brennan who has been the area Safer Neighbourhood Inspector since March 2015. Ms Brennan identified 64 incidents relating to betting shops in the area within the past five years. Mr Owen argued that this is proof that the threshold for review on the basis of crime and disorder is far from being satisfied. Rather than being a poor reflection of the existing betting shops, Mr Owen suggested that these 64 instances, coupled with the information contained in the crime and intelligence reports above, paint an unattractive picture of the people who frequent the betting shops and surrounding area. In support of this statement, Mr Owen referenced the witness statement provided by PC Ian Armstrong on page 193 of the Sub-Committee's report. PC Armstrong noted that William Hill's zero tolerance approach to street drinking has only served to move the problem towards Maida Hill market. Mr Owen cited this as proof that street drinking is prevalent in the community and that it bears no correlation to the location or clustering of betting shops. Mr Owen accepted that the addition of a further betting shop in the area would not improve the existing status quo but he also stated firmly that it would not make the situation any worse.

Mr Owen then drew the Sub-Committee's attention to Mr Nick Nelson's letter on page 210 of the report in order to support his view that gambling is not a direct cause of crime and disorder in the local area. He read the following statements aloud;

"Of the 70% of crime reports linked to a business address in the 2014 – 2015 period, 3% were linked to betting shops".

"In 2014 – 2015, 7% of Anti-Social Behaviour reports were linked to a business address. Of this figure, 20% were linked to betting shops and 16% were linked to the Prince of Wales Pub".

Mr Owen calculated that the total number of Anti-Social Behaviour crime reports linked to betting shops in 2014 – 2015 was 1.32% and advocated that this was clearly an inadequate indication that gambling is a contributory factor in the levels of crime and disorder occurring in the area. He also remarked that it would be helpful to have been provided with crime and disorder over a number of years so that trends could be identified and examined. Furthermore, Mr Owen was critical of the statistics for failing to compare betting shops to other retail establishments in the area such as supermarkets, fast food outlets and newsagents. He argued that the link from gambling to crime and disorder was unsubstantiated, as proven by the statistics above, and that betting shops were being disproportionately blamed for problems that are inherent in the local community.

In relation to the protection of children and vulnerable persons from gambling, Mr Owen was content that Members had read fully the applicant's response to the representations received contained in the report. He noted that Section 8 of the applicant's response dealt specifically with the protection of children and other vulnerable persons from being harmed or exploited by gambling and that Section 9 related to the specific location of the premises. Mr Owen felt that the measures outlined in Sections 8 and 9 of the applicant's response, coupled with the dedicated staff training programme offered by the Applicant to all staff, should be sufficient to deal with Members' concerns regarding the protection of children and vulnerable adults from being harmed or exploited by gambling.

Mr Owen did feel it was necessary to address some of the issues that had been raised in regard to the protection of children and vulnerable adults in the additional representations that were submitted to the Licensing Authority. He noted an email from Nada Calovska which cited concerns about the exposure of young people to betting from an early age especially in this prominent location at the Prince of Wales junction. Mr Owen then explained, with the use of the plan at page 23 of the Sub-Committee report, that due to the locations of the pedestrian crossings at the Prince of Wales junction, pedestrians are unlikely to ever pass 351 Harrow Road without first coming past one of the other betting shops located in the nearby vicinity.

In his last point to the Sub-Committee, Mr Owen addressed the late representation submitted by Dr. Henrietta Bowden-Jones, Director and Lead Clinician of the Central North West London National Problem Gambling Clinic, at the request of Karen Buck MP. Ms Bowden-Jones wrote that locations such as 351 Harrow Road would be better served by the construction of a subsidised gym, a library or a community centre rather than another betting shop. Mr Owen felt that such facilities would indeed be advantageous to the local community but, in reality, neither the demand nor the resources are available in the present economic climate. He stated that an application for a betting shop could not be refused simply because parts of the community feel there are more worthy alternatives. Dr Bowden-Jones goes on to say that evidence

suggests the clustering of betting shops can lead to an increase in betting. Mr Owen responded that evidence gathered by the Applicant suggests that this is not the case. He suggested that the creation of another shop in the area would relieve the pressure on existing premises by dispersing existing gamblers.

PC Bryan Lewis confirmed that the police were maintaining a representation in this case primarily due to the sensitivity of the location of the premises. He explained that the area has a high concentration of hostels for rough sleepers and homeless people, people with mental health issues and people with drug and alcohol problems. PC Lewis accepted that there are already a number of similar premises in the nearby vicinity but added that the addition of a further betting shop would only serve to increase the risk posed to the vulnerable people in the area. PC Lewis commented that the prevalence of street drinking was indicative of the high degree of vulnerable people in the area and that the street drinkers themselves should be considered by the Sub-Committee as being vulnerable.

PC Lewis wished to clarify that the police have no complaints against Betfred as an operator, confirming that the Applicant has worked in conjunction with the police in a number of other areas with positive outcomes. The police representation was maintained as a result of the proposed use of these particular premises as a betting shop and he felt that the licensing objective to protect children and vulnerable adults would not be upheld should the application be granted.

While the police representation focused primarily on the location of the premises, PC Lewis also highlighted the prevention of crime and disorder as an important factor in their opposition to the application. He suggested that the unusually high level of local opposition to the application indicated that a substantial level of crime in the area is not reported to the police. PC Lewis informed the Sub-Committee that PC Ian Armstrong, the dedicated ward officer for Harrow Road, was in the gallery and happy to elaborate on any of the points raised. His experience suggests that anti-social behaviour, public nuisance and the handling of stolen goods are all issues that are not reported to police. PC Lewis stated that these unreported crimes have had an adverse impact on the reported crime figures in the report.

Mr Nick Nelson addressed the Sub-Committee on behalf of the Licensing Authority and began by expressing his understanding the commercial reasoning behind the application given the prominent location of the premises. Mr Nelson said that this location is a major factor in the licensing service's opposition to the application because of its proximity to the various hostels for the homeless, addiction centres such as the North Westminster Drug and Alcohol Service and the Maida Hill Market. Mr Nelson voiced concerns that a betting shop in such a significant location would prove to be a significant attraction for vulnerable adults in the area. He produced a report which set out the detailed concerns of the Licensing Authority. In particular, the report concluded

that the operation of a betting shop at 351 Harrow Road would pose a significant risk in terms of the first and third licensing objectives, namely preventing gambling from being a source of crime and disorder or being associated with crime and disorder and protecting children and other vulnerable persons from being harmed or exploited by gambling. The Authority was of the opinion that the location of the premises and the associated problems with crime and disorder in the area were such that no measures could ensure that the use of the premises as a betting shop would be reasonably consistent with the licensing objectives.

Mr Nelson suggested that the number of vulnerable adults in the area was not easy to quantify given the nature of the services provided at these facilities. Service users normally go to great lengths to ensure discretion and are not likely to respond to requests for information. A recent report of the licensing authority has identified betting shops as an ideal location for rough sleepers to pass the day in a relatively warm and comfortable environment with the provision of tea and coffee in many cases. Mr Nelson referenced a recent report entitled 'Rates of Problematic Gambling in a British Homeless Sample: A Preliminary Study' which provided specific evidence which it was believed demonstrated that there was a link between the homeless in Westminster and problem gambling. The results showed a problem gambling rate of 11.6% amongst the homeless population, as opposed to 0.7% in the general population. The preferred gambling activities amongst the homeless population were electronic roulette machines (i.e. B2 gaming machines) and sports/horse betting, notably the main gambling activities provided by betting shops.

Regarding crime and disorder, Mr Nelson felt that the reported crime figures do not portray the reality of life in the Harrow Road area and again reiterated the unusually high level of local opposition to the application as evidence of this. While welcoming the conditions put forward by the Applicant, Mr Nelson advised that given the high number of expected customers to the premises would mean that constant monitoring would be difficult.

Mr Kerry Simpkin, the Licensing Team Manager, briefly addressed the Sub-Committee to confirm that the process for a review of the licence of one of the existing betting shops in the area is underway. The Licensing Service have serious concerns about the protection of vulnerable people from being harmed or exploited by gambling and are undertaking a review of the licence of another betting shop as a result of the street drinking and associated anti-social behaviour that is centred around those premises.

Mr Richard Brown addressed the committee on behalf of 18 local residents and the Paddington Society. He emphasised the level of local opposition to the application and felt that this was shown by the 68 opposing representations contained in the Sub-Committee's report coming from a broad section of the community including residents, local councillors, the local MP and various business interests. Mr Brown highlighted

three main themes that would underline his objection to the application; crime and disorder, vulnerable persons and location.

Referring to crime and disorder, Mr Brown reminded the committee that the police are opposing the application and he felt that their concerns over an increase in crime as a result of the application should outweigh the view put forward by Mr Owen that there is no direct correlation between gambling and crime and disorder. He also noted the likelihood that many instances of crime and disorder go unreported and suggested that the testimony of residents to the Sub-Committee would corroborate this. In support of this, Mr Brown referred to PC Armstrong's representation on page 195 of the report that states, "As I am not on duty all the time the incidents of street drinking are likely to be significantly higher as they are not always reported to the police". In addition, he drew the Sub-Committee's attention to the report dated 30th May 2005 (on page 203 of the Sub-Committee report) where there was reference to a machine being damaged by an irate customer at Coral's at 381 Harrow Road. Corals had indicated that there was an expectation that such machines would be damaged by frustrated customers and that such complaints would not be substantiated unless a member of staff was injured or upset. That perhaps suggested that the situation was worse than the crime statistics might show.

Mr Brown referred to photos submitted by residents that show a large number of people congregating outside the existing betting shops on a regular basis. He felt that the location of the premises at 351 Harrow Road, formerly the Prince of Wales pub, would only exacerbate this crowding because of its location on the junction and because the Prince of Wales pub was formerly a local landmark that would be likely to attract crowds. Mr Brown refuted Mr Owen's suggestions that the levels of betting would remain broadly the same and that a further betting shop in the area would disperse existing gamblers.

Mr Brown recognised that public nuisance is not a licensing objective under the Gambling Act 2005 but drew the Sub-Committee's attention to the Council's Statement of Principles Section 12.1.4. This section makes it clear that persistent and sustained public nuisance can be considered as crime and disorder. Mr Brown believed that the daily harassment suffered by residents, listed in the Sub-Committee report should be considered in this light. He said that any additional betting shops would only tip the scales further in this direction.

Mr Brown then commented on the protecting children and other vulnerable persons from being harmed or exploited by gambling licensing objective. The guidance stated that Licensing Authorities need to consider in relation to specific premises whether any special considerations apply in relation to vulnerable adults. The location in that context is particularly important. The Council's Statement of Principles stated that any application within close proximity to sensitive locations such as schools or hostels must

include detailed information as to how the proposals will promote the protecting children and other vulnerable persons licensing objective. Mr Brown also referred to 14.2 of the Statement of Principles that location of premises may be a significant factor in terms of promoting the licensing objective, including schools and hostels. As noted above, 351 Harrow Road is located in close proximity to a number of these facilities.

The Sub-Committee took account of all the relevant written representations that had been made by local residents and the local councillors, many of which were in considerable detail. The Sub-Committee heard directly from Andy Watson, Emily Hoffnung, Petra Kaurasia, Maya Vuksa and Councillors Hug and McKie. They complained about the frequent harassment, verbal abuse and intimidation they are subjected to when walking past the crowds that gather outside the betting shops. Karen Dwyer lives above William Hill at 357 Harrow Road. She gave compelling evidence about the people who congregate outside those premises. She said that they drink alcohol, smoke drugs and harass passes by and alleged that they used the premises to buy and sell stolen goods and drugs. Elizabeth Trafford-Owen is a resident in Hormead Road and gave similar evidence, adding that, although persons do feel intimidated, they do not typically report the situation to the police.

Ms Julie Bundy owns a local business and has been actively involved in attempts to regenerate the Harrow Road for over 15 years. She stated that Harrow Road is the worst performing High Street in Westminster and the degree vulnerability within the community is evidenced by the number of hostels and addiction centres in the surrounding area. She argued that the proliferation of betting shops is harmful to other businesses and the street drinkers are discouraging people from shopping in the area.

Ms Jacqui Hayes gave evidence in support of the representation by Julie Bundy. She has worked with vulnerable people in the Harrow Road area for over 25 years and emphasised that addiction is only one type of vulnerability and is not easily identified. She believed that the staff training offered by the Applicant would be insufficient to deal with the complex problems that she has encountered in her work throughout the Harrow Road area. Furthermore, she believed that the Applicant had failed to understand the sense of community that has grown organically amongst the people who frequent betting shops in the area, particularly the William Hill premises. Ms Hayes stated that vulnerable people know that they can go to one of the betting shops and have access to people, money and other substances that will feed their habits and increase their levels of vulnerability. Ms Hayes also believed that a similar pattern would emerge in the proposed betting shop at 351 Harrow Road given its previous history as the Prince of Wales pub.

Councillors Adam Hug and Guthrie McKie briefly addressed the committee to echo the statements made by the police, the licensing service and the local residents. Councillor Hug asked the Sub-Committee to pay heed to the powerful testimony provided by local

residents that painted a distressing picture of the levels of vulnerability that exist in the Harrow Road area. Councillor McKie explained the efforts that are currently in progress to regenerate the Harrow Road, including plans to extend the market area and introduce pedestrianisation, and believed firmly that the granting of this application would set back the progress that has been made in recent months.

The Sub-Committee offered Mr Owen the opportunity to respond to the verbal submissions made by residents but he felt that he had covered all the relevant information in the written submission and in his earlier presentation to the Sub-Committee.

After an extended period of deliberation, the Sub-Committee returned and emphasised immediately that the decision taken was a very difficult one. Members acknowledged that Betfred is a responsible owner and that the objectors who have made written or verbal statement are not against the operator or betting shops per se. The Sub-Committee noted that, in accordance with the Gambling Act, it had to aim to permit the use of the premises for gambling but only if that use was reasonably consistent with the licensing objectives and in accordance with the Licensing Authority Statement of Policy. In this case, the Members had concerns regarding two of the licensing objectives, namely crime and disorder and the protection of vulnerable adults. The members were particularly concerned that vulnerable persons in the area would be harmed or exploited by the operation of yet another betting shop in the immediate locality.

In regard to crime and disorder, the Sub-Committee accepted that Mr Owen could not guarantee the premises would be crime free. However, in seeking to make a balanced and proportionate decision, Members were swayed by the compelling evidence presented to the Sub-Committee by the police, licensing authority and by local residents of the regular anti-social behaviour and harassment that occurs both inside and outside the existing premises. Reports of criminal activity such as criminal damage, theft, threats of violence against residents and betting shop staff, aggravated begging, drug taking and drug dealing, both inside and outside the premises, listed from pages 193 – 204 in the Sub-Committee report coupled with the verbal submissions made at the hearing, were sufficient for Members to feel confident that they could establish a direct link between the local betting shops and crime and disorder associated with those shops. Whilst much of the evidence centred around the operation of the William Hill premises at 357 Harrow Road, there was evidence to the effect that the Maida Hill junction was generally a hotspot for criminal and anti-social behaviour and these premises occupied a very prominent position within that area. Despite the measures outlined in Mr Owen's presentation proposing how they intend to manage the premises effectively, the Sub-Committee believed that granting a licence to another betting shop at this location would further exacerbate the current crime and disorder that is associated with both the local area itself and the existing betting shops.

In that regard, the Sub-Committee noted the submission from the Licensing Authority that one of the existing betting shops is in the process of having its licence reviewed.

The licensing objective that was foremost in the Sub-Committee's thoughts when deciding to refuse the application was the protection of children and vulnerable adult from being harmed or exploited by gambling. Members wished to highlight that they had no concerns regarding the protection of children from harm or exploitation by gambling due to the robust measures adopted by the Applicant to protect children from harm. The Sub-Committee, however, had serious concerns about the Applicant's ability to make sure that vulnerable adults are not harmed as a result of the gambling activities proposed at these premises. The Sub-Committee noted paragraph 5.2.2 of the Gambling Commission's guidance which states:

"The Act does not seek to prohibit particular groups of adults from gambling in the same way that it prohibits children. The Commission does not seek to define vulnerable persons but it does, for regulatory purposes, assume that this group includes people who gamble more than they want to, people who gamble beyond their means and people who may not be able to make informed or balanced decisions about gambling due to mental health needs, learning disabilities or substance misuse related to alcohol or drugs".

The Sub-Committee referred to the concerns raised by the Licensing Authority, the police and local residents of the large number of vulnerable people who access a wide range of services for drug, alcohol and mental health issues based in the local area. These include the St. Mungo's hostel and the North Westminster Drug and Alcohol Service. Whilst the Sub-Committee was fully aware that there was a general presumption to permit gambling applications in the legislation, this needed to be balanced against the fact that there was specific relevant guidance that the location of the premises can be taken into account.

In addition, policy LOC1 in the Council's Statement of Principles clearly states that applications will not be granted in sensitive locations unless the relevant criteria in policies OBJ3 are met and further states that any application within close proximity to a hostel or other sensitive location where there is the potential for exposing vulnerable persons to gambling, must include detailed information as to how the proposals will promote the gambling objective of protecting vulnerable persons from being harmed or exploited by gambling. Paragraph 15.5 of the Council's Statement of Principles states that sensitive locations will include locations where there is a concentration of gambling premises in an area where vulnerable persons are likely to be harmed or exploited. Location is of particular significance in the case of Harrow Road because of the high proportion of services listed above.

Members also noted that Mr Owen accepted in his presentation that the area is one of

high depravation. Many of the vulnerable people living and or accessing services could potentially be attracted to the current betting shops in the vicinity. The Sub-Committee agreed with the evidence of the licensing service in relation to the difficulty presented by identifying vulnerable people. Ms Jacqui Hayes', a specialist worker in the Harrow Road area for many years, told the Sub-Committee that addiction was only one type of vulnerability and the basic awareness training put forward by the Applicant would be insufficient to identify people who require protection from gambling. Having regard to all the evidence put before them, Members did not accept that the Applicant could adequately guarantee the protection of vulnerable people from being harmed or exploited by gambling.

The Sub-Committee concluded that the granting of this application for a new betting shop at such a highly sensitive location would be likely to result in an increase in crime and disorder that is associated with betting but was particularly concerned that it would also increase the risk that vulnerable people in the area would be harmed or exploited by gambling. As a result, the application was refused.

From: karen dwyer
To: Nelson, Nicholas
Subject: Re: Incident outside William Hill
Date: 23 June 2015 14:48:59
Attachments: image001.png

Hi Nick

Here is a brief overview. I am a bit sketchy with dates as I don't record these events but would be happy for Ian Armstrong to give you the case details if that would help. If you need further information me know. I am planning to attend the hearing on 1st July and to represent myself.

Bw
Karen

I have lived above William Hill (WH) since March 2003. Since this time there has always been a congregation of drinkers outside the premises. Several years ago, I approached WH, asking them to address this issue. My main concerns were that the drinkers were hostile, aggressive, and attracted other forms of crime and anti-social behaviour, including prostitution and drugs. WH refused to acknowledge that there was a problem and offered no means or interest in addressing the problem.

I cannot recall the exact date (between 20011 and 2012 I think – I am happy for the police to provide this information at your request), but several members of the group outside WH began to make sexually offensive comments towards me when I passed by the shop (which I cannot avoid as it is next to the entrance door to my home). These comments began as lesser offensive remarks and quickly escalated to incredibly intimidating and insulting comments about what the individuals would like to do to me sexually and instructions for me to carry out sexual acts on them. At one point the comments became threatening, I vaguely recall the phrasing as something like "see/wait what I will do to you". This is when I contacted the police. I was called to Belgravia police station to make a statement and to identify the individual who had made this particular threat. I positively identified the man. He denied the accusations of making inappropriate sexual comments and threatening me. The only witnesses were his friends and thus in the absence of other evidence, he was released without charge. This man later left the area, but the sexual comments from the rest of the group continued.

On another occasion, I was washing the windows of my flat. I was trying to avoid splashing any water below, and mindful of potential spillage, I requested passers-by walk closer to the road that the shop fronts. One of the WH crowd took exception to my request and threw a bottle of orange juice up at my flat. This bounced off my head and into my flat. As I tried to explain to him that I was doing everything in my power to avoid splashing anyone, he felt my request "disrespectful" and shouted threats up to me, including his statement that he would "smash my fucking face in". I called the police. They said that there was nothing that they could do since the individual had left the area at that point. I have not since washed the windows in my flat, terrified that this will

incite further tensions between myself and the WH congregants.

I have called the police on many occasions reporting individuals drinking out WH. The police have responded to these calls and de-canned these individuals. Unfortunately, by the time the police turn up, the individuals have often left the scene. I understand that the caveats to the Westminster by-law on no drinking in the borough prevent the police from checking a drink container for alcohol if it is not in a vessel marked as containing an alcoholic drink. Many of these individuals are aware of this and decant their drinks into soft drink bottles. Others wrap a plastic or paper bag around the bottle or can to prevent police from being able to ask to inspect the vessel for alcohol. I am also aware that with the cuts to the police numbers, this is not the most important use of police time. I have since stopped phoning the police as I feel I am wasting their time/resources and since the drinkers can dodge police action quite cleverly.

On 16th June as I was talking to a neighbour and his newborn baby in the street, a woman and her companion, both of who had been standing outside WH and drinking from beer cans several minutes earlier, threw a beer can at the pram that skidded under a lorry. She then returned back to WH to rejoin her friends. I spoke to the manager of WH (Charles), asking him to watch out for this woman as she was drinking alcohol on his premises and being anti-social. He was extremely irate at my request. He explained that he felt as much a victim of these individuals as the rest of the community did. He continued that although he tried to prevent drinking inside the shop, it was impossible for him and his staff to control the drinking on the WH shop front. He explained that the counters were so far back in the shop that he could not see the drinking, the screens in the window blocked his view of the shop front outside anyway, and that the drinkers did not listen to him if he asked them to stay off the WH premises. He said that they had cameras for the shop front but that he could not view the footage as it was only accessible to a central security office. I explained that I often saw customers going into WH with drinks. He said that it was a difficult situation for him. He emphasised heavily his lack of complicity in the problem and his victimhood. He also felt that the junction was a hotspot for trouble as people came from other areas to hang out in WH and the local area, and that he was having to deal with non-locals exacerbating the problem.

I contacted WH head Office, asking to speak to the areas manager. Tony Avery (the District manager) called back and seemed oblivious to the problem when I explained to him what had happened on the 16th June and the ongoing issues. I have asked to meet with him on a visit to WH. He has yet to offer a date to meet and discuss the issues.

From: "Nelson, Nicholas" <nnelson@westminster.gov.uk>
To: "kadwyer@yahoo.com" <kadwyer@yahoo.com>
Sent: Monday, 22 June 2015, 15:02
Subject: Incident outside William Hill

Dear Dr Dwyer,

My name is Nick Nelson and I am a Senior Licensing Officer for Westminster Council. I have made a representation against the new betting shop at 351 Harrow Road (Betfred). In the course of my investigations, I was speaking with PC Iain Armstrong who I believe is known to you and he mentioned that you had personally received threats from the group outside William Hill that were so severe you had reason to call the police and make a complaint.

If possible, would you please be able to confirm the details of the incident (including dates, language used and outcomes) in a short paragraph as well as any other information you feel is relevant? I think it may be an important example to include in my statement on behalf of the Licensing Authority as to the type of issues generated by betting shops (and associated groups) in the area.

Any information you could provide would be most useful.

Kind regards,

Nick

Nick Nelson
Senior Licensing Officer
Licensing Team
Public Protection and Licensing Department
Westminster City Council
4th Floor East
64 Victoria Street
London SW1E 6QP
Tel: 020 7641 3431
E-mail: nnelson@westminster.gov.uk
Web: www.westminster.gov.uk/licensing

You can now apply online for the majority of licensing regimes that the authority is

responsible for. Please visit www.westminster.gov.uk/licensing and following the relevant links to apply.

please don't print this e-mail unless you really need to

LA9

RESTRICTED (when completed)

MG 11 (T)

WITNESS STATEMENT

(CJ Act 1967, s.9; MC Act 1980, ss.5A(3)(a) and 5B; MC Rules 1981, r.70)

Statement of Sumeet Anand-Patel .....URN:

Age if under 18 Over 18..... (if over 18 insert 'over 18') Occupation: .....

This statement (consisting of: .... 1 ..... pages each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated anything in it which I know to be false, or do not believe to be true.

Signature: S.Anandpatel Date: 19.06.15

Tick if witness evidence is visually recorded *(supply witness details on rear)*

My name is Sumeet Anand-Patel and I am Senior Licensing Officer of the Licensing Team at Westminster City Council.

On 12 May 2015, I visited William Hill at 357 Harrow Road with my colleague Nicholas Nelson as part of our investigations for the new Betfred application at 351 Harrow Road. Upon arrival at William Hill I experienced a strong smell of alcohol on the premises coming from the customers inside. On arrival there were approximately ten gentleman watching the screens in the premises.

Mr Nelson and I walked up to the main counter, introduced ourselves and asked to speak to a manager. A member of staff informed us that the manager was not present however he would be happy to answer any of our questions. As there were customers waiting to be served we stepped back from the main counter and waited for the staff member to finish serving the customers.

Whilst waiting to speak to the member of staff, a middle-aged African American gentleman who smelt of alcohol began speaking to me. He said 'hello, you have a pretty face' and attempted to continue the conversation however this made me feel very uncomfortable and uneasy so I did not respond to the gentleman and walked away from him towards my colleague.

Signature: .....S.Anandpatel..... Signature witnessed by: .....

2004/05(1): MG 11(T)

RESTRICTED – FOR POLICE AND PROSECUTION ONLY
(when completed)

Home address: .....

..... Postcode: .....

Home telephone number ..... Work telephone number .....

Mobile/pager number ..... Email address: .....

Preferred means of contact: .....

Male / Female (delete as applicable) Date and place of birth: .....

Former name: ..... Height: ..... Ethnicity Code: .....

Dates of witness non-availability .....

.....

Witness care

a) Is the witness willing and likely to attend court? Yes / No. If 'No', include reason(s) on MG6. What can be done to ensure attendance?

b) Does the witness require 'special measures' as a vulnerable or intimidated witness? Yes / No. If 'Yes' submit MG2 with file.

c) Does the witness have any specific care needs? Yes / No. If 'Yes' what are they? (Healthcare, childcare, transport, disability, language difficulties, visually impaired, restricted mobility or other concerns?)

Witness Consent (for witness completion)

a)	The criminal justice process and Victim Personal Statement scheme (victims only) has been explained to me	Yes ☐	No ☐	
b)	I have been given the leaflet 'Giving a witness statement to police — what happens next?'	Yes ☐	No ☐	
c)	I consent to police having access to my medical records in relation to this matter:	Yes ☐	No ☐	N/A ☐
d)	I consent to my medical record in relation to this matter being disclosed to the defence:	Yes ☐	No ☐	N/A ☐
e)	I consent to the statement being disclosed for the purposes of civil proceedings e.g. child care proceedings (if applicable)	Yes ☐	No ☐	N/A ☐
f)	The information recorded above will be disclosed to the Witness Service so they can offer help and support, unless you ask them not to. Tick this box to decline their services:		☐	

Signature of witness: .....

Statement taken by (print name): .....

Station: .....

Time and place statement taken: .....

Signature of witness: .....

WITNESS STATEMENT

CJ Act 1967, s.9; MC Act 1980, ss.5A(3)(a) and 5B; Criminal Procedure Rules 2005, Rule 27.1

Statement of **Nick NELSON** ..... URN: | | | | |

Age if under 18 **Over 18** (if over 18 insert 'over 18') Occupation: **Senior Licensing Officer, Westminster City Council**

This statement (consisting of: ....1..... pages each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated anything in it which I know to be false, or do not believe to be true.

Signature: N Nelson Date: 1 November 2015

Tick if witness evidence is visually recorded ☐ *(supply witness details on rear)*

I am a Senior Licensing Officer for Westminster City Council's Licensing Team in the Public Protection and Licensing department. I have worked in the Licensing Team in various roles for over ten years and have dealt with premises under the Gambling Act 2005 for over five years.

On 12 May 2015, at approximately 12:30, I visited William Hill at 357 Harrow Road with my colleague, Sumeet Anand-Patel as part of our investigations for a new Betting Shop application for a nearby premises, 351 Harrow Road. Upon entering William Hill at 357 Harrow Road, I noticed a strong smell of alcohol and at least one customer who appeared visibly drunk. When I identified myself and raised this with the shop staff, they stated it was a common occurrence for customers to visit the betting shop after leaving a local pub and they felt this was normal. At the same visit, whilst talking with shop staff, I noticed a young male who appeared to be under the influence of drugs. His speech was very rapid and his movement was agitated. He spoke directly to the shop staff member, who replied by telling him to "shut up" and then referred to him by name.

Following the submission of the review application by Westminster's Licensing Authority on 20 July 2015, I emailed the CCTV team with a request to monitor the premises at 357 Harrow Road on 21 July 2015. The request was for CCTV to be recorded of the exterior of the premises from a nearby camera in Maida Hill Market between the hours of 14:00 to 16:00 and 19:00 to 21:00 each day from 22 July 2015 until 16 August 2015. Following the completion of this task, I collected the CCTV images from the CCTV control room personally and viewed the CCTV footage over the next several weeks. From the footage, I identified twenty-six incidents of interest and captured these as separate video clips. These clips have been listed in the attached appendix 1 to this statement.

Signature: N Nelson Signature witnessed by: .....

Witness contact details

Home address: .....

..... Postcode: .....

Home telephone number ..... Work telephone number .....

Mobile/pager number ..... Email address: .....

Preferred means of contact: .....

Male / ~~Female~~ (delete as applicable) Date and place of birth: .....

Former name: ..... Ethnicity Code (16+1): ..... Religion/belief: .....

Dates of witness non-availability .....

.....

Witness care

a) Is the witness willing and likely to attend court? **Yes**. If 'No', include reason(s) on **MG6.**

b) What can be done to ensure attendance?

c) Does the witness require a Special Measures Assessment as a vulnerable or intimidated witness? **No**. If 'Yes' submit **MG2** with file.

d) Does the witness have any specific care needs? **No**. If 'Yes' what are they? (Disability, healthcare, childcare, transport, , language difficulties, visually impaired, restricted mobility or other concerns?)

Witness Consent (for witness completion)

a)	The criminal justice process and Victim Personal Statement scheme (victims only) has been explained to me	Yes	☐	No	☐	
b)	I have been given the Victim Personal Statement leaflet	Yes	☐	No	☐	
c)	I have been given the leaflet 'Giving a witness statement to police — what happens next?'	Yes	☐	No	☐	
d)	I consent to police having access to my medical record(s) in relation to this matter: (obtained in accordance with local practice)	Yes	☐	No	☐	N/A ☐
e)	I consent to my medical record in relation to this matter being disclosed to the defence:	Yes	☐	No	☐	N/A ☐
f)	I consent to the statement being disclosed for the purposes of civil proceedings e.g. child care proceedings, CICA	Yes	☐	No	☐	
g)	The information recorded above will be disclosed to the Witness Service so they can offer help and support, unless you ask them not to. Tick this box to decline their services:				☐	

Signature of witness: ..... Print name: .....

Signature of parent/guardian/appropriate adult: ..... Print name: .....

Address and telephone number if different from above: .....

Statement taken by (print name): ..... Station: .....

Time and place statement taken: .....

APPENDIX 1

Clip No:	Day:	Date:	Time (Hrs:Min:Sec):	Description:
1	Wednesday	22.07.2015	15:28:49	Two males drinking from can & bottle. Seen talking to staff. One male then enters William Hill.
2	Wednesday	22.07.2015	19:13:50	Male William Hill customer takes a drink from a bottle and leaves it outside the shop door prior to entry.
3	Wednesday	22.07.2015	19:27:52	Eight males outside the premises.
4	Wednesday	22.07.2015	19:52:34	William Hill customer leaves bottle outside to enter the premises.
5	Thursday	23.07.2015	14:02:50	William Hill customer outside the premises drinking from a can. 14:06:10 seen entering the premises.
6	Thursday	23.07.2015	14:41:00	Nine people outside the premises including two members of William Hill staff.
7	Friday	24.07.2015	14:44:00	Female with trolley crosses the junction to four males in the neighbouring doorway alcove and is seen passing out cans from an orange plastic bag. Later at 15:02:00, four males in neighbouring doorway alcove. One male seen passing goods from a trolley to another male who then enters William
8	Saturday	25.07.2015	14:20:15	Male william Hill customer exits the premises and is pointed towards another male. The two males make an exchange and the first male re-enters William
9	Sunday	26.07.2015	14:49:00	Male in green jacket and grey hood approaches William Hill door, looks in and moves to the alcove at the side of the premises.
			14:49:46	He enters the premises.
			14:52:27	He exits the premises and crosses the road.
			14:53:57	He walks past the premises and heads West along Harrow Road.
			14:56:54	He crosses the junction and enters William Hill.
			14:58:21	He leaves the premises and interacts with four people before entering the neighbouring premises, Sam's Chicken.

15:00:08	He leaves Sam's Chicken with no food and re-enters William Hill.
15:01:12	He leaves William Hill and walks East along Harrow Road.
15:01:25	He enters shot following a male in a grey jumper in conversation and follows him along the road until he picks something up from the floor and re-enters William Hill at 15:02:22.
15:03:20	He leaves William Hill and walks East along Harrow Road.
15:06:39	He re-enters the shot and begins stopping people in the street outside William Hill.
15:14:20	He re-enters William Hill.
15:15:43	He exits William Hill and begins stopping people outside the premises.
15:16:15	He follows a couple into Sam's Chicken next door to William Hill.
15:16:45	He leaves Sam's Chicken and re-enters William Hill.
15:18:40	He leaves William Hill and walks West up Harrow Road.
15:20:55	He walks down Harrow Road.
15:21:40	As the bus moves he is seen stopping two people outside William Hill.
15:21:57	He follows a male along the road past William Hill.
15:24:11	He re-enters William Hill.
15:26:08	He leaves William Hill and walks West up Harrow Road.
15:32:37	He walks back towards William Hill and re-enters the premises.
15:36:44	He leaves William Hill and walks East out of shot.
15:39:07	He comes back into shot and stops a person leaving neighbouring Sam's Chicken and then waits outside for other customers to leave and stops others on the street.
15:42:00	He stops a male and young girl behind a phone box and is passed something. He picks something up from the floor.
15:42:49	He is seen back outside William Hill visibly holding his hand out to four people.
15:42:36	He re-enters William Hill.
15:43:53	He leaves William Hill and talks to males outside.
15:46:08	He walks past William Hill West up Harrow Road.
15:48:05	He walks back into William Hill.

			15:49:35	He exits the premises, stops a female in the road and heads West up Harrow Road.
10	Monday	27.07.2015	14:00:00	Group of nine outside the premises.
11	Tuesday	28.07.2015	14:36:18	Male in beige suit and red cap passes something to female in black which she pockets. The female then passes the phone back to the male, takes out a purse from her bag and passes cash notes to the male. Female them leaves at 14:37:22. At 14:50:37 the male enters William Hill.
12	Tuesday	28.07.2015	14:59:00	Six males outside the premises.
13	Tuesday	28.07.2015	15:25:55	Male in blue jacket on a bike arrives at William Hill. Seen talking with another male in a black bomber jacket who comes out of William Hill.
			15:38:00	Male in black coat and black flat cap arrives and stands outside William Hill.
			15:38:23	He passes something to the male in the black bomber jacket who then goes to the male on the bike.
			15:38:47	An exchange takes place between the male in the black bomber jacket and the male on the bike.
			15:39:22	Male on bike leaves.
14	Thursday	30.07.2015	14:03:30	Male in black jacket approaches male leaning outside William Hill. The two exchange and the male in the black jacket leaves.
15	Friday	31.07.2015	14:10:05	Male exits William Hill with an open can.
16	Monday	03.08.2015	19:52:30	Exchange between male in beige hoodie in the neighbouring alcove and a male in a cap with a bottle.
			19:54:00	Male in cap enters William Hill.
			20:53:00	Male in beige hoodie passes iPhone or similar to male with suitcases.

17	Tuesday	04.08.2015	20:28:30	Male drinking from a bottle outside William Hill. At 20:34:16 he leaves the bottle outside and enters William Hill.
18	Wednesday	05.08.2015	19:54:53	Male in purple jumper crosses the junction towards William Hill. Male in chequered shirt exits William Hill. The two then make an exchange.
19	Friday	07.08.2015	15:23:49	Male in grey jacket and hat puts bottle in corner and enters William Hill.
			15:35:20	He exits William Hill and collects the bottle.
			15:38:45	He puts the bottle down again and goes back into William Hill.
			15:43:37	He exits William Hill and collects the bottle.
			15:44:25	He puts the bottle down again and goes back into William Hill.
			15:48:30	He exits William Hill and collects the bottle.
			15:49:30	He puts the bottle down again and goes back into William Hill.
			15:55:35	He exits William Hill and collects the bottle.
			15:56:24	He puts the bottle into his pocket.
			15:57:37	He finishes a cigarette and goes back into William Hill with bottle in his pocket,
20	Friday	07.08.2015	19:09:09	Two males and two females exit William Hill. One male hands out cups to the group and pours drinks.
			19:24:35	Male picks up the bag containing the drinks and re-enters William Hill.
21	Saturday	08.08.15	14:39:25	Male in black and orange top exits William Hill, walks to the traffic lights and takes a can from inside his jacket and takes a drink without having to open the can.
22	Tuesday	11.08.2015	20:42:30	William Hill customers street drinking. Take cans from pockets.
23	Wednesday	12.08.2015	19:10:00	Group of eight outside the premises. Staff member joins them briefly and then goes to smoke outside Sam's Chicken.

24	Thursday	13.08.2015	15:25:25	Premises attended by four paramedics. Male taken out of the premises on a stretcher.
25	Friday	14.08.2015	20:47:13	Two males exit William Hill. One reaches into his jacket pocket and removes a bottle to put in the bin. The second male is holding a bottle as he exits the premises.
26	Saturday	15.08.2015	15:59:00	Eight people outside the premises.

LA11

RESTRICTED (when completed)

MG 11 (T)

WITNESS STATEMENT

(CJ Act 1967, s.9; MC Act 1980, ss.5A(3)(a) and 5B; MC Rules 1981, r.70)

Statement of Klaudija Green.....URN:

Age if under 18 Over 18..... (if over 18 insert 'over 18') Occupation: .....

This statement (consisting of: ....1..... pages each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated anything in it which I know to be false, or do not believe to be true.

Signature: ..... Date: 18/06/2015.

Tick if witness evidence is visually recorded *(supply witness details on rear)*

My name is Klaudija Green and I have been Harrow Road Ward Community Protection Officer since September 2013. Westminster City Council Community Protection Service works in partnership with number of agencies internal and external to the council. These include: WCC Licensing Service and Metropolitan Police on reduction of antisocial behaviour and crime and disorder across our borough. The integrated partnership approach brings respite to community from such behaviour which affects their quality of life in the most disruptive way.

Harrow Road Ward is one of the more challenging wards in Westminster in terms of anti social behaviour due to its location and the busy intersection that is Maida Hill Market. On street drinking is persistent issue at this location which is further encouraged by the same people being betting shops customers. There is a large number of betting shops in the area which is a concern due to antisocial behaviour some customers engage in. One such premise is William Hill which is located directly opposite the market. In the past, council has received reports of William Hill customers who will smoke outside the premises and engage in antisocial behaviour towards other residents or visitors to the area.

In November 2014 I visited the William Hill in order to speak to staff about levels of antisocial behaviour that they may have seen or witnessed. Whilst approaching the shop I saw approximately 5 males standing directly outside the shop on the private forecourt who have immediately started to make comments about my physical appearance whilst whistling and making leary comments.

Signature: ..... Signature witnessed by: .....

2004/05(1): MG 11(T)

RESTRICTED – FOR POLICE AND PROSECUTION ONLY
(when completed)

Home address: .....

..... Postcode: .....

Home telephone number ..... Work telephone number .....

Mobile/pager number ..... Email address: .....

Preferred means of contact: .....

Male / Female (delete as applicable) Date and place of birth: .....

Former name: ..... Height: ..... Ethnicity Code: .....

Dates of witness non-availability .....

.....

Witness care

a) Is the witness willing and likely to attend court? Yes / No. If 'No', include reason(s) on MG6. What can be done to ensure attendance?

b) Does the witness require 'special measures' as a vulnerable or intimidated witness? Yes / No. If 'Yes' submit MG2 with file.

c) Does the witness have any specific care needs? Yes / No. If 'Yes' what are they? (Healthcare, childcare, transport, disability, language difficulties, visually impaired, restricted mobility or other concerns?)

Witness Consent (for witness completion)

a)	The criminal justice process and Victim Personal Statement scheme (victims only) has been explained to me	Yes ☐	No ☐	
b)	I have been given the leaflet 'Giving a witness statement to police — what happens next?'	Yes ☐	No ☐	
c)	I consent to police having access to my medical records in relation to this matter:	Yes ☐	No ☐	N/A ☐
d)	I consent to my medical record in relation to this matter being disclosed to the defence:	Yes ☐	No ☐	N/A ☐
e)	I consent to the statement being disclosed for the purposes of civil proceedings e.g. child care proceedings (if applicable)	Yes ☐	No ☐	N/A ☐
f)	The information recorded above will be disclosed to the Witness Service so they can offer help and support, unless you ask them not to. Tick this box to decline their services:		☐	

Signature of witness: .....

Statement taken by (print name): .....

Station: .....

Time and place statement taken: .....

Signature of witness: .....

LA12

STATEMENT OF WITNESS

(C.J. Act 1967,s,9; M.C. Act 1980, ss5A(3)(a) and 5B, Criminal Procedure Rules 2005, r27.1(1))

Statement of:	Paul Green
Age of witness:	Over 21
Occupation of Witness:	Senior City Inspector Public Protection and Licensing
Address:	Westminster City Council, City Hall 64 Victoria Street LONDON SW1V 6QP
Telephone Number:	0207 641 4614

This statement, consisting of two page's each signed by me, is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false, or do not believe to be true.

Signed: Paul Green **Dated: 7 July 2015**

I am employed by Westminster City Council as a Senior City Inspector for City Operations, Public Protection and Licensing. I have held this position since 1 April 2015. Prior to this date, I have held enforcement roles within the Council since 1994.

On Friday 26th June 2015, I undertook observations of the William Hill betting shop 357 Harrow Road, London W9 between 2030hrs and 2200hrs, to ascertain if there was any antisocial and / or illegal behaviour taking place. During the period of observation, I was accompanied by David Wood who is also in Public Protection and Licensing. During the period of observation, up to ten mainly middle aged and elderly Afro-Caribbean males were seen outside the betting shop sitting on wooden pallets or standing in front of them. Some of the group were observed pouring drinks from bottles into plastic or polystyrene cups and most of the group were drinking. The group seemed to be good natured and

Signed: Paul Green **Dated: 7 July 2015**

STATEMENT OF WITNESS

(C.J. Act 1967,s,9; M.C. Act 1980, ss5A(3)(a) and 5B, Criminal Procedure Rules 2005, r27.1(1))

Continuation Statement of Paul Green

Signed: Paul Green **Dated: 7 July 2015**

and were not loud. No one appeared to be drunk other than for one elderly white female who was drinking from a small bottle of wine. No drug taking or dealing was observed. We did not enter William Hill but it was busy with customers. The pallets belonged to the neighbouring premises, W9 Food and Wine, 355 Harrow Road, London W9 and staff removed them from William Hill and placed them in front of their premises after we made enquiries. From 2200hrs, the group moved across to the street market area of Prince of Wales junction and continued to drink whilst sitting on benches. On Saturday 27 June 2015, myself and David Wood undertook further observations of William Hill, 357 Harrow Road, London W9 from 2030hrs. At that time, no pallets or persons were in front of William Hill and on viewing the frontage of William Hill, it was noticed that the glazing to one of the front doors had been smashed but the glass was held in place by clear film. I had not noticed the smashed glass to the door on the 26 June. On entering William Hill, five customers were watching betting screens and one male was playing a gaming machine. We then left the premises. At 2130hrs, two males were standing in front of the doors of William Hill and one of them was holding a bottle of beer. On entering the premises, a can of Stella Artois was seen on a table. The number of customers had increased to about twelve and one unkempt and elderly white male was heard slurring his speech and had previously been seen staggering across Harrow Road. During the period of observation from 2030hrs until 2150hrs, a small crowd of male and female, middle aged and elderly Afro-Caribbean's were socialising on the street market area at the Prince of Wales junction, sitting on benches. Drinks had been decanted into plastics cups but no one appeared to be drunk; they were not loud nor a nuisance.

Signed: Paul Green **Dated: 7 July 2015**

LA13

STATEMENT OF WITNESS

(C.J. Act 1967,s,9; M.C. Act 1980, ss5A(3)(a) and 5B, Criminal Procedure Rules 2005, r27.1(1))

Statement of:	David Wood
Age of witness:	Over 21
Occupation of Witness:	City Inspector
Address:	Westminster City Council, City Hall 64 Victoria Street LONDON SW1V 6QP

This statement, consisting of one page signed by me, is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false, or do not believe to be true.

Signed: **Dated: 8th July 2015**

I am a City Inspector employed by Westminster City Council.

On Friday 26th June 2015, I was on duty in Harrow Road, London W9 with my colleague Paul Green who is also a City Inspector. Between the hours of 20:30 hours and 22:00 hours, A group of up to ten people gathered to the front of the William Hill betting shop at 357 Harrow Road, London W9. Some were sitting on wooden pallets and were holding cups which they occasionally drank from. Some of the group occasionally entered the William Hill betting shop.

On Saturday 27th June 2015, I was again on duty in the Harrow Road with Paul Green between the hours of 20:30 hours and 21:50 hours. At approximately 21:30hrs, I noticed two males were standing to the front of William Hill in the entrance and one of them was holding a bottle. Paul and I entered the business and I noticed a number of customers watching betting screens and one using a games machines. A can of Stella Artois was on a table. I noticed one member of staff behind the counter.

Signed Date: 8th July 2015

Intelligence Reports relating to William Hill, Harrow Road betting shop

CWRT00876662 - 21/02/13
On THURSDAY 21/02/2013 at approx 1930 hours I had cause to stop and speak to a female. She was stopped coming out of WILLIAM HILL 357 HARROW ROAD W9. She was clearly under the influence of alcohol and has previous for assault on police, drugs and prostitution. I was observing the location due to an increased amount of anti social behaviour associated with the premises.

CWRT0098760 -15/01/14
Source stated that in the day time the only place to purchase good crack is in the William Hill on HARROW ROAD.
Informant states numerous people sells crack in there and it is very good quality and a good price. He said at night you can just go into the West End and it is easy to get.
He said the main dealer is a an IC3 around 50 years old witha grey and black beard.
He said the dealing has been going on for years and they are very police aware.

CWRT00922127 - 24/02/15
WEST is often seen at the maida hill junction and in and around William Hill bookmakers on the junction. He is often asking members of the public for spare cigarettes.

CWRT00873801 - 17/01/13
On 17/01/2013 at 1420 Hrs the following person was seen to be drinking from a can wrapped in a brown bag o/s WILLIAM HILL 357 HARROW ROAD W9 when spoken to he admitted that it was a can of lager he was informed that it was an offence to do this on the street he handed it over to police when asked to he was given a verbal warning with regards to this

IIP Check for William Hill, Harrow Road. Searches for all Police reports in relation to relevant premises

William Hill 357 Harrow Road

24.4.15 Missing person report for a vulnerable adult found in the shop

30.10.14 CAD report refers to a call from an informant regarding a drunk male at address trying to kick his motorcycle over outside premises.

18.7.14 Police take a report for fraud from another branch of William Hill. Illegally obtained bank cards are used to deposit cash which is late refunded on genuine cards.

10.7.14 Missing person, elderly male reported missing. Known to frequent betting shops in the area.

NOTICE OF INTENTION TO HOLD A REVIEW OF A PREMISES LICENCE

This notice is given in accordance with regulations made under section 200 of the Gambling Act 2005

Notice is hereby given that the following licensing authority:
Westminster City Council
whose address is:
4th Floor East
Westminster City Hall
64 Victoria Street
London

Postcode SW1E 6QP
Website www.westminster.gov.uk/licensing
[Insert the address of the authority's principal office, followed by the address of its website]

intends to hold a review under section 201 of the Gambling Act 2005 of the premises licence which is in force at the following premises:
William Hill, 357 Harrow Road, London, W9 3NA

[Give the trading name used at the premises, and the address of the premises (or, if not known, give a description of the premises and their location).]

The following type of premises licence has effect in respect of the premises:
Betting (Other) Premises Licence
[Indicate the type of premises licence which applies to the premises, e.g. bingo premises licence, adult gaming centre premises licence, etc.]

The licensing authority intends to hold the review for the following reasons:
The licensing authority has received a complaint and other information about the premises which indicates that: The premises have breached conditions attached to the premises licence by permitting alcohol onto the premises. The premises are associated with crime and disorder, in that the premises are used by persons who are drunk, under the influence of alcohol or on drugs, and in that drug dealing and the sale of stolen goods have taken place on the premises. That the premises are further associated with crime and disorder, in particular in that groups of people under the influence of drugs or alcohol frequently congregate outside the premises, and abuse and threaten other members of the public and local residents. That there is a risk that vulnerable persons may be harmed by using the premises for gambling due to their impared judgement through alcohol or drugs. That these problems have been brought to the attention of the licence-holder by residents and that no positive action has been taken. In the circumstances the licensing authority considers it appropriate to review the premises licence.

The following person connected with the licensing authority is able to give further information about the review: Mr Kerry Simpkin, Licensing Team Manager.

Representations about the proposed review may be made in writing to the licensing authority by the licence holder, a responsible authority or an interested party during the

period of 28 consecutive days beginning on the date on which the notice of the authority's intention to hold the review was given to the licence holder. The last day of the period for making representations is: 16/08/2015

Following a review under section 201 of the Gambling Act 2005 a licensing authority may decide to take any of the following kinds of action:

- revoke the licence
- suspend the licence for a specified period not exceeding 3 months
- add, remove or amend a condition attached to the licence.

LA17


GPS: 51.5244
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6.0 DRUGS AND ALCOHOL POLICY

NB The consumption of alcohol on Company premises is prohibited and must be discouraged through positive action by Employees when it is either observed or drawn to their notice.

The consumption of alcohol by any person in an LBO is prohibited, as is working under the influence of non-prescribed drugs or other controlled substances. Any breach of this policy may result in disciplinary action and could result in dismissal.

The Company wishes to discourage the consumption of alcohol at any time during the working day. It is already illegal to consume or allow others to consume alcohol within an LBO therefore this discouragement refers to any meal breaks taken out of the LBO during the day or the evening.

VERY IMPORTANT POINTS

The police consider the failure of employees to take responsible action when they are aware that the use of drugs or the passing of drugs is taking place on Company premises to be grounds for opposing the renewal of our Premises Operating and Personal Licences. This could have very serious consequences for the Company. Furthermore, the police may bring criminal charges against an Employee.

THE SERIOUSNESS WITH WHICH THE COMPANY VIEWS THIS MATTER CANNOT BE OVEREMPHASISED. IT IS IMPERATIVE THAT IF YOU HAVE REASON TO BELIEVE THAT DRUGS OF ANY TYPE ARE BEING TRADED, PASSED OR USED ON COMPANY PREMISES, YOU MUST TELEPHONE AND INFORM CENTRAL SECURITY AND YOUR DISTRICT OPERATIONS MANAGER. YOU MUST ALSO RECORD THE DETAILS IN YOUR SHOP DIARY IMMEDIATELY THEN CONTACT THE LOCAL POLICE DIRECT TO REPORT THE INCIDENT.

FAILURE TO INFORM CENTRAL SECURITY IN THE STATED CIRCUMSTANCES WILL BE VIEWED AS GROSS MISCONDUCT.

STATEMENT OF WITNESS
(C.J. Act 1967,s,9; M.C. Act 1980, ss5A(3)(a) and 5B, Criminal Procedure Rules 2005, r27.1(1))

Statement of:	David Wood
Age of witness:	Over 21
Occupation of Witness:	City Inspector Public Protection and Licensing
Address:	Westminster City Council, City Hall 64 Victoria Street LONDON SW1V 6QP
Telephone Number:	0207 641 4614

This statement, consisting of two pages signed by me, is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false, or do not believe to be true.

Signed: **Dated: 20th July 2015**

I am employed by Westminster City Council as a City Inspector for City Operations, Public Protection and Licensing.

On Monday 20th July 2015, at approximately 16:48 hours, I visited William Hill betting shop, 357 Harrow Road, London W9 to arrange for a notice to be displayed in the shop window. A group of five males were standing to the front of the business. I entered the business and saw approximately twelve customers using the betting facilities. I noticed a man drinking from a can concealed in a brown paper bag (Exhibit DW1).

I introduced myself to an employee called Alima who was serving behind the counter and informed her that I was in possession of legal notices that needed to be displayed. She informed me that she was in charge. I waited whilst she was available to assist me. At approximately 16:56 hours, a man entered and was drinking from a small glass bottle.

Signed: Dated: 6 July 2015

STATEMENT OF WITNESS

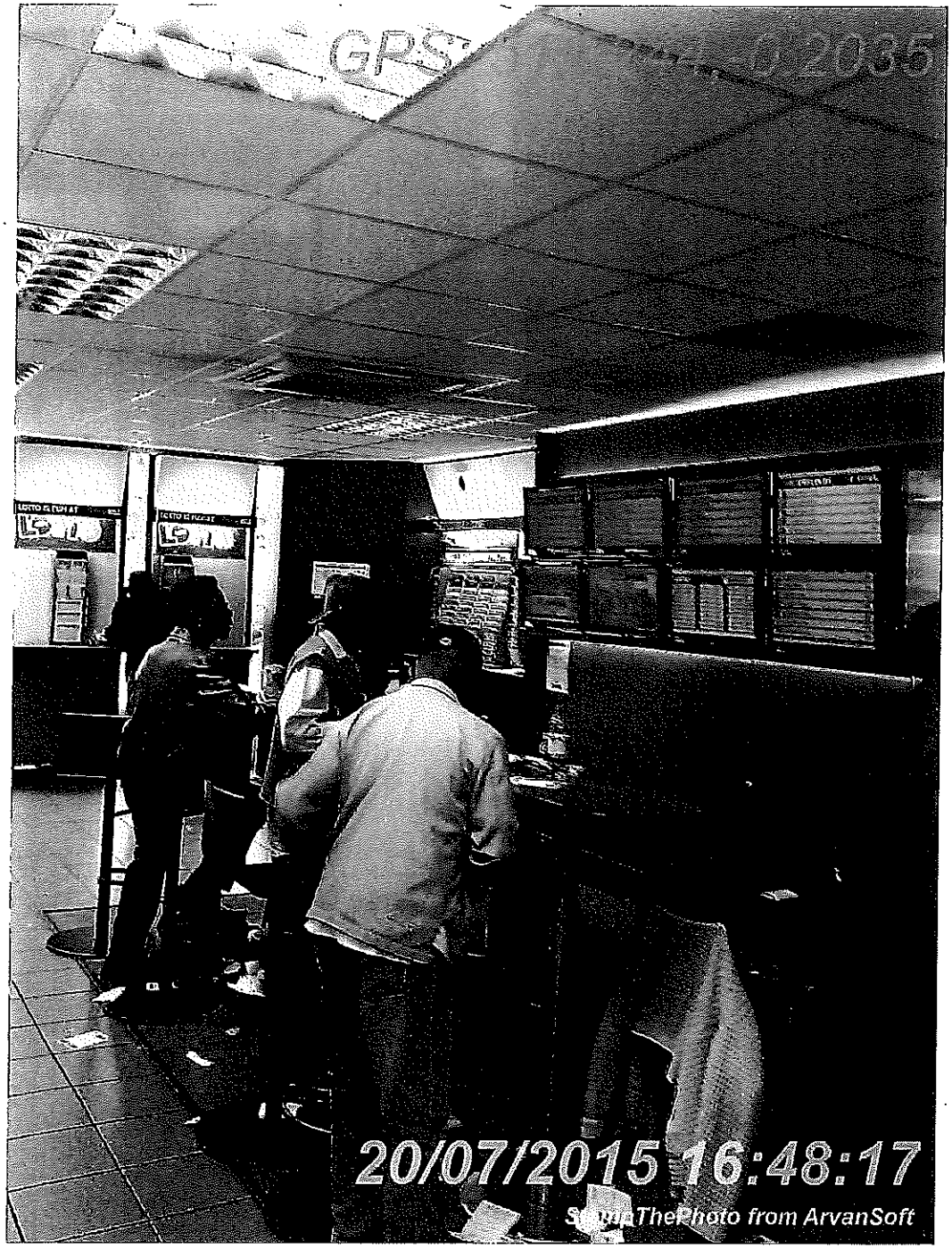
(C.J. Act 1967,s,9; M.C. Act 1980, ss5A(3)(a) and 5B, Criminal Procedure Rules 2005, r27.1(1))

Continuation of Statement: David Wood

At approximately 17:04 hours, Alima assisted me in displaying the notices. I brought to her attention that a customer had been drinking from a can concealed in brown paper. I pointed the customer out to her who had by now left the shop and was standing to the front of the business holding the drink. Alima advised me that the customer would not be allowed in the shop with the drink. The customer returned a few minutes later without the drink. I left the shop immediately and looked in the bin to the front of the shop (DW2), which contained a gold can of Super Skol lager and a brown paper bag which appeared consistent with the drink the man in the shop had been drinking (DW3). I left at 17:13 hours.

Signed: Dated: 6 July 2015

EXHIBIT DW1



I David Wood, hereby certify that I took this picture on Monday 20th July 2015 at 16:48 hours of a customer standing to the left consuming drink concealed in a brown paper bag.

I produce this as exhibit DW1

Signed

EXHIBIT DW2

I David Wood, hereby certify that I took this picture on Monday 20th July 2015 at 17:11 hours of the bin located to the front of William Hill, 357 Harrow Road, London W9.
I produce this as exhibit DW2

Signed

EXHIBIT DW3

I David Wood, hereby certify that I took this picture on Monday 20th July 2015 at 17:10 hours of the inside of a Westminster City Council bin to the front of William Hill, 357 Harrow Road, W9.The bin had a can of Super Skol and a brown paper bag.

I produce this as exhibit DW3

Signed

LA20

Harrow Road/Maida Hill Junction Council CCTV Footage – Clips

(Provided to applicants and Sub-Committee Members electronic file)

Clip No:	Day:	Date:	Time (Hrs:Min:Sec):	Description:
1	Wednesday	22.07.2015	15:28:49	Two males drinking from can & bottle. Seen talking to staff. One male then enters William Hill.
2	Wednesday	22.07.2015	19:13:50	Male William Hill customer takes a drink from a bottle and leaves it outside the shop door prior to entry.
3	Wednesday	22.07.2015	19:27:52	Eight males outside the premises.
4	Wednesday	22.07.2015	19:52:34	William Hill customer leaves bottle outside to enter the premises.
5	Thursday	23.07.2015	14:02:50	William Hill customer outside the premises drinking from a can. 14:06:10 seen entering the premises.
6	Thursday	23.07.2015	14:41:00	Nine people outside the premises including two members of William Hill staff.
7	Friday	24.07.2015	14:44:00	Female with trolley crosses the junction to four males in the neighbouring doorway alcove and is seen passing out cans from an orange plastic bag. Later at 15:02:00, four males in neighbouring doorway alcove. One male seen passing goods from a trolley to another male who then enters William
8	Saturday	25.07.2015	14:20:15	Male william Hill customer exits the premises and is pointed towards another male. The two males make an exchange and the first male re-enters William
9	Sunday	26.07.2015	14:49:00	Male in green jacket and grey hood approaches William Hill door, looks in and moves to the alcove at the side of the premises.
			14:49:46	He enters the premises.
			14:52:27	He exits the premises and crosses the road.
			14:53:57	He walks past the premises and heads West along Harrow Road.
			14:56:54	He crosses the junction and enters William Hill.
			14:58:21	He leaves the premises and interacts with four people before entering the neighbouring premises, Sam's Chicken.

15:00:08	He leaves Sam's Chicken with no food and re-enters William Hill.
15:01:12	He leaves William Hill and walks East along Harrow Road.
15:01:25	He enters shot following a male in a grey jumper in conversation and follows him along the road until he picks something up from the floor and re-enters William Hill at 15:02:22.
15:03:20	He leaves William Hill and walks East along Harrow Road.
15:06:39	He re-enters the shot and begins stopping people in the street outside William Hill.
15:14:20	He re-enters William Hill.
15:15:43	He exits William Hill and begins stopping people outside the premises.
15:16:15	He follows a couple into Sam's Chicken next door to William Hill.
15:16:45	He leaves Sam's Chicken and re-enters William Hill.
15:18:40	He leaves William Hill and walks West up Harrow Road.
15:20:55	He walks down Harrow Road.
15:21:40	As the bus moves he is seen stopping two people outside William Hill.
15:21:57	He follows a male along the road past William Hill.
15:24:11	He re-enters William Hill.
15:26:08	He leaves William Hill and walks West up Harrow Road.
15:32:37	He walks back towards William Hill and re-enters the premises.
15:36:44	He leaves William Hill and walks East out of shot.
15:39:07	He comes back into shot and stops a person leaving neighbouring Sam's Chicken and then waits outside for other customers to leave and stops others on the street.
15:42:00	He stops a male and young girl behind a phone box and is passed something. He picks something up from the floor.
15:42:49	He is seen back outside William Hill visibly holding his hand out to four people.
15:42:36	He re-enters William Hill.
15:43:53	He leaves William Hill and talks to males outside.
15:46:08	He walks past William Hill West up Harrow Road.
15:48:05	He walks back into William Hill.

			15:49:35	He exits the premises, stops a female in the road and heads West up Harrow Road.
10	Monday	27.07.2015	14:00:00	Group of nine outside the premises.
11	Tuesday	28.07.2015	14:36:18	Male in beige suit and red cap passes something to female in black which she pockets. The female then passes the phone back to the male, takes out a purse from her bag and passes cash notes to the male. Female them leaves at 14:37:22. At 14:50:37 the male enters William Hill.
12	Tuesday	28.07.2015	14:59:00	Six males outside the premises.
13	Tuesday	28.07.2015	15:25:55	Male in blue jacket on a bike arrives at William Hill. Seen talking with another male in a black bomber jacket who comes out of William Hill.
			15:38:00	Male in black coat and black flat cap arrives and stands outside William Hill.
			15:38:23	He passes something to the male in the black bomber jacket who then goes to the male on the bike.
			15:38:47	An exchange takes place between the male in the black bomber jacket and the male on the bike.
			15:39:22	Male on bike leaves.
14	Thursday	30.07.2015	14:03:30	Male in black jacket approaches male leaning outside William Hill. The two exchange and the male in the black jacket leaves.
15	Friday	31.07.2015	14:10:05	Male exits William Hill with an open can.
16	Monday	03.08.2015	19:52:30	Exchange between male in beige hoodie in the neighbouring alcove and a male in a cap with a bottle.
			19:54:00	Male in cap enters William Hill.
			20:53:00	Male in beige hoodie passes iPhone or similar to male with suitcases.

17	Tuesday	04.08.2015	20:28:30	Male drinking from a bottle outside William Hill. At 20:34:16 he leaves the bottle outside and enters William Hill.
18	Wednesday	05.08.2015	19:54:53	Male in purple jumper crosses the junction towards William Hill. Male in chequered shirt exits William Hill. The two then make an exchange.
19	Friday	07.08.2015	15:23:49	Male in grey jacket and hat puts bottle in corner and enters William Hill.
			15:35:20	He exits William Hill and collects the bottle.
			15:38:45	He puts the bottle down again and goes back into William Hill.
			15:43:37	He exits William Hill and collects the bottle.
			15:44:25	He puts the bottle down again and goes back into William Hill.
			15:48:30	He exits William Hill and collects the bottle.
			15:49:30	He puts the bottle down again and goes back into William Hill.
			15:55:35	He exits William Hill and collects the bottle.
			15:56:24	He puts the bottle into his pocket.
			15:57:37	He finishes a cigarette and goes back into William Hill with bottle in his pocket,
20	Friday	07.08.2015	19:09:09	Two males and two females exit William Hill. One male hands out cups to the group and pours drinks.
			19:24:35	Male picks up the bag containing the drinks and re-enters William Hill.
21	Saturday	08.08.15	14:39:25	Male in black and orange top exits William Hill, walks to the traffic lights and takes a can from inside his jacket and takes a drink without having to open the can.
22	Tuesday	11.08.2015	20:42:30	William Hill customers street drinking. Take cans from pockets.
23	Wednesday	12.08.2015	19:10:00	Group of eight outside the premises. Staff member joins them briefly and then goes to smoke outside Sam's Chicken.

24	Thursday	13.08.2015	15:25:25	Premises attended by four paramedics. Male taken out of the premises on a stretcher.
25	Friday	14.08.2015	20:47:13	Two males exit William Hill. One reaches into his jacket pocket and removes a bottle to put in the bin. The second male is holding a bottle as he exits the premises.
26	Saturday	15.08.2015	15:59:00	Eight people outside the premises.

LA22

Exploring area-based vulnerability to gambling-related harm:
Who is vulnerable?
Findings from a quick scoping review

Heather Wardle, Gambling and Place Research Hub
Geofutures

13th July 2015

Supported by:

Local Government Association

MANCHESTER CITY COUNCIL

City of Westminster

Contents

Acknowledgements

A number of people have contributed to the production of this report. We would first like to thank Kerry Simpkin and Nick Nelson at Westminster City Council and Fraser Swift at Manchester City Council for their support throughout the project. We would also like to thank the Local Government Association for part funding this research. Thanks are due to the many people who gave up their time to participate in the stakeholder interviews. Likewise, we thank the two independent peer reviewers who provided useful feedback and suggestions and thanks are also due to Gaynor Astbury, Mark-Thurstain Goodwin and Ruth Keily at Geofutures for commenting on earlier versions of this report.

Heather Wardle, Gambling & Place Research Hub, Geofutures

13 July 2015

Geofutures

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Executive Summary

Background

In Great Britain, there is a changing gambling policy and regulatory environment which has increased focus on risk. Local area risk assessments have been introduced into the Gambling Commission's updated Licensing Conditions and Codes of Practice with understanding local risk, and taking appropriate steps to mitigate risk, highlighted as a key concern. Policy is also becoming more focused on understanding and mitigating gambling-related harm more broadly, rather than focusing on problem gambling alone. Finally, in the Gambling Act 2005, children and vulnerable people were singled out for special regulatory attention. However, who is vulnerable, why and under what circumstances, has been subject to little investigation.

Aims of this study

This study aimed to explore who may be vulnerable to gambling-related harm and to assess the strength of the evidence base supporting this.

Methods

Semi-structured interviews were held with a range of stakeholders (academics, policy makers, industry, treatment providers and legal professionals) to explore understanding of terms like gambling-related harm and who they believed may be vulnerable to harm. From these interviews, a list of those deemed more likely to be vulnerable to harm was created. Quick scoping reviews of research literature then examined the evidence base for each group/characteristic mentioned.

Results

There was a broad consensus among stakeholders that gambling-related harm meant adverse consequences arising from someone's gambling engagement that could affect the individual, their family, friends, broader social network or community. It was felt that harm could be short-lived or experienced over a longer time frame and that you did not have to be a "problem

gambler" to experience harm. However, the experience of harm was viewed as subjective, varying based on the circumstances of the individual. This makes predicting who will experience harm challenging. As such, a probabilistic approach was recommended, thinking about who is **more likely** to experience harm given what we know about them.

Many stakeholders felt that anyone could be vulnerable to gambling-related harm and that vulnerability was also subjective as it depended on a range other circumstances. However, considering who may be more susceptible to harm was seen as useful: youth, students, those with mental health problems, substance use/misuse issues, learning difficulties, certain ethnic groups, migrants, homeless, those with constrained economic circumstances or living in deprived areas, prisoners, older people, problem gamblers, those with personality/cognitive impairments and women were identified as those potentially vulnerable to harm.

Looking at the research literature, there is good evidence to support youth, those with substance abuse/misuse/excessive alcohol consumption, poorer mental health, those living in deprived areas, from certain ethnic groups, those with low IQs, personality/cognitive impairments and those who are unemployed as potentially being more vulnerable to harm.

There is a smaller but emerging evidence base suggesting that homeless people, those experiencing financial difficulties and debt, prisoners and younger males with learning difficulties/disabilities may be also be vulnerable groups.

Patterns of evidence relating to students, educational qualifications and low income individuals were inconsistent, though the latter may serve as a proxy for financial difficulties. Evidence relating to migrants was sparse, though the rationale for viewing this group as vulnerable was plausible.

Implications

When thinking about who may be vulnerable to gambling-related harm, a probabilistic approach needs to be taken. The personal circumstances of each individual are not known. Therefore, broader generalisations have to be made. The groups listed above do not mean that everyone with those characteristics ***will*** experience harm rather that based on these characteristics there is an increased risk that they ***may*** experience harm. This is the central tenet of a risk-based approach to policy and regulation.

However, we should not think about groups of vulnerable people as silos. There are likely to be multiple and complex risk factors for harm, with some people having multiple characteristics of

potential vulnerability. Other public health areas focus on multiple risk factors; gambling should do the same.

Limitations

This review is constrained by existing evidence. A solid evidential base looking at broader gambling-related harms has yet to be developed. Therefore, evidence from the scoping review mainly relies on studies looking at problem and at-risk gambling. This is not the same as gambling-related harm. Therefore some groups or themes may have been missed. The aim was to assess the evidence base that currently exists and we are constrained by this, though given the paucity of evidence in some areas we are confident we included most relevant British-based studies in our review.

1 Introduction

Overview of project

This project aims to explore area-based vulnerability to gambling-related harm. Gambling behaviour and who experiences harm from gambling varies among different types of people. This includes characteristics relating to the person, such as their age, gender or intellectual functioning, those relating to personal circumstances, such as employment or income, those relating to where people live, such as deprived areas, and the political landscape in which gambling is provided and regulated.

Gambling premises in Great Britain are unequally distributed. They tend to be found in more urban areas, town centre locations or around coastal areas. Gambling venues also cluster in certain areas within towns and cities. However, there are significant local variations in the distribution of gambling premises and it should be considered as a local issue.

The focus on vulnerable persons and harm comes directly from the licensing objectives set out in the Gambling Act, 2005 (the Act), which states that children and vulnerable people should be protected from being harmed or exploited by gambling. To date, there has been little investigation about who may be vulnerable or why. Information about the characteristics of who is more or less vulnerable to gambling-related harm has only been considered in very general terms using evidence from large-scale national surveys, such as the British Gambling Prevalence Survey (BGPS). How vulnerability and harm may vary at a local level has not been explored. This project aims to help fill this gap. The aims of this project are as follows:

- to explore and document the range of characteristics that suggest someone is vulnerable to harm from gambling,
- to investigate how these characteristics can be measured at a local level, using a range of different data, and
- to develop a local risk index model showing areas where those who may be more vulnerable to harm are located.

Working with Westminster and Manchester City Councils, we are exploring models of area-based vulnerability to gambling-related harm and aim to map our results visually, so that areas of potential risk are highlighted. Our intention is that these results become a tool for both Local/Licensing Authorities (LA) and industry when making decisions about the location of gambling venues, helping them to think through the specific needs of local communities and enabling them to work together to develop plans to protect vulnerable people.

Policy context

The Gambling Act changed the way in which gambling was licensed and regulated in Great Britain. These changes included handing over responsibility for the licensing of gambling premises to LAs. To date, LAs remain responsible for issuing licenses for gambling premises, in accordance with the terms set by the Act. This includes the following three licensing objectives:

> (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.

The advice contained within the Act is that LAs should 'aim to permit' premise licenses so long as applications are reasonably consistent with these threes licensing objectives.

In the years since the Act was implemented, there have been some noticeable shifts in how gambling premises are distributed. A major change is that many gambling premises have moved from back street to high street locations and there has been rising concern about how some premises are 'clustering' in certain areas (Harman, 2011).

Recent research has shown that whilst there is some evidence of clustering, the patterns are highly localised and warrant further investigation (Astbury & Thurstain-Goodwin, 2015). More recently, industry regulator the Gambling Commission (GC) has stated that gambling industry operators should (from April 2016) conduct local risk assessments for premises to demonstrate that they understand local issues and to show what measures they propose to introduce to mitigate against this risk (See Box 1).

Box 1: The new provisions for local risk assessment in the LCCP, 2015

Social responsibility code provision 10.1.1
Assessing local risk
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.

This provision comes into force on 6 April 2016

1. Licensees must assess the local risks to the licensing objectives posed by the provisions of gambling facilities at each of their premises, and have policies, procedures and control measures to mitigate those risks. IN making risk assessments, licenses 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 into 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.

The introduction of local risk assessments into the Licensing Conditions and Codes of Practice (LCCP) reflects a broader policy movement which encourages LAs, the regulator and the industry to work in partnership to address local issues and concerns. This form of partnership working was enshrined within the Local Government Association's and the Association of British Bookmakers' Framework for Local Partnerships on Betting Shops.

This framework recognised there are local concerns about betting shops and their impact. It drew on practice from alcohol licensing and local partnerships between the alcohol trade and communities to suggest a range of ways that industry, LAs, community safety teams, and the police could work together to address concerns. Suggestions included setting up local Betwatch schemes, as has been done in Ealing, or creating other bespoke solutions to deal with issues, like the responsible gambling partnership set up in Medway.

This movement towards increased partnership working is arguably underpinned by the GC's adoption of a risk-based approach to regulation, ensuring that resources are spent where they can be most effective and are needed most. This risk-based approach was emphasised in a recent speech to stakeholders where the GC stated that they wanted to better understand risk and have a proportionate response to risk, which included looking at future risks and thinking about risk in a probabilistic way:

"Risk is not necessarily related to an event that has happened. Risk is related to the probability of an event happening and the likely impact of that event – in this case on licensing objectives" (GC, 2015)

With the change in responsibility for premises licensing introduced by the Act, all LAs were required to create a Statement of Licensing Policy. This sets out the principles that LAs propose to use in exercising their licensing functions. The statement has to be commensurate with the objectives of the Act but does allow some flexibility for LAs to set out the general principles they will draw on when reviewing applications, particularly relating to issues of location. All premise applications received should then be treated in accordance with these principles and this policy statement. Statements of Licensing Policy are due to be reviewed and refined in 2015 and updated to take effect from January 2016. Given the new focus on localised-risk assessment and partnership working in broader policy and regulatory circles, it is likely that revised Statements of Licensing Policy will incorporate these tenets.

A final important policy change is the devolvement of public health to LAs. The Health and Social Care Act, 2012 gave responsibility for health improvement to LAs. This gave each LA a new duty to take appropriate steps to improve the health of people in its area. Under this provision, new Directors of Public Health were appointed and units created to support the new public health functions of LAs. The intention was for LAs to have freedom in how they chose to improve their population's health and it was hoped that this would create a new focus on improving health and reducing inequalities.

These changes are important since gambling is often considered a public health issue. The Responsible Gambling Strategy Board (RGSB), the body responsible for providing advice to the GC and government about gambling, advocates that gambling is considered within a public health framework. Other jurisdictions, like New Zealand, have gone further and defined gambling a public health consideration with policy responsibility residing within its Department of Health.

In Great Britain, policy responsibility for gambling continues to be held by the Department for Culture, Media and Sport. However, devolvement of responsibility for public health to LAs may mean that an increasing health focus is given to local gambling policy. This is most likely to occur in relation to the third licensing objective of the Act, which states that vulnerable people should be protected from harm. Who 'vulnerable people' are or the ways in which they may be vulnerable is not defined by the Act, though the GC states that for regulatory purposes this is likely to include:

"people who gamble more than they want to, people who gamble beyond their means and people who may not be able to make informed or balanced decisions about

gambling due to, for example, mental health, a learning disability or substance misuse relating to alcohol or drugs." (GC, 2012)

There is clear overlap with people of interest to public health policy makers and practitioners, namely those with mental health problems, other health issues and substance misuse problems. As the public health function within LAs matures, it is likely that gambling issues and protection of the vulnerable may increasingly fall within the remit of public health specialists. However, this broader policy shift has not occurred to date and it is noticeable that the GC's consultation document on LAs revised Statements of Licensing Policy did not include any reference to public health.

It is against this policy and regulatory background that this project has been commissioned. Our aim is to explore what area-based vulnerability to harm might look like and support these policy changes. This will be done using Westminster and Manchester City Councils as case studies to demonstrate what a local area risk profile might look like when those vulnerable to gambling harm are identified, mapped and results displayed visually.

Should this project be successful, it is hoped that the methods and outputs could be used by other LAs and built into local area profiles, risk assessments and the up-coming revisions to Statements of Licensing Policy.

Phase 1 report

This report focuses on the first of our research objectives: to explore and document the range of characteristics that suggest someone may be vulnerable to harm. The intention is that this report helps to highlight the range of issues that LAs may wish to consider when developing their own local area profiles and is a useful tool for industry operators when thinking about local area risk assessment.

To create a localised risk index of who is vulnerable to harm, we first need to understand and document who and what 'vulnerable' means in this context.[1] Other terms used in the Act and

[1] This report primarily focuses on characteristics of vulnerability that are more likely to be visible at a local area level and thus can be built into local area profiles. The field of gambling studies has been dominated by contributions from psychologists and much of the research evidence available to date focuses on individual characteristics such as impulsivity, cognitive distortions, erroneous processing of information. Whilst these features are likely to contribute to vulnerability, it is broadly accepted that personal circumstances, social and economic contexts, the broader environment of the individual and how these interact is of paramount importance. Given the broader aim of this project to help develop local area risk indices, primary attention is given to personal and contextual features of vulnerability as these are features which LAs and industry alike can realistically use in local area risk profiles.

by policy makers, such as harm from gambling or gambling-related harm are also considered. The aim of this first project phase was to assess how vulnerable people and gambling harms are, or should be, defined and to briefly review existing evidence base relating to vulnerable people. To do this, two different methods were used:

- first, using data collected from interviews with key stakeholders, different understanding of terms like gambling-related harm and vulnerable people were explored. Results from these interviews are presented in Chapter 2,
- second, drawing on findings from stakeholder interviews, a list of characteristics of those believed to be vulnerable to harm from gambling was developed. Each characteristic was then reviewed against existing research evidence to assess the strength of the association. Results are presented in Chapter 3.

Finally, key themes from both are presented in Chapter 4. These themes will inform the development of our subsequent local area risk models.

Overview of methodology

As previously noted, this report uses two methodologies to examine the relationship between gambling and vulnerable persons. These are briefly described here but more detail is provided in Appendices B-D.

The first method generated insight from semi-structured consultation interviews with key stakeholders. Stakeholders included academics, policy makers, industry, treatment providers and legal professionals. This broad range of stakeholder types was included to ensure that views were gathered from those with a range of different expertise, backgrounds and viewpoints. For example, the academic group included those from a variety of different academic disciplines. The industry group included those from various different sectors and treatment providers with different approaches to treatment and varying levels of experience were interviewed. Ensuring that a broad spectrum of stakeholders were included in the interviews meant we could better understand the diversity of opinions and also assess points of consensus. Semi-structured interviews collected stakeholders' views about the following:

- understanding and definition of gambling-related harm,
- exploring who might be vulnerable to gambling-related harm, why and how has this may have changed, and
- the kinds of evidence that are used when making gambling policy/licensing decisions.

Interviews were conducted either one to one or at a specially convened workshop (for more detail about the interviews and a copy of topic guide used, see Appendices C & D).

The interviews specifically explored who each stakeholder felt might be vulnerable to harm and why. There was a dual purpose for these interviews. The first purpose was to explore how key stakeholders involved in the gambling industry and/or in creating or responding to policy and/or working with those with problems view some of the key aspects of the Gambling Act. The basis on which these views were held was also explored. For example, this could be through first-hand experience, through knowledge gained from research or policy literature or simply be a personally held belief (shaped through a variety of influences). Understanding these views is important as it sheds light on how policy is being understood, and reflected, in everyday practice by important actors who are responsible for shaping how the public interacts with gambling more generally. This makes stakeholders' ideas and views of vulnerability highly salient in better understanding current ideas about vulnerability and harm in everyday life.

The second purpose was to assess how broadly held beliefs about groups who may be vulnerable compare with empirical evidence on the topic. Received wisdom can sometimes be erroneous and it is important to explore differences between the perception of vulnerability, however broadly held, and current evidence. To do this, a list was generated of people who were viewed as vulnerable or characteristics of groups which may make them vulnerable to harm. The next step was to take this list and conduct a quick scoping review (QSR) for each group/characteristic to assess what research evidence currently says about this relationship.

QSRs are a methodology recommended by the Government Social Research Office. They are used to quickly determine the range of studies that are available on a specific topic and produce a broad 'map' of the existing literature. As they are conducted under short time frames, they are typically constrained by (a) search strategy (using fewer bibliographic sources, availability of sources, typically focusing on those that are available electronically) and/or (b) question, focusing on a limited range of issues. All of these constraints are applicable to this study; see Appendix D for further details.

The remainder of this report documents findings from both of these stages, focusing on broad themes and definitions first (Chapter 2) followed by evidence from the QSRs relating to vulnerable people (Chapter 3). Throughout these chapters, quotes from stakeholders illustrate key points. The group to which each stakeholder belongs is given at the end of the quote. The following codes are used: T = Treatment stakeholders; I = Industry stakeholders; A = Academic stakeholders; P = Policy stakeholders; L = Legal stakeholders.[2]

[2] For some quotes, the stakeholder group is not given as this could potentially identify the contributing interviewee.

2 Defining terms

This chapter provides an overview of how different terms often used in gambling policy are defined. Contextual information relating to current policy is given alongside views from each stakeholders and, where appropriate, related research evidence.

Gambling-related harm

Policy perspectives

Gambling-related harm is a term that is being increasingly used in British gambling policy circles. The Gambling Act enshrined harm as a key policy concept when it stated that the third licensing objective was for children and other vulnerable persons to be protected from harm or exploitation by gambling. However, the Act did not define what harm meant or specify the types of harms that were related to gambling. This can only be inferred through other definitions within the Act. For example, the Act defines a responsible authority (with respect to premises) as one:

> *"which has functions by virtue of an enactment in respect of minimising or preventing the risk of pollution of the environment or of harm to human health in an area in which the premises are wholly or partly situated"*

or, an authorised person as:

> *"an officer of an authority other than a licensing authority is an authorised person for a purpose relating to premises if— (a) the authority has statutory functions, for an area in which the premises are wholly or partly situated, in relation to minimising or preventing the risk of pollution of the environment or of harm to human health."*

Here, provisions are made that Responsible Authorities can, under certain circumstances, include others bodies or individuals who have formal responsibility for minimising or preventing the risk of harm to human health. This is the only place in the Act where harm is qualified in any way. Notably, the focus is on harm to the health of the public.

The Gambling Review Report (known as the Budd Report), which preceded the Act, also considered harm and grappled with the problem of the extent to which you restrict the liberties of the many to prevent harm to others. In response to this central dilemma, the Budd report noted the widely held view that:

> *"the state should respect the right of the individual to behave as he or she wishes, provided there is no harm to others. That view (the "liberal view") is held with varying degrees of robustness by the population of this country (and by members of the Review Body)."* (DCMS, 2001)

The difficulty with this statement is that, at the time of writing, there was limited evidence about the range of harms that 'others' experience from gambling. Yet again, harm was not defined, though throughout the report there was reference to harms to the individual (psychological and financial harms of excessive engagement), harms to families and harms to communities. This uncertainty, and lack of evidence base, was explicitly acknowledged in the Budd Report which stated that:

> *"Since we are uncertain about the effects on individuals and on society as a whole of changes in regulation we suggest fairly cautious moves in the first place, with scope for further deregulation in due course if the results seem acceptable. We also recognise that some localities might choose to limit the number and scale of gambling establishments because of their effects, in the widest sense, on the local community. That seems to us to be a legitimate task of local government."* (DCMS, 2001)

In short, in major policy reviews and legislation, the concept of harm is important. It is given primary importance in the Gambling Act and is a key tenet of the liberal approach to balancing protection and individual freedoms. However, what harm means, to whom and at what level behaviours and consequences are considered harmful was not articulated.

Since then, a number of attempts both nationally and internationally have been made to address this gap. The term gambling-related harm seems to have developed traction internationally from the mid 2000's, though the broader concept of harm and attempts to develop indicators of harm has antecedents in the mid 1990's (see Box 2). This movement towards focusing on harm seems to have developed alongside recognition that gambling behaviour should be considered in its broader context, and that it should be considered from a public health perspective (Korn & Shaffer, 1999; Korn, 2000). In academic circles, one of the earliest uses of the term was by Korn (2000) who argued that expanding gambling opportunities in Canada should be viewed through a public health lens so to balance the potential risks and benefits.

In Britain, the term gambling-related harm was adopted by the Responsible Gambling Strategy Board (RGSB) in 2009. The RGSB is the body responsible for providing strategic policy advice about gambling to the regulator (the GC) and the Department of Culture, Media and Sport. In their initial strategy, the RGSB made gambling-related harm as key concept stating that:

> *"We aim to support international, leading research about the treatment for and prevention of gambling-related harm. By 'gambling-related harm' we mean the adverse financial, personal and social consequences to players, their families and wider social networks that can be caused by uncontrolled gambling."* (RGSB, 2009)

The decision to adopt this term was based on the recognition that harm extends beyond the individual gambler but also that research strategy should consider:

> *"the shorter-term harms brought about by short-term bouts of intensive gambling, which may require a different preventative approach...the Board has therefore agreed to use a broader definition of 'gambling-related harm' in setting its priorities."* (RGSB, 2009)

This was, to our knowledge, the first time that gambling-related harm was defined in a British policy context and the first time this concept had been highlighted as a focus for research strategy. In 2010, the RGSB expanded this point, stating that there was a pressing need to recognise gambling-related harm as a public health issue:

> *"Public health discourse differs from clinical/psychological approaches in its emphasis on the social, economic, and cultural determinants of good health and ill-health. As such, it seeks to avoid a pathologising model of the sick individual acting and experiencing harm in isolation."*(RGSB, 2010)

Since then, the term gambling-related harm has gained increasing traction in British research and policy. Its increasing importance can be seen within the GC's revised Licensing Conditions and Codes of Practice (LCCP), where industry are now required to:

> *"make an annual financial contribution to one or more organisation(s) which between them research into the prevention and treatment of gambling-related harm, develop harm prevention approaches and identify and fund treatment to those harmed by gambling"* (GC, 2015)

In previous versions of the LCCP (2013) provisions largely referred to preventing and treating problem gamblers (in fact, in the 2013 LCCP, the term 'harm' did not appear at all). The new emphasis on gambling-related harm in the revised 2015 LCCP is symptomatic of a broader step change in policy and regulatory circles towards considering wider harms from gambling rather than problem individuals.

Box 2: "Harmful gambling" taken from the Australian Productivity Commission 1999: harm is defined by whether someone met any of the following conditions in the last year:

- gambling has made life a lot less enjoyable and feel they cannot control gambling, although they want to;
- have money arguments about gambling;
- borrow to gamble while not paying borrowings back;
- lose time from work or study due to gambling;
- feel guilty about gambling;
- borrow from loan sharks to gamble;
- fraudulently write cheques to gamble;
- believe they have a current problem;
- always spend more than they can afford;
- have often suffered from depression due to gambling;
- have often experienced adverse effects on their job due to gambling;
- have changed jobs in the last year due to gambling;
- have been sacked in the last year due to gambling;
- not had enough time to look after family's interests due to gambling;
- have become bankrupt due to gambling;
- have experienced a relationship breakdown due to gambling;
- have obtained money illegally to gamble;
- have been in trouble with police over gambling;
- have appeared in court on a gambling-related matter;
- have seriously thought about suicide because of gambling;
- have wanted help for gambling problems; or
- have tried to get help for gambling problems in the last year.

Stakeholder perspectives

Given the emerging policy importance of gambling-related harm as a concept, all stakeholders interviewed were asked a range of questions to explore what this term meant to them, if and how they felt it differed from problem gambling and to articulate the range of harms that they felt could be associated with gambling. These findings are summarised below.

Defining harm

There was broad consistency between stakeholders in defining gambling-related harm and a number of themes were evident. The first theme was the belief that harm that could be experienced by individuals but also those around them, their families, friends and communities. Harm was viewed as having a "*ripple down*" [I] effect that extends out from the individual "*like a spider's web*" [T].

There was recognition among some that gambling-related harm had been purposively positioned as a concept to move away from conceptions of the 'ill' individual towards thinking about the broader impacts gambling can have:

> "*it's the importance of moving debate on from seeing harm as a systemic problem that might be classed as an addiction, put down to that person, whereas there may be something about gambling, the product or the environment, that causes people not to play properly or causes them to be harmed.*" [P]

A second theme was the view that harm related to spending too much time or too much money gambling which had an adverse effect on both the individual and/or others. In the words of one

stakeholder: *"it's about a negative consequence experience that can be caused or exacerbated by gambling"* [P]. Related to this, some noted that this made quantifying and operationalising definitions of harm difficult because what counted as 'too much' was dependent on the circumstances of the individual. For these stakeholders, gambling-related harm was viewed as subjective:

> *"it's the difficulty of knowing the context of people's lives in terms of qualifying harm; how do you know what harm looks like for an individual?"* [I]

A final theme was that gambling-related harm was thought to be a broad-based measure. It was typically viewed as including problem and pathological gamblers but extended much further beyond narrow and clinical concepts of problem gambling. For some this meant looking at the harms that could be experienced occasionally and sporadically, for others this meant viewing gambling-related harm as a concept broader than problematic gambling:

> *"anyone who spent too much last night could consider themselves to be harmed by gambling, though that doesn't make them a serious problem gambler or someone who can't ever gamble again. Harm is a very broad brush stroke term...You can have different degrees of harm."* [I]

Harm was described as being *"more scattergun"* [P] and not necessarily progressive.

In general, the perception was that harm extends beyond the individual to families and communities in terms of a range of negative consequences that can arise from gambling. It was also seen as nebulous concept where harm could be sporadic, temporary, severe and subjective.

Who experiences harm

As noted above, there was a broad consensus that both the individual and those in their broader social network could experience harm; the belief was that you did not have to be a gambler yourself to experience harm from gambling. The individual gambler was highlighted by most as someone who experiences harm. However, family, partners and children were also cited as those who could also experience harm as a consequence of other people's gambling behaviour, especially when it came to financial harm and debts. This was seen as something that rarely just affects the individual, *"harm echoes through and affects the family* "[L]. It was, however, felt that the gambler themselves might not be aware of the harm their gambling caused to others. As one stakeholder argued, a gambler may not realise that their *"partner is at*

home trying to pay the bills, wondering where the money has gone" [P] or what the negative consequences are for their children because:

> *"children are affected by the instability and uncertainty it creates. Not knowing what parent is doing, not knowing if they are going to be present."* [A]

Under these circumstances, it was thought that harm may be more acutely felt by the extended family than the gambler themselves:

> *"harm may be more felt by those connected to the gambler as the gambler may be in denial.. and doesn't realise the harm, the anxiety to other family members... the family members are not getting any benefits from gambling, unlike the gambler."* [I]

Harm was also seen to extend more broadly than this to include friends, work colleagues, employers and so on. It was seen as something that can *"ripple out and affect the whole social network"* [A]. One stakeholder conceptualised this as a drawstring effect:

> *"lots of people are tied to each other through invisible bonds of money, and if you start reducing money, you soon see where these bonds lie - it shows up tensions in social relations."* [A]

Range of harms experienced

Stakeholders felt that a broad range of harms could be associated with gambling. In some cases these were viewed as interconnected between the individual gambler and their families. For the individual, the main harms mentioned related to money, to financial harms and debt, which were followed by general harms about putting gambling before other responsibilities. Describing the range of harms, one stakeholder thought that it was about:

> *"time spent on gambling that could have been used on other things, loss of activities, loss of variation of people's lives,[gambling] funnels it away from people's lives. But the main harm is financial, it's to do with money."* [A]

Others described what they thought were likely psychological harms and impact on wellbeing, describing health-related harms, like anxiety or depression, and relationship problems and breakdown. As one stakeholder described *"first you think about money and finances but there's an awful lot more than just money"* [T]. This was supported by others who argued that:

> *"you can still experience harm even if you can afford it... it doesn't necessarily have to be about spending beyond your means."* [I]

The notion of gambling taking you away from other things, the activities of daily life and social experiences, was a form of harm mentioned by some stakeholders. In some cases, this view was generated through personal experience and observation. One stakeholder described their conversations with gamblers in venues:

> *"they [the gambler] said they should be spending more time and money with their families. Their social lives constrict and they seemed less able to make positive social connections".*

Stakeholders highlighted a number of harms that they felt could affect individuals, their families or both. These tended to relate to familial arguments, relationship breakdown and family strain on resources, relating to either money, time or both. Some thought that harms existed on a spectrum, for example ranging from relationship stress and arguments to relationship breakdown, and felt that most harms could be conceptualised along a spectrum of severe to less severe.

Among others affected, anxiety, stress, uncertainty, instability and neglect were key themes mentioned as potential harms which could have an impact on the health and wellbeing of these people. These were noted alongside practical harms such as how to pay bills and manage finances. One stakeholder said they viewed harm in two ways: intrinsic and extrinsic. Extrinsic harms could be things that are more visible, like relationship breakdowns or evictions, whereas intrinsic harms, like anxiety, instability or neglect, are more hidden and the gambler themselves may not be aware of these harms upon other people.

Finally, some stakeholders argued that there could be broader harms at a societal level, typically mentioning harms relating to anti-social behaviour and/or crime. The feeling that gambling could create a more general sense of worry and anxiety among communities was mentioned by one stakeholder [A], though they also stated this was difficult to pin down.

Gambling-related harm and problem gambling: the same or different?

Stakeholders were asked to consider what differences, if any, there were between gambling-related harm and problem gambling. The two concepts were described by most as being quite different, this was in respect to the breadth of impacts considered, who might experience harms and recognition that harm could be episodic and short-term. On the whole stakeholders felt that gambling-related harm was a broader concept than problem gambling and that whilst problem gamblers may be experiencing harm, those experiencing harm were not always problem gamblers:

"problem gambling relates specifically to the individual doing the gambling whereas gambling-harm can be looked at as one step removed, that is the problem gambler puts the money into the machine but the harm is caused to his family" [T]

"problem gambling has a narrow focus on individuals as isolated units. Ideas about problem gambling don't take as much interest in the amount of money or time spent, they tend to look more at personality or irrational cognitions. Conceptions about harm look at more abstract things that are involved in gambling itself. It's to do with the product and the environment in which it goes on." [A]

Others, however, felt that the concepts were rather similar and that the term gambling-related harm was problem gambling in a different guise, *"an umbrella statement that politicians like to use"* [T]. It was argued that focus on gambling-related harm had not reframed policy thinking to look beyond the individual, as focus on the individual has carried through into the harm-reduction literature:

"it's just a temporary construction around which a group of scholars have consolidated a body of work trying to replace the idea of problem gambling with gambling-related harm." [A]

Some (though not all) industry stakeholders concurred and felt that gambling-related harm was a proxy for problem gambling. Interestingly, these stakeholders described problem gambling as spending too much time or money gambling, which is different from clinical definitions and has similarities to the definition of gambling-related harm given by other stakeholders. This group did, however, believe that *"the individual is the problem gambler, but the harm starts to draw in other people in"* [I]. Here, even though this group expressed problem gambling as a preferred term, their understanding of what problem gambling meant and its relationship to harm broadly reflected the views of other stakeholders.

Evidence

As noted earlier, the concept of gambling-related harm emerged in international academic and policy literature from the turn of the 21st century onwards. However, there has been a lack of research understanding, exploring and measuring harms more broadly and the area is still in its infancy. A review of literature containing the terms gambling and harm (in the abstract or title) returned over 100 articles. However, further review showed that for roughly half, the focus of the article was not harm itself but rather the term was used as a proxy for problem gambling or to describe implications for policy around gambling-related harm.

Of the 43 articles considered for further review, there was a broad range of approaches as to how harm was defined, conceptualised and operationalised. These can be summarised into four themes:

- studies which talked about harm but offer no definition of what harm means (11 articles),
- studies which talked about similar concepts but either did not use the terms gambling related-harm or define harms more specifically (7 articles),
- studies which conflated broader harm, with harm from problem gambling and other related concepts (11 articles), and
- studies which attempted to define harm and/or offer some ways of investigating it (16 articles).

Those studies which did not define harm, tended to talk about harm in a general sense or say that certain characteristics were associated with gambling-related harms, without defining or conceptualising these harms further. This ranged from noting associations between proximity to gambling venues and expenditure levels or characteristics of certain groups and saying that this was associated with harm (e.g., Young & Tyler, 2008).

The second group of articles tended to be either qualitative reports or review articles. The single qualitative study reviewed, rightly, let participants describe their experiences without enforcing rigid concepts and definitions upon analysis. The study was of the impact of gambling among 'heavy gamblers' and highlighted themes around the impact upon children, ranging from neglect to lack of funds to feed them or provide necessities, taking time away from family life, and getting angry or stressed with children, especially when worried about money. As well as financial impacts, other consequences such as having to move home or deal with bailiffs were cited. Marital breakdown was also a key theme (Dyall, 2007). These impacts are similar to those mentioned in stakeholder interviews as gambling-related harms. Other articles talked about similar issues but referred to these as the negative consequences of gambling (Cantinotti & Ladouceur, 2008) or as unhealthy gambling (Dickson-Gillespie et al, 2008), adverse consequences (Fogarty & Young, 2008) or as community harms (Wall et al, 2010).

The third group of articles tended to focus on harms associated with problem gambling under the rubric of gambling-related harm. In some articles the term gambling-related harm was used interchangeably with gambling-related problems (Peller et al, 2008). In others, the term harm was used but what was measured were problem gambling scores or evidence relating to consequences of problem gambling (Markham, Young & Doran, 2002; Raisamo et al, 2014; Delfabbro & LeCouteur, 2004; Brown & Raeburn, 2001). Others recognised that gambling harm is poorly described and conflate harms and problems (Rintoul et al, 2013).

The final group of articles included those where an attempt to define or explain harm was made, some of which also offered ways to measure/explore this empirically. Although there were a greater number of articles in this group than the others, this was because some came from New Zealand, which includes a national definition of harm in its primary legislation, or from a group of researchers in Canada who attempted to identify harm using the Problem Gambling Severity Index.[3] The Canadian research team then applied this approach across a number of articles.

Within these articles, explanations of harm included the following:

> *"Adolescents may experience a variety of harms in different social contexts in which the gambling is occurring, and thus, more attention should be given on assessment of all potential harms of gambling thoroughly, including less serious harms and other dimensions that are not typically part of the clinical based screens."* (Raisamo et al, 2013)
>
> *"Harm or distress of any kind caused or exacerbated by a person's gambling, and includes personal, social or economic harm suffered by the person, their spouse, partner, family, whänau and wider community, or in their workplace or society at large"* (This is the national definition used in New Zealand's 2003 Gambling Act and is used in a number of articles. See Dowdon, 2007; Walton, 2012; Tu et al, 2014; Livingstone, 2006).
>
> "*Harmful consequences are not limited to pathological or compulsive gamblers but may also affect recreational gamblers on occasions. As such, harm minimization represents an alternative to abstinence-oriented policies. It focuses on reducing the adverse consequences among all gamblers including those who cannot cease their activity at the present time, and is compatible with an eventual goal of abstention."* (Blaszczynski, 2003)
>
> *"Gambling results in a range of harms, not just for individuals but for families, communities and local economies."* (Hancock et al, 2008)
>
> Harm is *"that which is experienced by the individual and caused to others such as family, friends, employers and others in the community."* (Fearnley et al, 2013)
>
> Gambling-related harm is *"any significant negative consequences which result from gambling in excess of what the consumer can afford in terms of either time or money."* (Blaszczynski et al, 2014)

[3] The Problem Gambling Severity Index is one of many survey instruments designed to measure problem gambling.

"Harm from gambling can occur at multiple levels including the individual, family, community and society." (Currie et al, 2009)

With the exception of quotes from Blaszczynski, all definitions include the concept that harm extends beyond the gambler and can affect others, their families and communities. This echoes findings from stakeholder interviews. The first quote from Blaszczynski (2003) supports the notion that people who are not problem gamblers can experience harm, whereas the concept of harm extending beyond the individual is arguably implicit within the phrase *'any significant negative consequences'* though overall, this definition is rather more focused on the individual than the others (Blaszczynski et al, 2014).

Finally, even though harm was more broadly defined in these studies, many relied on analysing responses to problem gambling screens to identify harm, thereby reducing the conception of harm to a narrow basis. Only a few studies from New Zealand and Finland were identified which attempted to articulate a broader range of harms and capture information about this. For example, the New Zealand Health Survey captured information about whether there had been arguments in the household about the time and/or money spent gambling and whether someone in the household had to go without something they needed because of gambling or whether bills weren't being paid because of gambling. (Tu et al, 2014; Raisamo et al, 2013).

Summary

Among stakeholders and within the academic literature there is a broad consensus that gambling-related harms can be experienced by individuals, their families and their communities. There is general recognition that individuals can experience harm and not be problem gamblers and that some harms can be temporary and episodic. There is a recognition that the experience of harm is subjective and based on the personal circumstances of those involved.

It is also clear that the term gambling-related harm is often conflated with problem gambling or at-risk gambling and research evidence rarely reflects harm in the broadest sense of the definition. There is a lack of clarity around terminology and some people describe harm in other ways, such as adverse or negative consequences, or in the case of some stakeholders as problem gambling but describing something more akin to broader harm when probed.

The term gambling-related harm is relatively new in policy and academic circles, which partially explains the limited evidence base assessing it. Difficulties with definition are likely to exacerbate this, especially with the over-reliance of gambling research on quantitative

methods, which prefer less nuanced terms that can be measured or can be backed up with clinical assessment.

The implication for this study is that when looking at evidence relating to vulnerable persons and harm, the literature inevitably focuses on problem and at-risk gambling as a proxy for this. As such, the quick scoping reviews presented in Chapter 3 focus more on evidence relating to 'problem' individuals rather than broader harms or harm to others. This is because the evidence base is skewed towards this focus, and is a noted limitation of this study. However, given stakeholders views that people experiencing problems with gambling would almost certainly be experiencing harm, there is some confidence that this literature is appropriate to understanding one aspect of harm, even if it is in a more limited sense.

Vulnerable people

Policy perspectives

As with the concept of harm, the protection of vulnerable persons was given primary importance in the Gambling Act through the third licensing objective. However, as noted earlier, vulnerable people were not defined by the Act, neither was there further consideration of how those vulnerable to harm from gambling may be the same or different from vulnerable people in British society generally. In broader British policy circles, the term 'vulnerable person' has a distinct meaning, as set out by the Safeguarding Vulnerable Groups Act, 2006 (see Box 3).

However, looking at the Budd Report and clarifications issued by the GC, it is clear that the third licensing objective is intended to extend beyond the rather narrow meaning of the Safeguarding Act and is concerned with protecting those vulnerable to gambling-related harm.

Box 3: Definition of vulnerable persons from the Safeguarding Vulnerable Groups Act, 2006

A person is a vulnerable adult if he has attained the age of 18 and—
(a) he is in residential accommodation,
(b) he is in sheltered housing,
(c) he receives domiciliary care,
(d) he receives any form of health care,
(e) he is detained in lawful custody,
(f) he is by virtue of an order of a court under supervision by a person exercising functions for the purposes of Part 1 of the Criminal Justice and Court Services Act 2000 (c. 43),
(g) he receives a welfare service of a prescribed description,
(h) he receives any service or participates in any activity provided specifically for persons who fall within subsection (9),
(i) payments are made to him (or to another on his behalf) in pursuance of arrangements under section 57 of the Health and Social Care Act 2001 (c. 15), or
(j) he requires assistance in the conduct of his own affairs.

Protection of the vulnerable, alongside children, was a key recommendation in the Budd Report which argued that protection of the vulnerable was key reason why regulation was needed:

"it is a legitimate role of regulation to limit the risk of problem gambling even if this means restricting the freedom of those who can gamble harmlessly." (DCMS, 2001)

In discussing who was 'vulnerable', the Budd Report stated that there was a need to:

> *"identify the vulnerable or the conditions which are particularly likely to give rise to problem gambling in those who participate."* (DCMS, 2001)

Here vulnerability was clearly defined in accordance with gambling practice and behaviours. Although the GC has not defined who they consider to be 'vulnerable persons', they do state that this is likely to include:

> *"people who gamble more than they want to, people who gamble beyond their means, and people who may not be able to make informed or balanced decisions about gambling due to a mental impairment, alcohol or drugs."* (GC, 2015)

This clarification includes some of the groups identified within the Budd Report as those likely to be vulnerable, such as young people, those under the influence of drugs/alcohol and those with co-existing mental health conditions. It also implicitly includes other groups highlighted by the Budd Report as potentially vulnerable under the rubric of 'gambling beyond their means'. The Budd Report identified low income groups and those most disadvantaged and marginalised by economic change as potentially vulnerable. What the GC's clarification excludes are social determinants of vulnerability beyond economic means based on personal or social situations, such as being an offender or having a family background of problem gambling, which were highlighted in the Budd Report.

In 2012, the RGSB went further, stressing the need for research to better identify vulnerable groups. This strategy was explicit, vulnerable persons or groups meant those most at risk of gambling-related harm. They highlighted that some groups were already 'known' listing correlates for problem and at-risk gambling from the BGPS and other surveys. [4] Homeless people, ex-service forces personnel, offenders and itinerant groups were also identified as potentially vulnerable, echoing the broader considerations made in the Budd Report.

Stakeholder perspectives

Individuals and groups

Stakeholders were asked who they thought were vulnerable people generally and who might be vulnerable to gambling-related harm. There was broad agreement between the two concepts, as one stakeholder argued *"if you are vulnerable generally then you are vulnerable to harm from gambling"* (A). However, the characteristics of those who might be vulnerable to gambling-related harm were more broad ranging than those given for vulnerable people generally. Some stakeholders thought that anyone could be vulnerable to harm from gambling that *"everyone is potentially vulnerable at some points"* (L). However, these stakeholders also recognised the need to narrow the definition:

> *"anyone is a potential candidate - but I can see that you've got to try to identify other common characteristics"* (L)
>
> *"everyone could be vulnerable as a starting point... but I acknowledge that some people and groups who may be more vulnerable, I would want to break it into 1) individual and 2) groups and communities"* (A)
>
> *"anyone could be vulnerable but it's who is more likely to fall foul of that vulnerability."* (L)

Focusing on who was likely to be vulnerable to gambling-related harm, three thematic groups emerged from stakeholder interviews. These were:

1) Those with constrained social and economic circumstances. This tended to include those living in deprived areas, those who were unemployed, those with low income but also

[4] The 'known' vulnerable groups as articulated by the RGSB were those aged 16-24 (both men and women); Asian and Black British; those from socially deprived areas; the unemployed; heavily engaged gamblers; those with Anti-Social Personality Disorder; adolescents (especially those with Attention Deficit Hyperactivity Disorder).

those experiencing social isolation or more uncertain social circumstances, for example homeless populations, offenders and migrants.

2) Those with certain demographic characteristics. This included the young but also other characteristics such as gender and ethnicity – though it was broadly accepted that these characteristics may be serving as a proxy for other mechanisms. For example, older people were mentioned though the mechanisms articulated around this related to social isolation, or the experience of common life events, such as bereavement and/or having low fixed incomes.
3) Those who may have poorer judgement. This ranged from people with certain mental health conditions, those with learning disabilities or low educational attainment, to those with temporary impairment or longer term difficulties because of substance use/misuse.

It was clear from interviews that stakeholders believed that these three themes intersected with one another and were not mutually exclusive.

Dynamic nature of vulnerability

The broad characteristics of vulnerability articulated by stakeholders included personal, individual and social and economic determinants. It was argued that who may be vulnerable may change over time, as a reflection of broader social, economic and political changes. Some stakeholders argued that the economic crisis and the impact of austerity politics may impact on the propensity of some groups to be vulnerable to harm:

> *"austerity and income inequality may be exacerbating inequalities in gambling and who is at risk, and therefore who is vulnerable....perhaps we may be seeing more of a social gradient than we were seeing previously...[this is] symptomatic of relationship of behaviour to broader economic climate."* (A)

Others believed that vulnerability may be related to social changes in the nature and composition of inner city areas:

> *"inner cities used to be white working class, gambling is an inner city activity. Now those who live in inner cities has changed... the changing profile of who lives there makes them more vulnerable as it's a function of the inner city life,"* [I]

This theme of flux and movement within populations was also mentioned by some treatment providers who noted that the nationality of migrants presenting for treatment tended to mirror different waves of migration patterns from Europe.

For others, it was related to broader cultural changes in modern society or the way that gambling is now presented and situated:

> *"youth may be becoming more vulnerable because they want more instant gratification because they live in a fast paced world - this may make them more vulnerable"* (I)

> *"there's greater exposure to gambling as a society, so some people are now exposed to gambling who weren't before."* [L]

The normative shift in policy, positioning gambling as a leisure activity was, for some stakeholders, felt to be associated with certain groups becoming more vulnerable that they were previously: women and older people were the key groups mentioned here.

There was a broad consensus that those vulnerable to gambling-related harm may change as reflection of broader social processes. Therefore the characteristics of who is vulnerable to harm should be viewed as dynamic and open to change. This point was explicitly recognised by the RGSB in their 2012 strategy which concluded that the *"evidence needed to be kept under constant review"*.

Summary

Vulnerable people have been singled out for special regulatory attention and protection. Although not defined in the Gambling Act, it is clear from the Budd Report and subsequent policy advice that the third licensing objective refers to protecting those vulnerable to gambling-related harm, which is qualitatively different from protecting 'vulnerable persons' as defined by other legislation.

There is also a belief held among stakeholders that who may be vulnerable could be related to broader social changes and processes. This implies that a local perspective to understanding the risk of harm is vitally important, as these social processes and social change may be very variable at the local level. For example, certain areas may attract new kinds of people (for example migrants), changing the profile of who may be vulnerable to harm in that area.

Most stakeholders clearly articulated the kinds of characteristics of people or groups that they felt could be vulnerable to harm. However, some noted that anyone could experience harm and, as such, a probabilistic approach was needed focusing on those more likely to experience harm or who were more susceptible to problems. This has resonance with the previous discussion about the subjective nature of harm. Here the view was that not all individuals with certain characteristics ***will*** experience harm, but rather ***may have elevated risk*** of harm, and

thus be more vulnerable. This accords with recent policy thinking from the GC, and is a key consideration for this project.

The remainder of this report therefore looks at who **may be** more vulnerable, focusing on those groups highlighted by stakeholders, and the strength of the evidence supporting this.

Approaches to evidence

Finally, before reviewing evidence, it is important to discuss some key themes relating to evidence and how it is viewed and used in gambling policy and practice.

Stakeholder perspectives

Issues relating to the use of evidence in gambling policy and decision making were discussed with stakeholders. Topics discussed related to the ways in which evidence was used, how it related to the terms of the Act, and what 'counted' as evidence.

First, some stakeholders felt that the standards of evidence generally applied to gambling policy were much more conservative, and in their opinion, unobtainable comparative to other policy areas:

> *"sometimes I think that people demand standards of evidence that are almost impossible to generate because they are looking for causal connections and relationships and it's really, really hard to demonstrate. Even in medicine, it's really hard to demonstrate that A actually causes B..."* (A)

> *"The holy grail is to change the discourse from 'prove it, prove it" which the smoking industry used in the 1950s to precautionary principles and trying to put in place the measures to avert risk."* (L)

For some, this situation was exacerbated by the terms of the Act and the tension between the 'Aim to Permit'[5] clause and the licensing principles.

> *"the standards for gambling are even higher than for alcohol as the licensing objectives in the Gambling Act specifically refer to gambling. If you compare this with alcohol*

[5] In the Gambling Act, 2005, LAs are instructed that they should aim to permit gambling in so far as doing so is reasonably consistent with the three licensing objectives.

licensing, that just talks about crime and disorder generally, it doesn't relate that to the sale of alcohol, just says crime and disorder." (L)

It was felt that this created conditions where the burden of proof moved away from precautionary principles and towards a situation whereby causal proof must be demonstrated:

"asserting the existence of vulnerable people in the area - but so what? It's not presenting evidence that these people are being harmed - a district judge wouldn't accept it." (L)

A second related theme was that what counts as evidence varies based on what you believe is trying to be proved. If you are trying to prove that opening a new gambling premise in an area will cause harm (a deterministic view of causal processes that x causes y) then the standards of evidence required are much more stringent than if you are focusing on the risk of harm (taking a more generative view of causal processes, that x may cause y depending on a, b or c circumstances).

Both views were held among stakeholders. Those who tended towards the former view, referred to this as 'direct' evidence and said it was very rare that this kind of evidence was ever presented. Some also noted it was very difficult to generate. Among this group, some academic studies were viewed with caution, described as *'too general'* or useful in terms of *"shining a light on issues"* but unless this could be backed up with causal proof for a specific case, as anecdotal. This was view was illustrated discussing the potential relationships between pay day loan shops and gambling premises and the concern that some may use money obtained on credit to gamble:

"simply the presence and possibility of the link is anecdotal. Unless you can provide that there is a clear pattern that this is happening on a regular basis." (L)

These stakeholders were also more sceptical about the use of evidence generated from other jurisdictions, arguing that so many circumstances are different that this is not particularly helpful. For this group, evidence tended to count as something that was based on data, clear fact or fact-driven and subject to objective analysis.

Other stakeholders, who typically held a less deterministic view of causal process, discussed the use of broader sources of evidence, such as general research studies, academic papers and both quantitative and qualitative insight. Large gaps in evidence base were explicitly acknowledged and therefore some felt that inference and insight should be drawn together from a range of sources and methods. For example, one stakeholder spoke about the use of evidence from other jurisdictions:

> *"[this] does have a place in the evidence base, but it depends what it is... You need to fine tune any piece of research depending on what it is. There will be some things that are across the board that you can transpose into Britain but when you get into the detail of particular areas and jurisdictions and regulatory regimes and the people who live and work there you probably do need to tailor a little to take into account cultural differences. But sometimes doing that is dismissed out of hand and doesn't need to be... It can be used as a way of discounting evidence that isn't as appealing."* (A)

This group felt that hierarchies of evidence existed and that this resulted in difficulties in terms of broadening understanding. For some this bias was driven by those wanting *'statistical proof'* and the *"power of numbers in policy circles"* (A)

> *"there is an inherent bias for quantitative over qualitative - the bigger the sample the more it's trusted. ...It's very easy to flippantly dismiss a qual study as 'only' 50 people. ...good evidence is probably a mix of both."* (P)

Finally, it was broadly acknowledged by most stakeholders that there was a lack of evidence on which to rely. It was noted that large scale surveys deliver broad statistical overviews, but to date have given very little meaningful insight around harm. This lack of understanding was felt to relate to two aspects, first that harm is very often hidden, making it difficult to observe and understand and second, there is no strategic policy directed at exploring or evidencing harm, meaning there was little impetus for this evidence base to develop in Great Britain.

Implications for this study

These contrasting views of the nature of evidence and how it is used when aiming to mitigate harm are important. Recent policy changes announced by the GC represent a move away from more deterministic approaches of understanding behaviour and outcomes towards more probabilistic approaches, where the risk of certain outcomes occurring is of central importance. This signals a change in thinking about how evidence is used and what it is intended to prove.

It means thinking more specifically about the various contexts and mechanisms that could combine to generate different outcomes. Attention to context links strongly with the GC's new focus on local risk assessment and understanding local issues when making decisions. It also means moving away from thinking that evidence should prove that if 'I do X, the outcome will be Y' towards thinking that if 'I do X there is a risk of Y because of a, b or c', where evidence is used to assess the potential risk and is combined with knowledge about local contexts.

One stakeholder argued that this requires changing ways of thinking about evidence, how it is used and assessing evidence in a more probabilistic way, using a framework of logical inference instead to consider how plausible or coherent the evidence is. This perspective has been supported more broadly in epidemiology, which has cited the over-reliance on statistical proof that often hinders effective decision making:

> *"Regulators often fail to act because we have not yet statistically "proven" an association between an exposure and a disease, even when there is enough evidence to strongly suspect a causal relationship...If we can escape from the false dichotomy of "proven vs. not proven," facilitated by the non-existent bright line implied by statistical hypothesis testing and by the notion that causality can be definitively inferred from a list of criteria, then we can make decisions based on what we do know rather than what we don't." (Philips & Goodman, 2004)*

Drawing on this perspective, a framework of logical inference has been used in this report when reviewing and evaluating the evidence relating to gambling-related harm and vulnerable people. Drawing on the work of Bradford-Hill (1965), this includes the following:

1) Is the relationship is plausible; does it make sense?
2) Is the relationship coherent with existing knowledge?
3) Is the relationship consistent over space and time? If not, what are the contextual factors that explain why not?
4) How strong is the relationship? As Bradford-Hill described, the stronger the better in terms of potentially identifying casual associations.
5) What are the alternative explanations?
6) Is there analogous evidence from similar policy areas?

Consistent with a reorientation in how we think about and use evidence, we believe this provides a useful framework against which to evaluate the state of current knowledge about the relationship between gambling and vulnerable groups. This logic framework has been used in the following quick scoping reviews, to which this report now turns.

3 Identifying vulnerable people: findings from a quick scoping review

Introduction

This chapter provides an overview of the evidence relating to groups of people that stakeholders identified as potentially vulnerable to gambling-related harm. For each group or characteristic, stakeholder perspectives are discussed first, followed by issues relating to definitions or context. Evidence is then reviewed, drawing on the logic framework outlined in the previous chapter, followed by a summary.

There are some key terms and limitations which apply to the following sections:

- First, some stakeholders felt that anyone could be vulnerable to harm but understood that when looking at risk you have to try to identify those who are potentially more at risk than others. Therefore, in the discussion that follows we are not suggesting that everyone with this characteristic is vulnerable to harm, rather that they may be at increased risk of harm.
- Second, who is vulnerable is likely to vary and shift according to broader socio-economic changes. Therefore, the characteristics described by stakeholders are based on current understanding but should be updated and reviewed as society changes.
- Third, a concept used in the following discussion is that of the 'harm paradox'. The harm paradox is a concept from public health used when certain groups show higher risk of harm or health problems despite having overall lower engagement in or consumption of risk behaviours. It has been commonly used to describe socio-economic inequalities in alcohol consumption, whereby those from more socially deprived backgrounds are either less likely to consume alcohol or consume similar amounts to more affluent counterparts but are more likely to experience alcohol-related harm (as measured by alcohol-related mortality and hospital admissions) (Smith & Foster, 2014). The harm paradox is useful in highlighting groups or characteristics of groups who may be at greater risk of harm.
- Finally, the topics included in the scoping review were generated from stakeholder interviews. These interviews focused on understanding vulnerability in the context of the development of local area profiles. The characteristics cited by stakeholders focused more on demographic, social and economic vulnerabilities and less on psychological vulnerabilities. As this report is intended to help LAs, industry and regulators identify local risks, it focuses on aspects where local area knowledge and insight is more likely to

be available and does not consider psychological traits in-depth. We do not claim that this report is a comprehensive review of all potential characteristics of vulnerability but rather reviews characteristics of most relevance to local area risk profiles, as articulated by a diverse range of key stakeholders.

Scoping review: overview of methods

The type of evidence review used in this study was a quick scoping review (QSR). This was chosen primarily for practical reasons; LAs are revising their Statements of Licensing Policy in summer 2015 ahead of implementation in January 2016. This includes outlining their approach to local area profiles, which has to be subject to public consultation. For this project to be useful to LAs, results needed to be available by early summer 2015. Therefore, a QSR method was chosen.

QSRs are a methodology recommended by the Government Social Research Office. They are used to quickly determine the range of studies that are available on a specific topic and produce a broad 'map' of the existing literature. As they are conducted under short time frames, they are typically constrained by search strategy (using fewer bibliographic sources), availability of sources (typically focusing on those that are available electronically) and/or question (focusing on a limited range of issues). The main constraints for this study were:

1) limiting searches to key words in the title or abstract of the article/report,

2) limiting the number of databases searched (three in total) and,

3) for broader topic areas, focusing on existing research reviews and synthesis.

These constraints mean that QSRs may not identify all pertinent literature. Whilst this may have implications for the conclusions derived from these reviews, we consider this potential limitation to be less pertinent for this study. For many topics considered, there was a paucity of literature available and for these areas we are confident that we identified and considered most relevant studies. For broader topic areas, we focused on identifying studies from Britain and in some cases conducted new analysis of British data to provide this evidence. Whilst some international studies may have been overlooked by the QSR methodology, we are again confident that we have included evidence from the most relevant British-based literature.

All evidence reviewed was subject to an assessment of quality. With regards to quantitative studies, this included (where appropriate) review of the sample design, analytical methods used and appropriateness of conclusions given the study design. Where possible, evidence from gold

standard survey vehicles was preferred.[6] For some topics only a small number of studies were identified. In these cases, those of lesser quality were included in the reviews but the potential limitations of these studies have been noted in the commentary. Some quantitative studies were specifically excluded from the QSR. These were studies conducted using purposive sampling methods with non-representative population groups.[7]

For qualitative studies, similar assessments were made about the design, methods and appropriateness of conclusions drawn. Best practice was considered to be studies which mapped the range and diversity of opinion on a given topic and where results were appropriately analysed (thematically, not numerically).

In this review, equal weight is given to evidence from quantitative and qualitative studies, providing both meet minimum quality standards. However, in this report there is a greater focus on quantitative studies as this is the main research method used in gambling studies to date.

[6] The Health Survey for England, The Scottish Health Survey, The British Gambling Prevalence Survey and the Adults Psychiatric Morbidity Survey all have National Statistic status, a sign of scientific merit and rigour, demonstrating that these studies meet the Government's Code of Practice for Official Statistics.

[7] Much gambling research has been generated by conducting research with college students, where credit is exchanged for participation. The extent to which findings from these studies can be extrapolated to other populations groups is unclear and therefore studies of this kind were generally excluded from the QSR.

Evidence review – who are vulnerable groups?

Young people

Stakeholder perspectives

Most stakeholders thought that younger people could be vulnerable to harm. Definitions of younger people ranged from very young children through to those in their mid-twenties, including students. Among children, harm was seen to function in two ways. A child could experience harm from direct engagement with gambling or a child could experience harm because of parental gambling problems.

With regards to the former, it was generally felt that children could be vulnerable as they don't have the skills and experiences to make informed decisions and thus could experience difficulties more easily if they gambled. One stakeholder thought that children's vulnerability extended beyond these considerations. This participant felt that gambling is naturally interesting to children because of its overlap with play, meaning that children are more likely to be interested in gambling at a much younger age than for other risk taking behaviours.

Some stakeholders argued that there was a likely inherent vulnerability for those reaching the legal age to gamble as they now would be able to legally engage but may not have the same level of resilience as older adults. Others, however, thought that interest in gambling was part of the developmental process, part of the age of experimentation. Teenage years were seen as pivotal among some stakeholders, with one stating:

> *"if they [teenagers] don't feel supported, they don't have good communication skills, if they are a bit of a loner, it can create a predisposition [to gamble] as they tend to look for ways to escape."* [T]

All stakeholders thought that children could be vulnerable to harm as a result of their parents' gambling actions. Children not having what they needed financially, having less time/attention from parents, or living in households with high levels of stress and anxiety due to gambling problems were seen as some of the harms that these children could experience.

Definitions/context

The Gambling Act's third licensing objective states that children should be protected from being harmed or exploited by gambling. It is explicitly recognised that children are a vulnerable group. The legal age for most gambling products in Great Britain is 18, with the exception of lotteries,

scratchcards and football pools which is 16. There are also some gambling machines (Category D) which have no age limit and it is legal for anyone of any age to play them. For the purpose of this review young people is taken to mean anyone up to the age of 24, reflecting the range of ages mentioned by stakeholders.

Evidence

There is a wealth of research evidence exploring gambling behaviours among youth. In Great Britain, national studies were conducted in 1996, 1997, 1999, 2005 and 2009, with monitoring data about underage participation collected yearly by the GC. These studies, conducted among school pupils aged 12-15, have typically shown that gambling is a popular activity despite legal age restrictions on most commercial forms of gambling. In 2009, 21% of pupils had gambled in the week prior to interview (Ipsos, 2009).

These large-scale national studies also assessed the experience of gambling problems, using a problem gambling screen adapted from the one used for adults (called the DSM-IV-J-MR).[8] In 2009, rates of problem gambling among youth in Britain were estimated to be 2% (Ipsos, 2009). Whilst not directly comparable, this rate is similar to problem gambling rates reported among other young people, being 2.1% for those aged 16-24 and higher than rates reported for other adults (Wardle et al, 2011). This pattern has been replicated in studies of youth gambling worldwide.

Nevertheless, it is clear that not all youth engage in gambling. Forrest and McHale (2011) conducted extensive analysis of the 2009 British Survey of Children, the National Lottery and Gambling. They identified that boys, Asians, those with parents with permissive views of gambling or who themselves gambled, those without siblings, those in the care of a guardian, cigarette smokers and children with higher levels of income had elevated risk of gambling problems (Forrest & McHale, 2011).

The British Gambling Prevalence Survey (BGPS) and health survey series[9] have also shown that those aged 16-24 have elevated rates of problem gambling compared with other adults (Wardle

[8] This was developed in the 1990s though there are concerns about whether these screens are appropriate for use among adolescents, especially as they have not been clinically validated among adolescents. There is recognition that youth may experience a different range of impacts and harms as a result of gambling to adults. As Volberg et al (2010) note, there is a lack of consensus about what constitutes problems among adolescents which has yet to be resolved. However, in the absence of other measurement instruments, screening instruments adapted from those which measure problems among adults have been routinely used internationally to capture rates of problematic gambling among youth.

[9] In 2012, questions about gambling were included in the Health Survey for England and the Scottish Health Survey for the first time. These studies are called the health survey series in this report.

et al, 2011; Wardle et al, 2014). This is despite the fact that rates of past year gambling are typically lower among this age group than other adults (with the exception of those aged 75 and over). This means that those aged 16-24 who do gamble are more likely to experience problems than gamblers of other ages. However, in the QSR no British-based analysis was identified that examined how the experience of gambling problems varies among those aged 16-24, with the exception that rates are higher among men than women.[10]

Internationally, understanding of gambling behaviour among youth is generally recognised to be under-developed comparative to, say, alcohol studies (Blinn-Pike et al, 2010). Despite this, evidence relating to youth gambling has been synthesised on a number of occasions (Blinn-Pike et al, 2010; Valentine, 2008; Volberg et al, 2010) and common themes identified (see Box 4).

Box 4: Key themes from gambling research literature about gambling and youth: reproduced from Blinn-Pike et al (2010)

1. Gambling is more popular among males
2. Problem gamblers are greater risk-takers
3. Adolescent rates of problem gamblers are 2–4 times higher than those of adults
4. Adolescent problem gamblers have lower self-esteem compared to other adolescents
5. Adolescent problem gamblers have higher rates of depression than both adolescent social gamblers and non-gamblers
6. Adolescent problem gamblers dissociate more frequently while gambling than adolescents who gamble infrequently
7. Adolescents between 14 and 17 with serious gambling problems are at greater risk for suicide ideation and suicide attempts
8. Adolescent problem gamblers are at increased risk for other addictions, including substance abuse
9. Adolescent problem gamblers score higher on excitability, extroversion and anxiety and lower on conformity and self-discipline
10. Adolescent problem gamblers have poor coping skills
11. Adolescent problem gamblers report beginning gambling at younger ages as compared to peers without gambling problems
12. Adolescents move quickly from social to problem gamblers
13. Adolescent problem gamblers are more involved in delinquency and crime and are more likely to have disrupted family relationships and poorer academic records
14. Adolescent problem gamblers often replace quality friendships and relationships with associations with gambling associates
15. Adolescent problem gamblers often fail to be referred to or seek treatment
16. Adolescent gambling is an international problem.

[10] Base sizes from the BGPS and/or health survey series have not been large enough to examine patterns of behaviour within this age group specifically.

A notable limitation of many studies of youth gambling behaviour is that they tend to focus on problem gambling and pathologise behaviour. There is very limited evidence about the experience of broader gambling-related harms among youth. One study identified in the QSR addressed this issue specifically, stating:

> "*adolescents may experience a variety of harms in different social contexts in which the gambling is occurring, and thus, more attention should be given on assessment of all potential harms of gambling thoroughly, including less serious harms and other dimensions that are not typically part of the clinical based screens*" (Raisamo et al, 2013).

To do this, these authors developed survey questions about a range of harms and collected data on them among youth (aged 12-18) in Finland. The harms measured were: conflict with parents, conflict with friends, disruption to school work, feeling guilty, skipping school/work, non-payment of debts and stealing money to gamble. Estimates of harm ranged from 6% (for debt and money problems) to 17% for feeling guilty about gambling (Raisamo et al, 2013). The authors concluded that type of gambling-related harms that adolescents experience relates more to social problems and disruptions to daily life (in terms of school, work and social commitments) than issues about money. Experience of this broader range of harms among youth in Britain has yet to be explored.

Summary

Children were explicitly identified as being vulnerable to harm in the Gambling Act, 2005. There is strong evidence, consistent between jurisdictions, that children, adolescents and young adults are vulnerable to the experience of gambling problems or at risk of experiencing gambling problems. Rates of problem gambling among young people who gamble are higher than older adults. This is consistent with the harm paradox, whereby these age groups are less likely to gamble generally but those that do are more likely to experience difficulties with their behaviour. The harm paradox is evident among males and females alike, something that is often missed as comparisons tend to focus on men versus women.

There is limited understanding as to why this pattern occurs, broader experiences of harm and, among 'emerging adults', how behaviours vary for people with different backgrounds and characteristics. Youth should be considered a vulnerable group because of the greater likelihood of problems if they engage, but further research is needed to explore how this varies between and within groups. Attention is given to one subset of youth in the next section, students.

Students

Stakeholder perspectives

Nearly all stakeholders highlighted youth as a vulnerable group, with youth including children, adolescents and young adults. Within this, some stakeholders thought students could be vulnerable to harm. A combination of leaving home, stress of being in new environments, having fixed incomes as well as sudden increases in access to money through student loans and/or financial worries were seen as contributing factors underpinning this vulnerability.

For some, students were considered to be at higher risk than other younger people because they could legally access gambling, whereas younger people are (largely) legally prohibited from commercial forms of gambling. Foreign students were also seen as a potentially at risk group. This was viewed as related to their migrant status (see discussion about migrants later in the chapter), especially if students were coming from countries where gambling was not as accessible or available as in Britain.

Definitions/context

Students have been highlighted as at risk group in many public health areas. Termed 'emerging adults', student status is viewed as a time of heightened risk taking, identity exploration, instability and potentially isolation where there are fewer parental and social controls (Arnett, 2004; 2008). This group have been the focus of attention for engagement in other risk behaviours, such as alcohol consumption, drug use, and risky sexual behaviour. Therefore students have been given attention in the gambling literature because of potential clustering of risk behaviours as well as attendant issues relating to their 'emerging adult' status.

Students in higher education were seen by some stakeholders as a group whose vulnerability to harm may be increasing. This was in the context of greater changes to student finances with higher rates of tuition fees introduced in 2012, rising rents and greater uncertainty around job markets post-graduation. Data from the latest Student Income and Expenditure Survey shows that in 2011/12 first year students saw a real terms decrease in income, coupled with an 18% increase in housing costs. The authors concluded that:

> *"the overall impact on students' financial position was to increase the level of predicted student (net) debt among first year students"* (Pollard et al, 2013).

Stakeholders felt that this combination of factors could create contextual circumstances where students who gambled were at greater risk of harm than previously, as they may be facing greater financial strain generally.

Evidence

There is very little evidence about students' experience of gambling in a British context. Writing in 2008, Moodie stated that *"the lack of research [into British] student gambling was mystifying"*. Little has changed and aside from Moodie's study of gambling behaviours among Scottish college students, no other British studies looking at this were identified. Moodie's study identified that 3.9% of college students were probable pathological gamblers and a further 4% were problem gamblers. These figures are typically higher than those reported among similar age groups interviewed through household surveys. However, comparisons should be treated with caution due to different ways of measuring problem gambling and uncertainty about the extent to which these results can be extrapolated to the broader student population.

The BGPS/health survey series gives very little additional insight. These are both household based surveys and thus exclude those living in institutions, like student halls of residence. Whilst some students living in private rental accommodation, or living at home with parents, are included, results cannot be extrapolated to all students.

Nevertheless, these studies show that those aged 18-21 in full time education tended to gamble less than those aged 18-21 who were not in full time education. Rates of problem gambling were 0.6% among young people in full time education and 3.3% for non-students; these differences were not statistically significant and rates of at-risk gambling were similar (20.6% vs 19.9%).[11] Therefore, evidence from this skewed group of students shows that whilst they are less likely to gamble, those that do experience a similar range of problems to other young people of a similar age. This evidence does not discount the theory that students could be a vulnerable group but rather highlights the need for this to be better explored.

A final UK-based study was identified conducted by the organisation 'Save the Student' which provides money advice and support to students. In 2013, their annual survey of student finances found that 20% of students had turned to gambling to make money.[12] This is perhaps unsurprising as this organisation publicises gambling, specifically matched betting, as its number one way for students to make additional cash.

Looking at evidence from further afield, there is a wealth of international evidence exploring gambling behaviour among students in higher education. This is largely because much research has been conducted using college students as a sample, trading participation for credits (Disley et al, 2013). There are fewer studies which look at the experience of harmful gambling

[11] These estimates are based on new statistical analysis of the BGPS 2010 survey conducted for this report. See Appendix A.
[12] The question wording used was "Have you ever gambled to try and make money (rather than for fun)?"

consequences. Most research focusing on the gambling behaviour of students has been conducted in North America and comparisons should be made with care due to the different nature and structure of higher education between Britain and these countries. These studies tend to show elevated rates of problem gambling among college students comparative to adult rates generally, though it is not always clear if these rates are elevated comparative to the same age group who are not in higher education (Shaffer et al, 1999; Blinn–Pike et al, 2007; Nowak & Aloe, 2014). One study did not find elevated rates of problem or pathological gambling among college students (Shaffer et al, 2005). The conclusion Shaffer et al (2005) drew from this was that *"most adverse effects of student gambling remain sub-clinical"*. This suggests that some students may experience harm even if this does not reach clinical levels of gambling problems.

Summary

Students were highlighted by some stakeholders as being potentially vulnerable to harm from gambling. There is very limited British evidence to assess this as it has not been a focus of enquiry. Only one British study was identified in the QSR. This showed elevated rates of problem gambling among students in Scotland. Evidence from the BGPS showed students who are not living in institutions display similar levels of risk and problem gambling to those of the same age who are not in higher education. This suggests that students should be considered as vulnerable as others of the same age, though based on the evidence available to date, it cannot be concluded that they are more so. Further investigation is needed to explore whether gambling harms are increasing among this group, particularly relating to changes in student finances, cost of living and job prospects.

Mental health

Stakeholder perspectives

Those with poor mental health were identified by nearly all stakeholders as a potentially vulnerable group. One stakeholder described vulnerability as a *"temporary or permanent inability to appreciate what is best for you"* (A) and therefore they thought that people suffering mental incapacities, be it temporary or permanent, would be vulnerable.

Stakeholders described a range of mental health problems that they felt could indicate enhanced vulnerability. This ranged from those with psychological conditions such as paranoid schizophrenia, personality and bi-polar disorders to those with common mental disorders, such as depression, anxiety and Obsessive Compulsive Disorder to those with other substance

abuse/misuse conditions. Some stakeholders discussed how those with a history of trauma could also be vulnerable to gambling-related harm, using gambling as a way of escape.

Stakeholders, however, highlighted the complexity of some of these relationships and how difficult it is to untangle cause and effect. This was particularly true when considering the relationship between anxiety and/or depression and gambling. One stakeholder succinctly summarised their view of this:

> *"those experiencing psychological difficulties are vulnerable to gambling, but whilst this association is known, it's not clear whether this [psychological difficulties] is caused by the gambling or whether it's a precursor to the gambling. The assumption is that it's a bit of both and so far as it's a bit of both, then it implies that those with psychological difficulties are more at risk."* (A)

Another stakeholder illustrated the same point, talking about the reciprocal relationship between gambling and depression:

> *"it's a bit chicken and egg, it depends...sometimes in the gambler's head it [gambling] takes them away from the bad stuff, from the depression and feeling awful...but only for a very short period of time and then they are back to where they started so it can become very difficult to figure out where does it start...so the activity to relieve that feeling is actually creating that feeling."* (T)

Some stakeholders felt the relationship between gambling and some mental disorders were related to the way that people with mental health problems are treated by society. This was also combined with the attractiveness of the gambling environment. It was felt that people with mental health problems can be bullied or generally ostracised by society or are those who:

> *"are on the margins of society and find a place within the betting shop or the arcades...and they do tend to gravitate towards these places so they are pretty vulnerable."* (T)

Here it was felt that people with mental health problems can be attracted to gambling as a 'safe' place to go to be around others whilst not having to engage with others directly. It was also felt that these people could get validation from the gambling activity. For these stakeholders, the relationship between mental health problems and vulnerability to gambling harm was about more than people simply having diminished capacity to make informed decisions about play.

Finally, some stakeholders argued that broader societal changes could mean that those with mental health problems may be more vulnerable than previously. This was in the context of

British austerity politics, cuts to mental health services and generally the experience of living through recession creating stressful economic conditions for some, which are known to be related to mental health problems.

Definitions/context

The range of mental health problems described by stakeholders can be categorised into four broad types: common mental disorders, psychosis, substance abuse/misuse and other conditions.

Common mental disorders (CMDs) are mental conditions that cause marked emotional distress and interfere with daily function, but do not usually affect insight or cognition (McManus et al, 2009). They comprise different types of depression and anxiety and include General Anxiety Disorder, Mixed Anxiety and Depressive Disorder, Phobias, Obsessive Compulsive Disorder and Panic Disorders.

Psychoses are disorders that produce disturbances in thinking and perception severe enough to distort perception of reality. The main types are Schizophrenia and Affective Psychosis, such as Bi-Polar Disorder (McManus et al, 2009).

There is a range of different terminology used to describe substance abuse/misuse. For alcohol, the following tend to be used for public health monitoring purposes: hazardous and harmful alcohol consumption. Hazardous drinking is a pattern of alcohol consumption carrying risks of physical and psychological harm to the individual. Harmful drinking denotes the most hazardous use of alcohol which is likely to damage health.

One possible outcome of harmful drinking is alcohol dependence, a cluster of behavioural, cognitive, and physiological phenomena that typically includes a strong desire to consume alcohol, and difficulties in controlling drinking (McManus et al, 2009). With regard to drug misuse, this has been defined as the use of a substance for purposes not consistent with legal or medical guidelines. In a small proportion of users, this may lead to drug dependence, which like alcohol dependence, is a cluster of behavioural, cognitive, and physiological phenomena, such as a sense of need or dependence, impaired capacity to control substance-taking behaviour and persistent use despite evidence of harm (McManus et al, 2009).

Finally, a range of other conditions were also cited by stakeholders. These included the experience of trauma, Attention Deficit Hyperactivity Disorder (ADHD) and personality disorders. ADHD is a widely recognised complex developmental disorder in childhood that can persist into adulthood and cause impairment (McManus et al, 2009). Personality disorders are longstanding, ingrained distortions of personality that interfere with the ability to make and

sustain relationships. Anti-Social Personality Disorder and Borderline Personality Disorder are two types with particular public and mental health policy relevance (McManus et al, 2009). The experience of a traumatic event is distinct from and more severe than stressful life events. A traumatic event is where individuals experience, witness or are confronted with life endangerment, death or serious injury or threat to self or close others (McManus et al, 2009).

Evidence

As seen in the section above, there is a broad range of conditions to consider when looking at the relationship between mental health and gambling. Because of this breadth, it was not possible to fully review all literature relating to each individual condition. Evidence was preferred where it was UK based or where studies focused on the general population and compared the experiences of those with and without certain mental health conditions.

As noted by Petry et al (2005), most information about the co-occurrence of mental health problems and gambling behaviour has been generated from studies of people presenting for treatment. However, as only a small minority of those with gambling problems seek treatment, the extent to which results can be extrapolated to all gamblers is unclear. It may be that the existence of multiple mental health conditions means that these people are more likely to seek treatment than others.

Comparative to North America, there is a dearth of British evidence about the relationship between gambling and mental health. In 2007, gambling behaviour was included in the English Adult Psychiatric Morbidity Survey (APMS), which produces National Statistics on the prevalence of mental ill health in England. Yet to date, in depth analysis of the relationship between gambling behaviour and the full range of conditions captured by APMS 2007 has not been undertaken. The only analysis published in the main study report was a set of correlation coefficients showing the likelihood of two conditions being experienced by the same person. This is different to looking at the risk of gambling harms or problems among certain population groups.

New analysis produced for this report shows that higher rates of problem gambling are found among those with the following conditions (see Appendix A for tables):

- Mixed Anxiety and Depressive Disorder
- General Anxiety Disorder
- Phobia
- Obsessive Compulsive Disorder
- Panic Disorders

- Eating Disorders
- Probable psychosis[13]
- ADHD
- Post-Traumatic Stress Disorder
- Harmful and hazardous levels of alcohol consumption
- Drug dependency

Problem gambling prevalence rates varied from 6% among those with probable psychosis to 1.5% among those with Mixed Anxiety and Depressive Disorder. This latter estimate is over twice the level of problem gambling among the general population (0.7%). Whilst Anti-Social Personality Disorders, Borderline Personality Disorders and Autism were captured in APMS, sample sizes were not large enough to include in analysis. Problem gambling rates did not vary based on whether participants had experienced depressive episodes or were current smokers.

The patterns noted above persisted when age, sex, ethnicity, income and multiple deprivation were taken into account. Logistic regression models showed elevated odds of problem gambling among those who had any one of the conditions listed above (see Appendix A). The greatest odds of being a problem gambler were observed among those with probable psychosis and phobias (the odds of being a problem gambler being 8 times higher among people with these conditions than without them) followed by Panic Disorder (odds being 6 times higher) and General Anxiety Disorder (odds being 5 times higher).

Results also showed that the prevalence of at-risk gambling[14] was also higher among those with each of the conditions listed above (See Figure 1).

[13] In APMS, a diagnosis of 'probable psychosis' was given for a positive (Schedule for Clinical Assessment in Neuropsychiatry (SCAN) interview (phase 2 interviews), or where no SCAN was conducted if two or more psychosis screening criteria were endorsed in the phase 1 interview.

[14] In APMS, at-risk gambling was those with a DSM-IV score of 1-2 and problem gambling those with a score of 3 or more. See McManus et al, 2009 for further details.

Figure 1 Prevalence of at-risk and problem gambling by mental health conditions

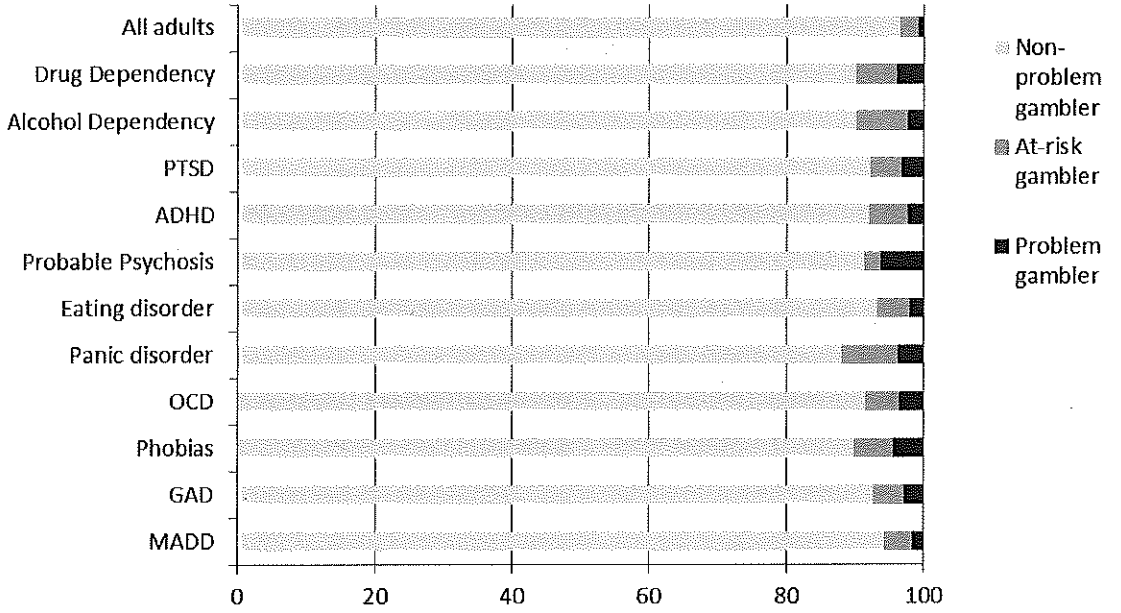


Figure 1 shows that for people with the conditions listed above, a significantly higher proportion were either at-risk or problem gamblers than all adults generally.[15] Among the general population, only 3% of adults were categorised as at-risk or problem gamblers. Yet for those with the conditions shown in Figure 1, rates were typically double that and for those with a drug or alcohol dependency, phobias or panic disorders around one in ten (10%) were at-risk or problem gamblers.

These patterns are notable as past year gambling participation was broadly similar among those with and without the conditions listed above. This was with the exception of those with phobias and probable psychosis who were far less likely to gamble than those without these conditions. This means that those with these conditions who do gamble experience far greater risk of problems, a clear example of the harm paradox. Current cigarette smokers and those with hazardous or dependent levels of alcohol consumption were more likely to gamble in the past year, though differences in problem gambling prevalence rates were not attributable to this. Looking at past year gamblers only (i.e., taking greater propensity to gamble into account) those with alcohol dependency had higher rates of problem gambling than those with no alcohol consumption problems. This means that people who have alcohol dependency

[15] In this analysis, problem gambling was defined as having a score of 3 or more on the DSM-IV screening questions and 'at-risk' a score of 1-2, meaning that these people experienced some difficulties but were below the threshold for problem gambling. See Shaffer et al, 1997.

problems and gamble are more likely to experience problems than gamblers who do not consume alcohol or do not consume alcohol to harmful levels.

A potential explanation for this was given in Reith and Dobbie's (2011) qualitative examination of gambling careers, where one participant explained the effect that alcohol had on their gambling behaviour:

> *"when you're drunk all that [studying form] goes out the window, your only mind-set is to try and win money as quick as possible. The drink clouds your judgement ... when you're drunk you can't stop and just say right I'm happy with that win I'll take that I'll put that in my back pocket, it doesn't really happen"* (Reith & Dobbie, 2011).

Other research has also shown a relationship between gambling problems and alcohol consumption more generally. The BGPS series highlighted that the prevalence of problem gambling was higher among those who consumed the most alcohol on the heaviest drinking day in the past seven days (Wardle et al, 2007). A similar finding was noted by Plant et al (2005) in their (British based) examination of the relationship of multiple risk taking behaviours.

Of course, what Figure 1 also shows is that not everyone with these conditions experiences a problem with their gambling, and that not everyone gambles. Looking at problem gamblers and at-risk gamblers specifically, 69% of problem gamblers experienced at least one of these conditions (including depressive episodes and personality disorders) and 47% of those who were at-risk experienced the same.[16] Therefore, whilst the majority of people with certain mental health problems may not experience problems with gambling, the majority of problem gamblers experience other mental health problems.

These findings, presented here for the first time, are similar to those found in other jurisdictions. In America, analysis of the National Epidemiological Study of Alcohol and Related Conditions (NESARC) showed that drug use disorder, alcohol use disorder, mood, personality and anxiety disorders were related to pathological gambling,[17] with the odds of being a pathological gambler being higher among people with these disorders. The authors concluded that the *"evidence for the relationship between substance use disorders and pathological gambling was unequivocal"* (Petry et al, 2005). However, they acknowledged that there was

[16] Being a current smoker was excluded from this analysis.

[17] This study differs from APMS in two ways. First, it uses the diagnostic term pathological gambling, given when a score of 5 or more is attained when answering the DSM-IV screen. The APMS analysis uses a threshold of 3 or more to represent problem gambling as this is commonly used in gambling policy in Great Britain. Second, NEARC measured lifetime pathological gambling rates. That is, whether a respondent had ever experienced a range of difficulties. APMS measures current rates of problem gambling, that is problems experienced in the past 12 months.

less information available about other psychological disorders and that some of the relationships observed could be related to diagnostic overlap.

Since Petry et al's 2005 study, others have analysed this relationship further. Similar results were found in a Canadian study, which showed that those with mood and anxiety disorders or substance misuse/abuse disorders were more likely to be at-risk or problem gamblers (el-Guebaly et al, 2006).

In 2008, Kessler et al analysed age of onset to attempt to unpick the temporal sequencing of disorders. They concluded that most co-morbid anxiety, depressive disorders and alcohol and drug abuse began at an earlier age than pathological gambling, with 74% of pathological gambling cases occurring subsequent to the onset of other disorders. However, they also noted that this was not universal and that *"some mental disorders might be a risk factor for pathological gambling and others a consequence"*. Pathological gamblers have periods of abstinence and relapse and problems persist over a long time frame, making sorting out the temporal sequencing of events difficult (Kessler et al, 2008).

A limitation of Kessler et al's (2008) study was their reliance on retrospective self-report of age of onset for each condition. A further study (Chou & Afifi, 2011) attempted to address this by analysing data from a follow-up study to NESARC 2005.[18] In the follow-up study, data about a variety of mental health issues were collected so investigators could see who now experienced certain conditions which they had not previously. Chou and Afifi (2011) demonstrated that pathological gambling was associated with the subsequent experience of mood disorders, PTSD, General Anxiety Disorder and substance abuse/misuse. However, because pathological gambling was not asked about in the second study, they were unable to look at what prior conditions may be associated with later onset of gambling problems. They concluded that there were likely reciprocal and cyclical relationships between gambling and other psychiatric disorders.

Summary

There is a consistent body of evidence from Britain and North American demonstrating a strong association between gambling problems and many mental health conditions. This suggests that those with Common Mental Disorders, substance use/abuse problems, psychoses and other conditions like PTSD have higher rates of problem or at-risk gambling than those without these conditions.

[18] A follow-up study is a study where the same people are interviewed again at a later date. Changes in circumstances are then analysed and investigators can start to determine the sequence of events.

However, the temporal sequencing and the specific mechanisms that underlie this relationship are uncertain. Here the comments made by one stakeholder seem appropriate and are worth repeating:

> *"it's not clear whether this [psychological difficulties] is caused by the gambling or whether it's a precursor to the gambling. The assumption is that it's a bit of both and so far as it's a bit of both, then implies that those with psychological difficulties are more at risk."* (A)

This is supported by current theory about the routes into problem gambling. The 'pathways model' put forward by Blaszyczski and Nower (2002) shows three different pathways into problem gambling, two of which differ based on whether psychopathology pre-existed gambling or whether it was a consequence of gambling engagement.

Finally, evidence relating to alcohol consumption and its relationship with gambling highlights the range of theories that might explain this relationship. For example, in the short term it is recognised that alcohol has a disinhibiting effect and, based on the evidence provided by Reith and Dobbie (2011), may impair judgement if gamblers engage when under the influence of alcohol.

However, this is just one theory. For some the relationship may be explained by a more general propensity to seek different sensations expressed through engagement in gambling and consumption of alcohol. For others, gambling and use of other substances may mask other problems. In short, it is unlikely that there is a single explanation for the relationship and we should allow for a plurality of theories.

Little work has been undertaken exploring this more broadly. Given the current state of the evidence base, we can conclude that those with mental health problems are potentially vulnerable to gambling problems, and whilst little is known about why this relationship exists, it is unlikely to be solely related to impaired judgement capacities.

Learning disabilities/difficulties

Stakeholder perspectives

Many stakeholders felt that those with learning problems may be more vulnerable to harm. This was described as *'people who might not understand gambling'*, *'people who aren't good with numbers'*, those with a *'learning difficulty'* or with low levels of education. It was felt that these groups might not be able to understand how gambling works, especially the role of chance or odds and probabilities. It was argued that this lack of understanding may make them

more vulnerable to harm as they may have less ability to make informed choices about their gambling behaviour and/or to understand the consequences of their actions.

Definitions/context

There are a plethora of terms used to describe learning problems. Over time, these have ranged from learning disabilities, intellectual disabilities, learning difficulties, special educational needs, mentally handicapped and so on. The variance in nomenclature was reflected in the way stakeholders described this potential vulnerability, suggesting a range of potential issues among those with 'learning difficulties' to those who don't understand odds or probabilities. In British policy, learning disability is described by the Department of Health as:

- a significantly reduced ability to understand new or complex information or to learn new skills,
- a reduced ability to cope independently, or
- an impairment that started before adulthood, with a lasting effect on development.

Learning disabilities exist upon a continuum of severity. This continuum, as described by the British Institute for Learning Disabilities (BILD), ranges from mild, where people may need some support to understand abstract or complex ideas or in completing forms and budgeting but who often live independently, to profound where people have a profound intellectual disability, requiring extensive support and care (BILD, 2011; Mansell, 2010).

Although used interchangeably, learning disability is viewed as different to learning difficulties. In educational policy, the term 'learning difficulty' is used to describe those with specific learning difficulties but who do not have impaired intellectual functioning (for example dyslexia or dyscalculia, a difficulty understanding arithmetic). The Special Educational Needs and Disability Code of Practice also presents learning difficulties on a spectrum from moderate to profound (DFE/DH, 2015).

In interviews with stakeholders it was clear that those with learning disabilities and, to a lesser extent, learning difficulties were considered potentially vulnerable groups. Those with low levels of educational attainment were also considered potentially vulnerable.

Evidence

Looking first at the relationship between learning disabilities and/or difficulties and gambling behaviour, there is a paucity of evidence. No British-based studies were identified examining

this. A small body of research from Ontario, Canada was identified which examined the relationship between 'learning disabilities' and gambling behaviour among adolescents.

Of the four studies identified, all used a similar methodology of administering surveys to pupils in school-based settings. Two of the four studies used participant self-report to identify those who had been diagnosed with a 'learning disability'. This included those with a reading or learning disability or dyslexia. The other two studies identified those with 'learning disorders' as those with individualised educational plans in place because of problems with reading and/or numeracy. Compared with British policy definitions, these studies focus more on 'learning difficulties' than disabilities. For clarity, this term is used in the following sections.

These four studies provided inconsistent results about the relationship between gambling behaviour and learning difficulties among adolescents. McNamara et al (2008) did not find a statistically significant difference in gambling participation between those with learning difficulties, those with learning difficulties and comorbid ADHD, and those with no learning difficulties. However, in a subsequent study, McNamara and Willoughby (2010) noted that participation in gambling was higher among those with learning difficulties than those without learning difficulties. The purpose of these two studies was to examine engagement in a range of risk taking behaviour among those with learning difficulties. As such, only participation in gambling was measured and not the experience of gambling problems.

The other two studies both found that the prevalence of gambling problems was significantly higher among boys with learning difficulties than boys without learning difficulties. However, there was no association between gambling problems and learning difficulties among girls (Parker et al, 2013; Taylor et al, 2014). Taylor et al (2014) also showed the boys with learning difficulties had more erroneous beliefs about gambling than those without learning difficulties.

No evidence about the relationship between learning difficulties/disabilities and gambling among adults was found in the QSR, though some surveys have shown a relationship by which those with lower levels of educational attainment have greater odds of problem gambling (Wardle et al, 2007; Sproston et al, 2000). The mechanisms underpinning this association are uncertain and it may be that that low levels of educational attainment is, to some extent, acting as a proxy for learning difficulties. This remains to be explored.

Thinking about the broader relationship between gambling and intellectual functioning, one British study analysed evidence from APMS 2007 and demonstrated a strong relationship between problem gambling and low verbal IQ scores. This association persisted even when a range of other factors were taken into account (such as mental health, substance use, impulsivity and socio-demographic characteristics). However, there was no relationship evident between low verbal IQ scores and non-problem gambling. The authors concluded that:

> *"The lack of similar associations in people with non-problem gambling may point towards general cognitive abilities being a predictor of individuals at a higher risk of making a transition to problem gambling"* (Rai et al, 2014).

A similar finding was evident among youth, Emond et al (2011) found that among 17 year olds, the odds of being a regular gambler and of being a problem gambler were higher among those with low IQ scores (measured when the child was 7.5). Emond et al (2011) noted that the relationship between low IQ and regular gambling was partially explained by socio-demographic and economic features but that the relationship between problem gambling remained significant even when these factors were taken into account. The QSR also identified one further study from Canada (Hodgins et al, 2012) where low IQ was positively associated with higher frequency gambling.

Finally, the relationship between educational attainment and gambling behaviour was assessed in the BGPS/health survey series. This shows mixed results. In 2010 and 2012, problem gambling rates did not vary by level of educational attainment. However, in the BGPS 2010, the odds of being a low risk gambler were 1.5 times higher among those with no educational qualifications than those educated to degree level or higher. Earlier studies in the BGPS series (1999 and 2007) showed that those who were educated to A-Level equivalent or lower had higher rates of problem gambling than those who were educated to degree level.

Summary

Stakeholders interviewed felt that those with learning difficulties could be at risk of experiencing harm and thus constitute a vulnerable group. This concern was typically based upon the notion that gambling should involve informed consumers, making informed choices to engage in gambling (Light, 2007). Those with diminished capacity to make these informed choices were therefore viewed as a vulnerable group. Viewing those with learning difficulties/disabilities as vulnerable is consistent with policy framing and GC advice. It is also consistent with the two British studies showing that those with lower IQ have a greater risk of gambling problems.

Thinking about learning difficulties/disabilities more specifically, there has been very little empirical investigation of this and the research that has been conducted focuses on the experience of adolescents in Canada. Three of the four studies reviewed showed a relationship between gambling behaviour and learning difficulties, though in some cases this was only evident for boys. These studies also discussed inconclusive findings of other studies examining the relationship between those with learning difficulties and engagement in other risk-taking behaviours. However, they have usefully highlighted a potential relationship between learning

difficulties among adolescent boys and the experience of gambling problems in a Canadian context.

Among adults, there is very little evidence available about the relationship between learning difficulties and gambling behaviour. However, varying evidence of a relationship between low level of educational qualifications (even after age has been controlled for) and gambling problems suggests this warrants further consideration. Further examination is needed of the relationship between learning difficulties/disabilities and gambling behaviour in adulthood, for which educational attainment may serve as a proxy.

Immigrants

Stakeholder perspectives

Some stakeholders felt that immigrants could be vulnerable to harm. In general, stakeholders were referring to first generation immigrants who had recently come to Great Britain. Some described witnessing increased numbers of Eastern Europeans in gambling establishments and that these groups were increasingly seeking treatment for problems.

Stakeholders felt that the social and economic circumstances of these migrants meant they may have heightened vulnerability to harm. For example, one stakeholder described how some recent immigrants may have poor social networks and/or little social support, be socially isolated, have limited financial resources which may contribute to increased vulnerability from harm. Other stakeholders felt that some migrants may come from cultures where gambling availability was not as widespread as in Great Britain and this may impact on their risk of harm.

Definitions/context

When considering issues about migrants there is a natural overlap with ethnicity and ethnic cultures. In this section, migrant status is taken to mean first-generation migrants who have recently entered Britain. We acknowledge there is an artificial distinction between migrant status and ethnicity.

When reviewing evidence about gambling behaviour among migrants, it is very important to consider contextual issues. Data from other jurisdictions may be less appropriate because of the different national and ethnic profiles of migrants and their circumstances upon entering each host country. Therefore, in this section, evidence from Britain and the EU is given preference over evidence from other jurisdictions.

Evidence

There has been very little examination of migrants' gambling behaviour and no British studies were found in the QSR. Two studies conducted in Norway and Denmark respectively found that immigrant status (measured by birth outside the resident country) was associated with being an at-risk gambler. In Norway, those born in non-western countries had greater odds of being an at-risk gambler than 'ethnic' Norwegians (Lund, 2007). In the Danish study, similar patterns were found, though this study only looked at whether people born within Denmark or elsewhere and thus did not make the distinction between western and non-western immigrants (Lyk-Jensen, 2010).

A study in Spain compared the experiences of immigrants who sought treatment with native Spanish treatment seekers. Whilst this study found there were more similarities than differences between them, the authors argued that immigration from Asia had an incrementally important relationship with pathological gambling (Penelo et al, 2012). A final study compared gambling behaviour between native Germans and immigrants using semi-structured interviews. This revealed that acculturative stress was associated with reasons for gambling among migrants (Jacoby et al, 2013).

A study of the experiences of Asian immigrants in New Zealand highlighted how processes of acculturation (that is the meeting of two cultures) can lead to high levels of stress and 'culture shock' when settling into a new country. In-depth exploration of this and its relationship to gambling behaviour among Asian immigrants suggested that these groups were more vulnerable to harm due to a range of contexts and processes. Asian immigrants described using gambling as a way to relieve stress but also gambling because it was a place where they could be with others from their community.

This linked both to themes of social isolation, where the casino offered a safe place for Asians to be around other Asians and for them to meet. As with other groups, financial insecurity and the hope of winning money were also key motivators to gamble and gamble excessively. Immigrants in this study also described differences in culture towards gambling, with gambling in New Zealand being legal and heavily advertised, something they were not used to (Sobrun-Maharaj et al, 2013). Cultural contexts can affect gambling behaviour (MacMillan, 1996; Okuda et al, 2009) and it is plausible that for some immigrants processes of acculturation heighten vulnerability to gambling-related harm.

Finally, in America, a study found that whilst immigrant status was associated with problem gambling, it varied by generation. Those who were first generation immigrants were less likely to be gamblers or problem gamblers than native born Americans whilst those who were second

or third generation migrants were more likely to be problem gamblers than first generation migrants (Wilson et al, 2015).

Summary

With the exception of the American study, this evidence shows broadly consistent results. The few European studies identified suggest that non-native birth was associated with greater probability of at-risk or problem gambling, though what underpins this observation is unknown. As suggested by stakeholders, it is possible that other ethnic, cultural or resources differences are driving this association. Indeed the authors of the American study concluded that:

> *"inter- and intra-generational dynamics relat[ing] to gender, age of arrival and duration in the United States, and world region from which participants emigrated"* (Wilson et al, 2015) were important factors for further consideration.

These are likely to be important considerations when examining this issue in Great Britain also. Sobrun-Maharaj et al's (2013) study of the experiences of Asian migrants in New Zealand highlighted a range of mechanisms through which migrants may be more vulnerable to harm. However, with all of these studies it is not clear the extent to which findings are transferable to Great Britain. Great Britain has a particularly diverse immigrant population and it is likely that processes and consequences of acculturation vary for different groups.

In summary, there is limited evidence that some immigrants may represent a vulnerable group though, to our knowledge, this has not been explored in a British context. Whilst immigrant status may serve as a proxy for potential vulnerability, it is likely that a range of complex mechanisms and processes underpin this which requires further exploration.

Ethnicity

Stakeholder perspectives

Some stakeholders highlighted that people from certain minority ethnic groups (MEGs) could be more vulnerable to harm. This extended beyond considerations of immigrant status as some stakeholders discussed the cultural preferences of certain ethnic groups for gambling. An industry participant described gambling among some MEGs, in their view, as '*endemic*' and how gambling was strongly related to culture. The most often cited MEG was Chinese. This may be a reflection of the London-centric focus of stakeholders interviewed and, in part, because there is

a currently a high-profile local community campaign against the opening of another bookmaker in London's Chinatown.

However, cultural preferences and predilections were not the only reasons given as to why certain MEGs should be considered vulnerable. Themes relating to the conditions and experiences of people from these communities were also mentioned. This ranged from type of employment, including low pay, shift work, to the types of urban areas in which many MEGs are based, being areas of greater deprivation. Therefore, MEG status was viewed by some as the visible trait of vulnerability but that underlying circumstances were the contributing factors.

Definitions/context

When thinking about ethnicity and vulnerability to harm, there is clear overlap with considerations of migrant status and the two themes should be considered in parallel. When reviewing evidence about the relationship between ethnicity and gambling behaviour, jurisdictional differences and contexts need to be taken into account.

For example, there is an emerging body of research in New Zealand about the gambling experience of Maori populations. Whilst Maori are a MEG in New Zealand, they are an indigenous population group displaced by Caucasian settlers. Their experiences of displacement, domination and discrimination, along with different cultural practices, are likely to vary to MEG groups in Great Britain who have been established through varying historical waves of immigration. Historical reasons for how and why certain groups came to be present in different countries, and their subsequent experiences, could affect comparisons and should be borne in mind when reviewing research evidence.

Evidence

The 2007 and 2010 BGPS and more recent 2012 health surveys have shown a consistent relationship between problem gambling and at-risk gambling and ethnicity. In all studies, problem gambling prevalence rates were higher among those from non-White ethnic backgrounds. Regression models also showed that the odds of being a problem or at-risk gambler were higher among those from Asian/Asian British backgrounds or Black/Black British backgrounds.

Forrest and Wardle (2011) explored gambling participation among South Asian adults and children, using the BGPS data. They noted the presence of the harm paradox in these findings, where both adults and children of Asian backgrounds were far less likely to gamble than their White British counterparts, yet those that did were more likely to experience problems. These relationships were evident even when other socio-economic factors were taken into account, for example income, socio-economic status and deprivation, leading Forrest and Wardle to conclude that being *"Asian appears to be an independent risk factor [for gambling problems] for both adults and children"*. Looking at evidence from the BGPS and health surveys series, similar conclusions can be made about those who are Black/Black British.

These results suggest the presence of other cultural and contextual effects underpinning this relationship. Religion and religious adherence is often cited as a potential explanation, as some religions, like Islam, explicitly forbid gambling. However, analysis of the combined 2012 English and Scottish Health Surveys showed that ethnic status was independently associated with both problem gambling and non-gambling even when religious status was taken into account. This suggests a broader set of processes and mechanisms influence this association.

Similar findings have been reported in the USA and New Zealand. In America, lifetime rates of problem gambling were higher among Native Americans/Asians and Black groups than White, though not significantly higher among Hispanic groups. The authors suggested that alongside socio-economic differences, cultural differences and different belief systems attached to gambling could play a role in understanding this. They also pointed to post-immigration stress and adjustment as an explanatory factor (Alegria et al, 2009). In New Zealand, the harm paradox was evident with Asian and Pacific groups being far less likely to gamble but problem gambling rates being significantly higher than those of European backgrounds. The experience of broader gambling harms[19] was also significantly higher among Pacific groups (Walker et al, 2012; HSC, 2012).

Stakeholders identified Chinese communities as vulnerable to harm. There are no current British-based estimates of the prevalence of gambling problems among Chinese communities. This is because sample sizes from the BGPS and health surveys series are too small to identify those of Chinese origin for analysis, and, our knowledge no bespoke studies have been conducted. The best estimates remain those from a study conducted in 1996 of a representative sample of British casino patrons. This study concluded that problem gambling estimates were three times higher among Chinese casino patrons than those from other ethnic groups. This suggests that even when propensity to engage in casino gambling is taken into

[19] This was measured through two questions about whether the respondent had experienced arguments about the time and/or money spent gambling and whether someone in the household had to go without something that they needed because someone was gambling too much.

account (in this study by sampling casino patrons) those of Chinese origin had elevated rates of problematic gambling (Fisher, 2000).

Further research into casino gambling behaviour among Chinese was conducted in 2006/07. This anthropological study concluded that whilst cultural practice and setting played a part in shaping Chinese gambling behaviour, other important factors were the material setting and structure of people's lives. Seeing gambling as being '*in the blood*' of Chinese people was viewed as dismissing the role of broad structural factors shaping behaviour, including that of corporate practice and the distribution of gambling opportunities (Loussouarn, 2011). Brief mention of these issues is given by Chan (2000) in her review of experiences of Chinese migrant women in Manchester, citing that irregular working hours and shift patterns among restaurant workers meant that gambling in casinos was one of very few forms of leisure/entertainment available to male Chinese workers (Chan, 2000). Here it is not just an ingrained Chinese culture of gambling that shapes participation but also patterns of employment and more limited leisure opportunities.

These themes have been discussed in an expanding body of literature in Australia, investigating the experience of gambling among Chinese groups. A critical review of the literature concluded that despite different methodological approaches, problem gambling rates among Chinese in Australia are higher than those of Caucasians. This review also cited emerging themes from qualitative research relating to migrant status as factors which underpinned Chinese communities' propensity to gamble. These included poor social support and casinos functioning as a place where Chinese could meet and be with other Chinese, stress and financial insecurity, with gambling being seen as a means to escape and differences in access, availability and state promotion of gambling (Loo, Raylu & Oei, 2008; Scull & Woolcock, 2005).

Finally, some studies have emphasised high reticence among Chinese communities to access help for gambling problems. Explanations given relate to different cultural understanding and suspicion of western medicine but also shame and stigma attached to admitting problems (Chan, 2000). Papineau (2005) stated that in the People's Republic of China gambling is viewed as synonymous with greed and individualism. Depending on the extent to which these values are imported into migrant communities, this may affect willingness to admit to gambling problems.

Summary

There is consistent evidence that those from Asian or Black backgrounds are more vulnerable to gambling problems and there is clear evidence of the harm paradox at work in these associations.

Like many other areas, the mechanisms underpinning these associations are little explored and are likely to be varied, ranging from religious adherence, cultural beliefs and practices, the economic structure and material setting of people's lives and jurisdictional differences in the provision of gambling. In this way, ethnic status may be a visible marker of vulnerability which masks a range of other processes.

Although Chinese were singled out for specific attention by stakeholders, there is very little British evidence which considers this. However, earlier findings from studies in the mid 1990's and anthropological insight from Chinese casino patrons, along with supporting evidence from other jurisdictions, like Australia, suggests that Chinese should also be considered a vulnerable group. Indeed, suggestions that those from Chinese groups are less likely to seek help because of culturally-associated fears of stigma and shame suggest that this group may be even more vulnerable to harm than Caucasians. This remains to be investigated.

Homeless people

Stakeholder perspectives

Some stakeholders felt that homeless people may be vulnerable to gambling-related harm. For one stakeholder this related to broader issues of social isolation, whereby they felt people who were potentially vulnerable to harm were those who had few opportunities to make an investment, either financially or socially, and used gambling to fill this gap. Another stakeholder argued that, in their opinion, if a homeless person was going into a gambling establishment then they should not be allowed to gamble because they lacked the resources to do so and thereby had greater risk of harm.

Definitions/context

In Great Britain, there is a legal definition of homelessness which is enshrined in the Housing Act (1996). Under these provisions, a person is legally defined as homeless if:

- they have no accommodation which they are entitled to occupy,
- the accommodation they are entitled to is of such poor quality they cannot reasonably occupy it,
- they have been illegally evicted or,
- they are in accommodation which they have no legal right to occupy.

Therefore, homelessness does not simply refer to being without shelter or sleeping rough, there is a broader range of circumstances under which someone may be homeless (for example, squatters) and people can move in and out of homelessness. In Britain in 2012/2013, it was estimated that there were around 53,000 homeless households[20] and a further 2,700 rough sleepers (DCLG 2015; DCLG 2014).

Evidence

There is a growing body of evidence highlighting a strong relationship between gambling problems and homelessness. A number of studies, despite differences in sampling approaches, ways of measuring gambling problems and cultural contexts, have demonstrated higher rates of problem gambling among homeless population groups. This pattern has been observed among homeless people in Westminster, London; homeless attending substance treatment clinics in Boston, Massachusetts; among homeless people in St Louis, Miss; in homeless shelters in Toronto and finally through comparisons between those visiting health care clinics (for homeless and non-homeless populations) in Albuquerque, New Mexico.

In all of these studies, the rates of problem gambling observed among homeless populations were substantially higher than general population estimates. For example, Sharman et al (2014) estimated that 11% of homeless[21] interviewed in Westminster were problem gamblers, compared with problem gambling prevalence rates of 0.4% among adults living in private households.[22] A further 11% were at-risk of gambling related harm.

With the exception of Heffron et al (1997), these studies have all sampled homeless people from those accessing services and so have been able to provide estimates of problem gambling among these sub-groups but have not explored problem gambling as a predictor of homelessness. Two studies have, however, analysed data from general population samples which included information about those who had and had not experienced homelessness.

The first study analysed administrative data of US veterans and, after controlling for other confounding factors, found that problem gambling status was the second most important predictor of homelessness among this group (Edens et al, 2011). The second study analysed data from a longitudinal survey of adolescents who had self-reported experience of homelessness. This study did not find an association between gambling behaviour and

[20] A homeless household is one which is deemed eligible for assistance from their local authority, is unintentionally homeless or falling within a priority need group.
[21] This study focused on those presenting at shelters for homeless people so represents a conservative definition of homelessness.
[22] This comparison was made using data from the combined Health Surveys 2012 report. See Wardle et al, 2014

experience of homelessness (Shelton et al, 2009). However, the measure of gambling behaviour used in analysis was whether gambling had caused serious or repeated problems with family or friends. This is just one aspect of harmful gambling behaviour and it may be that other harms, like financial difficulties, are associated with homelessness.

Finally, a couple of in-depth qualitative investigations of the relationship between gambling and homelessness have been conducted, mainly in Australia (Rota-barterlink & Lipmann, 2007; Holdsworth et al, 2011). These studies have highlighted two main processes underpinning the relationship between homelessness and gambling.

The first is that gambling contributes to homelessness through a number of complex pathways. These include gambling placing strain on financial resources leading to inability to pay rent/mortgages and putting strain on relationships, with relationship breakdown being associated with homelessness. These pathways also include a range of intersecting structural and individual features such as disadvantage, poverty, social isolation, mental health and substance abuse issues.

The second process is continued gambling among homeless population groups for a range of reasons. Holdsworth et al (2011) argued that housing-related stress increases vulnerability for gambling harm by creating instability, insecurity and the corrosion of health and wellbeing. In their study there was evidence of people using gambling to '*ease the conditions*' of being homeless. This included gambling as a method to relieve the types of stress described above and gambling because it provided hope and escape from the realities of their lives.

There were also practical reasons: the gambling venues gave homeless people somewhere to go. Venues provided warmth, shelter, were a safe place to be and were a place for homeless people to connect with others, a way for them to be part of a community and so to relieve social isolation (Rota-barterlink & Lipmann, 2007; Holdsworth et al, 2011). Griffiths (2014) has noted that similar processes may be evident in England and one stakeholder commented that they had witnessed this first hand, with homeless people being tolerated in certain gambling venues.

Summary

There is a small but growing body of research highlighting the association between homelessness and gambling. The relationship is complex and is likely to work in both directions, with gambling contributing towards the determinants of homelessness and housing instability for some and/or being *"a way of negating some the negative experiences of [homelessness]"* (Holdsworth et al, 2011) for others. Statistical analysis conducted to date sheds little insight on

these processes. Many of the North American studies cited measured lifetime rather than current problem meaning it is not certain from these studies that gambling problems and homelessness were concurrent. However, given the growing body of evidence across space and time demonstrating the strength of the relationship, and in the absence of further information about the processes underpinning this, homeless populations should be viewed as a vulnerable population group.

Constrained economic circumstances

Stakeholder perspectives

Most stakeholders felt that those with more constrained economic circumstances could be considered vulnerable people generally and vulnerable to gambling harm. Those with low incomes and/or those who were unemployed or with unstable employment were seen as potentially vulnerable. This tended to be based on a definition of harm as spending more money than you were able to afford which meant you had to go without other things.

However, the concept of the 'poor' being a group vulnerable to harm was contested among some stakeholders. There was concern that defining 'the poor' as a vulnerable group harked back to a moral agenda by which the *'chattering classes'* tried to control and regulate what working class people should and should not do. Others felt the concentration on the poor was *'offensive'* (L) saying it was akin to the dialogue in the twentieth century when people would say *"oh, the poor, they smoke and drink themselves to death"* (L). Another stakeholder felt that increased vulnerability among lower income groups was related to their increased engagement in gambling generally.[23]

Among these stakeholders it was felt that broader societal and contextual factors should be considered rather than focus on low income alone. It was suggested by one stakeholder that focus should be on those experiencing financial difficulties, rather than low incomes *per se*.

For some, the relationship between economic circumstances and gambling extended beyond a simple relationship between money, resources and gambling. Unemployment, for example, was seen as a stressor which could make problems more likely. In this way, employment circumstances were related to the experience of broader difficulties, as one stakeholder described *"there's lots of literature associating unemployment with psychological difficulty and showing that it's causal"*(A) meaning that those who were unemployed may be more vulnerable for a range of reasons, not just because they had less money to spare.

[23] This assertion can be tested by comparing problem gambling and at-risk rates conditional on being a gambler (Forrest & McHale, 2011).

Definitions/context

Interviews with stakeholders highlighted a range of economic issues for consideration – these included terms like poverty, poor, low income, under-employed. Defining more clearly what is meant by some of these terms is important. For example, when thinking about low income, how low is low? Defining poverty is also complex. This can be considered in both an absolute and relative way. Relative poverty has been defined as where *"resources are so seriously below those commanded by the average individual or family that they are, in effect, excluded from ordinary living patterns, customs and activities"* (Townsend, 1979).

This clearly highlights contextual understandings of poverty whereby the relative threshold is set in comparison to ordinary living patterns and customs of people within a jurisdiction. As one stakeholder noted:

> *"what makes someone vulnerable is not just a person's make-up but what society tells them to be. If a society tells you that you should aspire to be being rich, then it makes you more vulnerable to taking risks towards those goals."* (A)

At a more practical level, searching for evidence about the relationship between income and gambling should take into account a number of key points.

First, in policy circles, it broadly accepted that measures of household income should be the focus of analysis. This means looking at equivalised household income, a measure of income that takes into account the size and composition of the household so that incomes of all households can be compared on equal basis. For example, an individual earning £25,000 a year living alone has relatively different income levels to someone earning the same amount but who also supporting a partner and children. For this reason, focus in the QSR was given to evidence that compared equivalised household incomes.

Second is consideration of what counts as low. In Britain, poverty is typically described as a household income that is below 60% of the median income level (Child Poverty Act, 2010). As an example, if median household income were £25,000 then the poverty threshold would be any household with an income of less than £15,000. Because of this clear policy definition, evidence presented also focuses on this threshold. In British-based studies, household income is typically analysed in quintiles and behaviours among people in the lowest income group compared with those in the highest income group. Looking at the combined health survey data (Wardle et al, 2014), shows that focus on those in the lowest income quintile is a good proxy for those households living in relative poverty. In this dataset, households with income 60% below the median were those with an income of £14,819 or lower. Households in the lowest income quintile were those with an income of less than £13,057 per year.

Finally, stakeholders also spoke about those in financial difficulties. This is independent of income as people at all levels of income can have problems with their finances. It is recognised that the experience of financial difficulties and debt can be a temporary, transient situation, with people employing a range of ways to manage their difficult circumstances. As Barnard et al (2013) state, the term 'debt' itself needs careful articulation and should be considered alongside broader narratives around financial management to understand how financial 'debt' is experienced and managed. There have, however, been very few studies which examine this broader articulation. Therefore, the QSR included evidence relating to the experience of different kinds of indebtedness and gambling behaviour, with indebtedness broadly defined as use of credit, pay day loans, borrowing from family or friends or defaulting on bills.

Evidence

Household income/relative poverty

British-based evidence about the relationship between household income and gambling behaviour is mixed. Generally studies like the BGPS series have shown that those from low income households are less likely to gamble overall. Unlike other groups, where this can largely be attributable to differences in the popularity of the National Lottery, this is not the case with low income households. Those from low income households generally had lower participation rates in in other (non-lottery) forms of gambling than those from higher income households. Exceptions were bingo and scratchcards, where those from low income households were more likely to engage (Wardle et al, 2011).

Evidence about relationship between income and at-risk or problem gambling rates, however, is mixed. The 2007 BGPS showed no significant differences between the lowest and highest income households in term of problem gambling prevalence (0.9% vs 0.4%) though this may be because the study was underpowered to detect differences at this level (Wardle et al, 2007). The BGPS 2010 did show that rates of problem and at-risk gambling were higher among the lowest income households, yet this finding was not replicated in the combined health surveys study even though income was associated with problem gambling in the regression models (Wardle et al, 2011; Wardle et al 2014).

Reed's analysis of the Living Costs and Food Survey (2011) further highlighted the complex relationship between household income and gambling. Analysing data from 2008/2009 he showed that households with the lowest income were less likely to gamble than those with higher incomes. However, those from low income households who did gamble spent a higher proportion of their total income on gambling, showing that when they do engage they engage more heavily than their higher income counterparts. He also analysed the profile of households

with the heaviest engagement in gambling and found that they were roughly equally spread across the income distribution, though they were less likely to come from the lowest income households. He concluded that:

> *"heavy gambling activity is not the exclusive preserve of the rich, but involves a significant number of households on middle and low incomes"* (Reed, 2011).

Financial difficulties and debt

As noted above, financial difficulties and debt are not static and are likely linked and mediated through a range of processes including access to formal and informal sources of credit, financial management, personal control and income. Given the mixed relationship evident between gambling and household income, it is worth considering the broader relationship between financial difficulties and gambling behaviour. Evidence from the BGPS 2010 showed that both at-risk gambling and problem gambling rates were significantly higher among those who had money problems in the past month. In fact, the problem gambling prevalence rate of 6.1% among those with severe money problems was the highest figure seen among all socio-economic characteristics considered (Wardle et al, 2011).

The 2007 APMS survey also highlighted a strong relationship between the experience of debt and problem gambling. Overall, 8% of English adults experienced some form of debt, among problem gamblers it was 38% (Barnard et al, 2013). Two studies have used the APMS results to explore this relationship further.

The first specifically looked at the relationship between gambling, debt and financial management among people with a range of gambling behaviour, who were followed up from the original APMS study (Barnard et al, 2013). This qualitative investigation revealed a complex relationship between financial management and gambling expenditure. Some gamblers displayed controlled approaches to financial management generally but uncontrolled approaches to gambling. Some had chaotic approaches to both whilst others had controlled approaches to both or controlled approaches to gambling expenditure but uncontrolled approaches to broader financial management. This highlighted the non-linear relationship between financial management and gambling behaviours. It also highlighted a group of people who have very good financial management systems and strategies generally, but who have chaotic spending patterns when they gamble. Their uncontrolled gambling behaviour was not due to deficient financial skills but due to their interaction and relationship with gambling itself.

This study also traced pathways into debt among gamblers and highlighted the credit environment as an important factor. Here, easy access to credit facilitated the gambling

behaviour of some and the authors noted examples of where access to expensive credit (via payday lenders) was used almost instantaneously to gamble. Informal credit through friends and family also influenced ability to gamble.

The second study (Meltzer et al, 2012) analysed APMS 2007 data to explore the relationship between debt and common mental disorder. As noted by Meltzer et al (2012), financial stressors such as unemployment, benefit cuts, real term wage decreases and pension cuts are all financial stressors that can be related to common mental disorders and the experience of debt. Findings from this study showed that being in debt and having an addictive disorder, such as problem gambling, were related to the experience of common mental disorders.

This highlights the complex relationship between financial stressors, gambling and other mental health conditions. Focusing on the relationship between depression and debt, Meltzer et al (2012) noted that a dual set of mechanisms are likely to occur: people with debt maybe more likely to experience mental health problems but those with mental health problems may be more likely to experience debt. This study showed that gambling behaviour was also involved in this relationship.

The APMS 2007 survey also included questions about access to credit. To our knowledge, the relationship of this to gambling behaviour has not previously been published.[24] Questions asked whether participants had sold anything to a pawnbroker, taken a loan with a money lender, bought goods on a hire purchase scheme or borrowed from family or friends. Overall, 3% of adults in England had borrowed money from one of these sources. Among problem gamblers rates were over double with 7% having borrowed money. Taking age, sex and ethnicity into account, taking a loan from a money lender or pawning goods was significantly associated with at-risk and problem gambling, the odds of being an at-risk/problem gambler being 2.1 times higher among those who borrowed money from these sources.

This relationship between gambling expenditure and credit was supported by analysis from Brown et al (2011). They analysed the Expenditure and Food Survey and showed that making current credit repayments was associated with a 5 percentage point increase in probability of being a gambler. They also noted that the level of credit repayments made was positively associated with a higher probability of increased gambling expenditure. Their analysis did not show any variations in patterns by household income, meaning the increased probability of gambling among those with credit repayments was evident among lower and higher income households alike. The authors concluded that:

> *"while richer households may be able to better protect themselves against financial uncertainty, those in poorer households are less able to do so. Given the current unease*

[24] The section that follows in based on new analysis conducted for this report, see Appendix A for tables.

amongst policy makers regarding the levels of secured and unsecured debt at the household level, the similar attitude to financial risk-taking in terms of their [low income households'] propensity to gamble for given levels of indebtedness may be a cause for concern" (Brown et al, 2011).

Unemployment

In Reith and Dobbie's (2013) qualitative investigation of change in gambling behaviour over time, they noted that:

> *"employment patterns were more unstable and insecure among those whose behaviour progressed or was non-linear, with periods of unemployment and frequent changes of job common"* (Reith & Dobbie, 2013).

This describes a group of gamblers who either experienced increasing problems with their gambling over time or those whose difficulties fluctuated. Reith and Dobbie also noted that:

> *"employment patterns were more stable among those whose behaviour was consistent or reduced, with fewer periods of unemployment and a tendency towards long-term employment in the same job"* (Reith & Dobbie, 2013).

This means that where gambling behaviours did not change or people experienced fewer difficulties over time, there was a relationship with more stable employment.

Evidence from cross sectional surveys also highlights an association between employment and problem gambling, with those who are unemployed typically having higher rates of at-risk and problem gambling than those who are in paid employment. In the BGPS 2010, 13.6% of people who were unemployed were categorised as at-risk gamblers compared with 7.5% for those in paid employment. A further 3.3% were problem gamblers, compared with 0.9% of those in paid employment (Wardle et al, 2011). Similar patterns were evident in the more recent health surveys series. Whilst this does not look at movement over time, it does highlight that those who are unemployed may be more vulnerable to experiencing difficulties with their gambling.

These studies also showed that those who were unemployed were less likely than those in paid employment to gamble generally (in the combined health surveys report 59% of those who were unemployed and 71% of those who were employed had gambled in the past year). However, this hides a broader pattern by which those who were unemployed were far more likely to take part in certain activities (such as sports betting, playing slot machines, playing machines in a bookmakers and casino table games) and gambled more frequently than their counterparts in paid employment (Wardle et al, 2011).

Therefore, certain activity preferences and frequency of engagement are likely to combine to produce greater risk of problems among unemployed people. In a study of those holding loyalty cards for one of three major bookmakers, unemployed men specifically emerged as a key risk group. As with the other studies, this group had elevated rates of problem gambling and unemployed men had odds of being a problem gambler that were four times higher than those in paid employment (Wardle et al, 2014).

Summary

The evidence relating to household income and gambling harms is mixed, showing that generally those of lower income are less likely to gamble but those that do spend a higher proportion of their income on gambling. This was highlighted as a concern given the (likely) lesser ability of lower income households to protect themselves from financial instability (Brown et al, 2011). However, as stakeholders noted, there is some unease about labelling all low income households as vulnerable as income, gambling, debt and money management are likely to interact to shape outcomes. However, in the absence of more detailed insight about financial management and debt, low income – particularly those defined as being in poverty - may serve as a reasonable proxy for vulnerability.

Focusing on debt and access to credit, there is a small but interesting body of research highlighting the relationship between debt and gambling, with those in debt and those using money lenders and/or pawnbrokers being more likely to be problem or at-risk gamblers. Meltzer et al (2012) highlighted the further complex relationship between debt, addictive behaviours and common mental disorders, showing how financial difficulties can be associated with multiple health conditions. The reciprocal relationship between financial difficulties and health problems was noted but this highlights a potential vulnerability to harm.

Looking specifically at groups who may experience financial problems, the relationship between unemployment and problem gambling has been highlighted in other international studies (see for example Castren et al, 2013). As stakeholders noted, the relationship between unemployment and gambling difficulties is likely to be more complex than these people having limited access to resources. Unemployment is related to the experience of psychological difficulties which may mediate this relationship. More work is needed to build on the insights of Reith and Dobbie (2013) about the relationship of employment instability to gambling careers. However, there is a consistent body of evidence showing that, for whatever reason, those who are unemployed and who gamble are more likely to experience adverse outcomes from their gambling than those in paid employment.

Multiple deprivation

Stakeholder perspectives

Some stakeholders felt those living in deprived areas were potentially more likely to be vulnerable people generally and more vulnerable to gambling-related harm. Among these stakeholders there was a sense that where you lived, your communities, your local culture and access to services mattered. This was interwoven with views about area-based poverty and also pre-existing supply of gambling opportunities. One stakeholder described this as those:

> *"who live in poverty and impoverished areas where there are lots of gambling opportunities and there are areas where gambling shops cluster, with pawn brokers and pubs, and people who live in those areas are most vulnerable."* (A)

Definitions/context

In policy terms, it is recognised that deprivation is multifaceted and is not just about poverty and income. In England, deprivation is measured using the Index of Multiple Deprivation (IMD). The Department of Communities and Local Government is clear, this is a measure of deprivation not affluence (DCLG, 2011). In policy terms deprivation means:

> *"a broad range of issues and refers to unmet needs caused by a lack of resources of all kinds, not just financial"* (DCLG, 2011).

In analysis, the most commonly used tool is IMD. This brings together several different domains of deprivation: income; employment; health; disability; education, skills and training; barriers to housing and services; living environment and crime. These domains can be analysed separately or can be combined together into a single index of deprivation. Similar indices are available for Scotland and Wales, though because of different geographies and ways of calculating deprivation, they cannot be combined across the whole of Great Britain.

In addition to IMD, some types of deprivation can be measured in other ways. For example, in 2004, the Department of Health announced the identification of Spearhead Primary Care Trusts (PCTs). These were the 88 PCTs identified as the most health deprived in England. Health deprivation was measured across five areas:

- male life expectancy at birth,
- female life expectancy at birth,
- cancer mortality rate in under 75s,
- Cardio Vascular Disease mortality rate in under 75s and,

- Index of Multiple Deprivation 2004 (Local Authority Summary), average score.

By identifying Spearhead PCT areas, the aim was to create strategies to help tackle inequalities in health outcomes and behaviours by targeting resources in areas where it was needed most.

Finally, drawing on evidence from public health, there is a broad acceptance that where people live matters to health. In 2010, the Marmot Review[25] stated that:

> *"inequalities in health arise because of inequalities in society – in the conditions in which people are born, grow, live, work, and age"* and that tackling these inequalities was a matter of social justice (DH, 2010).

The RGSB increasingly advocates that a public health approach be taken to understanding gambling behaviour. Following the recommendations of the Marmot Review, this suggests a focus on inequalities in behaviour, the conditions of people's lives (including where they live) and the impact of gambling on wellbeing more broadly.

Evidence

British-based evidence relating to gambling and deprivation has tended to focus on two themes. The first is the relationship between deprivation and gambling behaviour, the second is the distribution of gambling opportunities and deprivation.

Looking at relationships between gambling behaviour and deprivation first, the BGPS, the English and Scottish health surveys and APMS 2007 provide some broadly consistent evidence. The first pattern is that those living in the most deprived areas are either less likely or are just as likely to gamble as those living in the least deprived areas. The most recent survey evidence from the health survey series saw no differences in participation by deprivation once age was taken into account (Wardle, 2013; Wardle & Seabury, 2013). According to Orford et al (2010) this masks a pattern where those in deprived areas who do gamble do so more frequently than gamblers in less deprived areas.

These studies also tended to show significant variations in the prevalence of at-risk or problem gambling by deprivation. In the BGPS 2010, problem gambling prevalence rates were higher among those living in more deprived areas. At-risk gambling rates were also higher among those living the most deprived areas (9%) than those in the least deprived areas (5%) (Wardle et

[25] The report "Fair Society, Health Lives" is known as the Marmot Review. It is the culmination of an independent review chaired by Professor Sir Michael Marmot into evidence-based strategies for reducing health inequalities in England. This review was commissioned by the Department of Health.

al, 2011). This is supported by the APMS 2007 survey whereby problem gambling rates were 1.3% among those in most deprived areas and 0.4% for those in least deprived areas.

This demonstrates that whilst gambling participation by deprivation may be similar, those living in deprived areas who gamble are more likely to experience problems (in the APMS survey, problem gambling rates conditional on being a gambler were 2% for those living in the most deprived areas and 0.6% for those in least deprived areas).[26]

The Scottish Health Survey also showed a strong relationship with deprivation (measured by the Carstairs Index). Those living in the most deprived areas in Scotland were 6.9 times more likely to be a problem gambler than those living in the least deprived areas (Wardle, 2013). Finally, in the Health Survey for England moderate risk/problem gambling rates did not vary by deprivation but was there was a significant association with Spearhead PCT status. Those living in Spearhead PCTs were 1.9 times more likely to be a problem/at-risk gambler than those who did not (Wardle & Seabury, 2013). The authors concluded that:

> *"It appears, on this evidence, that whilst those who live in deprived areas may be no more likely to gamble than others, those who do are at greater risk of experiencing some problems with their behaviour. This has the potential to contribute further to health inequalities already known to exist in these [Spearhead PCT] areas"* (Wardle & Seabury, 2013).

Finally, similar results were found among a survey of people who played machines in bookmakers and held a loyalty card holder for one of three bookmakers (Wardle et al, 2014). This study showed that whilst the number of gambling activities undertaken did not vary by deprivation, those living in more deprived areas had higher rates of problem gambling than those living in less deprived areas (Wardle et al, 2014). This study concluded that even though loyalty card holders come from:

> *"more economically constrained backgrounds than machine players as a whole, there is a distinct social gradient evident within this group. [Loyalty card customers] who have low incomes, live in deprived areas, and are economically inactive gamble on machines more frequently and are more likely to experience gambling problems"* (Wardle et al, 2014).

In Britain, there has been some consideration of the distribution of gambling venues and area characteristics, including deprivation. These studies have focused on the distribution of machines (Wardle et al, 2013) and the distribution of bookmakers (Astbury & Thurstain-Goodwin, 2015). The first study looked at the distribution of all types of gambling machines in

[26] This is based on new analysis conducted for this report, see Appendix A for tables.

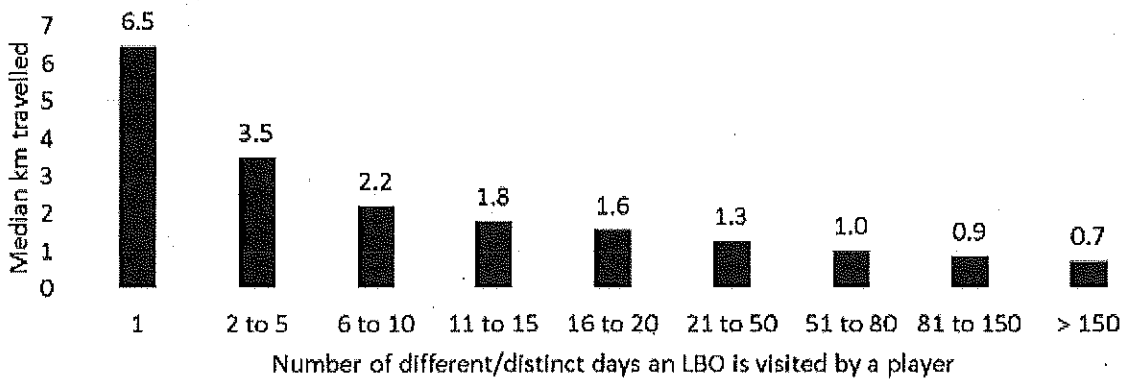
Great Britain and identified areas of high density machines. These high density machine zones had higher deprivation scores than other areas. Likewise similar analysis was conducted looking at the profile of areas where Licensed Bookmakers Offices (LBOs) were located. Analysis also showed that areas with LBOs had higher deprivation scores than areas either with no LBO or in urban areas generally.

These two studies showed the unequal distribution of machines and LBOs in Great Britain, being disproportionately placed in areas of greater deprivation. Furthermore, Astbury & Thurstain-Goodwin (2015) also highlighted how LBOs, typically, serve local markets, with the most regular customers residing locally to the LBO in which they gamble. Using data from loyalty card records, they compared where someone lives with location of the LBOs in which they gambled and concluded that:

> *"an estimated 8% of loyalty card players sampled live within 400m of an LBO where they have played a machine, nationally. 23% live within 1km, and 46% live within 3km, suggesting quite local choices being made and a typical pattern of accessibility to goods and services"* (Astbury & Thurstain-Goodwin, 2015).

Figure 2, reproduced from Astbury & Thurstain-Goodwin (2015), shows that those people who played machines on 80 or more different days between September 2013 and June 2014 had a median distance travelled from their home to the LBO of less than one kilometre. This indicates that more regular users of machines in LBOs are more likely to be local to the area. This study also concluded that machine players were more likely to live in neighbourhoods with significantly higher deprivation levels than either the national average or the average for urban areas.

Figure 2 Median distance travelled to LBO by frequency of visit



However, not all deprived areas had LBOs and both Wardle et al (2013) and Astbury and Thurstain-Goodwin (2015) have highlighted a range of mechanisms likely to be associated with this. For example, areas of greater deprivation are likely to have cheaper rents, some may have greater footfall being on high street locations, and also serve a population more traditionally interested in the products that LBOs offer.

Similar patterns have been identified in other jurisdictions, such as Canada and New Zealand. In Canada, two studies reported a positive relationship between access to video lottery terminals (gambling machines) and areas of increased socio-economic disadvantage (Robitaille & Herjean, 2008; Gilliland & Ross, 2005). In New Zealand, a recent assessment of increases in gambling-related harms during the financial crisis concluded that this increase was disproportionately higher among those in deprived areas (Tu et al, 2014). The authors concluded that poorer financial resilience, combined with financial stressors and an unequal distribution of gambling opportunities, with gambling being more available in deprived areas, were likely explanations for this result.

Summary

Evidence from a range of surveys has shown that those living in more deprived areas, measured either through IMD or other indicators like Spearhead PCT, are more likely to experience problems with their gambling behaviour. This is despite having roughly similar levels of past year gambling participation to those who live in less deprived areas. According to Orford et al (2010), one explanation for this might be that those living in deprived areas who gamble do so more often than others. Looking at the distribution of machines and LBOs, there is clear and consistent evidence of a spatial skew, whereby high density machine zones or areas with LBOs are more deprived than others. Whilst a range of reasons may explain this distribution, the unequal pattern remains.

As with other public health areas there is evidence that, when it comes to gambling-related problems, local areas and communities matter as there are inequalities in outcomes by area deprivation in Britain. This is observed in other jurisdictions and so is consistent across time and space, though the mechanisms underpinning this relationship need further consideration.

Other groups/people

Stakeholder perspectives

There were some groups/people that one or two stakeholders mentioned as being potentially vulnerable to gambling-related harm. These were:

- women,
- older people,
- prisoners/those on probation,
- existing problem gamblers and,
- those with certain psychological or personality traits.

With regard to women, there was disagreement among stakeholders as to whether this group were vulnerable to harm or not. Those arguing in favour did so because they believed women were increasingly accessing gambling in greater numbers. In their minds, this made women today more vulnerable to harm than previously. In this way, their 'vulnerability' was defined as a consequence of the changing role of gambling in society, where women were encouraged to take part in gambling activity. Others, however, did not think that women were more vulnerable than other groups and felt uncomfortable labelling a broad cross section of society as vulnerable.

Stakeholders who mentioned older people drew on similar logic to those for women, arguing that changes in the way that gambling was provided in Britain meant that older people may be more vulnerable to gambling as a function of increased participation. Some also noted that older people are more likely to be on fixed incomes and may have less resilience to financial difficulties.

Some stakeholders argued that prisoners and those on probation could be especially vulnerable to gambling harm. It was argued that this was because of the gambling culture that exists within prisons which may last beyond custodial sentences and impact on those on probation.

One stakeholder (and one of the peer reviewers) felt that those who are existing problem gamblers could also be considered vulnerable to harm. This was because some people could currently be experiencing acute harms because of their ongoing problems and/or could be vulnerable to experiencing harm at a future point because of the dynamic way gambling problems can fluctuate over time.

Finally, one groups of stakeholders (industry) thought that those with certain personality types could be vulnerable. This was viewed as just one aspect of vulnerability, alongside cultural explanations, factors relating to resources and those relating to life event and transitions.

A key theme cutting across the articulation of women, older people and prisoners as vulnerable was that of social isolation. When asked to describe what they thought made these groups vulnerable, stakeholders described a range of socially isolated individuals. This included the single mother looking for a distraction from the pressures of family life, or engaging in online gambling as a way to connect with others; older people who were lonely or had experienced bereavement, and those on probation who may experience difficulties reintegrating into society, with gambling offering a way to be with others. In this way, it was not necessarily the characteristic of the group (women, older people, prisoners) who were perceived as vulnerable but rather their life experiences, events and transitions that contributed towards vulnerability.

Definitions/context

With regards to women and older people, there was a view that these groups were gambling more and therefore more likely to be vulnerable to harm. With regards to women, this followed the concept of the 'feminisation' of gambling put forward by the Australian Productivity Commission (APA, 1999). This posits that more women gambling means more women experiencing problems. It sees a fairly linear relationship between gambling participation and the experience of harm. It does not consider the broader range of context and mechanisms that could mediate this relationship. Stakeholders articulated similar views with respect to older people.

Some stakeholders described those on probation or prisoners as vulnerable to harm. Probation can mean two different circumstances, either those with a commuted custodial sentence or those released from a custodial sentence. Stakeholders were thinking about the latter.

With regards to problem gamblers, it is increasingly recognised that behaviours can be very variable over time and that stasis is not the norm (Reith & Dobbie, 2013). Problem gamblers who seek treatment often 'relapse' and can move in and out of problem gambling experience. This dynamic movement in behaviour and fluidity of gambling patterns needs to be recognised as problem gamblers are not necessarily a clearly identifiable or stable group. This point is often missed. Broad stability in overall problem gambling prevalence rates (Wardle et al, 2014) can mask movement in and out of problems over time among different people.

Finally, there has been great deal of research that focuses on the links of certain personality traits with gambling behaviour. This tends to either focus on the relationship between the individual and the activity during the gambling experience or on the personality traits of problem gamblers. Because of the wide body of research undertaken in this area, this report focuses on summarising findings from previous reviews and meta-analysis.

Evidence

Women

Internationally, there is limited evidence supporting 'feminisation' of gambling. Studies in Sweden and the USA have found little support that either more women are now gambling than previously and that more women are now experiencing problems (Svensson et al, 2011; Volberg, 2003). Detailed analysis of this in Britain (using the BGPS series) concluded that there are some changes in gambling behaviour but outcomes differ for different age cohorts of women (Wardle, 2015). Among older women, aged 55 and over, there was a clear pattern of increasing gambling engagement. However, there was no evidence of them experiencing greater problems than previously.

Among younger women, aged 16-24, there was also evidence of increased engagement in gambling. Specifically, those aged 16-21 started to gamble at a much younger age than older age cohorts and there was some evidence of increasing problems. It was speculated that those aged 16-21, as the generation growing up in the aftermath of the Gambling Act 2005 and who were 'digital natives', may be more influenced by these changes than earlier cohorts of the same age (Wardle, 2015).

Commensurate with the views of some stakeholders, other evidence has highlighted that some groups of women do indeed use internet gambling to escape from problems and to connect with others and this could be problematic for some (Corney & Davis, 2010).

Older people

There is limited evidence about the gambling experiences of older people in Britain. The BGPS series has consistently shown that older people (aged 65 and over) have lower gambling participation rates and tend to take part in fewer activities than their younger counterparts, though they do gamble more regularly on the activities they engage with (Wardle et al, 2011). Rates of at-risk and problem gambling are lower among this age group also. Evidence among women, showed that those aged 55 and over had the greatest increases in gambling participation between 1999 and 2010 though there was no commensurate increase in gambling problems (Wardle, 2015).

Internationally, there is a small but emerging evidence base about the gambling experiences of older adults. A recent systematic review documented the inconsistencies in the evidence base relating to older adults experiences of gambling, though typically showed that rates of gambling among older people were lower than younger people (Tse et al, 2012). This overview highlighted both negative and positive consequences of gambling in older age. For example,

some studies showed the older adults gambled because of a desire to be with other people. The authors suggested:

> *"that gambling may offer a form of natural social support for older adults and that social isolation or loneliness may make older adults vulnerable to higher levels of participation in gambling"* (Tse et al, 2012).

The authors also highlighted:

> *"that most of the studies on older adults' gambling mainly examine adverse health consequences of gambling and associated risk factors. This skewed view may be limited in its ability to suggest meaningful protective factors within the context of productive aging"* (Tse et al, 2012).

In short, there is a need to better explore the why older people gamble, under what circumstances and how and why behaviours and outcomes vary for different groups of people.

Prisoners/probation

With regard to prisoners there is a small but growing body of international evidence showing that rates of problem gambling among incarcerated populations are significantly higher than those of other adults. Exploratory evidence from pilot studies in England showed that 10% of male prisoners and 6% of female prisoners reported being problem gamblers prior to incarceration. A further 37% of male and 23% of female prisoners were identified as at-risk gamblers prior to their prison sentence. These rates are significantly higher than those observed for adults in the general population (May-Chahal et al, 2012). International studies have reported similar findings, a prevalence survey of prisoners in Hamburg found that 7% of pre-trial detainees screened positively for gambling problems (Zurhold et al, 2014). In New Zealand, 16% of recently sentenced inmates were identified as probable pathological gamblers in the six months prior to imprisonment (Abbott et al, 2005) whereas in Canada, 27% of offenders in one institution reported some degree of problem with gambling (Turner et al, 2008).

These studies have tended to focus on the prevalence of problem gambling prior to imprisonment, rather than problems experienced whilst in prison. One Canadian study specifically looked at this, showing that half of those who had problems with gambling prior to incarceration continued to gamble and experience problems whilst in prison (Turner et al, 2013). As McEvoy and Spirgen (2012) note, there is lack of research on prisoners' experience of gambling whilst incarcerated, how this is organised, and the risks associated with it.

Their exploratory study of inmates in Ohio demonstrated that gambling was a normative way of prison life, with many engaging and continuing to engage in gambling. This highlights a dual relationship between incarcerated populations and gambling. Problem gambling rates are elevated among those who subsequently go to prison, but gambling is also an endemic part of prison life that may encourage some problem gamblers to continue to engage or promote gambling among those who previously did not gamble.

One stakeholder felt that those on parole or probation could be especially vulnerable because of these dual processes. This was because they may have had problems previously and not received help, or because of the gambling culture within prisons created problems. Once out of prison, it was argued that this group may be socially excluded and stigmatised, have low incomes and look to gambling to relieve such stressors.

There is very little empirical evidence examining this. May-Chahal et al (2012) cite a study by Ricketts et al (2000) showing that of offenders on probation in South Yorkshire, 4.2% were problem gamblers. This was the only citation identified in the QSR looking at the experiences of gambling among those on probation. However, as early as 1988, this was identified as an issue with Bisset and Crate-Lionel (1988) reporting their efforts at Glen Parva (England) Youth Correctional Facility to engage parole officers in issues relating to problem gambling among youth.

Problem gamblers/those seeking treatment

With regard to problem gamblers, our literature search focused on the experiences of those receiving treatment. It was taken as given that those currently experiencing problems would also be experiencing harm and therefore should be considered vulnerable. To extend this, we sought to examine the extent to which those who were seeking help for gambling problems could also be considered a vulnerable group.

A few international studies have examined the experiences of those in treatment and their outcomes post-treatment. These studies looked at experiences of 'recovery' and 'relapse' either during or after treatment. No studies were identified that looked at these issues among those receiving treatment in Britain.

Before considering what the evidence says, it is worth noting that there are various perspectives about what 'recovery' from problem gambling and 'relapse' means (Ledgerwood & Petry, 2006). Nower and Blaszczynski (2008) specifically recognised this complexity and argued that the concept of recovery was imprecise. They argued that recovery should be viewed as any kind of movement along a spectrum of improvement.

This highlights that recovery from problem gambling is not, in the views of some, synonymous with abstinence from gambling. Approaches to treatment vary from total abstinence to allowing the gambler to re-engage in a controlled way. Processes of 'natural recovery' have also been noted, whereby the gambler is able to change and moderate their own behaviour without need for outside assistance. Whilst there is some literature on the success (or otherwise) of treatment, what is largely missing from the studies identified is clear articulation of intended treatment outcomes, making synthesis of this evidence base difficult (Ledgerwood & Petry, 2006). Furthermore, concepts of 'relapse' have been borrowed from substance use literature and it is not clear that 'relapse' has the same meaning in the context of gambling treatment. However, in the absence of a broader evidence base, the literature on gambling treatment and 'relapse' has been reviewed.

This small body of evidence shows high rates of 'relapse' among those receiving treatment. Few studies have attempted to quantify rates of 'relapse' and most are based on small samples making estimation potentially unreliable. A common theme, however, is that despite differences in the definition of 'relapse' and study methodologies, most participants experienced some form of 'relapse' after treatment (Oaks et al, 2012). In one study, the 'relapse' rate was as high as 92% (Hodgins & el-Guebaly, 2004). Ledgerwood & Petry (2006) have noted the lack of empirical base upon which to assess rates of 'relapse' but also highlighted parallels with alcohol and drug treatment and argued that the evidence available to date is consistent with broader knowledge from these areas.

A few studies have examined reasons for 'relapse' among problem gamblers and have highlighted the *"complex interplay between factors integral to predicting a relapse event"* (Smith et al, 2015) or stated that:

> *"relapse is a complex, non-linear process involving factors that together can increase a gambler's vulnerability to relapse"* (Oaks et al, 2012).

Reasons given for 'relapse' ranged from a variety of individual, personal and environmental features which interacted with each other. The urge to gamble has been highlighted as particularly important by a few studies, with the urge being triggered either internally (for example, through depression or mood variance) or externally (for example, as a response to gambling-related cues) (Smith et al, 2015).

Oaks et al (2012) conducted qualitative interviews with problem gamblers to examine their reasons for 'relapse'. Along with negative states and emotions, financial difficulties and boredom, environmental triggers such as gambling accessibility and visual gambling cues (ranging from advertising to the venues themselves) were highlighted as factors which push people towards 'relapse'. This is supported by work from Hodgins and el-Guebaly (2004) who

argued that social and situational cues in the environment were part of the explanation for 'relapse' (alongside others). Smith et al (2015) and Oei & Gordon (2008) discussed the relevance of gambling urges as an explanatory factor in 'relapse', with gambling urges being associated with both relapse and continuation of gambling. Finally, a longitudinal study of gambling behaviour among men, where data was collected and compared over 10 years, found that the strongest predictor of past year gambling problems was a history of past gambling problems, demonstrating the potentially recurring nature of gambling problems for some (Scherrer et al, 2007).

Personality traits/cognitive distortions

A few studies have examined the strength of evidence between certain personality traits and problem gambling. First, Johansson et al (2009) conducted a critical literature review looking at the factors associated with problematic gambling, including cognitive distortions. In this review risk factors with three or more empirically validated studies were deemed to be well established. Cognitive distortions, which included erroneous perceptions of gambling and illusion of control, were classified as well established risk factors for problem gambling. Odlaug & Chamberlain (2014), in a selective literature review of personality dimensions and problem gambling, noted that personality traits, such as impulsivity, were associated with gambling problems. However, in relation to impulsivity they also stated:

> *"our understanding of the association between impulsivity and the development and maintenance of GD [gambling disorder]... is further complicated by research involving self-reported impulsivity, gender, environmental factors (such as socioeconomic status), and age of onset of gambling problems"* (Odlaug & Chamberlain, 2014).

In a broader review, Odlaug et al (2013) highlighted evidence showing that impulsivity is a key personality trait of pathological gamblers but also stated this could be mediated through a variety of other factors. They also noted that pathological gamblers experience a range of other personality disorders. Different types of impulsivity were considered by MacLaren et al (2011) in a meta-analysis. These were negative urgency (rash and emotionally motivated action); low premeditation (action without consideration of consequences); low perseverance (quick extinction of non-rewarded behaviour) and excitement seeking (action that results in sensory stimulation or arousal). They concluded that negative urgency and low premeditation were elevated among problem gamblers but that low perseverance and excitement seeking were not.

Summary

In summary, there is little evidence that women as a whole represent a group vulnerable to the experience of gambling-related harm, though there is some emerging evidence that the younger females may be experiencing gambling differently to older cohorts. There is some plausible evidence that certain groups of women may be using some forms of gambling to relieve stress and make social connections, the broader impact of this should be monitored.

Evidence about older people is mixed, though theories about social isolation and the intersection with life events are plausible. However, some researchers note that gambling could be a social benefit to some older people. If so, the circumstances under which this holds true need investigating. Finally, there is some evidence that prison populations are vulnerable to gambling problems, both pre-dating incarceration and whilst imprisoned. There is a single British study suggesting that those on probation continue to be vulnerable to gambling problems, and reasoning given by stakeholders as to why this is seems plausible.

With regards to problem gamblers, it seems self-evident that those who are currently experiencing problems will be vulnerable to harm. Indeed all stakeholders felt that problem gamblers would be experiencing harm to some degree, whether they recognise this or not. Literature relating to a further group of problem gamblers, those in treatment or post treatment, was also considered. Although the evidence base is slim and fraught with definition difficulties, findings suggest a high degree of 'relapse' post-treatment with reasons for relapse including environmental cues alongside other individual and personal explanations. This is consistent with knowledge from alcohol and drug studies where the evidence base is more advanced.

Finally, there is a strong body of evidence highlighting the relationship between various personality traits, such as cognitive distortions or impulsivity, with problem gambling. However, little research has been conducted to explore the complex interaction of personality traits with other factors and their combined influence on the experience of broader gambling harms. Certain personality traits and/or cognitive distortions are just one potential aspect of vulnerability which is likely to intersect and be mediated by a range of other factors.

4 Key themes

Policy context

- In Great Britain, there is a changing gambling policy and regulatory environment which has increased focus on risk. This new focus has been written into the Gambling Commission's updated Licensing Conditions and Codes of Practice and is highlighted in their advice to Local Authorities, stressing the need to build local area profiles into their Statements of Licensing Policy.
- Understanding local risk, local profiles and local circumstances and, based on this knowledge, taking appropriate steps to mitigate risk, are key components of this approach to regulation.
- Policy is also becoming more focused on understanding and mitigating gambling-related harm, rather than focusing on problem gambling alone. Other jurisdictions are taking similar approaches, though the research world has been slow to adopt this broader focus.
- Under the terms of the Gambling Act 2005, children and vulnerable people were singled out for special regulatory attention. Academics have supported focus on understanding the impact of gambling upon vulnerable groups. However, who is vulnerable, why and under what circumstances, has been subject to little investigation.

This study

- Through consultation interviews with key stakeholders and review of research literature, this study aimed to explore and document the range of characteristics that suggest that someone may be vulnerable to harm from gambling.
- Given increasing policy emphasis on risk, harm and vulnerability, this study also sought to understand how different stakeholders define these terms, particularly in relation to the development of local risk profiles, and to briefly consider issues relating to standards of evidence.

What is harm?

- Among stakeholders, there was a broad consensus that gambling-related harm meant adverse consequences arising from someone's gambling engagement that could affect the individual, their family, friends, broader social network or community.

- It was felt that these consequences could be short-lived or exist over a broader time frame. A person did not have to gamble themselves to be harmed by gambling. Harms could range in severity, for example ranging from arguments with partners to relationship breakdown.
- Most stakeholders argued that people did not have to be problem gamblers to experience harm, though stakeholders felt that most problem gamblers would experience some kind of harm.
- Harm was typically felt to arise when someone spent too much time or too much money gambling.
- Stakeholders also argued that the experience of gambling-related harm is subjective, as the range and depth of harmful consequences depends on the personal circumstances of the individual and those around them. This makes predicting who will experience harm challenging. As such, taking a probabilistic approach, thinking about who is **more likely** to experience harm given what we know about them, was recommended.

Who is vulnerable to gambling-related harm?

- Some stakeholders felt that anyone could be vulnerable to gambling-related harm and that vulnerability was also subjective as it depended on a range other circumstances.
- With the growing focus on risk assessment, it was recognised by stakeholders that identifying which groups might be considered more vulnerable or more susceptible was useful.
- Stakeholders identified youth, students, those with mental health problems, substance use/misuse issues, learning difficulties, certain ethnic groups, migrants, the homeless, those with constrained economic circumstances or living in deprived areas, prisoners, older people, those with certain personality traits and women as potentially vulnerable to harm. Problem gamblers were considered vulnerable as they were already experiencing harm.
- There is good evidence to support youth, those with substance abuse/misuse/excessive alcohol consumption, poorer mental health, those living in deprived areas, from certain ethnic groups, those with low IQs, those with certain personality traits and those who are unemployed as being potentially more vulnerable to harm.
- The evidence base was skewed towards comparisons of gambling, and problem gambling, prevalence rates by these characteristics and there was very little insight explaining the resulting associations. This likely masks some important and reciprocal relationships. For example, looking at mental health and gambling harm, it was uncertain whether gambling caused mental health problems or mental health problems

caused gambling harm. In reality, the relationship is likely to be much more fluid. As one stakeholder argued, it's likely to be a bit of both and insofar as that is true, then these groups should be considered potentially vulnerable.

- There is a smaller but emerging evidence base suggesting that homeless people, those experiencing financial difficulties and debt, and some youth with learning difficulties/disabilities may be also be vulnerable groups.
- There is some evidence to suggest that problem gamblers seeking treatment or who are attempting to overcome their problems are vulnerable to harm, for example through relapse. There is a small evidence base suggesting that a range of reasons contribute to relapse, including personal, social and environmental factors. This is consistent with evidence from similar areas, like alcohol or drug problems.
- Patterns of evidence relating to students, low educational attainment and low income were inconsistent, though the latter may serve as a proxy for financial difficulties which cannot be so easily identified at a local level. Evidence relating to migrants was sparse, though the rationale for viewing this group as vulnerable was plausible.

Important considerations

- When thinking about who may be vulnerable to gambling harm, a probabilistic approach needs to be taken. The personal circumstances of each individual are not known. Therefore, broader generalisations have to be made. The groups listed above do not mean that everyone with those characteristics ***will*** experience harm rather that based on these characteristics there is an increased risk that they ***may*** experience harm. This is the central tenet of a risk-based approach to policy and regulation.
- Who is vulnerable and why is likely to vary based on broader political, social and economic changes. For example, students may become more vulnerable now than in the past because of changes to their financial circumstances. This needs to be considered and reviewed.
- There are likely to be a number of cross cutting themes which help explain why some groups are vulnerable to harm. Social isolation was one theme that emerged from stakeholder interviews and applied to many of the groups mentioned (prisoners, homeless, older people, certain groups of women).
- We should not think about groups of vulnerable people as silos. There are likely to be multiple and complex risk factors for harm. For example, youths who are doing badly at school, have learning difficulties, who live in more deprived areas or in households with relative poverty may be more at risk of gambling harms because of the existence of

these multiple risk factors. This has been little explored in gambling research. A growing focus on multiple risk factors would mirror a similar focus in other public health areas.

- If thinking is to focus on risk and therefore which groups are potentially more vulnerable, there is a need to consider what 'more' means and who is being compared. In some cases, vulnerability is defined in contrast to other groups (older vs younger; more vs less deprived). However, vulnerability can also be defined in comparison to previous behaviour (i.e., are women more vulnerable now than previously?). Both methods of comparison are valid, with the latter helping to identify where broader shifts and changes may be occurring.

Limitations

- This review is constrained by existing evidence. A solid evidential base looking at broader gambling-related harms has yet to be developed. Therefore, evidence from the scoping reviews relies on studies looking at problem and at-risk gambling. This is not the same as gambling-related harm and therefore some groups or themes may have been missed.
- Because of the evidential focus on problem and at-risk gambling, this review is skewed towards looking at the characteristics of individuals who may experience harm, rather than the families and friends of those who may also be affected. As the evidence base relating to harm develops, the findings in this report should be reviewed, as should the groups identified as vulnerable to harm, though this study brings together the key themes for the first time in a single report that is accessible by all.
- This study used a quick scoping review methodology. There may be other evidence that was not identified in our quick scoping searches. This report is intended to highlight and map the range of studies on each area and to identify some broad themes; it does not claim to be comprehensive, though we are confident we have considered most relevant British-based studies.

Next steps

- The next steps for this project are to take the main findings from this report and to identify relevant local level data relating to the characteristics of potentially vulnerable people identified. Using this data, we will then explore visualising places where the potential for gambling-related harm is greater based on the profile of the local area.

- Specifically, this means taking those characteristics shown to have strong evidential support and/or strong logical inference and exploring what kinds of data exist to show whether these types of people are present in a local area or not.
- Once data has been reviewed, we will then explore how to model this data at low level geographies. The resulting model will be based on those characteristics with an evidence base to support inclusion **and** which have good quality local data.
- Because of the focus on research evidence on gambling problems, we recognise that our models are likely to show those vulnerable to problems rather than harms in the broader sense. However, since this is the first time this has been attempted in Great Britain, we consider this to be a useful and valid starting point, though we would recommend that the models are revisited if and when more evidence becomes available.
- This next phase of our research is due to be published in summer 2015. This work will highlight the technical and practical challenges of producing local area risk profiles and discuss other relevant issues when thinking about local risks to gambling-related harm.

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Appendix A: New analysis for this report – tables

Table A1 Prevalence of past year gambling and problem gambling, by mental health and substance use

Source: Adult Psychiatric Morbidity Survey 2007

Condition	Past year gambling prevalence	Problem gambling prevalence	Odds ratio (OR) of being a problem gambler*	Confidence interval for OR (lower)	Confidence interval for OR (lower)
	%	%	OR		
All adults	66	0.7			
Mixed anxiety and depressive disorder	65	1.5	2.6	1.0	2.0
General anxiety disorder	61	2.8	5.5	2.1	14.5
Depressive episodes	61	1.8	2.6	0.8	8.9
Phobias	56	4.4	8.2	2.5	27.6
Obsessive Compulsive Disorder	58	3.5	5.3	1.3	22.0
Panic disorder	71	3.7	6.0	1.4	25.1
Eating disorder	68	1.9	4.7	1.7	12.8
Probable psychosis	43	6.0	8.0	1.1	61.5
Attention Deficit Hyperactivity Disorder:					
Score 0 to 1	66	0.4	1		
Score 2 to 3	65	0.9	2.3	1.0	5.5
Score 4 or more	67	2.2	5.0	2.0	12.4
Post-Traumatic Stress Disorder	66	3.1	4.6	1.4	14.7
Current cigarette smoker	71	1.2	0.6	0.3	1.3
Alcohol consumption:					
Non-hazardous alcohol consumption	64	0.5	1		
Hazardous but not dependent	74	1.3	1.9	0.7	5.5
Alcohol dependent	76	2.2	3.2	1.3	7.8
Drug dependent	70	3.8	4.4	1.6	12.1

*The regression models run included each condition separately with age, sex, income and deprivation also entered into the models as controls.

Table A2	Prevalence of problem and at-risk gambling, by sources of credit and debt
	Source: Adult Psychiatric Morbidity Survey 2007

Sources of credit and debt	Non-problem gambling %	At-risk gambling %	Problem gambling %
All adults	96.8	2.5	0.7
Borrowed from money lender or pawn broker	93.5	5.0	1.5
Borrowed money from friends Borrowed money from family	91.6	5.2	3.2
Borrowed money from any source	92.7	5.6	1.7
In debt	93.4	5.0	1.6

Table A3	Odds ratio of problem gambling by borrowing from money lender or pawn broker
	Source: Adult Psychiatric Morbidity Survey 2007

	Odds ratio*	Confidence interval (lower)	Confidence interval (upper)
Did not borrow money	1		
Borrowed from money lender and/or pawn broker	2.2	1.1	4.6

*Regression models included age, sex and income as controls

Table A4	Problem and at-risk gambling among those aged 18-21 by student status
	Source: British Gambling Prevalence Survey 2010

	Aged 16-24 and in full time education %	Aged 16-24 and not in full time education %	All aged 16-24 %
Problem gambler according to the DSM-IV or the PGSI	0.6	3.3	1.9
At-risk gambler according to the PGSI	20.6	19.9	20.3

*Regression models included age, sex and income as controls

Appendix B: Quick scoping review procedures

A number of quick scoping reviews were undertaken for this report. These included searches for literature relating to:

- Gambling and harm
- Gambling and vulnerable people/adults
- Gambling and young people/adults/youth/adolescents
- Gambling and students
- Gambling and deprivation
- Gambling and income
- Gambling and unemployment
- Gambling and mental health
- Gambling and alcohol/drugs/substance use
- Gambling and migrants/immigrant
- Gambling and learning disabilities/difficulties/IQ
- Gambling and ethnicity/Asian British/Chinese
- Gambling and homeless

A quick scoping review aims to broadly map the available literature on a topic but is produced under constrained circumstances. Given time and resource constraints, the following restrictions apply to the search strategy used for this project:

1) A limited number of databases were searched: these were PubMed, Google Scholar and the University of Glasgow's Advance Serial Solution search database.
2) The searches were limited to look for evidence where the terms appeared in the title or abstract of the article only.
3) A limited number of search iterations using related terms were made.

Therefore, it is acknowledged that the evidence reviews presented here may not be comprehensive and may have missed some literature. In order to make the number of articles reviewed more manageable, an order of preference was applied to the resultant searches:

a) Those that were based on evidence generated from the UK were all reviewed
b) Those that were recent systematic reviews (i.e. from 2005 onwards) of literature were reviewed
c) Those that were empirical evidence from other Western countries were shortlisted and the abstract reviewed to assess potential contribution.

With regards to C, those studies which presented empirical evidence (either quantitative or qualitative) using sound and appropriate methods (i.e., random probability sampling with good base sizes) were shortlisted for further review. A number of studies were rejected because they used purposive sampling methods or had sample sizes too small for meaningful statistical inference (for a discussion of the importance of this, see Disley et al, 2011). Some qualitative studies were rejected because they reported findings numerically rather than thematically.

In some cases, there was a breadth of literature available (such as gambling and youth) and therefore the evidence presented in this report discusses results from a and b only. In others, such as the literature around gambling and homeless people, evidence from all three shortlisting strategies is presented. This was to attempt to make the process more manageable within the time available for this project (approximately 10 weeks). We acknowledge this means there may be some gaps in this review.

Appendix C: Consultation interviews

Consultation interviews were conducted with the following stakeholder groups:

- Academics
- Industry
- Treatment providers
- Policy makers
- Legal professionals

Two formats of interviews were used, either one to one semi-structured interviews or semi-structured workshops. For both, the same content was covered (see Appendix D for the example topic guide). All interviews/workshops were conducted between March 2015 and May 2015.

For both interviews and workshops, the procedure was the same – the purpose and background of the project was explained along with the format of the session. It was explained that all interviews were confidential and results would not be reported in a way that could identify individuals. Permission was asked to record each session and once permission was granted the interview began. One to one interviews lasted between 30 minutes to 1 hour on average, whereas workshops lasted between 1 hour to 1 hour and 45 mins.

The table below shows the number of participants within each stakeholder group by format type.

Stakeholder group	One to One interviews	Workshops
Academic	4	
Policy	4	
Industry		3 (14 participants)
Treatment		2 (10 participants)
Legal	6	

Interviews were not transcribed but notes and quotes from interviews entered directly into the data management system. Data management was undertaken using Framework (Ritchie & Lewis, 2003), a systematic approach to qualitative data management that was developed by NatCen Social Research and is widely used in social policy research. Framework is a matrix

approach where data is summarised into cells with the row representing an individual case and a column representing a common theme across the data set. The advantage of this approach is that it facilitates the analysis of different aspects of an individual's views as well as enabling analysis of particular themes across different cases. It is this thematic analysis which is presented in this report.

Appendix D: Topic guide

Topic guide for Gambling Vulnerability Index consultation

17.03.2015

Introduction

Introduce myself and purpose of the study:

- Looking at the evidence base about the relationship between gambling-related harm and vulnerable population groups
- Aims to look at areas where more vulnerable people may be and to display them visually - this is regardless of whether gambling venues currently exist in those areas.
- But recognise there is a need for more clarity around who and what we mean
- Therefore consulting key stakeholders to understand more about what they think gambling-related harm means, for whom and under what circumstances. Also gain insight into who stakeholders think might be vulnerable to harm and what they are basing this opinion on.
- Seeking to explore differences between stakeholder groups to look for points of agreement and points of disagreement.

Practicalities:

- Consent to participate
- Assurance of confidentiality
- Consent to record
- Should take about 20-30 mins

Gambling related-harm

- Ask what the term gambling-related harm means to the stakeholder? *Probe: What else?*
- How does this differ from problem gambling?
- Do these differences matter? In what way?
- What different types of harms arise from gambling?
- *Probe: Why do you think that?*
- Who do these different harms effect?
- How might 'harms' vary from person to person?
- Over what time frame might harm be experienced?
- What are they basing these thoughts on? What evidence?

Vulnerable people

- What does the term 'vulnerable people' mean to the stakeholder? What types of groups do they think about?

Think in a generic sense first

- Who might be vulnerable to gambling-harm? Which groups specifically?
- *Probe: Why?*
- Is this different to groups who are vulnerable to gambling problems?
- Which groups do you think are **most** vulnerable to harm?
- *Probe: Why is that? What evidence is this based on?*
- How do you think the characteristics of who is vulnerable have changed over the last 10 years?
- How would you identify vulnerability and what measures might you use to protect people?

Evidence and legislation

- When it comes to licensing/policy decisions, what counts as evidence?
- In what ways is evidence used?
- Is there a hierarchy of evidence? Is this right?
- If there is a conflict between the aim to permit and protection of vulnerable people, which takes precedence? Which should take precedence and why? Under what circumstances?

Anything else?

- Anything else they would like to add on this topic?

End

- Thanks for participation
- Reassure about confidentiality

Supported by:

Local Government Association

MANCHESTER CITY COUNCIL

City of Westminster

7.0 SOCIAL RESPONSIBILITY

We have policies and procedures designed to ensure that we comply with all regulatory requirements stipulated by the Gambling Act 2005. The Act gives it's objectives as:

Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime (Crime Free)

Ensuring that gambling is conducted in a fair and open way (Fair and Open)

Protecting children and other vulnerable persons from being harmed or exploited by gambling (Protecting Children and the Vulnerable)

Procedures in place include

- Providing regular compliance training to all employees and ensuring additional support is available via the Compliance Department and the Gambling Commission Manual.
- Ensuring our marketing materials meet all required compliance standards and easily accessible information regarding the terms and conditions of a bet is available to our customers.
- Ensuring relevant information regarding customer complaints and responsible gambling is available in our LBO's, via our websites, customer services department to customers and their relatives and friends who approach us asking for support
- Providing a facility for individuals to self exclude themselves from identified licensed betting offices, telephone and internet accounts.
- Providing a customer Self-Exclusion Renewal Helpline
- Think 21 – ID Verification procedures introduced to minimise the risk of underage gambling.
- Providing a telephone helpline number for employees with gambling problems
- Conducting periodic reviews to ensure compliance with our policy.
- Daily reporting process enabling ongoing monitoring of compliance incidents in each and every LBO

Details of all compliance procedures can be found in the Gambling Commission Manual

7.1 Think 21

Details of all procedures and processes relating to the Think 21 policy can be found in the Gambling Commission Manual – Protecting Children and Vulnerable Persons section
It is illegal for anyone under the age of 18 to enter an LBO. It is also an offence to accept a bet from someone under 18 or to pay any winnings to them.

The Think21 policy reduces the risk of underage gambling taking place

Every young individual entering the premises must be asked for ID that confirms they are at least 18 years old. Once approached, the individual must provide an acceptable proof of photographic ID (UK or International Passport Book; full or provisional UK only Driving Licence; Pass Hologram Logo Cards). Full details on ID verification processes can be found in the GC Manual.

Accurate details of all instances involving ID verification must be recorded using the Daily Totals Report to be completed at the end of the day, processed via EPoS. Incidents where a customer actually gambles or attempts to gamble and, when challenged, they have no acceptable ID must be supplemented with an Incident Report form (Category A) to be processed at the earliest opportunity. Forms should then be stored in the red Gambling Commission Compliance File for future reference.

Customers who enter our LBO's accompanied by anyone under 18, including young children, must also be asked to leave the premises – **it is strictly forbidden to serve them.** Customers who are repeat offenders must be considered for permanent refusal of access to the shop (please speak to the DOM beforehand). In such circumstances, so as not to cause offence, the customer should be approached in a discreet and tactful manner.

7.2 Refund of Stakes

We have a legal obligation to refund the stakes of those found to have gambled when under 18. Before we refund stakes we need proof that the individual is under 18. Contact your DOM or the Compliance team for advice and ensure you are fully aware of the procedures as outlined in the GC Manual.

If someone claims to be under 18 but is unable to provide ID and asks for their stakes to be refunded, request their name and address and refer them to Customer Relations

If a parent, relative or other reliable adult informs you that they believe a person under 18 years of age has been placing bets/playing on machines then **you should take the adult's name and contact details.** You must then call your DOM so that further investigations can be made.

Please consult the GC Manual for guidance on refund of stakes in shop (DOM authorisation is always required)

7.3 Persons Wearing School Uniform

It is not appropriate for persons wearing items of school uniform to enter our Licensed Betting Offices. Any such persons must be asked to leave immediately, even if they offer to prove they are aged 18 or over.

7.4 Responsible Gambling Interactions

Responsible Gambling refers to 'protecting vulnerable persons from being harmed or exploited by gambling'. Vulnerability refers to the inability or limited ability of people to control their actions. We would like our customers to be comfortable and in control of their gambling. If the shop teams suspect that gambling affects customers negatively or should signs of potential vulnerability be identified, reasonable steps should be taken to ensure the customers are aware of the support available to them. Every time a team member interacts with a customer, having concerns about them gambling in the shop whilst displaying potential signs of vulnerability, a record is kept in the form of a Responsible Gambling Interaction reported via an Incident Report Form.

Examples of Responsible Gambling Interaction prompts can be found on p. 28 - 29, in the GC Manual.

If you have doubts about whether or not it is appropriate for you to interact or if you would like the benefit of another opinion, contact your District Operations Manager or the Compliance Team for advice

Another vulnerable group of people that you may need to deal with are those who are clearly under the influence of drink or drugs or customers with mental health issues.

Do not accept a bet or allow anyone to play on the Gaming Machines if they are very obviously under the influence of drink or drugs.

If you believe someone may have mental health problems or a learning disability, you may want to take advice on how to handle the situation. A Duty Manager may wish to speak to their DOM or the Compliance team who will be happy to help. It is a very difficult area and there is not going to be one right answer for all circumstances.

Whilst we do not want people to bet if they do not know what they are doing, we have to be careful not to discriminate against individuals who, whilst they may have a disability, are perfectly capable of making sensible decisions about their gambling behaviour.

7.5 Self-Exclusion

All employees must be familiar with the self-exclusion process and be able to handle any customer enquiries. The self-exclusion process is outlined in the Customer Self-Exclusion & Interaction pack. All relevant details of the process can also be found in the GC Manual.

All employees, including those working in a shop on a relief basis must familiarise themselves with the shop's self-excluded customers and remind themselves daily as necessary

Additional copies of the self-exclusion form or Gamcare literature can be ordered from **Stores**.

7.6 Licensing Objectives

Any incidents which might affect one or more of the 3 Licensing Objectives and are not reported under any other category should be reported by completing an Incident Report Form

Examples of reportable incidents are as follows:

- suspected drug dealing / drug misuse takes place and police were not called
- unauthorised gambling (card playing, etc)
- unofficial organised money lending
- gang activity
- any other disorderly / criminal behaviour not reported under any other category
- any other incidents which you consider relevant and affecting the Licensing Objectives:

- preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime (Crime Free)

-ensuring that gambling is conducted in a fair and open way (Fair and Open)

- protecting children and other vulnerable persons from being harmed or exploited by gambling (Protecting Children and the Vulnerable)

7.7 Data Protection

All personal data should be handled with the utmost care. Personal data includes, for example:

- Names
- Addresses
- Telephone numbers
- Dates of birth
- Betting history
- Photos

Keep customer data (images of customers' available on ALBOS screens, self-exclusion forms, and monitored customers logs) secure and never give access to any third parties. Do not discuss a customer's betting with anyone outside the company except with the express consent of the customer or because you have been advised to by Security or Compliance. Should the police make enquiries regarding a customer's business - refer them to the MLRO (Money Laundering Reporting Officer).

If in doubt, contact your DOM or the Compliance Team for advice.

7.8 Slander

Employees must ensure that they do not involve the Company or themselves in litigation over slanderous remarks.

A slanderous remark is a negative comment about a person's character. For instance, if an employee tells a customer, in the hearing of others, that he/she has underpaid them for a bet and they are a thief. The customer may be able to sue the Company and/or the employee for damages for slander

To be slanderous, a remark must be made in the hearing of a third party. Therefore conversations of a delicate nature should be conducted in private

The most dangerous allegations to make are those that imply the person accused is guilty of a serious criminal offence, such as theft or forgery.

Actions may also be considered slanderous, even if no words are spoken, if they imply discreditable conduct. In one case legal action was brought by a customer who claimed he was escorted out of the shop by a security employee.

7.9 Equality Act 2010

The Equality Act 2010 legally protects disabled people from discrimination. We mustn't treat disabled people less favorably and we have a duty to make reasonable adjustments in order to allow them access to our facilities. This could mean modifying physical features of the premises or introducing equipment which would allow the person the same access as anyone else.

Should you become aware of a customer who might require additional arrangements as a result of their disability or should a member of the public bring it to your attention, it must not be ignored. It should be raised as a matter of Importance with your DOM.

For advice, please contact your DOM or the Compliance Team.

7.10 Expolink (Whistleblowing Hotline)

Expolink (0800 37410 99) is an anonymous confidential and free telephone service enabling you to raise your concerns about theft, fraud and other malpractice in the workplace which you might not feel comfortable in raising with your Line Manager.

Expolink are a completely independent company. Your conversation will not be recorded. You can choose to remain completely anonymous, with only details concerning your report being passed back to your employer.

LA24

Linked Training 2015

Licensing Objectives

- **Keeping crime and disorder out.**
- **Fair and open play.**
- **Protection of children and the vulnerable.**

Remember - everything we call 'Compliance' falls under one of these objectives and we need to think about how we can reduce risks to the 3 objectives in everything we do.

You may have had a visit from the Gambling Commission to your shop. They are entitled to visit and ask questions and we must be co-operative. If however, they are asking questions about a particular customer (fair and open objective), we have to balance that against our data protection obligations to our customers.

If in doubt and whenever anyone from outside William Hill asks you to provide details about one of your customers, phone your DOM, AOM, Security or Compliance for advice.

Age verification

- We need to Think 21 and ask for ID where necessary before a youth gambles – either at the counter or at a machine.
- Challenge on entry is the gold standard we need to reach. When the local authorities, police or Gambling Commission send in real underage testers, they don't usually loiter waiting to be spotted. If they get to a machine and gamble we have failed – whether or not we ask them for ID if they come to the counter.
- Remember, you can disable machines from behind the counter if you need to.
- When a young customer can't produce ID think about whether you are reporting it correctly. Had they attempted to gamble? Was it a Cat A or a Cat B?
- Do you understand rules around return of stakes? We are legally obliged to return the stakes of anyone under the age of 18 who has gambled with us. You need authority to do this in shop and, generally, these cases are handled by Customer Relations and line management.

Anti-Money Laundering and the Proceeds of Crime Act (PoCA)

- Do you have clear understanding of the difference between money laundering and the use of proceeds of crime?
- Can you list potential indicators of money laundering and the use of proceeds of crime?

Do you understand how fraud alerts on machines work?
Getting to know our customers is good customer service. It is also very important in the context of anti-money laundering, the potential use of proceeds of crime and responsible gambling. The more we know about our customers the better.

Over the last year we have been approached by the Gambling Commission about several customers who, as it turned out, were betting with us using the proceeds of crime. We were able to show what our processes were and that we followed them.

We are not suggesting that you go out and question all your large staking customers about where they get their money from and how they afford their gambling but you can learn all sorts of things which may be important.

We want to make sure that any suspicions we have regarding money laundering and the use of proceeds of crime are reported to the authorities. If you have suspicion you must inform your AOM. Your DOM, your AOM and your Machine Manager may all ask you what you know about certain large staking customers. As well as the excellent work you do in shop, there are certain central reports being run which identify non-standard patterns and highlight the need for investigation.

Self-exclusion

Self-exclusion is a tool we offer to help people control their gambling. It is not a guarantee that we can control it for them but we have to do all we reasonably can to make sure we prevent our excluded customers from gambling.

We must:

- Explain how exclusion works to customers.
- Know how to complete an exclusion form.
- Understand the importance of the customer providing a good quality colour photo.
- Know that the exclusion period is 12 months.
- Know that you have to get your AOMs permission before you accept an exclusion without a photo or add more than 6 additional premises.
- Realise that the form has been accepted once you and the customer have signed it.
- Remember to scan new exclusions and additional premises forms through your till and send the right copies to you DOM and to Compliance.
- Understand how the 6 month review period works.
- Know that the 24 hour cooling off period comes when a customer wants to return to gambling – not before they can exclude.
- Have proper arrangements for the circulation of colour copies of photos and forms.
- Check the yellow box at the start of every shift so you know who your excludees are.
- Understand that self-exclusion forms include sensitive personal data about your customer and keep them safe and secure.

A lot of high staking problem gamblers will be using their debit cards

- **Look at the names on debit cards in case they match one of you self-excludees – particularly if they are depositing relatively large amounts.**

If we are doing all these things we are genuinely trying to get exclusions to be effective. Breaches will occur but always occur but many will be breaches where we identify and stop people gambling.

Customers who self exclude can opt to give up their LINKED accounts:

- They can surrender their card. Enter the card number on the self-exclusion form, log it with Helpdesk and destroy the card.
- If they dont use a card, note their mobile/email they used to validate the account on the self-exclusion form and inform the Helpdesk.

Responsible Gambling and Interactions

There is still a very large amount of negative publicity around problem gambling, particularly relating to machines.

Overall, as we have said before, the rates of problem gambling have not been increased by gaming machines in betting shops.

At the end of 2014 the results of some extensive research in to gaming machine use was published. The research used data from the big bookmakers, it was commissioned by the Responsible Gambling Trust and carried out by NatCen.

As we already knew, the research showed that we do have people who have gambling problems playing our machines. The various reports are well over a 100 pages long, so we can't go into detail here but some of the interesting points are:

- GM problems are most apparent in young males, ethnic groups, deprived areas and people who live by themselves
- Problem gambling is not just about high stake levels
- People with gambling issues tend to gamble on a variety of products – gaming machines being just one of them
- Customers coming in to play machines first thing in the morning or until last thing at night may be more likely than other customers to have gambling problems
- 'Markers of harm' (what we would refer to as our interaction triggers) are not the same for all customers.

There will be much more academic research to come on all matters relating problem gambling – and not just on machines!

An interaction must be as specific to a customer as it can be. If a customer knows that lots of people in a shop get asked if they are OK with their gambling, and he is asked the same question, it is easy to brush off as not being relevant to him. However, if the interaction specifies reasons particular to the customer (I've seen you go and get more money from the cashpoint/your card was refused on your 4th deposit/you did talk about saving for your holiday before you staked £x – or whatever) they are much more likely to take no board what is being said.

In any event, it is very obvious that we do have customers playing on our machines who are either not in control of their levels of gambling or who are at risk of losing control. We need to focus our efforts on helping these people.

What is it that we have to do?
Let's be very clear, we are not counsellors. Our job is to provide information about tools available to control gambling and where to get help.

The number of responsible gambling interactions we carry out has increased dramatically over the last few years. That in itself is proof of William Hill's desire to do the right thing and make sure that all its customers have the information they need to make informed decisions about their gambling behaviour.

Those who specialise in how the minds of people with gambling issues work would identify some of the following signs in making a diagnosis:

- The individual is preoccupied with gambling – they obsess about it.
- They need to gamble more and more to get the 'high' they want.
- They make repeated unsuccessful attempts to control their behaviour.
- They may be trying to use gambling to escape other aspects of their lives.
- They are likely to chase their losses rather than accepting them.
- They are likely to lie and may even commit criminal offences to fund their habit.
- They jeopardise their relationships with family and friends to continue gambling.

We should accept that there is an extreme of gambling behaviour that can only be resolved by the individual when they decide to take responsibility for their actions by getting specialist counselling and self-excluding from places from which they are tempted to gamble.

At the other end of the spectrum are those customers who may not have developed a severe problem like the one we have just talked about but who may in some danger of doing so. Many of our responsible gambling interactions are going to be about making sure that we are providing those 'at risk' individuals with advice on how to gamble only with money they can afford to lose and with time they don't need to devote elsewhere. We are prompting them to consider their gambling more carefully. This is where machine limits rather than self-exclusion can help some people.

Machine limits are there to be used by people who want another tool to help control their behaviour. We know they are unlikely to help people who do not consider themselves to have an issue or who are at the extreme end of the spectrum.

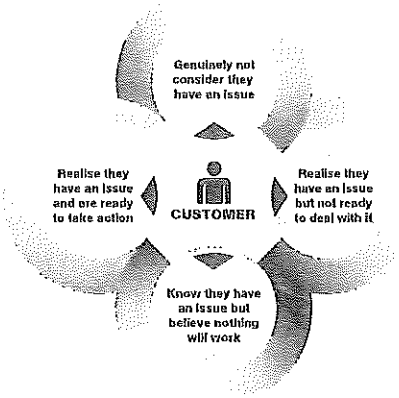
Responsible Gambling Interaction Basics

- We are not trained counsellors - and we can't ever be
- Our job is to use our experience to recognise potential signs of gambling issues and to prompt a conversation which, ideally, will inform the customer of the options available to them
- We do not make decisions on behalf of the customer. Like any addiction, the decision to address an issue has to come from the individual
- We absolutely do not have a legal 'duty of care' to problem gamblers. Don't use that phrase. The requirement on us is to provide information about what the customer can do. We can't be responsible for or solving their problem

For very obvious reasons it is impossible to have one definition what a good interaction is. Good is going to depend on the particular circumstances, the state of mind of the customer and how tuned in to this the team member is.

The customer who you see as displaying signs of a potential gambling issue may:

- Genuinely not consider they have an issue.
- Realise that their gambling is an issue but not be ready to deal with it.
- Realise that their gambling is an issue and be ready to take steps to deal with it.
- Know very well that they have an issue but believing that nothing works for them in addressing it.
- .... and all stages in between.



How they react to what you say is going to depend on them isn't it?

Remember that your task is only to provide information about steps they can take. You can't promise to solve their problem for them, counsel them or assume you know what is best for them.

Remember, you should think about:

- How you will communicate effectively with the customer.
- How you can do so discreetly.
- Whether it is safe for you. Do not risk your own safety or that of others in the shop.
- Whether it is the right moment to interact.

Messages that you might consider getting over:

- Are you OK. Because I'm concerned about (whatever it was that has caused you concern)
- I want to make sure you are happy with your gambling pattern (refer to their losses/time/using several cards etc.)
- If you did decide that you needed help do you know about the options available to you?
- Responsible gambling leaflet - National Gambling Helpline (GamCare), Gambleaware website information.
- Loss/time limits on machine.
- Self-exclusion.
- You can talk to a member of the shop team at any time if you want us to go through your options with you.
- It may be best for you to stop for today and go and think about it (it is the customer's choice to make though).

Whether you get to discuss all these things is going to depend on how receptive the customer is, or is not, to your approach. You may be able to be more direct and forceful about the options available with customers who admit they have a problem. But, try not to hammer away at those who are just not ready to hear it!

A series of gentle nudges, perhaps over several days, is more likely to get them thinking and realising they need to take action.

Some of these conversations are straight forward and some are anything but. Remember you can ask your DOM or Compliance for advice at any time. Do not ignore a situation when you can ask for advice on how to handle it.

The only exception to the rule that we don't make decisions on behalf of the customer is if they threaten self-harm or even suicide. In that case, phone the police immediately, contact your DOM and prevent the customer from gambling further.

If someone has taken the difficult decision to self-exclude then complete and process the exclusion for them. Then is not the time to suggest they might want to try our new machine limits instead!

Potential Interaction Triggers

Remember that a customer with a gambling issue will not always appear distressed. Many of them will be calm and, on the surface, appear to be in control.

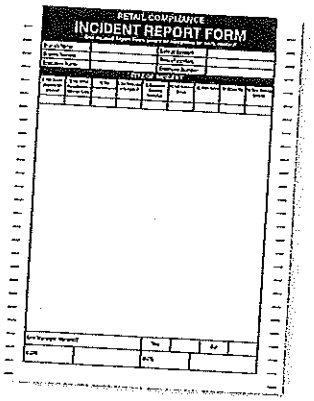
We need to think about other indicators too.

Not all of these will necessarily indicate a gambling problem but you need to consider them in the context of everything else you know about the customer.

- Increasing stakes.
- Chasing losses.
- Repeated loading on machines.
- Using several different payment methods.
- Those you have recently returned from self-exclusion.
- Those who have asked about help before.
- Those who comment on adverse affects on their life e.g. spent all the rent money etc.
- Displaying agitation or aggressive behaviour.
- Wanting to gamble on more than one machine at a time.
- Gambling for prolonged periods without a break.
- Strangers who enter your shop and stake unusually large amounts on machines.
- Customers you know to be excluded elsewhere.
- Customers who don't believe the machines are random yet insist on continuing to play on them.
- Customers who are regularly there first thing in the morning and last thing at night playing on machines.
- Customers who ask you for help.
- Clearly intoxicated individuals (refuse service and ask them to leave).
- Remember that those with certain forms of disability do not necessarily lack to the capacity to make sensible decisions about their gambling. Do ask for advice from your DOM or Compliance if you have any doubt about whether a customer is capable of making informed decisions about their gambling. We want to protect the vulnerable but we don't want to discriminate against people who may be 'different' but can still decide for themselves what to do.

What about the interaction triggers that we need consider when the machine limits are set?

- Those who ignore the voluntary limits they have set.
  How do you think you might want to approach those customers?
- Those who you know have set limits before - perhaps ask them if they found it useful.



How to complete a RGI IRF

Every incident report form you complete gets read by the Compliance team and the information it contains is recorded in a central database. We don't want you to write a novel when you complete an IRF but we do need enough information to understand what happened. Visitors to your shop from the Gambling Commission may read your RGI reports too. They need to be clear and informative.

It is important that you include:

- Who the customer is – name if known/regular?/stranger?/logged?
- Any relevant history with the customer?
- What it was that triggered you to interact?
- What you said and what the customer's reaction was. (Remember, the sort of conversation you can have is going to be affected by whether or not the customer thinks they have an issue and whether they are ready to deal with it).
- Whether there is follow up action required (e.g. speaking to the customer again next time they visit etc.)

You don't have to have persuaded someone to self-exclude for it to have been a well conducted interaction!

DCMS requirements around £50 stake

As we've established, William Hill was already taking its regulatory responsibilities very seriously indeed. The ABB Code last year introduced time and spend limits on machines as a tool for customers to control their gambling.

However, the DCMS is keen for the industry to do more work around potential problem gambling with those who want to stake at more than £50 on machines.

The idea is that anyone who want to stake at our above this level will need to have an 'account' (so we can track their spend patterns and establish interaction triggers from those) or load over the counter so that the shop teams can talk to them about their gambling levels as necessary.

Not every £50+ stake authorisation will automatically lead to a Responsible Gambling Interaction, however in cases when the customer behaviour raises concern concider having a more in depth conversation and then then record it.

Don't ignore customers who already have LINKED accounts. Consider interacting when they start showing signs of potential gambling issues.

Summary

- Regulatory compliance is not optional – we have to get it right.
- From a moral point of view, social responsibility needs to be at the heart of what we do. We do not want the profits we make to come from problem gamblers who can't afford to lose their money.
- **WE DO NOT WANT OUR PROFITS TO COME FROM THOSE WHO HAVE A GAMBLING PROBLEM.**
- DCMS have brought in requirements around £50+ stakes because of fears about machines and problem gambling.
- The 'account'/OTC loading choice gives us more opportunities to ensure that our customers are aware of where they can get help and the tools they can use to control their gambling.
- It is better to prompt people to control their gambling before they develop a serious issue. We want to speak to 'at risk' customers so they do not become pathological gamblers.
- Not all people who do have an issue will be ready to accept that they do.
- There isn't one 'right' interaction for all situations.
- Our responsibility is to explain the options available – we are not counsellors and we don't take decisions on the customer's behalf.
- Getting to know your customer is important from a regulatory perspective as well as a compliance one.
- Please follow the procedures you have been trained to follow and, if any doubt, ask.

WITNESS STATEMENT

CJ Act 1967, s.9; MC Act 1980, ss.5A(3)(a) and 5B; Criminal Procedure Rules 2005, Rule 27.1

Statement of **Iain ARMSTRONG 1451CW** ..... URN: | | | | |

Age if under 18 **Over 18**..... (if over 18 insert 'over 18') Occupation: **Police Constable 219469**.....

This statement (consisting of: .... **5**..... pages each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated anything in it which I know to be false, or do not believe to be true.

Signature: .....1451CW..... Date: .....

Tick if witness evidence is visually recorded ☐ *(supply witness details on rear)*

On Thursday 29th October 2015 I was on duty and in plain cloths. I was asked by Kerry Simpkin of Westminster City Council (WCC) licensing to view CCTV footage that was recorded between 22/07/2015 and 15/08/2015 by CCTV camera number 140 which is located at the Junction of Great Western Road W9 and Harrow Road W9. This CCTV was tasked to observe William Hill Bookmakers between 1400 hrs and 1600 hrs and again between 1900 hrs and 2100 hrs each day.

Several incidents of note had been identified by WCC officers and these were then recorded to a viewable format for me to view.

1) Wednesday 22/07/2015 at 15:28:49 - Two (2) males can be seen outside William Hill and they appear to be talking to a member of staff from the venue. Male 1 IC3 male wearing a light blue jacket appears to be drinking from a bottle, this is suspected to be an alcoholic beverage as when a female member of staff approaches the male moves his hands behind his back which in my opinion is a deliberate act in order to conceal the bottle. Male 2 IC3 male wearing a dark blue t-shirt appears to be holding a can and is drinking from this, it is a light coloured can and it can not be determined what the contents are. The IC1 female member of staff hovers near to the two males and speaks to them. She appears to be smoking. Male 2 then enters William Hill after disposing of the can and is followed by the Female member of staff.

2) Wednesday 22/07/2015 at 19:13:50 - Group of seven (7) Males are gathered outside the venue a Male wearing a white t-shirt then walks towards the entrance he appears to take a drink from a vessel and then bends down placing the vessel carefully on the floor to the left of the entrance. In my opinion this is likely to be alcohol and because it is not allowed in the venue he has placed it there in order to come back to it.

3) Wednesday 22/07/2015 at 17:27:52 - Eight (8) Males gathered outside the front of William Hill. Four males are gathered outside the door to flats above the shop. This is blocking access to the location.

4) Wednesday 22/07/2015 at 19:52:34 - Male and a female outside William Hill Female is holding a large bottle in her hand which she takes several drinks from this appears to be wrapped in a bag. In my opinion this is alcohol

Signature: .....1451CW..... Signature witnessed by: .....

and the bottle is concealed for this reason. This is a common way to avoid Police noticing that it is alcohol. Male in a white shirt is also drinking from a smaller bottle and moves towards the door and before entering again carefully places the bottle on the floor to the left of the door.

5) Thursday 23/07/2015 at 14:02:50 Elderly IC3 male stood to the right of the door he is wearing a cap. He takes a small bottle from a pocket and furtively takes several sips from the bottle. It appears that the bottle is also in a paper bag, in order to conceal the identity of the contents. He is continually looking around in order to make sure no one is watching him. He then enters William Hill.

6) Thursday 23/07/2015 14:41:00 - Group of males gathered to the right of the shop entrance they are also talking to at least one (1) member of William Hill staff, who appears to be smoking. There are Two (2) Males stood to the left of the shop in the entrance way to the flats above and they are blocking this entrance.

7) Friday 24/07/2015 14:44:00 - Three (3) males stood in the doorway of the entrance to the flats above William hill. It is raining and they appear to be gathering under an awning. An elderly female approaches with a trolley, two (2) more males approach and gather around all the males attention are focused downwards towards the trolley as if looking at what is in the trolley. The female takes an orange plastic bag from the trolley and hands three objects from this bag to three of the males. It is not clear but the female is handed small items as her hand goes out. This is likely to be money. The items handed to the males are unknown however it is possible they are stolen items from local shops that she is selling. The female then leaves the group walking towards Great Western Road. Later at 15:02:00 three men are stood in the entrance to the flat and they are all drinking from cans, a trolley can be seen in front of a male with a black jacket on. A male in a green jacket appears and speaks to the group. An object is then passed to this male and the male in green hands something small back in return. The Male in green then enters William hill. Prior to the male entering William hill the male in black routes through the trolley showing several items to the group and placing them back. It appears that he has other items to sell. These may be stolen from local shops.

8) Saturday 26/07/2015 14:20:15 - Two (2) Males outside William hill are in conversation at the end the taller male has something small and light coloured in his palm as he shakes hands with the other Male they don't have any eye contact and are looking elsewhere they quickly part company. The smaller male then enters William Hill. In my opinion this was a drugs deal which they were trying to conceal and did not have eye contact as they were checking that they were not being watched. Had this been witnessed at the time by Police officers there is ample evidence to stop and search both of these males for drugs.

9) Sunday 26/07/2015 14:49:00 to 15:49;35 Male in a Green jacket and blue jeans is seen to enter and exit William Hill a total of eleven (11) times. Whilst outside the shop he approaches many people male and female and holds them in short conversations. He can be seen with his hands out towards the people. In my opinion this the male is begging for money. By approaching people and walking with them I would class this as aggressive begging and if I were to witness this he would be arrested.

Signature: ..... Signature witnessed by: .....

Continuation of Statement of **Iain ARMSTRONG 1451CW** .....

10) Monday 27/07/2015 14:00:00 - Group of nine (9) males stood outside the shop around the entrance to the shop. This is preventing easy access to the shop.

11) Tuesday 28/07/2015 14:36:18 - Male in a beige jacket and baseball cap is talking to a female with a black top she is on a mobile phone. The male stretch's out is hand towards her and passes her something small she quickly places this in her pocket. She then finishes the call and passes the phone to the male. She then takes a purse out of her bag and hands him one bank note (Unknown amount). This could be a drugs deal due to the quickness that she has pocketed the item. The item is very small and she passes a bank note and receives no change. A hit of crack or a small amount of cannabis can cost as little as £10. If I had witnessed this I would certainly approach them and speak to them and ask them to account for their actions. Depending on their answers there would undoubtedly be grounds to search.

12 Tuesday 28/07/2015 14:59:00 - Six (6) males outside the premises, that appear to be blocking the entrance to the shop.

13) Tuesday 28/07/2015 15:25:55 to 15:39:22 Male in a dark coloured Gillett exits William Hill and a Male in a light coloured t-shirt arrives on a bike an exchange takes place and the male on the bike places something small in his back pocket. The male in the dark Gillett then joins two Males near to the flats entrance they are in conversation. Male in the Gillett then takes something from his pocket and 'Palms' it to one of the males by shaking his hand. This male then walks away. The male in the Gillett then joins the male on the bike. They talk and several small items (Possibly cash) are exchanged.

Drug dealers are known to use 'Runners' usually on bikes to deliver to order drugs. This is so they have only a small amount of drugs on them at anyone time and the stash is kept nearby in a hidden place.

14) Thursday 30/07/2015 at 14:03:30 - Male in a dark jacket approaches a male leaning against the window of William Hill. The male in the dark jacket takes something small from the inside pocket and hands this to the other male. The male then hands what appears to be a bank note to the male in the jacket who then leaves no change is given. It is my opinion that this was a drugs deal due to the amount of money and the size of the item paid for. There are grounds to search on what I saw.

15) Friday 31/07/2015 at 14:10:05 - Male in a black t-shirt exits William hill. He has a can in his hand that appears to be open. The length of the can appears to be larger than the average soft drinks can such as coke. He then takes a drink and places it in the bin.

16) Monday 03/08/2015 19:52:30 to 20:53:00 - Male in a beige top hands, what appears to be a white phone to the male with an open bottle, they have an animated conversation and male in beige puts phone back in the bag. Male with bottle enters William Hills. Later Male in beige is seen in conversation with a male with suite cases. The male with suite cases appears to be examining a white phone whilst talking to the male in beige. The male in beige points and gestures to the phone. It would appear to me that they male in beige is trying to sell what looks like a smart phone to people. This could be stolen as thefts of mobile smart phones are numerous in Westminster.

Signature: ..... Signature witnessed by: .....

17) Tuesday 04/08/2015 20:28:30 - Male in blue shirt exits off licence next door to William hill and is drinking from a bottle. He lingers outside William Hill drinking and then places the bottle carefully to the left of the door and enters William Hill. The bottle appears to be brown in colour with a light label that could be a Budweiser bottle.

18) Wednesday 05/08/2015 19:54:53 - Male in a checked shirt exits William Hill and hovers outside the front. A male in a purple hoody then crosses the road towards him and they shake hands they linger in that position. The male in the checked shirt then un-zips a shoulder bag and places his hand inside. The male in the purple hoody moves about 1-2 metres away whilst the male in the checked shirt does this, he then returns and he is passed something by the male in the checked shirt. The male in the purple hoody then walks away. This in my opinion could have been a drugs deal and they would have been stopped and searched on the evidence of what I saw.

19) Friday 07/08/2015 15:23:49 to 15:57:37 - Male with a walking stick approaches William hill and places a vessel on the floor to the left of the window carefully, he then enters William hill. He then retrieves the vessel that appears to be contained in a bag. He then places it back and re-enters William Hill. He then exits a short time latter and picks the vessel up again. He unwraps the contents and takes a drink from it. He does not remove a cap so in my opinion this is a can. The fact that it is wrapped in a can makes me believe that this is a can that contains alcohol.

He then places it back on the floor and enters William Hill again. He then exits again and retrieves the vessel and takes a drink. He then wraps it up and then places it back on the floor and enters William Hill.

He exits again and retrieves the vessel and takes another drink he then places the vessel in his pocket and lights a cigarette and smokes it. Once finished he then re-enters William Hill.

20) Friday 07/08/2015 19:09:09 to 19:24:35 - Two (2) males and two (2) females exit William Hill one male, in a flat cap, then hands out what appears to be white plastic cups. He then fills the cups up after he has shielded himself from view from the shop. The male in the flat cap is known to me and he is part of a group of regular drinkers that gather on the market place. The fact that he has separate cups makes me suspect that the drinks were alcoholic and not soft drinks.

21) Saturday 08/08/2015 14:39:25 - Male in black and orange t-shirt exits William Hill and from his pocket takes out a can. He straight away takes a drink from this and does not need to open it. He then places the can in his inside pocket.

22) Tuesday 11/08/2015 20:42:30 - Male in beige shorts exits William Hill and takes a can from his pocket. He then opens it and takes a drink. The length of the can appears to be longer than a normal soft drinks can and therefore I believe that this can contained Alcohol. He then stands and drinks from this in the doorway to the flats.

23) Wednesday 12/08/2015 19:10:00 - Group of eight (8) gathered outside William Hills and a female staff member exits the shops and briefly speaks to this group before moving to outside Sam Chicken for to smoke.

24) Thursday 13/08/2015 15:25:25 - Premises was attended by LAS and a male was taken from William Hill on a

Continuation of Statement of **Iain ARMSTRONG 1451CW** .....

stretcher, it is unknown what the medical need of the patient was.

25) 14/08/2015 20:47:13 - Two (2) males exit William Hill with bottles in their hands one disposes of his in the bin.

26) Saturday 15/08/2015 15:59:00 - Eight people outside the premises some appear to be smoking.

PC 1451CW.

Signature: PC 1451CW Signature witnessed by: .....

Witness contact details

Home address: .....

..... Postcode: .....

Home telephone number ..... Work telephone number .....

Mobile/pager number ..... Email address: .....

Preferred means of contact: .....

Male / ~~Female~~ (delete as applicable) Date and place of birth: .....

Former name: ..... Ethnicity Code (16+1): ..... Religion/belief: .....

Dates of witness non-availability .....

.....

Witness care

a) Is the witness willing and likely to attend court? **Yes**. If 'No', include reason(s) on **MG6.**

b) What can be done to ensure attendance?

c) Does the witness require a Special Measures Assessment as a vulnerable or intimidated witness? **No**. If 'Yes' submit **MG2** with file.

d) Does the witness have any specific care needs? **No**. If 'Yes' what are they? (Disability, healthcare, childcare, transport, , language difficulties, visually impaired, restricted mobility or other concerns?)

Witness Consent (for witness completion)

a)	The criminal justice process and Victim Personal Statement scheme (victims only) has been explained to me	Yes ☐	No ☐	
b)	I have been given the Victim Personal Statement leaflet	Yes ☐	No ☐	
c)	I have been given the leaflet 'Giving a witness statement to police — what happens next?'	Yes ☐	No ☐	
d)	I consent to police having access to my medical record(s) in relation to this matter: (obtained in accordance with local practice)	Yes ☐	No ☐	N/A ☐
e)	I consent to my medical record in relation to this matter being disclosed to the defence:	Yes ☐	No ☐	N/A ☐
f)	I consent to the statement being disclosed for the purposes of civil proceedings e.g. child care proceedings, CICA	Yes ☐	No ☐	
g)	The information recorded above will be disclosed to the Witness Service so they can offer help and support, unless you ask them not to. Tick this box to decline their services:		☐	

Signature of witness: ..... Print name: .....

Signature of parent/guardian/appropriate adult: ..... Print name: .....

Address and telephone number if different from above: .....

Statement taken by (print name): ..... Station: .....

Time and place statement taken: .....

7.5 Self-Exclusion

All employees must be familiar with the self-exclusion process and be able to handle any customer enquiries. The self-exclusion process is outlined in the Customer Self-Exclusion & Interaction pack. All relevant details of the process can also be found in the GC Manual.

All employees, including those working in a shop on a relief basis must familiarise themselves with the shop's self-excluded customers and remind themselves daily as necessary

Additional copies of the self-exclusion form or Gamcare literature can be ordered from **Stores**.

7.6 Licensing Objectives

Any incidents which might affect one or more of the 3 Licensing Objectives and are not reported under any other category should be reported by completing an Incident Report Form

Examples of reportable incidents are as follows:

- suspected drug dealing / drug misuse takes place and police were not called
- unauthorised gambling (card playing, etc)
- unofficial organised money lending
- gang activity
- any other disorderly / criminal behaviour not reported under any other category
- any other incidents which you consider relevant and affecting the Licensing Objectives:

- preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime (Crime Free)

-ensuring that gambling is conducted in a fair and open way (Fair and Open)

- protecting children and other vulnerable persons from being harmed or exploited by gambling (Protecting Children and the Vulnerable)

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Incident Report Form

Incident Report Forms are to be filled in by the team member who dealt with the incident as soon as possible after it occurred.

Fill in all required information! Ensure that the date and time of the incident are correct

RETAIL COMPLIANCE

INCIDENT REPORT FORM

One Incident Report Form should be completed for each Incident

Branch Name		Date of Incident	
Branch Number		Time of Incident	
Employee Name		Employee Number	

Mark the type of Incident appropriately.

TYPE OF INCIDENT								
2) H&S Hazard-Helpdesk Not Informed	3) H&S Verbal Abuse/Violence – Police Not Called	4) H&S Incident/Accident	5) Age Verification – Category A	9) Responsible Gambling Interaction	10) Self-Exclusion Breach	12) Police Called	14) Official Visit	15) Other Relevant Incident

The details are very important, so use the reporting guide to ensure all needed information is provided. You will receive a phone call from the Compliance Team if details are missing or ambiguous.

Sign and date at the bottom

SIGN		DATE	

Scan the form through the till as soon as you fill it in after the incident occurred. Remember to mark it on the Daily Totals Report.

Incident Report Form

Incident Report Form – A form must be completed and scanned for each of the incidents identified below. The forms should be filed in the red Gambling Commission Compliance File unless they are Responsible Gambling Interactions and Self-Exclusion Forms which should be filed in the yellow Social Responsibility File.

Incident Report Forms should be completed and scanned at the earliest opportunity. Each individual incident requires a separate Incident Report Form. Incident Report Forms should be completed by the staff member who dealt with the incident. If unsure regarding reporting procedures – contact Compliance on 72 3608 and / or find the relevant guidance note in the GC Manual.

Category of Incident	Information required on the Incident Report Form	Question on Daily Totals Report
	HEALTH AND SAFETY	
H&S Hazard – Helpdesk Not Informed	What hazard has been identified? Only mark if you have not removed the hazard already. Why was it not reported to Helpdesk.	Question 2
H&S Verbal Abuse/ Violence – Police Not Called	A brief description of what the incident was.	Question 3
H&S Incident/Accident	A brief description of what the incident was. Ambulance needed / attended? What action was taken?	Question 4
	AGE VERIFICATION – Category A	
Category A	How the individual attempted to gamble (OTC/machines)? Did the individual succeed in gambling? If so how? What action did you take? Was ID shown? What ID was it? What action was taken regarding the individuals stakes/winnings?	Category A
	RESPONSIBLE GAMBLING	
Self-Exclusion	**No Incident Report Form should be completed** however the Self-Exclusion Form must be scanned through EPOS.	Question 8
Responsible Gambling Interaction	What was said to the customer? What was his/her reaction? What did the interaction lead to (self-exclusion etc)?	Question 9
Self-Exclusion Breach	The customer's name. Was a photograph provided? Did the customer attempt or succeeded in gambling? If so, how (OTC/machines)? What action was taken regarding the customers stakes/winnings? Any other general information.	Question 10
Self-Exclusion Review	**No Incident Report Form should be completed** however the Self-Exclusion Form must be scanned through EPOS and rung up for 1p.	Question 11
	POLICE INCIDENTS	
Police Called	All police incidents must be recorded on an Incident Report Form regardless of whether the police attended or not. A brief description of what the incident was, did the police attend? What action did the police take?	Question 12
	OFFICIAL VISITS	
Official Visits	Who visited the shop? What was inspected? What questions were asked? What was discussed? Were any issues raised?	Question 14
	OTHER RELEVANT INCIDENTS	
Details of other incidents affecting licencing objective	A brief description of what the incident was.	Question 15

- Quality of printing; lines should be sharp and well defined and the colours clear, distinct with no hazy fringes.
- Forged Coins: Iranian coins can often be mistaken for two pound coins. Be aware of customers using large amounts of coins on gaming machines. All findings to be reported to Central Security.

11.0 DYED NOTES (over the counter)

Cash transit companies identify stolen notes through the use of permanent dyes. Any monies stolen from them are marked with this dye. Although these notes are legal tender, if taken, the following procedure should be followed:

- **Central Security,** Police and your District Operations Manager are to be informed at the earliest opportunity.
- Value and denomination of dyed notes to be identified and recorded in the Shop Diary.
- Although these notes are not to be used as payment they still remain part of the shop float and should be retained in the Insert.
- Retain a maximum of 2 dyed notes for collection by Police.
- Remainder of dyed notes to be stored, a form obtained from Central Security and sent along with the notes to the Bank of England.

12.0 Forged/Dyed Notes (via Gaming Machine/AWP/SSBT)

If Dyed/Forged notes are taken via your Gaming Machine/AWP it is important that you follow the procedures outlined in **Section 9 (Slots), Parts 5&6 (Forged Currency / Dyed Notes)**.

13.0 DRUGS

All employees, as well as shop cleaners, should be aware of the correct procedure to follow in the event that any form of drug abuse occurs in their shop. Intravenous drug users are prepared to use public areas to inject themselves and this means that it is possible that any one of us could, in our daily working life, have to deal with a drug related situation that could, if mishandled, be personally hazardous.

13.1 Issues

The Misuse of Drugs Act 1971 charges both owners and managers of betting offices with the legal responsibility to enforce the law under the Act. It is an offence to knowingly allow drugs to be kept or supplied on any premises. If you suspect that dealers or users of illegal drugs are using your shop, you must contact your **Central Security** Department immediately and inform your District Operations Manager. You must then contact the local police direct to report the incident.

13.2 Guidelines For Identifying A Drugs Problem

- All employees must be aware of the problems related to drug abuse.
- Illegal drug users are not easy to identify as they display varied physical symptoms dependent on which drug they are using. The most common noticeable symptoms are similar to the various stages of drunkenness (i.e. loud, aggressive, excitable, confused or dazed state).

- Quality of printing; lines should be sharp and well defined and the colours clear, distinct with no hazy fringes.
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- An illicit drug dealer (usually a user) prefers to stand in the same place for customer identification purposes, and will be sought after by non-betting customers. The exchange of money or packets may be seen.
- Beware of the individual who continually frequents toilet facilities, a favoured place for transactions to occur. Also, the individual who walks into the LBO and goes straight to the toilet without appearing interested in the betting environment. Occasionally, toilet cisterns are used for drug storage and the abandonment of items, and it is not uncommon for the cisterns to become blocked.
- Toilets must be checked regularly. The following items, either individually or collectively, indicate possible drug abuse: -
- Stained cotton wool; empty capsules; syringes and needles; mirrors; razor blades; straws; spoons; squared pieces of paper; burnt silver paper / foil; blood stains on wall and floor.
- Look out for strange rolled cigarette ends and odd cigarette filters. These may be an indication that cannabis is being smoked.
- Where needles or other drug paraphernalia associated with intravenous drug taking are found, do not use bare hands when handling any suspect materials, as contagious diseases could be transmitted through open cuts or abrasions (see **Part 13.3 of this section (Cleaning)**).
- It is unlikely that the Police will need to be given any of the above discarded items. They should therefore be disposed of safely and securely (see **Part 13.3 of this section (Cleaning)**).
- Ensure your premises are well lit and that colleagues can see all aspects of customer areas. Should your shop have 'blind' areas or areas that are badly lit and these give you reason for concern, contact your District Operations Manager.

13.3 Cleaning

- In all shops where drug abuse is suspected, cleaners and shop contractors must be advised to take particular care when emptying waste bins, handling discarded paper / carrier bags and cleaning behind pipes or in recesses to avoid potential contamination by needles or drug debris.
- Whenever blood or body fluids have to be cleaned up, disposable rubber gloves should be worn. Do not use bare hands, as both Aids and Hepatitis, which are contagious diseases, are transmittable through such body fluids. Disposable wipes, together with a suitable disinfectant / detergent, should be used when cleaning. Any items, including plastic gloves / wipes etc which have been used in the cleaning process must then be placed in the plastic bag which should be sealed and safely disposed of with your regular waste.

DO NOT HANDLE WITH BARE HANDS ANY SUSPECTED MATERIALS YOU MAY FIND. CONTAGIOUS DISEASES CAN BE TRANSMITTED BY SOME OF THE INSTRUMENTS USED.

- For your protection a Sharps Bin is provided for each shop together with a pair of sterile medical gloves and plastic tongs to enable the shop team, including the cleaner, to pick up and dispose of any suspect articles safely.
- Syringes, needles, razor blades and other sharp instruments must be placed in the secure container provided and retained in the container, in the shop in a secure place. **Central Security** should immediately be notified that such paraphernalia has been found. **Stores** should then be contacted directly and the department will then arrange for the Sharps Bin to be collected and replaced.
- The Duty Manager must ensure that all staff follow these guidelines when dealing with drug debris.

NB If you have any reason to believe that activity in either the passing or using of drugs is taking place in your shop, inform Central Security immediately and your District Operations Manager.

LA29

RESTRICTED (when complete)

MG 11 (T)

WITNESS STATEMENT

CJ Act 1967, s.9; MC Act 1980, ss.5A(3)(a) and 5B; Criminal Procedure Rules 2005, Rule 27.1

Statement of **Iain ARMSTRONG PC 1451CW**..... URN: | | | | |

Age if under 18 **Over 18**..... (if over 18 insert 'over 18') Occupation: **Police Constable** .....

This statement (consisting of: .... **2**..... pages each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated anything in it which I know to be false, or do not believe to be true.

Signature: ..... Date: 17/09/2015.....

Tick if witness evidence is visually recorded ☐ *(supply witness details on rear)*

I am PC Iain ARMSTRONG 1451CW currently in the role of Dedicated Ward Officer (DWO) for Harrow Road Ward. The statement concerns the William Hill premises at 357 Harrow Road W9 near to the Maida Hill Market area of the Harrow Road Ward.

Historically William Hill customers have been involved in street drinking outside the establishment, there are a total of seven (7) intelligence reports since 2010 associated with William Hill. There are also reports with regards to drug dealing from the premises, nine (9) associated with William Hill.

Currently the Madia Hill Market has a significant problem with street drinkers. Recently work was conducted with William Hill with regards to a zero Tolerance towards this behaviour and this appears to have moved the problem on to the Market. In the last twelve Months there have been twenty (24) intelligence reports where Street Drinkers have been stopped and de-canned or given words of advice, these reports are concerning a total of Sixty Six (66) people. The stops have taken place within a 25 metre area of William Hill.

Currently due to street drinking four (4) people have been issued with a Community Protection Notice (CPN) warning letter and three (3) have been issued with a full CPN.

Currently one (1) person is in breach of their CPN and will be summands to court re this breach.

The following reports cover a five (5) year period:

Please note POA = Public Order Act

William Hill 357 Harrow Road W9

Total CAD's 5 Years = 16

6516292/11 - 03/11 - S4 POA
6520650/11 - 06/11 - Harassment
6564986/11 - 11/11 - S4 POA
6518947/12 - 04/12 - Assault
6538761/12 - 07/12 - Criminal Damage
6545619/13 - 09/13 - Theft

Signature: ..... Signature witnessed by: .....

Continuation of Statement of **Iain ARMSTRONG PC 1451CW** .....

6546179/13 - 10/13 - Criminal Damage
6554620/13 - 11/13 - Theft
6509799/14 - 03/14 - S4 POA
6532741/14 - 07/14 - Assault
6528318/15 - 07/15 - Assault

6536930/15 - 08/15 - GBH

In the past I have had cause to deal with a male by the name of Michael Brewster, who was a frequent patron of William Hill. He has come to notice due to him selling alcohol to other customers at the venue. Several intelligence reports detail incidents where bottles of spirits have been seized and disposed of along with a quantity of small plastic cups. Mr Brewster is now deceased and therefore has not come to notice recently, however staff at the location were aware of Mr Brewster and at no time did I see any action taken due to his behaviour.

Crime number 6536930/15 concerns an incident were a possible GBH had been committed. The victim in this was extremely drunk and a call was made to Police by staff at William Hill as she was refusing to leave. The victim was then helped whilst police were on scene by another well known street drinker who was at the location. Whilst not all the street drinkers frequent the William Hill, a proportion of them do and are joined in the local area by other drinkers.

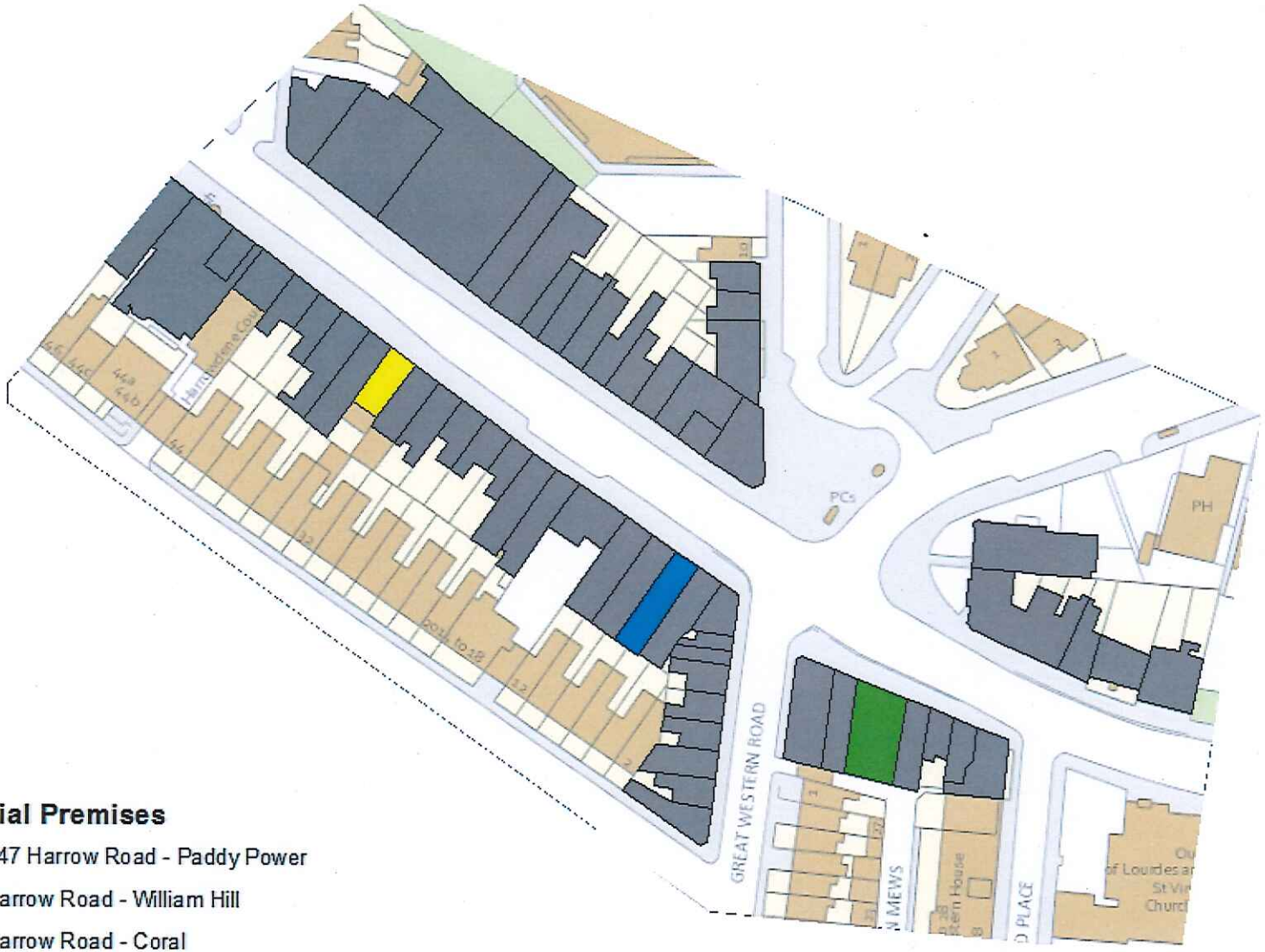
PC 1451 CW

Signature: ..... Signature witnessed by: .....

Commercial Premises Harrow Road

City of Westminster

LA30



Commercial Premises

- 345-347 Harrow Road - Paddy Power
- 357 Harrow Road - William Hill
- 381 Harrow Road - Coral
- Commercial Premises

0 12.5 25 50 75 100 Meters

N

Commercial Premises Harrow Road

City of Westminster

LA31

Count of CRIS + CAD

- 0
- 1 - 4
- 5 - 9
- 10 - 15
- 20
- 24
- 27

N

0 10 20 40 60 80 Meters

LA32

GOLD	PremisesName	Address	Unique Ref	Date	Day	Hour	ASB?	class1	class2	class3
598477	William Hill (3	357 Harrow Road	ID:193020130924	24-Sep-13	Tuesday	08	y	Rowdy Or Inconsiderate Behaviour		
598477	William Hill (3	357 Harrow Road	ID:917320131021	21-Oct-13	Monday	20	y	Civil Disputes		
598477	William Hill (3	357 Harrow Road	ID:318320140415	15-Apr-14	Tuesday	11	y	ASB - Nuisance		
598477	William Hill (3	357 Harrow Road	ID:620820140423	23-Apr-14	Wednesday	16	y	ASB - Nuisance		
598477	William Hill (3	357 Harrow Road	ID:529620140709	09-Jul-14	Wednesday	14	y	ASB - Nuisance		
598477	William Hill (3	357 Harrow Road	ID:841320140718	18-Jul-14	Friday	17	y	ASB - Nuisance		
598477	William Hill (3	357 Harrow Road	ID:671220140726	26-Jul-14	Saturday	15		Civil Disputes		
598477	William Hill (3	357 Harrow Road	ID:431720140913	13-Sep-14	Saturday	12		Civil Disputes		
598477	William Hill (3	357 Harrow Road	ID:827420141113	13-Nov-14	Thursday	18	y	ASB - Nuisance		
598477	William Hill (3	357 Harrow Road	ID:272720141224	24-Dec-14	Wednesday	11	y	ASB - Nuisance		
598477	William Hill (3	357 Harrow Road	ID:777020150210	10-Feb-15	Tuesday	19		Civil Disputes		
598477	William Hill (3	357 Harrow Road	ID:877720150223	23-Feb-15	Monday	21		Civil Disputes		
598477	William Hill (3	357 Harrow Road	ID:811920150309	09-Mar-15	Monday	19	y	ASB - Nuisance		
598477	William Hill (3	357 Harrow Road	ID:571720150529	29-May-15	Friday	15	y	ASB - Nuisance		
598477	William Hill (3	357 Harrow Road	ID:550820150529	29-May-15	Friday	15	y	ASB - Nuisance		
598477	William Hill (3	357 Harrow Road	ID:782320150624	24-Jun-15	Wednesday	17	y	ASB - Nuisance		
598477	William Hill (3	357 Harrow Road	ID:922720150707	07-Jul-15	Tuesday	20	y	ASB - Nuisance		
598477	William Hill (3	357 Harrow Road	ID:887120150721	21-Jul-15	Tuesday	19	y	ASB - Nuisance		
598477	William Hill (3	357 Harrow Road	ID:905620150722	22-Jul-15	Wednesday	19	y	ASB - Nuisance		
598477	William Hill (3	357 Harrow Road	ID:695520150801	01-Aug-15	Saturday	17	y	ASB - Nuisance		
598477	William Hill (3	357 Harrow Road	ID:686120150814	14-Aug-15	Friday	17		Suspicious Circumstances		
598477	William Hill (3	357 Harrow Road	ID:821320150815	15-Aug-15	Saturday	19		Civil Disputes		
598477	William Hill (3	357 Harrow Road	ID:351920150825	25-Aug-15	Tuesday	12		Civil Disputes		

Qualifier1	Qualifier2	Qualifier3	Resolution1	Resolution2	Class Text
ASB - Nuisance	Stop / Search		No Offences Disclosed	Satisfactory Stop / Search	ASB NOT REQ. ONE ARRESTED FOR D&D
Rowdy Or Inconsiderate Behaviour	Repeat Caller and / Or Victir		No Offences Disclosed		ASB URN NOT REQUIRED - CIVIL DISPUTE - ONE OFF INCIDENT - 3386CW
Begging / Vagrancy	Cancelled		Police Attendance Not Required		ASB URN NOT REQUIRED P203063
Assistance Requested / Rendered	Rowdy Or Inconsiderate Beh		Assistance Requested / Rendered	No Offences Disclosed	ASB URN NOT REQUIRED P227211
Rowdy Or Inconsiderate Behaviour	Assistance Requested / Ren		No Trace	No Offences Disclosed	ASB URN NOT REQUIRED P208760
Rowdy Or Inconsiderate Behaviour			Cancelled		ASB URN NOT REQUIRED P203063
Assistance Requested / Rendered			No Offences Disclosed	Advice Given	
Assistance Requested / Rendered			No Offences Disclosed		ASB URN NOT REQUIRED P208760
Rowdy Or Inconsiderate Behaviour			Police Attendance Not Required	Advice Given	ASB URN NOT REQUIRED P203063
Rowdy Or Inconsiderate Behaviour			No Offences Disclosed		NO ASB URN REQ ^ P235824
Assistance Requested / Rendered			Cancelled		ASB URN NOT REQUIRED P208760
Assistance Requested / Rendered			No Offences Disclosed		
Rowdy Or Inconsiderate Behaviour	Alcohol		No Offences Disclosed		ASB URN VACW151352
Rowdy Or Inconsiderate Behaviour	Alcohol		No Offences Disclosed	Advice Given	ASB URN NOT REQUIRED P009490
Alcohol	Assistance Requested / Ren		No Offences Disclosed	Advice Given	ASB URN NOT REQUIRED P009490
Rowdy Or Inconsiderate Behaviour			Advice Given		ASB URN NOT REQUIRED P227211
Rowdy Or Inconsiderate Behaviour			No Offences Disclosed	No Trace	ASB URN NOT REQUIRED P227211
Rowdy Or Inconsiderate Behaviour			No Offences Disclosed		ASB URN VACW 154385
Rowdy Or Inconsiderate Behaviour			No Trace	No Offences Disclosed	ASB URN NOT REQUIRED P228927
Rowdy Or Inconsiderate Behaviour	Youth Related		No Trace		ASB URN VACW154562
Assistance Requested / Rendered			No Trace		
Call Made with Good Intent			Cancelled		CANX PRIOR TO POL ARRIVAL
Assistance Requested / Rendered			No Offences Disclosed	Advice Given	AS PER REMS.

Crimed	ORGNAME	SUBBNAME	BUILDING	BNUM	STREET	Location
NOT CRIMED	WILLIAM HILL			357	HARROW ROAD	357 HARROW RD, W9,WILLIAM HILL
NOT CRIMED	WILLIAM HILL			357	HARROW ROAD	357 HARROW RD,W9,WILLIAM HILL
NOT CRIMED	WILLIAM HILL			357	HARROW ROAD	357 HARROW RD, W9,WILLIAM HILL
NOT CRIMED	WILLIAM HILL			357	HARROW ROAD	WILLIAM HILL, 357 HARROW RD, W9
				357	HARROW ROAD	357 HARROW RD, W9,WILLIAM HILL
NOT CRIMED				357	HARROW ROAD	357 HARROW RD, W9, WILLIAM HILL
				357	HARROW ROAD	357 HARROW RD, W9,WILLIAM HILL
NOT CRIMED	0	W9	0	357	HARROW ROAD	357-361 HARROW RD, W9,William Hills
NOT CRIMED		0	0	357	HARROW ROAD	357 HARROW RD,W9,WILLIAM HILL
NOT CRIMED	WILLIAM HILL	0	0	357	HARROW ROAD	357 HARROW RD, W9,william hill
NOT CRIMED		0	0	357	HARROW ROAD	364 HARROW ROAD, W9,william hill betting office
NOT CRIMED		0	0	357	HARROW ROAD	WILLIAM HILL BOOKMAKERS, 364 HARROW ROAD, W9
NOT CRIMED		0	0	357	HARROW ROAD	357 HARROW RD, W9,WILLIAM HILL
NOT CRIMED	0	0	0	357	HARROW ROAD	WILLIAM HILL 357 HARROW RD,W9,3NA
NOT CRIMED	0	0	0	357	HARROW ROAD	357 HARROW RD, W9,william hill
NOT CRIMED	0	0	0	357	HARROW ROAD	357 HARROW ROAD, W9,WILLIAM HILL
NOT CRIMED	0	0	0	357	HARROW ROAD	357 HARROW ROAD,LONDON,W9,William Hill
NOT CRIMED	0	0	0	357	HARROW ROAD	357 HARROW ROAD,W9,3NA - william hill
NOT CRIMED	0	0	0	357	HARROW ROAD	357 HARROW ROAD,W9,WILLIAM HILL
NOT CRIMED	0	0	0	357	HARROW ROAD	357 HARROW ROAD,W9, WILLIAM HILL
NOT CRIMED	0	0	0	357	HARROW ROAD	357 HARROW ROAD, W9
NOT CRIMED	0	0	0	357	HARROW ROAD	357 HARROW ROAD,W9,william hill
NOT CRIMED	0	0	0	357	HARROW ROAD	357 HARROW ROAD,LONDON,W9 , WILLIAM HILL

GOADNUMBER	PremisesName	PremisesType	PremisesAddress	Crime No	Start Date	Start Time	Weekday	Month	Year
598477	William Hill (357)	Betting Shop	357 Harrow Road	6545619/13	14/09/2013	1415	Saturday	September	2013
598477	William Hill (357)	Betting Shop	357 Harrow Road	6546179/13	18/09/2013	1315	Wednesday	September	2013
598477	William Hill (357)	Betting Shop	357 Harrow Road	6509799/14	01/03/2014	745	Saturday	March	2014
598477	William Hill (357)	Betting Shop	357 Harrow Road	6532741/14	13/07/2014	1445	Sunday	July	2014

Venue Address	VEN Location Type Desc	CLASS Major Text	CLASS Minor Text
William Hill Bookmakers,357,HARROW ROAD,LONDON,W9 3NA	Betting Shop	Theft and Handling	Other Theft
William Hill Bookmakers,357,HARROW ROAD,LONDON,W9 3NA	Betting Shop	Criminal Damage	Other Criminal Damage
O/S,William Hill Bookmakers 357,HARROW ROAD, LONDON,W9 2HU	Betting Shop	Violence Against the Person	Harassment
O/S,William Hill Bookmakers 357,HARROW ROAD, LONDON,W9 3NA	Betting Shop	Violence Against the Person	Common Assault

Data Protection Act - Dispose Of As Confidential Waste
PC BG LEWIS 4161CW 200892
CR:6509799/14 CrType:B Notifiable/MPS/Other:N-1 Status:U Press:Y Class:S/Pub Order S 4a
GLU:CW

General Information

Screening Decision: IN

Main

IU:	CW WESTMINSTER		
Crime Type:	B	H/O Crime Type:	1
Allegation (Prefix):			
Allegation:			
Committed on/from Date:	SAT 01/03/2014 07:45		
Committed to Date:	SAT 01/03/2014 10:30		
Reported Date:	SAT 01/03/2014 10:31		
How Notified:	NP Phone Call to Police		
Restricted? By:		Date:	
Restriction Reason:			

Flags
CW

Borough **Branch**

Service **Area (Historical)**

OIC

Is OIC Same As Reporting Officer ?			
Investigating Officer's Rank:	PC		
Surname:	BOLT	Initials:	M
Warrant Number:	231346 Div/D Number: 1953CW	Usual Relief:	D
Duty:	AA Borough Uniform		
Station/Branch:	CW WESTMINSTER		
Allocated Date/Time:	01/03/2014 11:46		
Allocation Noted?	Y	Noted Date/Time:	01/03/2014 12:16

Previous OIC Details

Usual Relief	Duty	Station Branch	Allocated Date/Time	Noted Date/Time
APS 204912 GE ELLIS 1100CW				
D	AA Borough Uniform	CW	01/03/2014 11:29	01/03/2014 11:29

OIC Supervisor: PS1091CW/227430 RJ PHAIR

Press

Suitable for Press?	Y
Restrictions:	
Is this a Specrim?	N
Date/Time:	
Was a Firearm Used?	N
Was other Weapon Used?	N
Are there Terrorist Implications?	N
Was a Suspect present on Police arrival?	Y
No. of Suspects Present:	1

Data Protection Act - Dispose Of As Confidential Waste
PC BG LEWIS 4161CW 200892
CR:6509799/14 CrType:B Notifiable/MPS/Other:N-1 Status:U Press:Y Class:S/Pub Order S 4a
GLU:CW

General Information

Was the Suspect(s) arrested? Y
No. of Suspects Arrested: 1

Source System References

Source System Name	Source System Reference	Entered Date/Time	Entered By
CAD	003290/01MAR14	01/03/2014 11:28	APS 1100CW/204912 GE ELLIS

Totals

Total Values:

Stolen £: Outstanding £: Damaged £:
Recovered £: Damaged On Recovery £:

Total:

VIW(s):	1	Property	0	Vehicles(s):	0
Accused:	0	Suspect(s):	1	CAIT Subject(s):	0

Drugs/Fraud

Is this CR for an arrest for possession etc. (not theft) of controlled drugs?
If Fraudulent Use-Item Used: N

DV/Hate Crime
Is this a Hate Crime/Domestic Incident/Carer Abuse? N

Domestic Incident? Forced Marriage?
Honour Based Violence? Hate Crime?
Carer Abuse?

Initial Risk Assessment (SPECSS+):
Completed by:

Initial Risk Assessment Management Supervised?
Completed by:

Current Risk Assessment (SPECSS+):
Completed by:

Form 124D Completed?
Completed by:

Form124D Supervised?
Completed by:

Received by the CSU? CSU Reference
Completed by:

LGBT Relationship?

Category of Hate Crime

Race?
Faith/Religion/Belief? Religion Name:
Homophobia?

General Information

Transphobia?
Disability?
Targeted because of Vulnerability?

Venue

Location

OMPD?
Address:
O/S,William Hill Bookmakers 357,HARROW ROAD,
LONDON,W9 2HU
Location Text:

GLU: CW Local Id: CW08 Grid Ref: 524785,182177
Watch Area:

Main

Location Type(s): JF Betting Shop

Is the Venue covered by CCTV or in a CCTV Area? N
CCTV Options:

Approach:
Entry Method:
Entry Point:
Exit Point:
Security:
Person On Premises?
Other Info:

Internal Transfer

Date/Time	Transferred By	Previous GLU	Previous IU

Transfer From MPS

Transfer from Met To:-
Service:
Station:
Their Reference:

Received By:-
Rank:
Number:
Surname:

Victim/Informant/Witness Details

VIW No: 1 Of: 1
Role(s): V I W

Total - Victims: 1
Total Witness: 1

CAIT Subject No:

Personal Details

Co/Public Body?
Title: [redacted]
Surname: [redacted]
Co./Forenames: [redacted]
Date of Birth: [redacted]
Age Estimated:
App. Age or From: Over 18
To:
Sex: [redacted]
Ethnic Appearance: [redacted]
Self Class Ethnicity:
Occupation:
Occupation relevant to offence: N
School or College:

GLU:
Local ID:
GridRef:
National of 1:
Passport No 1:
National of 2:
Passport No 2:
Religion:

Address Details

VIW's Address is same as VEN?
Address:
WITHHELD
GLU: WITHHELD
Local ID: WITHHELD
GridRef: WITHHELD
Home Intelligence Unit: WITHHELD

PCM: E
CNAA Reason:

Contact Details:
Home: WITHHELD
Business: WITHHELD
Mobile: WITHHELD
Other: WITHHELD
Email: WITHHELD

Victim/Informant/Witness Details

Injury Details

Injury Degree: HE Threats Only
Injury Description:
Description/Dress:

Vulnerable/intimidated Victim/Witness? WITHHELD
Reason for Vulnerability/Intimidation: WITHHELD

Victim Interviews

Interview Type	Date of Interview	Start Time	Location	Other Persons Present	Interviewing Officer	eStatement Ref No

Actions

MG11 Taken? Y Witness Albums Visited? N
Victim of Reported Crime to Police in last 12 months? N No
Is V willing for VSS to be informed? Y Yes
V Code of Practice Applicable? Y
204912 APS ELLIS GE 01/03/2014

Changed To	Entered By	Date

VCOP Actn Compl? Y
227430 PS PHAIR RJ 15/03/2014
Fraud Cl'rup Date:

Knows Suspect No.	How Known

Aware of Suspect No.	How Victim or Witness aware of Arrest
1	HA Present when Susp arrested

Victim/Informant/Witness
Details

Knows Accused No. **How Known**

Needs

Does anyone perceive VIW to be Deaf and/or Disabled? N
If Yes, who? VIW/Other:

Details of Disability:

Physical Access Needs:

Personal Care Needs:

Medical Needs:

Communication Needs:

Sexual Orientation:
Gender Identity:

Officer's Notes:

Victims Code of Practice

VIW No: 1 Of: 1

VSS Info:

Local VSS Ref:
Language (If not English):
Victim Contacted by I.O? Y
Date/Time: 03/03/2014 15:15

Action Taken	Action Date	Entered by					Generated	Date Generated
AZ SI - General Letter	03/03/2014	622264	CIV	MARNELL	AT		Y	03/03/2014 10:32
EA VSS Informed	03/03/2014	622264	CIV	MARNELL	AT			
DF Crime Specific Info.	03/03/2014	622264	CIV	MARNELL	AT			
HX VU-Regular Update	03/03/2014	622264	CIV	MARNELL	AT		Y	03/03/2014 15:40
HX VU-Regular Update	03/03/2014	231346	PC	BOLT	M		Y	03/03/2014 15:18
HB VU - Suspect BTR	03/03/2014	231346	PC	BOLT	M		Y	03/03/2014 15:43
HC VU-Susp.Ch/Summ/TIC	13/03/2014	231346	PC	BOLT	M		Y	13/03/2014 22:46
HK VU-Case Closed Undet	13/03/2014	231346	PC	BOLT	M		Y	13/03/2014 22:46
HU VU-Suspect NFA/Elim	15/03/2014	231346	PC	BOLT	M		Y	15/03/2014 04:44

Remarks:

Suspect Details

Suspect No: 1 Of: 1 Currently Eliminated? Y

Possibly identical to
Suspect No(s):
CAIT Subject No:

Names

Case Class: SU Suspected
Surname Used: [redacted]
Forenames Used: [redacted]
PNC Surname: [redacted]
PNC Forename: [redacted]
Maiden Name:

Alias Surname

Alias Forenames

Nickname

Info Markers

Do you want to create an Accused record? Accused Created: Accused No: 0

PNC Status: K
CRO Result:
PNC Result: 89/22068Q

Suspect considers they have a disability? N
Disability Category:

Warning Signal Type **On PNC?**

Created by: APS 1100CW/204912 GE ELLIS
Date/Time: 01/03/2014 11:35

Last Updated by:
Date/Time:

Personal Details

Date of Birth: [redacted] Age Estimated:
App. Age or From: [redacted] To: [redacted]
Sex: [redacted]
Ethnic Appearance: [redacted]
Self Classified Ethnicity: [redacted]
Height Imperial: [redacted] Height Metric: [redacted]
Birth Place: [redacted]
Nationality(1): [redacted]

Data Protection Act - Dispose Of As Confidential Waste
PC BG LEWIS 4161CW 200892
CR:6509799/14 CrType:B Notifiable/MPS/Other:N-1 Status:U Press:Y Class:S/Pub Order S 4a
GLU:CW

Suspect Details

Nationality(2):
Passport No 1:
Passport No 2:
Dress:
Composite Description: N
Religion:
Occupation:
School or College:

GLU: Local ID: Grid Ref:
Details of ID Docs:

Suspect Details

Personal Description

Hair
Desc: [redacted] Colour: [redacted] Texture:
Facial Hair
Type: Colour: Features:
Eye Colour Left: Eye Colour Right:
Spectacles? Spectacles Type:
Eyebrows:
Voice: Accent:
Photo-Fit Ref: Build:

Marks/Scars

Type/Position

Address

Suspect's Address is same as VEN ?

Address:
[redacted]
GLU: [redacted] Local ID: [redacted] Grid Ref: [redacted]
Home Intelligence Unit: [redacted]
Frequents:

Contact Details:
Home: Business:
Mobile: Other:
Email:

Known to Victim

VIW Knows Suspect? N

Known by VIW No How Known

Was the Victim or Witness aware the Suspect was arrested? Y

VIW No.	How Victim or Witness aware of arrest
1	HA Present when Susp arrested

Suspect Elimination

Suspect No: 1 Of: 1
Currently Eliminated? Y

Disposal

Circulate PNC?

Date Eliminated	Reason Eliminated	Method of Detection	How Suspect Notified	Date/Time Notified	Notified By:				
					Rank	Div/D Number	Warrant Number	Initials	Surname
13/03/2014	NE Insufficient evidence to Proceed		AE Personally	13/03/2014 17:56	PC	1327C W	233890	P	FAN

Date of Arrest	Custody No	Result	Bail Return Date/Time	Station	Entered By:					Entered Date/Time
					Rank	Div/D Number	Warrant Number	Init's	Surname	
01/03/2014	01DD/760/14	Released			PC	1953CW	231346	M	BOLT	15/03/2014 04:43

Identifiable By

Identifiable By
VIW No(s):

Circulation

Title	Date	Case No	Date Cancelled

Wanted Docket Ref No:
ID by Witness Albums?
Warrant Issued? Date Warrant Issued:

Conditions:

Officer's Notes:

IDO

IDO Request:

Request Id	Requested Date/Time	Surname	Warrant/Pay No	Accepted Date/Time	Cancel Reason	Cancel Date

IDO Visit:

Request Id	Surname	Visit Date/Time	Entry Gained	Job Sheet No	Useful Marks

CPO

CPO Request:

Request Id	Requested Date/Time	Surname	Warrant/Pay No	Accepted Date/Time	Cancel Reason	Cancel Date

CPO Visit:

Request Id	Surname	Visit Date/Time	Entry Gained	Job Sheet No	Useful Marks

Photographer

Photographer Request:

Request Id	Requested Date/Time	Surname	Warrant/Pay No	Accepted Date/Time	Cancel Reason	Cancel Date

Photographer Visit:

Request Id	Surname	Visit Date/Time	Entry Gained	Job Sheet No	Useful Marks

Other

Other Request:

Request Id	Type	Requested Date/Time	Surname	Warrant/Pay No	Accepted Date/Time	Cancel Reason	Cancel Date

Other Visit:

Request Id	Surname	Visit Date/Time	Entry Gained	Job Sheet No	Useful Marks

Access Info

Features

Features/instruments

MF Susp been drinkng

Text:

IDO Text:
Prop Ref Nos

Forensic Data

Lab Reference No:

FORENSIC REFERENCES

Type	**No**

Officers Notes:

Data Protection Act - Dispose Of As Confidential Waste
PC BG LEWIS 4161CW 200892
CR:6509799/14 CrType:B Notifiable/MPS/Other:N-1 Status:U Press:Y Class:S/Pub Order S 4a
GLU:CW

Linked Crimes

Chain ID	Removed from Chain?	Police Contact

Classification

Method

Current Position: C Classified
Method: By drunk suspect continuously swearing at people and causing a disturbance inside and outside betting shop.

Classification Set by CIT:
Lock: Date:
By:

Classify

Main Classification:

	Code	Victim	Date
Initial:	S125/12		01/03/2014 11:28
Current:	S125/09	Y	01/03/2014 13:19

Description: SUBSTANT./Causing Intentional Harassment Alarm or Distress

Subsidiary Classifications:

Code	Victim	Count

Confirm? Y Date: 01/03/2014 13:19
By: DS /205683 AJ YOUNG
Victim Count Discrepancy:

Classification

No Crime

No Crime? Date:
Reason:
Confirm? Date:
By:

Crime Related Incident? Date:
Confirm? Date:
By:

Statistical Info

Current Status: U Undetected Crime Last Changed:
Cleared-Up Reason: Date:

Original Classification

Off.	Code	Victim	Count	Status	Outcome	Outcome Changed	Change Reason	Last Changed	Last Changed By

Confirmed Date: 01/03/2014 13:19
Confirmed By: DS /205683 AJ YOUNG

Statistical Parent CR:

Administrative Detections

Home Office Rule:
Date:
By:
Explanatory Notes:

Classification

All Current Home Office Requirements Satisfied: Date:
By:

Of Interest To

Method Index:
CP Analysis:

Victim Amendments

Date Added	Time	VIW No	By

Date Removed	Time	VIW No	By

History

Off.	Code	Victim	Count	Status	Outcome	Reason	When	By

Data Protection Act - Dispose Of As Confidential Waste
PC BG LEWIS 4161CW 200892
CR:6509799/14 CrType:B Notifiable/MPS/Other:N-1 Status:U Press:Y Class:S/Pub Order S 4a
GLU:CW

Messages

Addressee	Date Sent	Text	Cancel Date

Gen Reg No **Description**

Important/Interest Crime? Date:

Details of Investigation

01/03/2014 11:46

APS 204912 1100CW GE ELLIS

PRIMARY INVESTIGATION DETAILS : 1 Immediate action
1. CAD 003290/01MAR14 refers with PC1100CW ELLIS and PC1411CW UNDERHILL in attendance.

2. Police received a call from the deputy manager of WILLIAM HILL on HARROW ROAD stating that she had a drunk MALE in the shop who was being threatening and violent towards staff.

Police arrived on scene and found the suspect outside, on seeing police he began to stumble away and was stopped around the corner in GREAT WESTERN ROAD. He was clearly drunk.

Police spoke with staff at the location and they informed them that the suspect had been drunk at 0745 hours when they opened the shop. He attempted to get in with them and was abusive when they turned him away. He was then seen to stand in the middle of PRINCE OF WALES JUNCTION and threaten passing motorists. On re-entering the shop he became aggressive towards customers harassing them and then abused the manager when she asked him to leave, swearing at her and threatening her.

The suspect was arrested for section 5 POA and taken to DD where he continued to be abusive. A statement was obtained from the victim/informant and the CCTV could not be viewed or seized as it could not be operated from within the shop.

PRIMARY INVESTIGATION DETAILS : 2 Scene

PRIMARY INVESTIGATION DETAILS : 3 Forensics

PRIMARY INVESTIGATION DETAILS : 4 Victims/Witnesses

PRIMARY INVESTIGATION DETAILS : 5 Suspects

PRIMARY INVESTIGATION DETAILS : 6 Other evidence

01/03/2014 11:52

APS 204912 1100CW GE ELLIS

OIC Changed

Details of Investigation

01/03/2014 12:07

APS 204912 1100CW GE ELLIS

**********HOT RISK ASSESSMENT**********

VICTIM

Clear risk of further offending against victim. NO

Substantial financial loss. (Proportionate to victim's circumstances). NO

Disability/Mental health issue. (Relevant to offence &/or relevant risk/vulnerability identified). NO

Public Servant on duty. NO

Close relationship to offender. (Relevant to the offence). NO

Evidence of

Details of Investigation

01/03/2014 12:07

APS 204912 1100CW GE ELLIS

victimization. NO

Substantial age difference to offender. (Relevant to the offence). NO

OFFENCE

Complexity of investigation. NO

Risk of high community impact. NO

Evidence of corruption. NO

Media interest. NO

MPS Mandatory Crime. NO

Crime scene & forensic opportunities identified. NO

Sensitive material/ information involved. NO
Seek advice prior to entering detail on CRIS

Hazardous materials involved. NO

OFFENDER

Likely to commit further offences. NO

Mental health issues. (Relevant to offence &/or relevant risk/vulnerability identified).NO

Repeat offender against same victim. NO

Position of trust. NO

Relevant offending history. NO

Part of organized crime gang/MPS gang matrix. NO

Borough target/Prolific priority offender. NO

CONFIDENCE AND SATISFACTION

VICTIM CARE CARD GIVEN NO

CRIME PREVENTION ADVICE GIVEN? YES

PRACTICAL HELP GIVEN? YES

Details of Investigation

01/03/2014 13:18

DS 205683 AJ YOUNG

Service Flag CO added

01/03/2014 13:18

DS 205683 AJ YOUNG

Screened In

01/03/2014 13:19

DS 205683 AJ YOUNG

Classification confirmed

03/03/2014 10:23

CIV 622264 AT MARNELL

Service Flag CO deleted

03/03/2014 15:11

PC 231346 1953CW M BOLT

SUSP1 was too drunk to be dealt with by IIO and was handed over to be dealt with by a late turn or Night duty officer when he had sobered up. There has been no update on this report and it appears that the suspect has been bailed to myself, although I am unclear as to why. The relevant paperwork was left on the board for an officer to deal with SUSP1 and so at this point in time I am unsure as to where my notes are. I have sent an email to PS COOKE 3091CW who made an entry on the custody record that SUSP1 has been bailed back to me to enquire as to what is going on.

Data Protection Act - Dispose Of As Confidential Waste
PC BG LEWIS 4161CW 200892
CR:6509799/14 CrType:B Notifiable/MPS/Other:N-1 Status:U Press:Y Class:S/Pub Order S 4a
GLU:CW
Details of Investigation

03/03/2014 15:16

PC 231346 1953CW M BOLT

Victim contacted by telephone and updated that SUSP1 has been bailed with conditions not to enter the the William Hill Betting shop 357 Harrow Road and tro not contact any member of staff there directly or indirectly. SUSP1 is BTR to Paddington Green on 13/03/2014 at 1600hrs

13/03/2014 19:30

PC 233890 1327CW P FAN

On advice from Custody Sergeant WOODS and ERO EDWARDS, there was not enough Evidence for the Section 5 POA as there was not a M.O.P witness statement taken for this part of the offence.

Section 5 POA was N.F.A'd at around 1630 hours.

Drunk and Disorderly Charge was authorised at 1756 hours with Bail Granted for [redacted] to attend West London Narey Magistrates Court on 26/03/2014 at 1000 hours

14/03/2014 22:25

PC 231346 1953CW M BOLT

I am still showing as needing to do a victim update. I have contacted the victim with email and letter to tell her that SUSP1 was NFA for the section 5 but charged with D&D howeverbut the VCOP update outstaning will not go away.

15/03/2014 22:55

PS 227430 1091CW RJ PHAIR

INVESTIGATION COMPLETE SUPERVISION

This matter is complete as insufficient evidence to proceed.

Memos

Sent To **Noted By** **Completed By** **Entered By**					**Urgent?**	**Date** **Noted**	**Completed**	**Cancelled**	**Entered**
Sent: PC	231346	1953CW	BOLT	M					
Noted: PC	231346	1953CW	BOLT	M					
Completed: PC	231346	1953CW	BOLT	M					
Entered: CIV	622264		MARNELL	AT					
						03/03/2014	03/03/2014		03/03/2014

Please can you update the susp details i.e. if they have been BTR thanks

Sent: PS	176394	1053CW	HUTTON	WM					
Noted: PS	176394	1053CW	HUTTON	WM					
Completed: PS	176394	1053CW	HUTTON	WM					
Entered: PC	231346	1953CW	BOLT	M					
						15/03/2014	15/03/2014		14/03/2014

Sarge, VCOP will not go away! VIW has been contacted and knows the outcome but it still says i owe an update to VIW1. Please can you have a look and help as you're the guru with VCOP!

Create Action/Decision/Review Screens ?
Action/Decision/Review Screens Created By:

Create CAIT Screens?
CAIT Screens Created By:

Case Mgt Administration

Is SIO Same As OIC Supervisor?
Current Senior Investigating Officer (SIO):
Allocated:

Noted?
Noted Date/Time:

Previous SIOs:

Officer	**Allocated**	**Noted**

Review Period: days

Next Review Due:

Summary:

Actions:	Total:	Ready for Completion:	Completed:
Decisions:	Total:	With Rationale:	Seen By SIO:
Review:	Total:		

Data Protection Act - Dispose Of As Confidential Waste
PC BG LEWIS 4161CW 200892
CR:6509799/14 CrType:B Notifiable/MPS/Other:N-1 Status:U Press:Y Class:S/Pub Order S 4a
GLU:CW

Supervision

Initial Entry

Initial I.O.:			
Rank:	APS		
Surname:	ELLIS	Initials:	GE
Wt/Pay No:	204912	Div/D No:	1100CW

Crime Recorded by:	204912 ELLIS APS 1100CW GE
Date/Time:	01/03/2014 11:28
Recording Unit:	CW

Supervision

Initial entry checked?	Y
Initial entry checked by:	PS HILLMAN 170CW 186045
Date/Time:	01/03/2014 12:14

Ongoing Supervision

Date	Supervision By
15/03/2014 22:55	PS 1091CW/227430 RJ PHAIR
11/03/2014 16:05	PS 1091CW/227430 RJ PHAIR

Investigation complete?	Y
Investigation complete by:	PS 1091CW/227430 RJ PHAIR
Date/Time:	15/03/2014 22:55

Crime Report closed?	Y
Crime Report closed by:	PC 1297CW/228115 RM MILLS
Date/Time:	19/03/2014 13:15

Screening

Screening Decision:	IN Crime screened "in" for further investigation.
Reason:	92 Proportionate Investigation
Text:	
Ay	ARREST

Screening History

Decision	Reason	Text

Completion

Date/Time CR Last Updated:	19/03/2014 13:15
CR Completed?	Y
Date/Time:	19/03/2014 13:15
By (Wt.No):	228115

Data Protection Act - Dispose Of As Confidential Waste
PC BG LEWIS 4161CW 200892
CR:6509799/14 CrType:B Notifiable/MPS/Other:N-1 Status:U Press:Y Class:S/Pub Order S 4a
GLU:CW

Supervision

Bring Forward:

Date	**Date Entered**	**For**
Reason		
Date Cancelled	**Cancelled By**	

Data Protection Act - Dispose Of As Confidential Waste
PC BG LEWIS 4161CW 200892
CR:6532741/14 CrType:B Notifiable/MPS/Other:N-1 Status:U Press:N Class:S/Common Assault
GLU:CW

General Information

Screening Decision: IN

Main

IU:	CW WESTMINSTER		
Crime Type:	B	H/O Crime Type:	I
Allegation (Prefix):			
Allegation:			
Committed on/from Date:	SUN 13/07/2014 14:45		
Committed to Date:	SUN 13/07/2014 15:00		
Reported Date:	WED 23/07/2014 12:18		
How Notified:	NP Phone Call to Police		
Restricted? By:		Date:	
Restriction Reason:			

Flags
CW

Borough **Branch**

Service **Area (Historical)**

OIC

Is OIC Same As Reporting Officer ?			
Investigating Officer's Rank:	PC		
Surname:	SPENCER	Initials:	O
Warrant Number:	235800 Div/D Number:	Usual Relief:	S
Duty:	AA Borough Uniform		
Station/Branch:	CW WESTMINSTER		
Allocated Date/Time:	07/08/2014 13:39		
Allocation Noted?	Y	Noted Date/Time:	07/08/2014 14:53

Previous OIC Details

Usual Relief	Duty	Station Branch	Allocated Date/Time	Noted Date/Time
PS 207652 AM BROWN 130CW				
F	OA Other duty(Uniform)	CWN	28/07/2014 07:55	
DS 195682 BN GIBBS				
Z	AA Borough Uniform	CW	25/07/2014 15:44	28/07/2014 07:53
PC 215322 SJ HAWKE 1509CW				
G	OA Other duty(Uniform)	CWN	23/07/2014 15:09	23/07/2014 15:09

OIC Supervisor: PS130CW/207652 AM BROWN

Data Protection Act - Dispose Of As Confidential Waste
PC BG LEWIS 4161CW 200892
CR:6532741/14 CrType:B Notifiable/MPS/Other:N-1 Status:U Press:N Class:S/Common Assault
GLU:CW

General Information

Press

Suitable for Press? N
Restrictions:
Is this a Specrim? N
Date/Time:
Was a Firearm Used? N
Was other Weapon Used? N
Are there Terrorist Implications? N
Was a Suspect present on Police arrival? N
No. of Suspects Present:
Was the Suspect(s) arrested? N
No. of Suspects Arrested:

Source System References

Source System Name	Source System Reference	Entered Date/Time	Entered By
CAD	006455/13JUL14	23/07/2014 15:07	PC 1509CW/215322 SJ HAWKE

Totals

Total Values:

Stolen £: Outstanding £: Damaged £:
Recovered £: Damaged On Recovery £:

Total:

VIW(s):	1	Property	0	Vehicles(s):	0
Accused:	0	Suspect(s):	1	CAIT Subject(s):	0

Drugs/Fraud

Is this CR for an arrest for possession etc. (not theft) of controlled drugs?
If Fraudulent Use-Item Used: N

DV/Hate Crime
Is this a Hate Crime/Domestic Incident/Carer Abuse? N

Domestic Incident? Forced Marriage?
Honour Based Violence? Hate Crime?
Carer Abuse?

Initial Risk Assessment (SPECSS+):
Completed by:

Initial Risk Assessment Management Supervised?
Completed by:

Current Risk Assessment (SPECSS+):
Completed by:

Form 124D Completed?
Completed by:

Form124D Supervised?
Completed by:

Received by the CSU? CSU Reference

Data Protection Act - Dispose Of As Confidential Waste
PC BG LEWIS 4161CW 200892
CR:6532741/14 CrType:B Notifiable/MPS/Other:N-1 Status:U Press:N Class:S/Common Assault
GLU:CW

General Information

Completed by:

LGBT Relationship?

Category of Hate Crime

Race?
Faith/Religion/Belief? Religion Name:
Homophobia?
Transphobia?
Disability?
Targeted because of Vulnerability?

Venue

Location

OMPD?
Address:
O/S,William Hill Bookmakers 357,HARROW ROAD,
LONDON,W9 3NA
Location Text:

GLU: CW Local Id: CW17 Grid Ref: 523905,182488
Watch Area:

Main

Location Type(s): JF Betting Shop

Is the Venue covered by CCTV or in a CCTV Area? Y
CCTV Options: CE CCTV Not Recovered By Police

Approach:
Entry Method:
Entry Point:
Exit Point:
Security:
Person On Premises?
Other Info:

Internal Transfer

Date/Time	Transferred By	Previous GLU	Previous IU

Transfer From MPS

Transfer from Met To:-
Service:
Station:
Their Reference:

Received By:-
Rank:
Number:
Surname:

Victim/Informant/Witness Details

VIW No: 1 Of: 1
Role(s): V I

Total - Victims: 1
Total Witness: 0
CAIT Subject No:

Personal Details

Co/Public Body?
Title: [redacted]
Surname: [redacted]
Co./Forenames: [redacted]
Date of Birth: [redacted]
Age Estimated:
App. Age or From: [redacted]
To:
Sex: [redacted]
Ethnic Appearance: [redacted]
Self Class Ethnicity: [redacted]-[redacted]
Occupation: [redacted]
Occupation relevant to offence: N
School or College:

GLU:
Local ID:
GridRef:
National of 1: UNITED KINGDOM
Passport No 1:
National of 2:
Passport No 2:
Religion:

Address Details

VIW's Address is same as VEN?
Address:
WITHHELD
GLU: WITHHELD
Local ID: WITHHELD
GridRef: WITHHELD
Home Intelligence Unit: WITHHELD

PCM: P
CNAA Reason:

Contact Details:
Home: WITHHELD
Business: WITHHELD
Mobile: WITHHELD
Other: WITHHELD
Email: WITHHELD

Victim/Informant/Witness Details

Injury Details

Injury Degree: HD No Injury
Injury Description:
Description/Dress:

Vulnerable/intimidated Victim/Witness? WITHHELD
Reason for Vulnerability/Intimidation: WITHHELD

Victim Interviews

Interview Type	Date of Interview	Start Time	Location	Other Persons Present	Interviewing Officer	eStatement Ref No

Actions

MG11 Taken? Witness Albums Visited? N
Victim of Reported Crime to Police in last 12 months? N No
Is V willing for VSS to be informed? N No
V Code of Practice Applicable? Y
215322 PC HAWKE SJ 23/07/2014

Changed To	Entered By	Date

VCOP Actn Compl? Y
207652 PS BROWN AM 27/08/2014
Fraud Cl'rup Date:

Knows Suspect No.	How Known

Aware of Suspect No.	How Victim or Witness aware of Arrest

Victim/Informant/Witness
Details

Knows Accused No. **How Known**

Needs

Does anyone perceive VIW to be Deaf and/or Disabled? N
If Yes, who? VIW/Other:

Details of Disability:

Physical Access Needs:

Personal Care Needs:

Medical Needs:

Communication Needs:

Sexual Orientation:
Gender Identity:

Officer's Notes:
The victim's district managers email address for cctv enquiries is; [redacted]

Victims Code of Practice

VIW No: 1 Of: 1

VSS Info:

Local VSS Ref:
Language (If not English):
Victim Contacted by I.O? Y
Date/Time: 15/08/2014 09:15

Action Taken	Action Date	Entered by					Generated	Date Generated
AA SI - Assault	25/07/2014	8303	PC	DE CHASTELAIN	EV	Y		25/07/2014 15:43
HX VU-Regular Update	25/07/2014	8303	PC	DE CHASTELAIN	EV	N		
EA VSS Informed	25/07/2014	8303	PC	DE CHASTELAIN	EV			
HX VU-Regular Update	15/08/2014	235800	PC	SPENCER	O	N		
HU VU-Suspect NFA/Elim	22/08/2014	235800	PC	SPENCER	O			
HK VU-Case Closed Undet	27/08/2014	207652	PS	BROWN	AM			

Remarks:
Viw 1 - wishes to withdraw allegation will contact them again 18/08/2014 to arrange to take withdrawal statement.

Data Protection Act - Dispose Of As Confidential Waste
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GLU:CW

Suspect Details

Suspect No: 1 Of: 1 Currently Eliminated? Y

Possibly identical to
Suspect No(s):
CAIT Subject No:

Names

Case Class:
Surname Used:
Forenames Used:
PNC Surname:
PNC Forename:
Maiden Name:

Alias Surname

Alias Forenames
[redacted]

Nickname

Info Markers

Do you want to create an Accused record? Accused Created: Accused No: 0

PNC Status: P
CRO Result:
PNC Result:

Suspect considers they have a disability?
Disability Category:

Warning Signal Type **On PNC?**

Created by: PC 1509CW/215322 SJ HAWKE
Date/Time: 23/07/2014 15:15

Last Updated by:
Date/Time:

Personal Details

Date of Birth: Age Estimated: Y
App. Age or From: [redacted] To: [redacted]
Sex: [redacted]
Ethnic Appearance: [redacted]
Self Classified Ethnicity:
Height Imperial: [redacted] Height Metric: [redacted]
Birth Place:
Nationality(1):

Suspect Details

Nationality(2):
Passport No 1:
Passport No 2:
Dress: Blue/black hat, dark jacket.
Composite Description: N
Religion:
Occupation:
School or College:

GLU: Local ID: Grid Ref:
Details of ID Docs:

Data Protection Act - Dispose Of As Confidential Waste
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GLU:CW

Suspect Details

Personal Description

Hair
Desc: Colour: Texture:
Facial Hair
Type: [redacted] Colour: [redacted] Features:
Eye Colour Left: Eye Colour Right:
Spectacles? Spectacles Type:
Eyebrows:
Voice: [redacted] Accent: [redacted]
Photo-Fit Ref: Build: [redacted]

Marks/Scars

Type/Position

Address

Suspect's Address is same as VEN ?

Address:

GLU: Local ID: Grid Ref:
Home Intelligence Unit:
Frequents:

Contact Details:
Home: Business:
Mobile: Other:
Email:

Known to Victim

VIW Knows Suspect? N

Known by VIW No How Known

Was the Victim or Witness aware the Suspect was arrested?

VIW No. How Victim or Witness aware of arrest

Suspect Elimination

Suspect No: 1 Of: 1
Currently Eliminated? Y

Disposal

Circulate PNC?

Date Eliminated	Reason Eliminated	Method of Detection	How Suspect Notified	Date/Time Notified	Notified By:				
					Rank	Div/D Number	Warrant Number	Initials	Surname
22/08/2014	NQ Victim unwilling to prosecute								

Date of Arrest	Custody No	Result	Bail Return Date/Time	Station	Entered By:					Entered Date/Time
					Rank	Div/D Number	Warrant Number	Init's	Surname	

Identifiable By

Identifiable By
VIW No(s):

Circulation

Title	Date	Case No	Date Cancelled

Wanted Docket Ref No:
ID by Witness Albums?
Warrant Issued? Date Warrant Issued:

Conditions:

Officer's Notes:

Support Services

IDO

IDO Request:

Request Id	Requested Date/Time	Surname	Warrant/Pay No	Accepted Date/Time	Cancel Reason	Cancel Date

IDO Visit:

Request Id	Surname	Visit Date/Time	Entry Gained	Job Sheet No	Useful Marks

CPO

CPO Request:

Request Id	Requested Date/Time	Surname	Warrant/Pay No	Accepted Date/Time	Cancel Reason	Cancel Date

CPO Visit:

Request Id	Surname	Visit Date/Time	Entry Gained	Job Sheet No	Useful Marks

Photographer

Photographer Request:

Request Id	Requested Date/Time	Surname	Warrant/Pay No	Accepted Date/Time	Cancel Reason	Cancel Date

Photographer Visit:

Request Id	Surname	Visit Date/Time	Entry Gained	Job Sheet No	Useful Marks

Other

Other Request:

Request Id	Type	Requested Date/Time	Surname	Warrant/Pay No	Accepted Date/Time	Cancel Reason	Cancel Date

Other Visit:

Request Id	Surname	Visit Date/Time	Entry Gained	Job Sheet No	Useful Marks

Access Info

Features

Features/instruments

EP Victim punched
EQ Victim pushed
MF Susp been drinkng

Text:
Victim punched and pushed by male unknown to him when asked not to smoke in the doorway of his work premises. Suspect then walked away when victim went back into the shop/

IDO Text:
Prop Ref Nos

Forensic Data

Lab Reference No:

FORENSIC REFERENCES

Type	**No**

Officers Notes:

Data Protection Act - Dispose Of As Confidential Waste
PC BG LEWIS 4161CW 200892
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GLU:CW

Linked Crimes

Chain ID	Removed from Chain?	Police Contact

Classification

Method

Current Position: C Classified
Method: Victim punched and pushed outside his work place by unknown male who was asked to stop smoking and drinking in the shops's doorway. Victim went back inside the shop and the suspect walked away not followed by the victim.

Classification Set by CIT:
Lock: Date:
By:

Classify

Main Classification:

	Code	Victim	Date
Initial:	S105/01	Y	23/07/2014 15:07
Current:	S105/01	Y	23/07/2014 15:31

Description: SUBSTANT./Common Assault - Summarily Only

Subsidiary Classifications:

Code	Victim	Count

Confirm? Y Date: 24/07/2014 12:28
By: DC /205316 HA PEARSON
Victim Count Discrepancy:

Classification

No Crime

No Crime? Date:
Reason:
Confirm? Date:
By:

Crime Related Incident? Date:
Confirm? Date:
By:

Statistical Info

Current Status: U Undetected Crime Last Changed:
Cleared-Up Reason: Date:

Original Classification

Off.	Code	Victim	Count	Status	Outcome	Outcome Changed	Change Reason	Last Changed	Last Changed By

Confirmed Date: 24/07/2014 12:28
Confirmed By: DC /205316 HA PEARSON

Statistical Parent CR:

Administrative Detections

Home Office Rule:
Date:
By:
Explanatory Notes:

Classification

All Current Home Office
Requirements Satisfied: Date:
By:

Of Interest To

Method Index:
CP Analysis:

Victim Amendments

Date Added	Time	VIW No	By

Date Removed	Time	VIW No	By

History

Off.	Code	Victim	Count	Status	Outcome	Reason	When	By

Data Protection Act - Dispose Of As Confidential Waste
PC BG LEWIS 4161CW 200892
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GLU:CW

Messages

Addressee	Date Sent	Text	Cancel Date

Gen Reg No **Description**

Important/Interest Crime? Date:

Details of Investigation

23/07/2014 15:54

PC 215322 1509CW SJ HAWKE

PRIMARY INVESTIGATION DETAILS : 1 Immediate action
CAD 6455/13JUL14 refers to the victim telephoning police to report the assault on him by an unknown male.

CM18 L appointment made and assigned to PC 1509CW posted.

The victim states that between around 1445-1500 hours on 13th July 2014 he was working at the venue where he is employed. Because of anti-social issues around street drinkers and those previosuly drinking inside the premises threatening their gaming licence, the venue banned alcohol inside the shop. On this occasion the suspect, who is unknown to the victim other than possibly having a first name of [redacted], was standing in the doorway of the shop drinking and smoking.
The victim approached him and asked politely that he stands to one side at which point this male punched the victim on the chin. The victim states that he was more shocked than injured and when the suspect then pushed him he went back inside the shop choosing not further engage with him.
The suspect did not follow the victim inside, instead walked away from the premises towards the direction of Paddington, not followed by the victim.

The victim did not sustain any injury but said he was more shocked by the males unprovoked and unnecessary reaction to merely being asked to move away from the door.

PRIMARY INVESTIGATION DETAILS : 2 Scene
The incident occured outside the premises of the William Hill betting shop at 357 Harrow Road, Maida Hill, W9 3NA.

No scene to preserve.

PRIMARY INVESTIGATION DETAILS : 3 Forensics
No forensics identified regarding this incident.

PRIMARY INVESTIGATION DETAILS : 4 Victims/Witnesses
VIW1 - Victim and informant, please refer to details pages.

There are no communication issues with the victim who does not consider himself to be vulnerable.

The victim was unable to provide any witnesses to this assault and stated that other persons drinking outside the shop at the time were unknown to him.

The victim will be called back with the crime report reference number when filed.

PRIMARY INVESTIGATION DETAILS : 5 Suspects
SUSP1 - Suspect who occasionally visits the premises, see details pages for description provided by victim.

The suspect is unknown to the victim other than having a possible name of [redacted] He does not know whether he is local and unable to provide any further information of him.

Victim believed he may have possible mental health or alcoholic use issues.

PRIMARY INVESTIGATION DETAILS : 6 Other evidence
CCTV is present at the venue but can not be viewed by staff at the shop/ Any application would have to be made through their head office. Therefore because of this the outside coverage and whether this incident was recorded is unknown at this time.

**********HOT RISK ASSESSMENT**********

******If Yes to any of these questions detail required on Dets******

VICTIM
Clear risk of further offending against victim. NO
Substantial financial loss. (Proportionate to victim's circumstances). NO
Disability/Mental health issue. (Relevant to offence &/or relevant risk/vulnerability identified). NO
Public Servant on duty. NO
Close relationship to offender. (Relevant to the offence). NO
Evidence of victimization. NO
Substantial age difference to offender. (Relevant to the offence). NO

OFFENCE
Complexity of investigation. NO
Risk of high community impact. NO
Evidence of corruption. NO
Media interest. NO
MPS Mandatory Crime. YES
Crime scene & forensic opportunities identified. NO
Sensitive material/ information involved. NO
Seek advice prior to entering detail on CRIS
Hazardous materials involved. NO

OFFENDER
Likely to commit further offences. N/K
Mental health issues. (Relevant to offence &/or relevant risk/vulnerability identified). - Believed by victim to possibly have some form of issue.
Repeat offender against same victim. NO
Position of trust. NO
Relevant offending history. N/K
Part of organized crime gang/MPS gang matrix. N/K
Borough target/Prolific priority offender. N/K

Details of Investigation

24/07/2014 12:23

DC 205316 HA PEARSON

Service Flag CO added

24/07/2014 12:27

DC 205316 HA PEARSON

Screened In

24/07/2014 12:28

DC 205316 HA PEARSON

Classification confirmed

25/07/2014 15:41

PC 8303 3166CW EV DE CHASTELAIN

Service Flag CO deleted

25/07/2014 15:45

PC 8303 3166CW EV DE CHASTELAIN

OIC Changed

28/07/2014 07:55

DS 195682 BN GIBBS

SNT Crime manager Review.

The only proportionate line of inquiry at this stage is the CCTV. This matter has been screened to SNT ward where offence happened to check CCTV and carry out VIDO procedure.

MG11 needs to be obtained.

OIC to consider WADS

No other proportionate lines of inquiry available at this time.

VCOP to be adhered to.

28/07/2014 07:56

DS 195682 BN GIBBS

OIC Changed

30/07/2014 14:47

PC 205554 3272CW D HOWSDEN

CW CMU Administration Entry...
Dets stated that the Suspects was drunk or had been drinking, however feature code MF (Suspect been drinking) was not entered in the Feature screen. This is a failure in the Data Quality list.... The MF code has now been entered.

07/08/2014 13:39

PS 207652 130CW AM BROWN

OIC Changed

07/08/2014 13:40

PS 207652 130CW AM BROWN

##############SUPERVISION NOTE##################

Data Protection Act - Dispose Of As Confidential Waste
PC BG LEWIS 4161CW 200892
CR:6532741/14 CrType:B Notifiable/MPS/Other:N-1 Status:U Press:N Class:S/Common Assault
GLU:CW

Details of Investigation

Delay in allocation due to annual leave. This report has been allocated and investiagtion will commence on our next duty day of 11/08/2014

11/08/2014 15:14

PC 235800 O SPENCER

Left message for Viw 1 to contact 1526CW asap, to arrange to provide a statement also confirm whether there would be CCTV as I believed incident took place of Venue's CCTV range.

11/08/2014 15:44

PC 235800 O SPENCER

Also emailed - [redacted] / 'Trocadero CCTV' to ascertain as to whether CCTV footage is available

12/08/2014 12:44

PC 235800 O SPENCER

Spoke to [redacted] - responsible for CCTV of the venue and they have informed the suspect hasn't actually entered them premises at any point during the incident and also. The council CCTV camera opposite the venue was out of service at the time.

15/08/2014 09:23

PC 235800 O SPENCER

Viw 1 - wishes to withdraw allegation will contact them again 18/08/2014 to arrange to take withdrawal statement.

Details of Investigation

21/08/2014 19:17

PC 235658 A ALKIZWINI

PC 1526CW and PC 1527CW attended venue at 1350hrs.
VIW1 does not wish to pursue the case. A pocket book entry made into PC1526CW's pockets book, Page number, 10 signed by VIW1.

27/08/2014 14:43

PC 235800 O SPENCER

Report suitable for closure.

Memos

Sent To **Noted By** **Completed By** **Entered By**					**Urgent?**	**Date** **Noted**	**Completed**	**Cancelled**	**Entered**
Sent: PC	215322	1509CW	HAWKE	SJ					
Noted:									
Completed:									
Entered: PC	205554	3272CW	HOWSDEN	D				30/07/2014	30/07/2014

CW CMU... Please remember in future if the suspect has been drinking or drunk you must add an MF flag in the feature screen. Cheers.

Sent: PC	205554	3272CW	HOWSDEN	D					
Noted: PC	205554	3272CW	HOWSDEN	D					
Completed: PC	205554	3272CW	HOWSDEN	D					
Entered: PC	205554	3272CW	HOWSDEN	D		31/07/2014	31/07/2014		30/07/2014

above memo entered in wrong report.

Create Action/Decision/Review Screens ?
Action/Decision/Review Screens Created By:

Create CAIT Screens?
CAIT Screens Created By:

Case Mgt Administration

Memo

Is SIO Same As OIC Supervisor?
Current Senior Investigating Officer (SIO):
Allocated:

Noted?
Noted Date/Time:

Previous SIOs:

Officer	**Allocated**	**Noted**

Review Period: days

Next Review Due:

Summary:

Actions:	Total:	Ready for Completion:	Completed:
Decisions:	Total:	With Rationale:	Seen By SIO:
Review:	Total:		

Data Protection Act - Dispose Of As Confidential Waste
PC BG LEWIS 4161CW 200892
CR:6532741/14 CrType:B Notifiable/MPS/Other:N-1 Status:U Press:N Class:S/Common Assault
GLU:CW

Supervision

Initial Entry

Initial I.O.:			
Rank:	PC		
Surname:	HAWKE	Initials:	SJ
Wt/Pay No:	215322	Div/D No:	1509CW

Crime Recorded by:	215322 HAWKE PC 1509CW SJ
Date/Time:	23/07/2014 15:07
Recording Unit:	CWN

Supervision

Initial entry checked?	Y
Initial entry checked by:	DC PEARSON 205316
Date/Time:	24/07/2014 12:27

Ongoing Supervision

Date	Supervision By
27/08/2014 16:45	PS 130CW /207652 AM BROWN
07/08/2014 14:12	PS 130CW /207652 AM BROWN
28/07/2014 07:53	DS /195682 BN GIBBS

Investigation complete?	Y
Investigation complete by:	PS 130CW /207652 AM BROWN
Date/Time:	27/08/2014 16:46

Crime Report closed?	Y
Crime Report closed by:	PC 4703CW/192286 TM GORRINGE
Date/Time:	09/09/2014 10:29

Screening

Screening Decision:	IN Crime screened "in" for further investigation.
Reason:	92 Proportionate Investigation
Text:	
hp2 b - CCTV?	

Screening History

Decision	Reason	Text

Completion

Date/Time CR Last Updated:	09/09/2014 10:29
CR Completed?	Y
Date/Time:	09/09/2014 10:29
By (Wt.No):	192286

Data Protection Act - Dispose Of As Confidential Waste
PC BG LEWIS 4161CW 200892
CR:6532741/14 CrType:B Notifiable/MPS/Other:N-1 Status:U Press:N Class:S/Common Assault
GLU:CW
Supervision

Bring Forward:

Date	**Date Entered**	**For**
Reason		
Date Cancelled	**Cancelled By**	

Data Protection Act - Dispose Of As Confidential Waste
PC CS MARRIOTT 3540CW 219276
CR:6546179/13 CrType:B Notifiable/MPS/Other:N-7 Status:D Press:Y Class:S/Crim Dam O499
GLU:CW

General Information

Screening Decision: IN

Main

IU:	CW WESTMINSTER		
Crime Type:	B	H/O Crime Type:	7
Allegation (Prefix):			
Allegation:			
Committed on/from Date:	WED 18/09/2013 13:15		
Committed to Date:			
Reported Date:	WED 18/09/2013 13:30		
How Notified:	NP Phone Call to Police		
Restricted? By:		Date:	
Restriction Reason:			

Flags
CW

Borough **Branch**

Service **Area (Historical)**

OIC

Is OIC Same As Reporting Officer ?			
Investigating Officer's Rank:	PC		
Surname:	SPENCER	Initials:	O
Warrant Number:	235800 Div/D Number:	Usual Relief:	S
Duty:	AA Borough Uniform		
Station/Branch:	CW WESTMINSTER		
Allocated Date/Time:	26/01/2014 07:56		
Allocation Noted?	Y	Noted Date/Time:	26/01/2014 08:56

Previous OIC Details

Usual Relief	Duty	Station Branch	Allocated Date/Time	Noted Date/Time
PS 229194 GT SKINNER 1058CW				
C	OA Other duty(Uniform)	CWN	17/01/2014 10:41	26/01/2014 07:50
PC 208816 NE PRICE 1175CW				
Q	OA Other duty(Uniform)	CWS	16/01/2014 17:58	17/01/2014 08:20
PC 199956 DE FINN 4273CW				
C	OA Other duty(Uniform)	CWN	12/11/2013 23:04	22/11/2013 21:48
PC 219577 A WALTERS 1608CW				

Data Protection Act - Dispose Of As Confidential Waste
PC CS MARRIOTT 3540CW 219276
CR:6546179/13 CrType:B Notifiable/MPS/Other:N-7 Status:D Press:Y Class:S/Crim Dam O499
GLU:CW

General Information

C	OA Other duty(Uniform)	CWN	30/10/2013 21:46	31/10/2013 20:26

OIC Supervisor: PS1058CW/229194 GT SKINNER

Press

Suitable for Press? Y
Restrictions:
Is this a Specrim? N
Date/Time:
Was a Firearm Used? N
Was other Weapon Used? N
Are there Terrorist Implications? N
Was a Suspect present on Police arrival? N
No. of Suspects Present:
Was the Suspect(s) arrested? N
No. of Suspects Arrested:

Source System References

Source System Name	Source System Reference	Entered Date/Time	Entered By
CAD	004092/18SEP13	18/09/2013 14:12	PC 1183CW/232006 H WHYTE

Totals

Total Values:

Stolen £: Outstanding £: Damaged £: 3500.00
Recovered £: Damaged On Recovery £:

Total:

VIW(s):	2	Property	2	Vehicles(s):	0
Accused:	1	Suspect(s):	1	CAIT Subject(s):	0

Drugs/Fraud

Is this CR for an arrest for possession etc. (not theft) of controlled drugs?
If Fraudulent Use-Item Used: N

DV/Hate Crime
Is this a Hate Crime/Domestic Incident/Carer Abuse? N

Domestic Incident? Forced Marriage?
Honour Based Violence? Hate Crime?
Carer Abuse?

Initial Risk Assessment (SPECSS+):
Completed by:

Initial Risk Assessment Management Supervised?
Completed by:

Current Risk Assessment (SPECSS+):
Completed by:

Form 124D Completed?
Completed by:

General Information

Form124D Supervised?
Completed by:

Received by the CSU? CSU Reference
Completed by:

LGBT Relationship?

Category of Hate Crime

Race?
Faith/Religion/Belief? Religion Name:
Homophobia?
Transphobia?
Disability?
Targeted because of Vulnerability?

Venue

Location

OMPD?
Address:
William Hill Bookmakers,357,HARROW ROAD,
LONDON,W9 3NA
Location Text:

GLU: CW Local Id: CW08 Grid Ref: 524785,182177
Watch Area:

Main

Location Type(s): JF Betting Shop

Is the Venue covered by CCTV or in a CCTV Area? Y
CCTV Options: CD CCTV Recovered By Police CE CCTV Not Recovered By Police

Approach:
Entry Method:
Entry Point:
Exit Point:
Security:
Person On Premises?
Other Info:

Internal Transfer

Date/Time	Transferred By	Previous GLU	Previous IU

Transfer From MPS

Transfer from Met To:-
Service:
Station:
Their Reference:

Received By:-
Rank:
Number:
Surname:

Victim/Informant/Witness Details

VIW No: 1 Of: 2
Role(s): V

Total - Victims: 1
Total Witness: 1

CAIT Subject No:

Personal Details

Co/Public Body? Y
Title:
Surname:
Co./Forenames: William Hill
Date of Birth: WITHHELD
Age Estimated:
App. Age or From:
To:
Sex:
Ethnic Appearance:
Self Class Ethnicity:
Occupation:
Occupation relevant to offence: N
School or College:

GLU:
Local ID:
GridRef:
National of 1:
Passport No 1:
National of 2:
Passport No 2:
Religion:

Address Details

VIW's Address is same as VEN?
Address:
WITHHELD
GLU: WITHHELD
Local ID: WITHHELD
GridRef: WITHHELD
Home Intelligence Unit: WITHHELD

PCM:
CNAA Reason:

Contact Details:
Home: WITHHELD
Business: WITHHELD
Mobile: WITHHELD
Other: WITHHELD
Email: WITHHELD

Victim/Informant/Witness Details

Injury Details

Injury Degree:
Injury Description:
Description/Dress:

Vulnerable/intimidated Victim/Witness? WITHHELD
Reason for Vulnerability/Intimidation: WITHHELD

Victim Interviews

Interview Type	Date of Interview	Start Time	Location	Other Persons Present	Interviewing Officer	eStatement Ref No

Actions

MG11 Taken?
Witness Albums Visited? N
Victim of Reported Crime to Police in last 12 months? Y Yes
Is V willing for VSS to be informed? N No
V Code of Practice Applicable? N
232006 PC WHYTE H 18/09/2013

Changed To	Entered By	Date

VCOP Actn Compl?

Fraud Cl'rup Date:

Knows Suspect No.	How Known

Aware of Suspect No.	How Victim or Witness aware of Arrest

Victim/Informant/Witness
Details

Knows Accused No. **How Known**

Needs

Does anyone perceive VIW to be Deaf and/or Disabled?
If Yes, who? VIW/Other:

Details of Disability:

Physical Access Needs:

Personal Care Needs:

Medical Needs:

Communication Needs:

Sexual Orientation:
Gender Identity:

Officer's Notes:

Victim/Informant/Witness Details

VIW No: 2 Of: 2
Role(s): I W

Total - Victims: 1
Total Witness: 1

CAIT Subject No:

Personal Details

Co/Public Body?
Title: [redacted]
Surname: [redacted]
Co./Forenames:
Date of Birth:
Age Estimated:
App. Age or From: Over 18
To:
Sex:
Ethnic Appearance: [redacted]
Self Class Ethnicity:
Occupation:
Occupation relevant to offence: N
School or College:

GLU:
Local ID:
GridRef:
National of 1:
Passport No 1:
National of 2:
Passport No 2:
Religion:

Address Details

VIW's Address is same as VEN?
Address:
WITHHELD
GLU: WITHHELD
Local ID: WITHHELD
GridRef: WITHHELD
Home Intelligence Unit: WITHHELD

PCM:
CNAA Reason:

Contact Details:
Home: WITHHELD
Business: WITHHELD
Mobile: WITHHELD
Other: WITHHELD
Email: WITHHELD

Victim/Informant/Witness Details

Injury Details

Injury Degree:
Injury Description:
Description/Dress:

Vulnerable/intimidated Victim/Witness? WITHHELD
Reason for Vulnerability/Intimidation: WITHHELD

Victim Interviews

Interview Type	Date of Interview	Start Time	Location	Other Persons Present	Interviewing Officer	eStatement Ref No

Actions

MG11 Taken?
Victim of Reported Crime to Police in last 12 months?
Is V willing for VSS to be informed?
V Code of Practice Applicable?

Witness Albums Visited? N

Changed To	Entered By	Date

VCOP Actn Compl?

Fraud Cl'rup

Date:

Knows Suspect No. **How Known**

Aware of Suspect No. **How Victim or Witness aware of Arrest**

Victim/Informant/Witness
Details

Knows Accused No. **How Known**

Needs

Does anyone perceive VIW to be Deaf and/or Disabled?
If Yes, who? VIW/Other:

Details of Disability:

Physical Access Needs:

Personal Care Needs:

Medical Needs:

Communication Needs:

Sexual Orientation:
Gender Identity:

Officer's Notes:

Data Protection Act - Dispose Of As Confidential Waste
PC CS MARRIOTT 3540CW 219276
CR:6546179/13 CrType:B Notifiable/MPS/Other:N-7 Status:D Press:Y Class:S/Crim Dam O499
GLU:CW

Property Details

Item No: 1 Of: 2 VIW No:
Property Type: CO Financial-Other/NK Status: DA Damaged
Stolen £: Damaged £: 2000.00 Handled £:

Make: Model:
ID Number/ ID Number/
Indiv/from: Indiv/to:
IMEI No:
Property Mark:
Inscription:
Description including damage:
2x gambling machines
Victim considers property item to be Art or Antique?
Of NIB Interest?

Data Protection Act - Dispose Of As Confidential Waste
PC CS MARRIOTT 3540CW 219276
CR:6546179/13 CrType:B Notifiable/MPS/Other:N-7 Status:D Press:Y Class:S/Crim Dam O499
GLU:CW

Property Details

Item No: 2 Of: 2 VIW No:
Property Type: EB TV/Video/DVD/Projectors equipmt Status: DA Damaged
Stolen £: Damaged £: 1500.00 Handled £:

Make: Model:
ID Number/ ID Number/
Indiv/from: Indiv/to:
IMEI No:
Property Mark:
Inscription:
Description including damage:
3x TV screens smashed
Victim considers property item to be Art or Antique?
Of NIB Interest?

Accused Details

Accused No: 1 Of: 1 AA Charge/further charg
Charged/Summonsed
Surname: [redacted]
Forename(s):
PNC File name
Surname:
Forename(s):

Personal Details

Occupation: Relevant to Offence? N
School or College:

GLU: Local Id: Grid Ref:

Date of Birth: [redacted] Age: [redacted]
Sex: Ethnic Appearance:
Self Class Ethnicity:
OVRO Number: Birth Place:
National Of 1: [redacted]
National Of 2
Passport No 1: Passport No 2:
Religion:

Address

Accused Address Same As Ven ?

Address:
[redacted]
Local Id: [redacted] Grid Ref: [redacted]
Home Intelligence Unit [redacted]

Contact Details:
Home: Business:

Accused Details

Mobile:
Email:

Other:

Additional Details

PNC Status: [redacted]
CRO Result:
This offence circ on PNC?
Disqualified Driver?
Arrested/Summonsed Date/Time:
How Arrested:

PNC Result: [redacted]
Previous Convictions?
On bail at time of offence?

By:(Met)

Is Arrested By (Met) same as OIC details?
Div/D.No:
Rank:
Surname:
Stn/Branch:

Warrant No:
Inits:
Duty at time of arrest:

By:(Non-Met)

Rank:
Surname:
Service:

No:
Station:

Accused Details

Info Markers

Accused considers they have a disability? N
Disability Category:

Warning Signals: Type **On PNC?**

Created by: PC 1451CW/219469 I ARMSTRONG
Date/Time: 24/02/2014 15:28

Last Updated by: PC 2105CW/225816 K MERRITT
Date/Time: 26/02/2014 08:50

Known To Victim

Victim Knows Accused? N

Known by Victim No. **How Known**

Other Names

Maiden Name:

Alias Surname(s): Alias Forename(s):

Nickname(s):
Former names(s):

OTHER OFFENCES CHARGED/SUMMONSED

CR No	Judicial Disposal	Proceedings Type	Prev Rep?	Plea	Finding

OTHER OFFENCES TO BE CLEARED UP

CR No	Judicial Disposal	Proceedings Type	Prev Rep?

Data Protection Act - Dispose Of As Confidential Waste
PC CS MARRIOTT 3540CW 219276
CR:6546179/13 CrType:B Notifiable/MPS/Other:N-7 Status:D Press:Y Class:S/Crim Dam O499
GLU:CW

Accused Custody

Accused No: 1 Of: 1 [redacted]

Proceedings Type

U.R.N (Case No):	[redacted]	Original CR ID:	
Custody No:		Process/Other Ref:	
Offence in Brief:	Criminal Damage		
Judicial Disposal:	AA Charge/further charge		
Date Entered:	25/02/2014		
By:	PC 1297CW/228115 RM MILLS		
Proceedings Type:	AA Charge/further charge		
Date Entered:	26/02/2014		
Date Charged:			

Court Details

Court Appearance Type:
Court:
Date/Time:
Date IM Form served:

Bail Details

Police Bail?	Y
Return to Station Date	
Court Bail?	Unknown
Conditions:	

Current Bail: Date Imposed:
Non Appearance Warrant?
Wanted Docket Ref No:

Data Protection Act - Dispose Of As Confidential Waste
PC CS MARRIOTT 3540CW 219276
CR:6546179/13 CrType:B Notifiable/MPS/Other:N-7 Status:D Press:Y Class:S/Crim Dam O499
GLU:CW

Accused Offence & Results

Accused No: 1 Of: 1 [redacted]

Court Results

Skeletal Charge:

Plea:
Finding:
Sentence:

Date Convicted: Recommended for Deportation?

Appeal Details

Appeal Notice Served?
Varied on Appeal?
If Varied:
Court: Date:

Circulations

Title	Date	Case No.	Date Cancelled

Officer's Notes:

Data Protection Act - Dispose Of As Confidential Waste
PC CS MARRIOTT 3540CW 219276
CR:6546179/13 CrType:B Notifiable/MPS/Other:N-7 Status:D Press:Y Class:S/Crim Dam O499
GLU:CW

Suspect Details

Suspect No: 1 Of: 1 Currently Eliminated? Y

Possibly identical to
Suspect No(s):
CAIT Subject No:

Names

Case Class: SU Suspected
Surname Used: [redacted]
Forenames Used
PNC Surname:
PNC Forename:
Maiden Name:

Alias Surname

Alias Forenames

Nickname

Info Markers

Do you want to create an Accused record? Y Accused Created: 24/02/2014 15:28 Accused No: 1

PNC Status: [redacted]
CRO Result:
PNC Result:

Suspect considers they have a disability? N
Disability Category:

Warning Signal Type **On PNC?**

Created by: PC 1183CW/232006 H WHYTE
Date/Time: 18/09/2013 14:24

Last Updated by:
Date/Time:

Personal Details

Date of Birth: [redacted] Age Estimated: [redacted]
App. Age or From: To:
Sex:
Ethnic Appearance:
Self Classified Ethnicity:
Height Imperial: Height Metric:
Birth Place:
Nationality(1):

Data Protection Act - Dispose Of As Confidential Waste
PC CS MARRIOTT 3540CW 219276
CR:6546179/13 CrType:B Notifiable/MPS/Other:N-7 Status:D Press:Y Class:S/Crim Dam O499
GLU:CW

Suspect Details

Nationality(2):
Passport No 1:
Passport No 2:
Dress: [redacted]
Composite Description: N
Religion:
Occupation:
School or College:

GLU: Local ID: Grid Ref:
Details of ID Docs:

Suspect Details

Personal Description

Hair
Desc: Colour: Texture:
Facial Hair
Type: Colour: Features:
Eye Colour Left: Eye Colour Right:
Spectacles? Spectacles Type:
Eyebrows:
Voice: Accent:
Photo-Fit Ref: Build: [redacted]

Marks/Scars

Type/Position

Address

Suspect's Address is same as VEN ?

Address:
[redacted] Local ID: [redacted] Grid Ref: [redacted]
Home Intelligence Unit: [redacted]
Frequents:

Contact Details:
Home: Business:
Mobile: Other:
Email:

Known to Victim

VIW Knows Suspect? N

Known by VIW No How Known

Was the Victim or Witness aware the Suspect was arrested?

VIW No. How Victim or Witness aware of arrest

Suspect Elimination

Suspect No: 1 Of: 1
Currently Eliminated? Y

Disposal

Circulate PNC? Y

Date Eliminated	Reason Eliminated	Method of Detection	How Suspect Notified	Date/Time Notified	Notified By:				
					Rank	Div/D Number	Warrant Number	Initials	Surname
12/02/2014	AA Arrested and charged	AA Charged	AE Personally	06/02/2014 22:00	PC		235800	O	SPENCER

Date of Arrest	Custody No	Result	Bail Return Date/Time	Station	Entered By:					Entered Date/Time
					Rank	Div/D Number	Warrant Number	Init's	Surname	
06/02/2014	01DD/474/14	Judicial Disposal			PC		235800	O	SPENCER	12/02/2014 19:54

Identifiable By

Identifiable By
VIW No(s):

Circulation

Title	Date	Case No	Date Cancelled

Wanted Docket Ref No:
ID by Witness Albums?
Warrant Issued? Date Warrant Issued:

Conditions:

Officer's Notes:

Support Services

IDO

IDO Request:

Request Id	Requested Date/Time	Surname	Warrant/Pay No	Accepted Date/Time	Cancel Reason	Cancel Date

IDO Visit:

Request Id	Surname	Visit Date/Time	Entry Gained	Job Sheet No	Useful Marks

CPO

CPO Request:

Request Id	Requested Date/Time	Surname	Warrant/Pay No	Accepted Date/Time	Cancel Reason	Cancel Date

CPO Visit:

Request Id	Surname	Visit Date/Time	Entry Gained	Job Sheet No	Useful Marks

Photographer

Photographer Request:

Request Id	Requested Date/Time	Surname	Warrant/Pay No	Accepted Date/Time	Cancel Reason	Cancel Date

Photographer Visit:

Request Id	Surname	Visit Date/Time	Entry Gained	Job Sheet No	Useful Marks

Other

Other Request:

Request Id	Type	Requested Date/Time	Surname	Warrant/Pay No	Accepted Date/Time	Cancel Reason	Cancel Date

Other Visit:

Request Id	Surname	Visit Date/Time	Entry Gained	Job Sheet No	Useful Marks

Access Info

Features

Features/instruments

MO Other feature

Text:

IDO Text:
Prop Ref Nos

Forensic Data

Lab Reference No:

FORENSIC REFERENCES

Type	**No**

Officers Notes:

Data Protection Act - Dispose Of As Confidential Waste
PC CS MARRIOTT 3540CW 219276
CR:6546179/13 CrType:B Notifiable/MPS/Other:N-7 Status:D Press:Y Class:S/Crim Dam O499
GLU:CW

Linked Crimes

Chain ID	Removed from Chain?	Police Contact

Classification

Method

Current Position: C Classified
Method: Suspect damaged gaming machine and three TV screens at location

Classification Set by CIT:
Lock: Date:
By:

Classify

Main Classification:

	Code	Victim	Date
Initial:	S149/83	Y	18/09/2013 14:12
Current:	S149/83	Y	18/09/2013 14:25

Description: SUBSTANT./Criminal Damage to Other Property - Where Value of Damage Is £500 or over and under £5000

Subsidiary Classifications:

Code	Victim	Count

Confirm? Y Date: 18/09/2013 15:32
By: PC 887TP /185904 MA WALDRON
Victim Count Discrepancy:

Classification

No Crime

No Crime? Date:
Reason:
Confirm? Date:
By:

Crime Related Incident? Date:
Confirm? Date:
By:

Statistical Info

Current Status:	D Detected Crime	Last Changed:	26/02/2014
Cleared-Up Reason:	SA Ch/Summ-Prev. Undet	Date:	26/02/2014

Original Classification

Off.	Code	Victim	Count	Status	Outcome	Outcome Changed	Change Reason	Last Changed	Last Changed By

Confirmed Date: 18/09/2013 15:32
Confirmed By: PC 887TP /185904 MA WALDRON

Statistical Parent CR:

Administrative Detections

Home Office Rule:
Date:
By:
Explanatory Notes:

Classification

All Current Home Office
Requirements Satisfied: Date:
By:

Of Interest To

Method Index:
CP Analysis:

Victim Amendments

Date Added	Time	VIW No	By

Date Removed	Time	VIW No	By

History

Off.	Code	Victim	Count	Status	Outcome	Reason	When	By

Data Protection Act - Dispose Of As Confidential Waste
PC CS MARRIOTT 3540CW 219276
CR:6546179/13 CrType:B Notifiable/MPS/Other:N-7 Status:D Press:Y Class:S/Crim Dam O499
GLU:CW

Messages

Addressee	**Date Sent**	**Text**	**Cancel Date**

Gen Reg No **Description**

Important/Interest Crime? Date:

Data Protection Act - Dispose Of As Confidential Waste
PC CS MARRIOTT 3540CW 219276
CR:6546179/13 CrType:B Notifiable/MPS/Other:N-7 Status:D Press:Y Class:S/Crim Dam O499
GLU:CW
Details of Investigation

18/09/2013 14:53

PC 232006 1183CW H WHYTE

PRIMARY INVESTIGATION DETAILS : 1 Immediate action
1. CAD 4092/18SEP13
Officers attending was PC H WHYTE 1183cw and PC N YATES 1204cw

2. On Wendesday 18th September 2013 at 1315 hours the suspect was in the betting shop on one of the gaming machines. He was playing the machines for some time and VIW2 said he kept getting a bit excitable and sometimes angry at the machine, so he suggested that he stop playing. The suspect refused and continued until his card was declined. The shop switched the winnings onto another machine and after running up a winning streak the suspect then lost it.
He became aggressive, picked up one of the stools and smashed it against two of the gaming machines, smashing the screens. Then turned the stool onto three TV screens which are now broken too.

Police were called but suspect left the premises prior to arrival. He ran out of the betting shop turning right on Harrow Road then right again into Great Western Road.

3-4. N/A

PRIMARY INVESTIGATION DETAILS : 2 Scene
1. The scene is a betting shop on Harrow Road W10. The suspect came and left via the entrance onto Harrow Road

2. N/A

3. No forensic opportunities as the stools which the suspect used were leather and have been handled by many different people throughout the course of the day and do not get regularly wiped down. Likewise with the machine that the suspect was playing on prior to smashing it up.

4-7. N/A

PRIMARY INVESTIGATION DETAILS : 3 Forensics
1-7. N/A

PRIMARY INVESTIGATION DETAILS : 4 Victims/Witnesses
1. Details on VIW page

2-6. N/A

7. Victim called with crime reference number.

PRIMARY INVESTIGATION DETAILS : 5 Suspects
1. The suspect has been described as a [redacted]

2. Suspect description was circulated and [redacted] completed an area search. No Trace

3,5. N/A

Details of Investigation

6. Suspect had been using his debit card with a name on it of [redacted] Debit card number [redacted]

I have run this name through PNC and got the following:

[redacted]

This male is shown as wanted for non payments of fines also.

As CCTV could not be viewed at time of reporting it is not confirmed that this male is the suspect. At the moment we just have a partial name and description.

PRIMARY INVESTIGATION DETAILS : 6 Other evidence
1. There is CCTV but this could not be viewed or burnt as it is controlled centrally. Staff have requested this be downloaded and have given the name of [redacted] as a contact.

Westminster have been emailed regarding our CCTV footage, as there is a camera that covers William Hill but only the outside. This may however have covered the suspect leaving.

2-5. N/A

6. Sgt Allen informed

7. N/A

HOT RISK

VICTIM

Clear risk of further offending against victim. NO

Substantial financial loss. (Proportionate to victim's circumstances). NO

Disability/Mental health issue. (Relevant to offence &/or relevant risk/vulnerability identified). NO

Public Servant on duty. NO

Close relationship to offender. (Relevant to the offence). NO

Evidence of victimization. NO

Substantial age difference to offender. (Relevant to the offence). NO

OFFENCE

Complexity of investigation. NO

Risk of high community impact. NO

Evidence of corruption. NO

Details of Investigation

Media interest. NO

MPS Mandatory Crime. NO

Crime scene & forensic opportunities identified. NO

Sensitive material/ information involved. NO
Seek advice prior to entering detail on CRIS

Hazardous materials involved. NO

OFFENDER

Likely to commit further offences. NO

Mental health issues. (Relevant to offence &/or relevant risk/vulnerability identified).NO

Repeat offender against same victim. NO

Position of trust. NO

Relevant offending history. NO

Part of organized crime gang/MPS gang matrix. NO

Borough target/Prolific priority offender. NO

1) VICTIM CARE CARD GIVEN YES

2) CRIME

Data Protection Act - Dispose Of As Confidential Waste
PC CS MARRIOTT 3540CW 219276
CR:6546179/13 CrType:B Notifiable/MPS/Other:N-7 Status:D Press:Y Class:S/Crim Dam O499
GLU:CW
Details of Investigation

PRIMARY INVESTIGATION DETAILS : 6 Other evidence
PREVENTION ADVICE GIVEN? YES - advised to limit time irrate players spend on machine

3) PRACTICAL HELP GIVEN? NO - not requested

18/09/2013 15:17

PS 200052 155CW GP ALLEN

Report noted.

I note the reporting officer has possible suspect details. At this time it is not known for sure that the [redacted] is the same suspect. An arrest enquiry has not been set up at this time until CCTV can be obtained. The [redacted] shown in the PNC is shown also as [redacted] for non-payment of fines. All these details taken from a Debit Card handed to the cashier bearing the name shown.

CCTV will need to be viewed and collected. Statements also need to be taken. Once these have been obtained we will have a clearer idea of the [redacted] in question & have sufficient evidence to arrest, interview and charge (if necessary) rather than bail in order to gather evidence.

Enquiries will need to be made & this report screened in to a more appropriate unit to deal.

18/09/2013 15:31

PC 185904 887TP MA WALDRON

Screened In

18/09/2013 15:31

PC 185904 887TP MA WALDRON

Service Flag CO added

18/09/2013 15:32

PC 185904 887TP MA WALDRON

Classification confirmed

18/09/2013 15:44

PC 219817 3638CW C STEVENS

Service Flag CO deleted

18/09/2013 15:44

PC 219817 3638CW C STEVENS

OIC Changed

19/09/2013 11:49

PS 191590 169CW MJ SHORT

OIC Changed

19/09/2013 11:58

PS 191590 169CW MJ SHORT

SNT Crime Manager - Review

i) Victim Care - Contact victim, obtain a fully detailed account obtain MG11. Obtain accurate contact details. CPA to be given. Obtain accurate description of suspects.

- VCOP to be complied with.

- Establish if any other witnesses were at location, and complete MG11 for each further witness identified.

ii) Medical - The victim was not injured during the incident nor particularly traumatised by the experience.

iii) Suspects - suspect identity not confirmed, although some identity details have been obtained.

Suspect has left bank card details at scene.

19/09/2013 11:58

PS 191590 169CW MJ SHORT

In the first instance, identity may be gleaned from CCTV, but in the absence of an identification this way, enquiries to be made with card issuer to identify the suspect.

iv) Weapon - No weapon seen or intimated.

v) Reported in a timely fashion.

vi) CCTV - CCTV to be obtained. The named contact at William Hill has been contacted by email and reply awaits at this stage.

vii) SNT to be made aware for intelligence and local patrolling purposes.

viii) Forensics - I do not believe there are any forensic opportunities available.

19/09/2013 20:16

PC 232006 1183CW H WHYTE

CCTV UPDATE

Hi[redacted]

I have checked the footage from camera 141 and it was off tour, facing South down Great Western Road from 13:15 to 13:23:19 – there was no trace of the suspect.

At 13:23:19 a CCTV Operator moved the camera to monitor William Hill again there was no trace of the suspect so I assume this was after the call had gone out.

Police arrived on scene @ 13:28:01.

I also checked camera 4037 but it is faulty and had no footage available for review.

REF# SEPT13CW105.

20/09/2013 10:28

PC 208816 1175CW NE PRICE

Data Protection Act - Dispose Of As Confidential Waste
PC CS MARRIOTT 3540CW 219276
CR:6546179/13 CrType:B Notifiable/MPS/Other:N-7 Status:D Press:Y Class:S/Crim Dam O499
GLU:CW

Details of Investigation

It appears that there is no CCTV outside from Westminster.
However possibly inside therefore as below reguested SNIT PCSO to attend and seize/submit to VIDDO

20/09/2013 10:34

PC 208816 1175CW NE PRICE

Dear All.
I only got this report yesterday and already it is getting old so time of essence
Please could one of you attend seize and submit CCTV for the following.
Please advise asap who is dealing.
LOCATION
William Hill Bookmakers,357,HARROW ROAD,
LONDON,W9 3NA
DATE
13:15hrs 1809/2013
SUSPECT
[redacted]
CRIS
On Wendesday 18th September 2013

Data Protection Act - Dispose Of As Confidential Waste
PC CS MARRIOTT 3540CW 219276
CR:6546179/13 CrType:B Notifiable/MPS/Other:N-7 Status:D Press:Y Class:S/Crim Dam O499
GLU:CW
Details of Investigation

20/09/2013 10:34

PC 208816 1175CW NE PRICE

at 1315 hours the suspect was in the betting shop on one of the gaming machines. [redacted] was playing the machines for some time and [redacted] said he kept getting a bit excitable and sometimes angry at the machine, so he suggested that he stop playing. The suspect refused and continued until his card was declined. The shop switched the winnings onto another machine and after running up a winning streak the suspect then lost it.
He became aggressive, picked up one of the stools and smashed it against two of the gaming machines, smashing the screens. Then turned the stool onto three TV screens which are now broken too.

20/09/2013 10:34

PC 208816 1175CW NE PRICE

Await to hear from SNIT CCTV PCSO

26/09/2013 12:02

DS 195682 BN GIBBS

OIC is AL until tuesday 01 Oct 2013. this matter will be updated then

04/10/2013 09:05

PC 208816 1175CW NE PRICE

SNIT CCTV PCSO Janlolo dealing as below:
Hi [redacted]
I just got back today.I will be happy to investigate this.
Regards
[redacted]

04/10/2013 09:43

Data Protection Act - Dispose Of As Confidential Waste
PC CS MARRIOTT 3540CW 219276
CR:6546179/13 CrType:B Notifiable/MPS/Other:N-7 Status:D Press:Y Class:S/Crim Dam O499
GLU:CW

Details of Investigation

PC 208816 1175CW NE PRICE

Email recieved from SNIT CCTV PCSO
Hi [redacted]
Just to update you I spoken to [redacted] I was told he will call the Main office for CCTV I given him all the information.
Regards
[redacted]

04/10/2013 13:10

PC 208816 1175CW NE PRICE

Update from PCSO Janolo:
Hi [redacted]
JUST TO UPDATE YOU WITH THIS ONE STILL WAITING FOR THE HEAD OFFICE TO GOT BACK TO ME.I SPOKEN TO [redacted] MANAGER OF HARROW ROAD TODAY I WAS TOLD HE CONTACT THEM ALREADY LAST WEEK.
REGARDS
[redacted]

04/10/2013 13:36

PC 208816 1175CW NE PRICE

Phoned [redacted] No answer. Message left for contact ASAP

05/10/2013 09:42

DS 195682 BN GIBBS

SUPV.

Seen and noted

08/10/2013 10:41

PC 208816 1175CW NE PRICE

Data Protection Act - Dispose Of As Confidential Waste
PC CS MARRIOTT 3540CW 219276
CR:6546179/13 CrType:B Notifiable/MPS/Other:N-7 Status:D Press:Y Class:S/Crim Dam O499
GLU:CW

Details of Investigation

PC Price has spoken to security directly and has arranged to personally go to William Hill 1-5 Morris Place Finsbury Park, N43JP to collect CCTV personally.

Security [redacted] claimed that no other setails of the suspect are held as although he paid by card, only last 4 digits

Details of Investigation

08/10/2013 10:41

PC 208816 1175CW NE PRICE

are recorded.

Collect CCTV

08/10/2013 10:43

PC 208816 1175CW NE PRICE

Attending to get CCTV on Monday 14/10 at 1200hrs

14/10/2013 12:42

PC 208816 1175CW NE PRICE

PC Price contacted [redacted] via his office and rearranged appointment for tomorrow after 1300hrs 15/10/2013
SNIT PCSO Townsend has offered to attend/collect and submit CCTV

15/10/2013 15:34

PC 183377 3242CW D NUFER

ViiDo entry.. CCTV booked into office. reference 105/2430/13. awaiting.

18/10/2013 10:16

PC 208816 1175CW NE PRICE

PC Price attended venue this morning and took witness/aggd statement.

Data Protection Act - Dispose Of As Confidential Waste
PC CS MARRIOTT 3540CW 219276
CR:6546179/13 CrType:B Notifiable/MPS/Other:N-7 Status:D Press:Y Class:S/Crim Dam O499
GLU:CW

Details of Investigation

22/10/2013 12:35

PC 208816 1175CW NE PRICE

File completed and placed in handover drawer at SNIT Charing Cross.
Room 265.

OIC changed to Sgt Skinner for his allocation

22/10/2013 12:36

PC 208816 1175CW NE PRICE

OIC Changed

30/10/2013 21:46

PS 229194 1058CW GT SKINNER

OIC Changed

30/10/2013 21:47

PS 229194 1058CW GT SKINNER

All noted. Allocated to an NPT North Cluster Officer to collect handover package and continue investigation.

12/11/2013 23:04

PS 229194 1058CW GT SKINNER

OIC Changed

12/11/2013 23:04

PS 229194 1058CW GT SKINNER

Data Protection Act - Dispose Of As Confidential Waste
PC CS MARRIOTT 3540CW 219276
CR:6546179/13 CrType:B Notifiable/MPS/Other:N-7 Status:D Press:Y Class:S/Crim Dam O499
GLU:CW

Details of Investigation

**********Ongoing Supervision**********

29/11/2013 01:01

PS 229194 1058CW GT SKINNER

Memo sent to OIC requesting progress report.
**********Ongoing Supervision**********

30/11/2013 22:25

PC 199956 4273CW DE FINN

Attempted to collect handover pack today but the office was locked. This will now have to wait until I return from rest days.

11/12/2013 13:30

PS 229194 1058CW GT SKINNER

Memo sent to OIC requesting that he make further attempts to collect the handover package and then arrange for an arrest enquiry to be conducted.
**********Ongoing Supervision**********

16/01/2014 14:40

PC 199956 4273CW DE FINN

I was on A/L from 13/12/13 until 07/01/14 and since then have hade several diary car appoinmtents and more pressing enqs to deal with. Today is my last day of service with the MPS and I will therefore ask PS Skinner to re-allocate this report.

In the meantime, it might be prudent for an officer from the SNIT to view the CCTV and compare with Custody Imaging etc to confirm the suspect

Details of Investigation

16/01/2014 14:40

PC 199956 4273CW DE FINN

is ident as there is no mention of this being done thus far.

16/01/2014 17:58

PS 229194 1058CW GT SKINNER

OIC Changed

16/01/2014 18:02

PS 229194 1058CW GT SKINNER

All noted. In light of the OIC having left the MPS today, without having had the opportunity to collect the handover package, I have re-allocated this CR to the officer who is currently in possession of the handover package in order that they may be able to assist with identification of the suspect prior to a North Cluster NPT officer collecting the package and continuing with enquiries.
**********Ongoing Supervision**********

17/01/2014 10:38

PC 208816 1175CW NE PRICE

Memo read and noted.
Following actions completed as below:

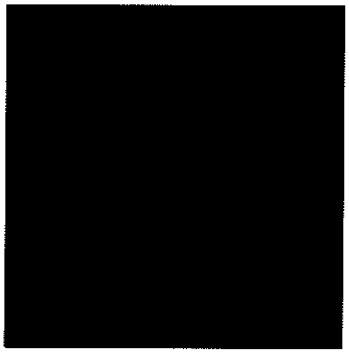
Please note that the suspect has numerous aliases as listed below.
[redacted] This has been taken from PNC and please note that it appears current as suspect also has one impending prosecution linked to this address

Custody imaging gives what appears to be wrong DOB for suspect however this is definitely the same suspect on Custody imaging as that on PNC/CRIS report as identical PNCID number.

PC Price attended VIIDO to view the CCTV and compare it to that from custody imaging but the CCTV is with the file in possession of OIC.

Details of Investigation

I will also forward a custody image of the named suspect to Sgt Skinner (I believe there is already one on file).



Details of Investigation

17/01/2014 10:38

PC 208816 1175CW NE PRICE

SIMIR

CRIS report OIC changed to Sgt Skinner for allocation

17/01/2014 10:42

PC 208816 1175CW NE PRICE

OIC Changed

17/01/2014 11:00

PC 208816 1175CW NE PRICE

Email with custody images of suspect sent to Sgt Skinner

26/01/2014 07:56

PS 229194 1058CW GT SKINNER

OIC Changed

26/01/2014 12:19

PS 229194 1058CW GT SKINNER

New OIC allocated. Handover package and CCTV viewing statement to be collected from PC PRICE of the SNIT before any further progress can be made with this investigation. OIC has been tasked with collecting both the viewing statement and the handover package.Awaiting further update.
**********Ongoing Supervision**********

Details of Investigation

27/01/2014 09:21

PC 208816 1175CW NE PRICE

This report has been submitted for allocation since 22/10/2013.
The file has not changed since then as it was and is complete.
[redacted]
It contains [redacted] from PC Price for viewing and submitting print of suspect as an exhibit.
It clearly states in the summary that the suspect used his named bank card to obtain cash and this is in the witness/loser statement.
It contains a still from the CCTV of the suspect which is exhibited in officers [redacted]
It contains the CCTV DVD that was provided by VIIDO (Paperwork also in file).
It contains suspect last known address which has been confirmed.
Also Custody imaging photo sent to PS Skinner which confirms ident to suspect.

30/01/2014 15:24

PC 235800 O SPENCER

Due to collect case files from CX 30/01/2014

06/02/2014 23:34

PS 229194 1058CW GT SKINNER

Suspect has been arrested and, at the time of writing, is currently being interviewed, Awaiting further update from OIC once interview has been completed and CPS advice has been sought.
**********Ongoing Supervision**********

Data Protection Act - Dispose Of As Confidential Waste
PC CS MARRIOTT 3540CW 219276
CR:6546179/13 CrType:B Notifiable/MPS/Other:N-7 Status:D Press:Y Class:S/Crim Dam O499
GLU:CW
Details of Investigation

12/02/2014 19:27

PS 229194 1058CW GT SKINNER

Memo sent to OIC requesting progress update regarding suspect being charged to court and elimination page to be completed. Once done this CR will be suitable for closure. VCOP also to be completed by OIC.
**********Ongoing Supervision**********

12/02/2014 19:58

PC 235800 O SPENCER

Sus 1 charged due to appear at Hammersmith Mags, updated viw / venue manger [redacted]. Cris sutiable for closure

20/02/2014 17:44

PS 229194 1058CW GT SKINNER

All noted. Investigation complete, suspect charged to court. CR suitable for closure.

24/02/2014 10:42

PC 228115 1297CW RM MILLS

CR Re-Opened, previously marked as Ready for Completion by PS 1058CW/229194 GT SKINNER 20/02/2014 17:45:00

25/02/2014 11:27

PC 208816 1175CW NE PRICE

email recieved 24/02/2014 from PC Iain Armstrong as below:
[redacted]
We have received this from the CPS. You initially investigated this. We have been asked to supply Two (2) working copies of the CCTV on this. The case builders say that VIIDO wont accept a request

Details of Investigation

from them. As you are based at CX, Could you do PC Spencer a favour and get another copy made? PC Spencer works at DD so we would be grateful for your help.
Regards
[redacted]

At 11:20hrs on 25/02/2014 I replied:
[redacted]
I went to VIIDO in order to make you another 2 working copies but the file has been booked out by an officer who has not put his warrant or shoulder number in the 105 book so I can only assume it has been booked out by OIC.
Anyway as it has been booked out I obviously cannot make a copy as the DVD will now be on file with I am guessing the OIC
If you can get this to me I will be more than willing to make and exhibit a couple of copies for you.
I tried phoning you both to update you but couldn't get a reply
I have

Data Protection Act - Dispose Of As Confidential Waste
PC CS MARRIOTT 3540CW 219276
CR:6546179/13 CrType:B Notifiable/MPS/Other:N-7 Status:D Press:Y Class:S/Crim Dam O499
GLU:CW
Details of Investigation

25/02/2014 11:27

PC 208816 1175CW NE PRICE

left a message on [redacted] phone as no ans and the number on outlook for [redacted] is unobtainable.

Memos

Sent To
Noted By
Completed By
Entered By

					Urgent?	Date Noted	Date Completed	Date Cancelled	Date Entered
Sent: PS	229194	1058CW	SKINNER	GT					
Noted: PS	229194	1058CW	SKINNER	GT					
Completed: PS	229194	1058CW	SKINNER	GT					
Entered: PC	208816	1175CW	PRICE	NE					
File completed and ready for allocation as per last dets. Regards Nigel						30/10/2013	30/10/2013		22/10/2013
Sent: PC	219577	1608CW	WALTERS	A					
Noted: PC	219577	1608CW	WALTERS	A					
Completed: PC	219577	1608CW	WALTERS	A					
Entered: PS	229194	1058CW	SKINNER	GT					
Tony, please could you collect the handover package from CX Investigation Team and conduct further investigations. Thanks.						31/10/2013	31/10/2013		30/10/2013
Sent: PC	199956	4273CW	FINN	DE					
Noted: PC	199956	4273CW	FINN	DE					
Completed: PC	199956	4273CW	FINN	DE					
Entered: PS	229194	1058CW	SKINNER	GT					
Dan, please could you take this job over from Tony. Thanks.						24/11/2013	24/11/2013		12/11/2013
Sent: PC	199956	4273CW	FINN	DE					

Noted:
Completed:
Entered: PS 229194 1058CW SKINNER GT

Y 29/11/2013

[redacted] I appreciate you've been very busy, due to our lack of resources, but please could you update the DETS with any progress made or planned dates to conduct arrest enquiry of suspect named. Thanks.

Sent: PC 199956 4273CW FINN DE
Noted:
Completed:
Entered: PS 229194 1058CW SKINNER GT

29/11/2013

Non-OIC Changes: Details Of Investigation

Sent: PC 199956 4273CW FINN DE
Noted:
Completed:
Entered: PS 229194 1058CW SKINNER GT

11/12/2013

Dan, please could you collect the handover package and ,if of sufficent content ,arrange for an arrest enquiry to be conducted. Thanks.

Sent: PC 199956 4273CW FINN DE
Noted:
Completed:
Entered: PS 229194 1058CW SKINNER GT

11/12/2013

Non-OIC Changes: Details Of Investigation

Sent: PC	208816	1175CW	PRICE	NE
Noted: PC	208816	1175CW	PRICE	NE
Completed: PC	208816	1175CW	PRICE	NE
Entered: PS	229194	1058CW	SKINNER	GT

17/01/2014 17/01/2014 16/01/2014

PC PRICE, please would you be able to assist with the former OIC's request on the DETS and once completed send back to me for re-allocation. Appreciate your help as I currently only have two officers

Sent: PS	229194	1058CW	SKINNER	GT
Noted: PS	229194	1058CW	SKINNER	GT
Completed: PS	229194	1058CW	SKINNER	GT
Entered: PC	208816	1175CW	PRICE	NE

26/01/2014 26/01/2014 17/01/2014

Action completed please note last entry onto Dets from PC Price. Email to be sent to yourself with image of suspect attached. Regards [redacted]

Sent: PC	208816	1175CW	PRICE	NE
Noted: PC	208816	1175CW	PRICE	NE
Completed: PC	208816	1175CW	PRICE	NE
Entered: PS	229194	1058CW	SKINNER	GT

27/01/2014 27/01/2014 26/01/2014

[redacted] thanks for your help with this. Please could you send the e-mail with the image and do a viewing statement and attach that to the e-mail and send it to the new OIC PC 1526 SPENCER. Thanks.

Sent: PS	229194	1058CW	SKINNER	GT
Noted: PS	229194	1058CW	SKINNER	GT
Completed: PS	229194	1058CW	SKINNER	GT
Entered: PC	208816	1175CW	PRICE	NE

06/02/2014 06/02/2014 27/01/2014

Memo

Morning [redacted]. Please note the dets. This report is and has been complete since Oct 2013.

Sent: PC	235800		SPENCER	O
Noted: PC	235800		SPENCER	O
Completed: PC	235800		SPENCER	O
Entered: PS	229194	1058CW	SKINNER	GT

12/02/2014 12/02/2014 12/02/2014

Omar, please could you update the DETS that the suspect has been arrested and charged and submit this CR for completion. Please complete the elimination page. Thanks.

Sent: PC	235800		SPENCER	O
Noted: PC	235800		SPENCER	O
Completed: PC	235800		SPENCER	O
Entered: PC	228115	1297CW	MILLS	RM

24/02/2014 24/02/2014 24/02/2014

Pls can you eliminate , and creat a accused screen so we can show this one as detected, thanks [redacted]

Sent: PC	228115	1297CW	MILLS	RM
Noted: PC	228115	1297CW	MILLS	RM
Completed: PC	228115	1297CW	MILLS	RM
Entered: PC	228115	1297CW	MILLS	RM

25/02/2014 25/02/2014 24/02/2014

monitor

Sent: PC	225816	2105CW	MERRITT	K
Noted: PC	225816	2105CW	MERRITT	K
Completed: PC	225816	2105CW	MERRITT	K

Entered: PC 228115 1297CW MILLS RM

26/02/2014 26/02/2014 25/02/2014

1 4 u ....

Create Action/Decision/Review Screens ?
Action/Decision/Review Screens Created By:

Create CAIT Screens?
CAIT Screens Created By:

Case Mgt Administration

Is SIO Same As OIC Supervisor?
Current Senior Investigating Officer (SIO):
Allocated:

Noted?
Noted Date/Time:

Previous SIOs:

Officer	**Allocated**	**Noted**

Review Period: days

Next Review Due:

Summary:

Actions:	Total:	Ready for Completion:	Completed:
Decisions:	Total:	With Rationale:	Seen By SIO:
Review:	Total:		

Supervision

Initial Entry

Initial I.O.:			
Rank:	PC		
Surname:	WHYTE	Initials:	H
Wt/Pay No:	232006	Div/D No:	1183CW

Crime Recorded by:	232006 WHYTE PC 1183CW H
Date/Time:	18/09/2013 14:12
Recording Unit:	CW

Supervision

Initial entry checked?	Y
Initial entry checked by:	PS ALLEN 155CW 200052
Date/Time:	18/09/2013 15:17

Ongoing Supervision

Date	Supervision By
20/02/2014 17:45	PS 1058CW/229194 GT SKINNER
12/02/2014 19:27	PS 1058CW/229194 GT SKINNER
06/02/2014 23:34	PS 1058CW/229194 GT SKINNER
26/01/2014 12:19	PS 1058CW/229194 GT SKINNER
16/01/2014 18:06	PS 1058CW/229194 GT SKINNER
11/12/2013 13:32	PS 1058CW/229194 GT SKINNER
29/11/2013 01:04	PS 1058CW/229194 GT SKINNER
12/11/2013 23:05	PS 1058CW/229194 GT SKINNER
30/10/2013 21:48	PS 1058CW/229194 GT SKINNER
05/10/2013 09:42	DS /195682 BN GIBBS
26/09/2013 12:01	DS /195682 BN GIBBS

Investigation complete?	Y
Investigation complete by:	PC 2105CW/225816 K MERRITT
Date/Time:	26/02/2014 08:50

Crime Report closed?	Y
Crime Report closed by:	PC 2105CW/225816 K MERRITT
Date/Time:	26/02/2014 08:50

Screening

Screening Decision:	IN Crime screened "in" for further investigation.
Reason:	92 Proportionate Investigation
Text:	

MW T 2D CCTV Business

Screening History

Decision	Reason	Text

Completion

Date/Time CR Last Updated:	28/02/2014 07:08

Data Protection Act - Dispose Of As Confidential Waste
PC CS MARRIOTT 3540CW 219276
CR:6546179/13 CrType:B Notifiable/MPS/Other:N-7 Status:D Press:Y Class:S/Crim Dam O499
GLU:CW

Supervision

CR Completed?	Y
Date/Time:	26/02/2014 08:50
By (Wt.No):	225816

Data Protection Act - Dispose Of As Confidential Waste
PC CS MARRIOTT 3540CW 219276
CR:6546179/13 CrType:B Notifiable/MPS/Other:N-7 Status:D Press:Y Class:S/Crim Dam O499
GLU:CW

Supervision

Bring Forward:

Date	**Date Entered**	**For**
Reason		
Date Cancelled	**Cancelled By**	

PRINTED AT 14:08 29:OCT:15 PC LEWIS (CW) 079341 INFORMATION ROOM

SINGLE INCIDENT PRINTOUT PAGE 1

INCIDENT No. 1930:24SEP13

INCIDENT No. 1930 entered at 08:58 on 24SEP13 by CHS/CHS in CCC/IR

INCIDENT WAS ENTERED "EXTERNALLY"

Rec By :E (Emergency)
Call Tel :[redacted]
Call Name[redacted]
Call Type:T (Third Party)
Call Mail:
Cntct Tel:
Att Locn :357 HARROW RD, W9:WILLIAM HILL
Map :Page 139, Grid Reference 524785,182177
GPA :CM [Division: DD:DD]
Inc Locn :357 HARROW RD, W9:WILLIAM HILL
Map :Page 139, Grid Reference 524785,182177
GPA :CM [Division: DD:DD]
Call Locn:357 HARROW RD, W9:WILLIAM HILL
Map :Page 139, Grid Reference 524785,182177
GPA :CM [Division: DD:DD]
Opening 1:202 (Rowdy Or Inconsiderate Behaviour)
2:215 (ASB - Nuisance)
3:600 (Alcohol)
Prompt(s) existed for Opening Code(s) at time of creation
Open Text:
Urgency :S (Significant)
VRMs :
Proposal :(BOCU at 08:59/24SEP13):
CW31E CW32E CW25 CW50E CW20E CW89E CM91E 4025CW 4143CW
Assigned :
DeAssign :7836CW
TOA :09:10:00/24SEP13
DO Name :
DO Tel :
CRIS :NOT CRIMED
Class 1 :202 (Rowdy Or Inconsiderate Behaviour)
Qual 1 :215 (ASB - Nuisance)
2 :672 (Stop / Search)
Res 1 :703 (No Offences Disclosed)
2 :706 (Satisfactory Stop / Search)
Clo Text :ASB NOT REQ. ONE ARRESTED FOR D&D
O Dealing:7836CW
Metops :
CHS Demid:20130924001855

CONTINUED ...

INCIDENT No. 1930:24SEP13

Linked :explicitly to 2709:24SEP13
Linked :implicitly to (none)

Phone Field : (For previous Incidents from this phone use action:PHD or PHL - use DARIS to extend search)
Location Field : (For previous Incidents at this location use action:LCD or LCL - use DARIS to extend search)
Gazetteer Comments : (May have existed or altered since Incident creation - Use MSS SMF:SPECARCHIVE)

Location Based Comments
No Comments for this Location
** Attendance and Incident and Caller Location **

Remarks:

```
Time     Date    Opid   Termid
-------- ------- ------ --------
         24SEP13 CHS    CHS      (pre 1st routing)
         CREATED IN: CHS   AT: 2013-09-24 08:58:26  CAD AT: 2013-09-24 08:59:40
         ==========================================================================
         ENTERED BY: CHS  (c721860 ) AT: 2013-09-24 08:59:40
         ^ OP - CALLER STATES THAT THERE IS A MALE INSIDE THE SHOP VERY
         INTOXICATED AND IS NOW SMOKING INSIDE THE SHOP, HE IS REFUSING TO LEAVE
08:59:40 24SEP13 CHS
         ** **START OF DATA AUTOMATICALLY COPIED FROM OPEN PROMPT** **
         OPEN CODE "202" :
         USE SMF/ASB
         ** **END OF DATA AUTOMATICALLY COPIED FROM OPEN PROMPT** **
09:00:20 24SEP13 CHS
         ENTERED BY: CHS   AT: 2013-09-24 09:00:08
         SMF ASB (For All Incidents Of Anti-social Behaviour)
         Always consider whether the circumstances of the individual of the
         incident render the person concerned as vulnerable.
         1. Has anything like this happened before?: Yes
         2. Has the person concerned spoken to police (either by telephone or in
         person) about this or any other matter relating to ASB?: Yes
         3. If the answer to 2 is 'Yes' when were police called? : FEW MONTHS
         AGO
         4. Has the person sought help from any other agency about this (e.g.
         local authority, Samaritans, Citizens Advice, BT, etc.)?: No
         If the answer to point 1, 2 or 4 is 'Yes' commence steps 1-6 below and
         consider vulnerability:
              1. Set response appropriate to repeat victim status.
```

CONTINUED ...

INCIDENT No. 1930:24SEP13

```
Time     Date    Opid   Termid
-------- ------- ------ --------
              2. Set response & prioritise actions according to vulnerability.
              3. Categorise &amp; identify caller's vulnerability &amp; 'repeat
         caller' status.
              4. Make use of LBC's or critical police information.
              5. Update the CAD with SMF/REPEATVICTIM and/or SMF/VULNERABLE.
              6. Route to BOCU and IBO for assignment/deployment/information and
         prioritise intelligence checks.
09:00:20 24SEP13 CHS
         ENTERED BY: CHS   AT: 2013-09-24 09:00:20
         THE MALE HAS BEEN THERE FOR THE LAST 10 MINS
09:00:59 24SEP13 CHS
         ENTERED BY: CHS   AT: 2013-09-24 09:00:43
         SMF REPEATVICTIM (Repeat Caller / Vulnerability And / Or Victim)
         GPC Supervisor - Please note that this caller has been categorised as:
         'Repeat caller' and / or 'Victim'.
         GPC - Prioritise any additional intelligence checks & inform relevant
         SNT.
         Consider if the person is susceptible to physical abuse, emotional or
         mental hurt, and liable to be easily influenced.
         Are they a repeat caller and/or victim of anti-social behaviour which
         is affecting their quality of life, or are they intimidated by the
         activity?
09:01:00 24SEP13 CHS
         ENTERED BY: CHS   AT: 2013-09-24 09:00:59
         REF NO GIVEN, LINE CLEARED
09:02:12 24SEP13 208299 H2721
         ^CCTV - ON LOC
09:17:42 24SEP13 187663 H2722
         7836CW...SATISF STOP, MALE LEFT
09:18:05 24SEP13 187663 H2722
         DD...CW89E CANX'ED
09:20:06 24SEP13 187663 H2722
         ************************* NCRSCIRCS ************************************
         THE CIRCUMSTANCES OF THIS INCIDENT DO NOT AMOUNT TO A NOTIFIABLE
         CRIME BECAUSE (place the word 'YES' by either A,B,C,D or E and in ALL
         cases show supporting grounds under F):
         A................ THERE IS CREDIBLE EVIDENCE TO THE CONTRARY:Y
         B......................THE REPORT IS A GENUINE ERROR/MISTAKE:
         C.RECORDED ON CRIS AS A NON-CRIME BK SPECIFIED INVESTIGATION:
         D.........................PREVIOUSLY REPORTED/RECORDED CRIME:
         (Original incident number with CRIS no.or the CRIS number will be
```

CONTINUED ...

INCIDENT No. 1930:24SEP13

Time	Date	Opid	Termid

provided by IBO in final classification.)
E.....CRIME RECORDED BY ANOTHER AGENCY:
(As shown under Rule 1 in HOCR,e.g.UK Border Agency,RSPCA,Royal Mail)
.
F.Supporting grounds:NO OFFENCES DISCLOSED
.
*** THEREFORE A NOTIFIABLE CRIME HAS NOT BEEN RECORDED ***

Previous Actions:

Time	Date	Opid	Termid	ACTION
				SYSTEM(EXTERNAL)
08:59:40	24SEP13	CHS	CCC:CCH	O() 202:ROWDY OR INCONSIDERATE BEHAVIOUR,21 5:ASB - NUISANCE, &
08:59:40	"	"	"	O& 600:ALCOHOL
"	"	"	"	PI
08:59:44	"	081253	DIV:DD	AK
"	"	"	"	XP/AK/O202
09:00:20	"	CHS	CCC:CCH	PI
09:00:21	"	081253	DIV:DD	CI/CW33E
09:00:24	"	205463	CCC:MDT	MA/DELIVERED TO CW33E
"	"	081253	DIV:DD	AV/CW33E
09:00:26	"	"	"	AK
09:00:59	"	CHS	CCC:CCH	PI
09:01:11	"	081253	DIV:DD	AK
09:01:45	"	"	"	AV/7914CW
09:01:49	"	"	"	AV/7836CW
09:02:27	"	SYSTEM	SYSTEM	NA/CW33E
09:02:31	"	208299	DIV:DD	AK
09:02:53	"	081253	"	DA/CW33E
09:03:03	"	"	"	CI/CW89E
09:03:08	"	"	"	AV/CW89E
09:04:31	"	231912	CCC:MDT	MA/DELIVERED TO CW89E
09:06:36	"	SYSTEM	SYSTEM	NA/CW89E
09:06:38	"	208299	DIV:DD	AK
09:10:55	"	231912	CCC:MDT	VI/CW89E
09:19:01	"	187663	DIV:DD	AC()
"	"	"	"	AQ()
"	"	"	"	AR()
09:20:06	"	"	"	EXP/SMF//CIRCS
09:20:34	"	"	"	OD()

CONTINUED ...

PRINTED AT 14:12 29:OCT:15 PC LEWIS (CW) 079341 INFORMATION ROOM

SINGLE INCIDENT PRINTOUT PAGE 1

INCIDENT No. 9173:21OCT13

INCIDENT No. 9173 entered at 20:56 on 21OCT13 by CHS/CHS in CCC/IR

INCIDENT WAS ENTERED "EXTERNALLY"

```
Rec By    :E (Emergency)
Call Tel [redacted]
Call [redacted]
Call Type:V (Victim)
Call Mail:
Cntct Tel:
Att Locn :(ASB)357 HARROW RD,W9:WILLIAM HILL
    Map  :Page 139, Grid Reference 524785,182177
    GPA  :CM [Division: DD:DD]
Inc Locn :357 HARROW RD,W9:WILLIAM HILL
    Map  :Page 139, Grid Reference 524785,182177
    GPA  :CM [Division: DD:DD]
Call Locn:357 HARROW RD,W9:WILLIAM HILL
     Map :Page 139, Grid Reference 524785,182177
     GPA :CM [Division: DD:DD]
Opening 1:215 (ASB - Nuisance)
        2:202 (Rowdy Or Inconsiderate Behaviour)
        3:610 (Repeat Caller and/or Victim)
          Prompt(s) existed for Opening Code(s) at time of creation
Open Text:
Urgency  :S (Significant)
VRMs     :
Proposal :(BOCU at 20:58/21OCT13):
          CW40L 4025CW 4143CW 4311CW 4279CW 4304CW 4203CW 4330CW
Assigned :
DeAssign :C3L, C3L
TOA      :21:09:12/21OCT13
DO Name  :
DO Tel   :
CRIS     :NOT CRIMED
Class 1  :305 (Civil Disputes)
Qual  1  :202 (Rowdy Or Inconsiderate Behaviour)
      2  :610 (Repeat Caller and/or Victim)
Res   1  :703 (No Offences Disclosed)
Clo Text :ASB URN NOT REQUIRED - CIVIL DISPUTE - ONE OFF INCIDENT - 3386CW
O Dealing:
Metops   :
CHS Demid:20131021012119
```

CONTINUED ...

INCIDENT No. 9173:21OCT13

Linked :

Phone Field : (For previous Incidents from this phone use action:PHD or PHL - use DARIS to extend search)
Location Field : (For previous Incidents at this location use action:LCD or LCL - use DARIS to extend search)
Gazetteer Comments : (May have existed or altered since Incident creation - Use MSS SMF:SPECARCHIVE)

Location Based Comments
No Comments for this Location
** Attendance and Incident and Caller Location **

Remarks:

Time	Date	Opid	Termid	
	21OCT13	CHS	CHS	(pre 1st routing)

CREATED IN: CHS AT: 2013-10-21 20:56:18 CAD AT: 2013-10-21 20:58:01

==========

ENTERED BY: CHS (c721848) AT: 2013-10-21 20:57:24
caller states customer in store refusing to leave male is becoming agressive.
no weapoms seen no threats made but male is becoming irate.

20:58:01 21OCT13 CHS
** **START OF DATA AUTOMATICALLY COPIED FROM OPEN PROMPT** **
OPEN CODE "202" :
USE SMF/ASB
** **END OF DATA AUTOMATICALLY COPIED FROM OPEN PROMPT** **

20:58:01 21OCT13 CHS
ENTERED BY: CHS (c721848) AT: 2013-10-21 20:57:49
SMF ASB (For All Incidents Of Anti-social Behaviour)
Always consider whether the circumstances of the individual of the incident render the person concerned as vulnerable.
1. Has anything like this happened before?: Yes
2. Has the person concerned spoken to police (either by telephone or in person) about this or any other matter relating to ASB?: No
3. If the answer to 2 is 'Yes' when were police called? : n/a
4. Has the person sought help from any other agency about this (e.g. local authority, Samaritans, Citizens Advice, BT, etc.)?: No
If the answer to point 1, 2 or 4 is 'Yes' commence steps 1-6 below and consider vulnerability:
1. Set response appropriate to repeat victim status.
2. Set response & prioritise actions according to vulnerability.

CONTINUED ...

INCIDENT No. 9173:21OCT13

```
Time     Date    Opid   Termid
-------- ------- ------ --------
              3. Categorise &amp; identify caller's vulnerability &amp; 'repeat
         caller' status.
              4. Make use of LBC's or critical police information.
              5. Update the CAD with SMF/REPEATVICTIM and/or SMF/VULNERABLE.
              6. Route to BOCU and IBO for assignment/deployment/information and
         prioritise intelligence checks.
21:00:45 21OCT13 CHS
         ENTERED BY: CHS   AT: 2013-10-21 21:00:39
21:00:45 21OCT13 CHS
         ** **START OF DATA AUTOMATICALLY COPIED FROM OPEN PROMPT** **
         ** **END OF DATA AUTOMATICALLY COPIED FROM OPEN PROMPT** **
21:01:53 21OCT13 088149 H2629
         ^DD SUPV - C3L DEASSIGNED, DIVERTES TO I CALL - CAD 9022
21:02:10 21OCT13 088149 H2629
         CAD 9197...EVEN
21:14:49 21OCT13 205513 H2721
         ^1693CW - CIVIL DISPUTE OVER PAYMENT NOW RESOLVED, NCFPA
21:16:14 21OCT13 205513 H2721
         ************************ NCRSCIRCS **********************************
         THE CIRCUMSTANCES OF THIS INCIDENT DO NOT AMOUNT TO A NOTIFIABLE
         CRIME BECAUSE (place the word 'YES' by either A,B,C,D or E and in ALL
         cases show supporting grounds under F):
         A................ THERE IS CREDIBLE EVIDENCE TO THE CONTRARY:Y
         B......................THE REPORT IS A GENUINE ERROR/MISTAKE:
         C.RECORDED ON CRIS AS A NON-CRIME BK SPECIFIED INVESTIGATION:
         D........................PREVIOUSLY REPORTED/RECORDED CRIME:
         (Original incident number with CRIS no.or the CRIS number will be
         provided by IBO in final classification.)
         E..........................CRIME RECORDED BY ANOTHER AGENCY:
         (As shown under Rule 1 in HOCR,e.g.UK Border Agency,RSPCA,Royal Mail)
         .
         F.Supporting grounds:REMS 1693CW - CIVIL DISPUTE
         .
            *** THEREFORE A NOTIFIABLE CRIME HAS NOT BEEN RECORDED ***

Previous Actions:
Time     Date    Opid   Termid   ACTION
-------- ------- ------ -------- ------
                                 SYSTEM(EXTERNAL)
20:58:01 21OCT13 CHS    CCC:CCH  O() 215:ASB - NUISANCE,202:ROWDY OR INCONSI
                                 DERATE BEHAVIOUR
```

CONTINUED ...

INCIDENT No. 9173:21OCT13

Time	Date	Opid	Termid	ACTION
20:58:01	21OCT13	"	CCC:CCH	PI
20:58:11	"	700600	DIV:DD	AK
20:58:12	"	"	"	XP/AK/0202
20:58:32	"	"	"	CI/C3L
20:58:35	"	"	"	AV/C3L
21:00:35	"	209490	CCC:MDT	MA/NOT DELIVERED TO C3L
21:00:42	"	205513	DIV:DD	AK
21:00:45	"	CHS	CCC:CCH	O(215/202) 215:ASB - NUISANCE,202:ROWDY OR INCONSIDERATE BEHAVIOUR, &
"	"	"	"	O& 610:REPEAT CALLER AND/OR VICTIM
"	"	"	"	PI
21:00:50	"	205513	DIV:DD	AK
21:01:34	"	088149	"	DA/C3L
21:03:25	"	"	"	AV/C3L
21:03:38	"	205513	"	CI/C3L
21:04:42	"	209490	CCC:MDT	MA/DELIVERED TO C3L
21:06:42	"	SYSTEM	SYSTEM	NA/C3L
21:06:45	"	205513	DIV:DD	AK
21:09:12	"	"	"	TOA/C3L
21:14:53	"	"	"	DA/C3L
21:15:11	"	"	"	AC()
21:15:12	"	"	"	AQ()
"	"	"	"	AR()
21:16:14	"	"	"	EXP/SMF//CIRCS
21:16:17	"	"	"	ACR/NC
21:16:18	"	"	"	PS/CM
21:32:16	"	088149	"	AWT/GPC
21:32:20	"	"	"	LOCA(357 HARROW RD,W9:WILLIAM HILL)(CM)
21:34:24	"	193678	"	AWT/TASKING
08:50:12	22OCT13	226124	"	C(215)
08:50:33	"	"	"	CTX()
08:50:35	"	"	"	PS/CM
09:35:59	"	207664	"	CM

... END OF PRINT ...

PRINTED AT 14:15 29:OCT:15 PC LEWIS (CW) 079341 INFORMATION ROOM

SINGLE INCIDENT PRINTOUT PAGE 1

INCIDENT No. 3183:15APR14

INCIDENT No. 3183 entered at 11:33 on 15APR14 by CHS/CHS in CCC/IR

INCIDENT WAS ENTERED "EXTERNALLY"

```
Rec By    :E (Emergency)
Call Tel  :[redacted]
Call Name:[redacted] [redacted]
Call Type:T (Third Party)
Call Mail:
Cntct Tel:
Att Locn :357 HARROW RD, W9:WILLIAM HILL
    Map  :Page 139, Grid Reference 524785,182177
    GPA  :CM [Division: DD:DD]
Inc Locn :357 HARROW RD, W9:WILLIAM HILL
    Map  :Page 139, Grid Reference 524785,182177
    GPA  :CM [Division: DD:DD]
Call Locn:357 HARROW RD, W9:WILLIAM HILL
     Map :Page 139, Grid Reference 524785,182177
     GPA :CM [Division: DD:DD]
Opening 1:215 (ASB - Nuisance)
        2:212 (Begging / Vagrancy)
          Prompt(s) existed for Opening Code(s) at time of creation
Open Text:
Urgency  :R (Referred)
VRMs     :
Proposal :(BOCU at 11:39/15APR14):
          CW36E CW35E CW32E CW40E CW50E 4025CW 4143CW 4311CW 4279CW
Assigned :
DeAssign :
TOA      :
DO Name  :
DO Tel   :
CRIS     :NOT CRIMED
Class 1  :215 (ASB - Nuisance)
Qual  1  :212 (Begging / Vagrancy)
      2  :707 (Cancelled)
Res   1  :718 (Police Attendance Not Required)
Clo Text :ASB URN NOT REQUIRED P203063
O Dealing:
Metops   :
CHS Demid:20140415003682

Linked   :
```

CONTINUED ...

INCIDENT No. 3183:15APR14

Gazetteer Comments : (May have existed or altered since Incident creation - Use MSS SMF:SPECARCHIVE)

Location Based Comments
No Comments for this Location
** Attendance and Incident and Caller Location **

Remarks:

```
Time     Date    Opid   Termid
-------- ------- ------ --------
         15APR14 CHS    CHS      (pre 1st routing)
         CREATED IN: CHS   AT: 2014-04-15 11:33:51  CAD AT: 2014-04-15 11:38:58
         ==========================================================================
         ENTERED BY: CHS  (c702964 ) AT: 2014-04-15 11:36:29
         Caller says that there is a male begging in the shop.
         Whilst on the phone the male left because he knew caller was on the
         phone to the police.
         Caller cleared the line quickly as police no longer required.
11:38:58 15APR14 CHS
         ** **START OF DATA AUTOMATICALLY COPIED FROM OPEN PROMPT** **
         OPEN CODE "212" :
         USE SMF/ASB
         ** **END OF DATA AUTOMATICALLY COPIED FROM OPEN PROMPT** **
11:38:58 15APR14 CHS
         ENTERED BY: CHS  (c702964 ) AT: 2014-04-15 11:38:57
         PH X 1 -
11:39:39 15APR14 097900 H2721
         ************************* NCRSCIRCS ***********************************
         THE CIRCUMSTANCES OF THIS INCIDENT DO NOT AMOUNT TO A NOTIFIABLE
         CRIME BECAUSE (place the word 'YES' by either A,B,C,D or E and in ALL
         cases show supporting grounds under F):
         A................ THERE IS CREDIBLE EVIDENCE TO THE CONTRARY:YES
         B......................THE REPORT IS A GENUINE ERROR/MISTAKE:
         C.RECORDED ON CRIS AS A NON-CRIME BK SPECIFIED INVESTIGATION:
         D.........................PREVIOUSLY REPORTED/RECORDED CRIME:
         (Original incident number with CRIS no.or the CRIS number will be
         provided by IBO in final classification.)
         E.............................CRIME RECORDED BY ANOTHER AGENCY:
         (As shown under Rule 1 in HOCR,e.g.UK Border Agency, RSPCA, Royal Mail)
         F.Supporting grounds:CANCELLATION
         *** THEREFORE A NOTIFIABLE CRIME HAS NOT BEEN RECORDED ***
11:40:27 15APR14 CHS
         ENTERED BY: CHS  AT: 2014-04-15 11:40:20
```

CONTINUED ...

INCIDENT No. 3183:15APR14

Time	Date	Opid	Termid

SMF ASB (For All Incidents Of Anti-social Behaviour)
Always consider whether the circumstances of the incident render the person concerned as vulnerable.
Remember to use SMF/VULNERABLE and/or SMF/REPEATVICTIM.
If the questions below do not appear valid, have you selected the correct opening code?
1. Has anything like this happened before?: No
2. Has the caller spoken to police about this or any other matter relating to ASB?: Yes
3. If the answer to 2 is 'Yes' when were police called (approximately)? : u/k
4. Prior to calling police today, has the person sought help from elsewhere (e.g. Local Authority, Security, Housing Association, Samaritans, Citizens Advice, BT, etc.)?: No
5. If the answer to 4 is 'Yes' please state who? :
6. Any other relevant information? : caller had never seen this male before and called police as a deterent to the male as he was refusing to leave the shop

11:43:59 15APR14 CHS
ENTERED BY: CHS AT: 2014-04-15 11:40:54
Ref number given to caller verbally as on a landline

11:47:18 15APR14 203063 3610C
PARTNERSHIP - I have reviewed this CAD and on this occasion this incident will be treated as a "one off incident". I have taken into account any remarks made by officers deployed and attending the scene. Not all ASB calls will generate an Airspace number and every report is assessed to ensure and identify any vulnerable victims or supporting evidence of repeat calls. The SMF is reviewed and answers cross referenced with any previous incidents recorded on that telephone number or informant details. No Airspace number will be provided to satisfy a message being passed to the SNT. The Airspace process is to task not message and if the incident is deemed as intelligence then a CRIMINT should be entered.

11:50:00 15APR14 101849 H2629
********** NCRSCIRCS **********
THE CIRCUMSTANCES OF THIS INCIDENT DO NOT AMOUNT TO A NOTIFIABLE CRIME BECAUSE (place the word 'YES' by either A,B,C,D or E and in ALL cases show supporting grounds under F):
A..... THERE IS CREDIBLE EVIDENCE TO THE CONTRARY:Y
B.....THE REPORT IS A GENUINE ERROR/MISTAKE:
C.RECORDED ON CRIS AS A NON-CRIME BK SPECIFIED INVESTIGATION:

CONTINUED ...

INCIDENT No. 3183:15APR14

Time	Date	Opid	Termid

D.....PREVIOUSLY REPORTED/RECORDED CRIME:
(Original incident number with CRIS no.or the CRIS number will be provided by IBO in final classification.)
E.....CRIME RECORDED BY ANOTHER AGENCY:
(As shown under Rule 1 in HOCR,e.g.UK Border Agency, RSPCA, Royal Mail)
F.Supporting grounds:DETS TO PARTNERSHIP DESK
*** THEREFORE A NOTIFIABLE CRIME HAS NOT BEEN RECORDED ***

Previous Actions:

Time	Date	Opid	Termid	ACTION
				SYSTEM(EXTERNAL)
11:38:58	15APR14	CHS	CCC:CCH	O() 215:ASB - NUISANCE,212:BEGGING / VAGRANCY
"	"	"	"	PI
11:39:04	"	097900	DIV:DD	AK
"	"	"	"	XP/AK/O212
11:39:15	"	"	"	AK
11:39:28	"	"	"	AC()
"	"	"	"	AQ()
"	"	"	"	AR()
11:39:29	"	"	"	ACR/NC
11:39:30	"	"	"	PS/CM
11:39:39	"	"	"	EXP/SMF//NCRSCIRCS
11:40:27	"	CHS	CCC:CCH	PI
11:40:33	"	097900	DIV:DD	AK
11:41:18	"	101849	"	AWT/GPC
11:43:59	"	CHS	CCC:CCH	PI
11:44:01	"	097900	DIV:DD	AK
11:47:26	"	203063	"	CTX()
11:47:28	"	"	"	PS/CM
11:50:00	"	101849	"	EXP/SMF//NCRSCIRCS
11:50:01	"	"	"	CM

... END OF PRINT ...

PRINTED AT 14:15 29:OCT:15 PC LEWIS (CW) 079341 INFORMATION ROOM

SINGLE INCIDENT PRINTOUT PAGE 1

INCIDENT No. 6208:23APR14

INCIDENT No. 6208 entered at 16:24 on 23APR14 by CHS/CHS in CCC/IR

INCIDENT WAS ENTERED "EXTERNALLY"

```
Rec By    :O (Ordinary)
Call Tel  :[redacted]
Call Name:[redacted]
Call Type:T (Third Party)
Call Mail:
Cntct Tel:
Att Locn :WILLIAM HILL, 357 HARROW RD, W9
    Map  :Page 139, Grid Reference 524785,182177
    GPA  :CM [Division: DD:DD]
Inc Locn :WILLIAM HILL, 357 HARROW RD, W9
    Map  :Page 139, Grid Reference 524785,182177
    GPA  :CM [Division: DD:DD]
Call Locn:ALARM COMPANY OBO WILLIAM HILL
     Map :
     GPA :
Opening 1:215 (ASB - Nuisance)
        2:202 (Rowdy Or Inconsiderate Behaviour)
        3:600 (Alcohol)
          Prompt(s) existed for Opening Code(s) at time of creation
Open Text:
Urgency  :S (Significant)
VRMs     :
Proposal :(BOCU at 16:26/23APR14):
          C3L C4L CW34L CW31L CW50L 4025CW 4143CW 4311CW 4279CW 4304CW
Assigned :
DeAssign :CW35L
TOA.     :16:27:52/23APR14
DO Name  :
DO Tel   :
CRIS     :NOT CRIMED
Class 1  :215 (ASB - Nuisance)
Qual  1  :701 (Assistance Requested / Rendered)
      2  :202 (Rowdy Or Inconsiderate Behaviour)
Res   1  :701 (Assistance Requested / Rendered)
      2  :703 (No Offences Disclosed)
Clo Text :ASB URN NOT REQUIRED P227211
O Dealing:1178CW
Metops   :
CHS Demid:20140423008203
```

CONTINUED ...

INCIDENT No. 6208:23APR14

Linked :

Phone Field : (For previous Incidents from this phone use action:PHD or PHL - use DARIS to extend search)
Gazetteer Comments : (May have existed or altered since Incident creation - Use MSS SMF:SPECARCHIVE)

Location Based Comments
No Comments for this Location
** Attendance and Incident Location **

Remarks:

```
Time     Date    Opid   Termid
-------- ------- ------ --------
         23APR14 CHS    CHS      (pre 1st routing)
         CREATED IN: CHS   AT: 2014-04-23 16:24:22  CAD AT: 2014-04-23 16:25:58
         ==========================================================================
         ENTERED BY: CHS  (c711488 ) AT: 2014-04-23 16:25:29
         ^OP ALARM SET AT  WILLAIM HILL DRUNK MALE  NONE VIOLENT  REFSUING TO
         LEAVE
16:25:58 23APR14 CHS
         ** **START OF DATA AUTOMATICALLY COPIED FROM OPEN PROMPT** **
         OPEN CODE "202" :
         USE SMF/ASB
         ** **END OF DATA AUTOMATICALLY COPIED FROM OPEN PROMPT** **
16:25:59 23APR14 CHS
         ENTERED BY: CHS  (c711488 ) AT: 2014-04-23 16:25:41
         ^OP BLK MALE 40-50 YEARS BLK HAT GREY AND BLK HOODED TOP
16:27:05 23APR14 CHS
         ENTERED BY: CHS   AT: 2014-04-23 16:26:50
         SMF ASB (For All Incidents Of Anti-social Behaviour)
         Always consider whether the circumstances of the incident render the
         person concerned as vulnerable.
         Remember to use SMF/VULNERABLE and/or SMF/REPEATVICTIM.
         If the questions below do not appear valid, have you selected the
         correct opening code?
         1. Has anything like this happened before?: No
         2. Has the caller spoken to police about this or any other matter
         relating to ASB?: No
         3. If the answer to 2 is 'Yes' when were police called (approximately)?
         : N/A
         4. Prior to calling police today, has the person sought help from
         elsewhere (e.g. Local Authority, Security, Housing Association,
```

CONTINUED ...

INCIDENT No. 6208:23APR14

```
Time     Date    Opid   Termid
-------- ------- ------ --------
         Samaritans, Citizens Advice, BT, etc.)?: No
         5. If the answer to 4 is 'Yes' please state who? : N/A
         6. Any other relevant information? : NONE
16:27:06 23APR14 CHS
         ENTERED BY: CHS   AT: 2014-04-23 16:27:05
         ^OP NORMALLY MALE IS OK  CUSTOMER TODAY DRUNK AND ABUSIVE `
16:27:29 23APR14 CHS
         ENTERED BY: CHS   AT: 2014-04-23 16:27:29
         ^OP CAD REF GIVEN
16:48:02 23APR14 223111 H2722
         ^1178CW - MALE QAS O/S VENUE AND GIVEN SUITABLE WORDS OF ADVICE
17:26:48 23APR14 227211 3778C
         ^GPC-PARTNERSHIP. NOT ALL ASB CALLS WILL GENERATE AN AIRSPACE NUMBER
         AND EVERY REPORT IS ASSESSED TO ENSURE AND IDENTIFY VULNERABLE VICTIMS
         OR SUPPORTING EVIDENCE OF REPEAT CALLS.THE SMF IS REVIEWED AND ANSWERS
         CROSSED REFERENCED WITH ANY PREVIOUS INCIDENTS RECORDED ON THAT
         TELEPHONE NUMBER OR INFORMANT DETAIL. I HAVE REVIEWED THIS CAD AND ON
         THIS OCCASION THIS INCIDENT WILL BE TREATED AS A ONE OFF INCIDENT.I
         HAVE TAKEN INTO ACCOUNT ANY REMARKS MADE BY THE OFFICERS DEPLOYED AND
         ATTENDING THE SCENE. P227211
```

Previous Actions:

```
Time     Date    Opid   Termid   ACTION
-------- ------- ------ -------- ------
                                 SYSTEM(EXTERNAL)
16:25:58 23APR14 CHS    CCC:CCH  O() 215:ASB - NUISANCE,202:ROWDY OR INCONSI
                                 DERATE BEHAVIOUR, &
16:25:58    "      "       "     O& 600:ALCOHOL
  "         "      "       "     PI
16:26:25    "    209203 DIV:DD   AK
16:26:26    "      "       "     XP/AK/O202
16:27:02    "      "       "     AV/CW35L
16:27:05    "    CHS    CCC:CCH  PI
16:27:08    "    209203 DIV:DD   AK
16:27:29    "    CHS    CCC:CCH  LOCC()(     )
  "         "      "       "     PI
16:27:39    "    209203 DIV:DD   AK
16:27:52    "      "       "     TOA/CW35L
16:48:14    "    223111    "     DA/CW35L
16:48:40    "      "       "     AC()
  "         "      "       "     AQ()
```

CONTINUED ...

PRINTED AT 14:15 29:OCT:15 PC LEWIS (CW) 079341 INFORMATION ROOM

SINGLE INCIDENT PRINTOUT PAGE 4

INCIDENT No. 6208:23APR14

Time	Date	Opid	Termid	ACTION
16:48:40	23APR14	"	DIV:DD	AR()
16:48:50	"	"	"	CTX()
16:48:53	"	"	"	R(701)
16:48:59	"	"	"	OD()
16:49:02	"	"	"	PS/CM
17:19:24	"	085190	"	LOCA(WILLIAM HILL, 357 HARROW RD, W9)(CM)
17:19:26	"	"	"	AWT/GPC
17:26:56	"	227211	"	LOCA((ASB)WILLIAM HILL, 357 HARROW RD, W9)(CM)
17:27:08	"	"	"	CTX(WORDS OF ADVICE)
17:27:11	"	"	"	PS/CM
17:28:15	"	085190	"	ACR/NC
"	"	"	"	CM

... END OF PRINT ...

PRINTED AT 14:16 29:OCT:15 PC LEWIS (CW) 079341 INFORMATION ROOM

SINGLE INCIDENT PRINTOUT PAGE 1

INCIDENT No. 5296:09JUL14

INCIDENT No. 5296 entered at 14:23 on 09JUL14 by CHS/CHS in CCC/IR

INCIDENT WAS ENTERED "EXTERNALLY"

```
Rec By    :E (Emergency)
Call Tel  :[redacted]
Call Name[redacted]
Call Type:T (Third Party)
Call Mail:
Cntct Tel:
Att Locn :357 HARROW RD, W9:WILLIAM HILL
    Map  :Page 139, Grid Reference 524785,182177
    GPA  :CM [Division: DD:DD]
Inc Locn :357 HARROW RD, W9:WILLIAM HILL
    Map  :Page 139, Grid Reference 524785,182177
    GPA  :CM [Division: DD:DD]
Call Locn:357 HARROW RD, W9:WILLIAM HILL
     Map :Page 139, Grid Reference 524785,182177
     GPA :CM [Division: DD:DD]
Opening 1:215 (ASB - Nuisance)
        2:202 (Rowdy Or Inconsiderate Behaviour)
          Prompt(s) existed for Opening Code(s) at time of creation
Open Text:
Urgency  :S (Significant)
VRMs     :
Proposal :(BOCU at 14:25/09JUL14):
          CW50E CW43 CA91E 4025CW 4143CW 4311CW 4279CW 4304CW 4203CW
Assigned :
DeAssign :C3L
TOA      :15:05:24/09JUL14
DO Name  :
DO Tel   :
CRIS     :
Class 1  :215 (ASB - Nuisance)
Qual  1  :202 (Rowdy Or Inconsiderate Behaviour)
      2  :701 (Assistance Requested / Rendered)
Res   1  :702 (No Trace)
      2  :703 (No Offences Disclosed)
Clo Text :ASB URN NOT REQUIRED P208760
O Dealing:1421CW
Metops   :
CHS Demid:20140709006358
```

CONTINUED ...

INCIDENT No. 5296:09JUL14

Linked :

Gazetteer Comments : (May have existed or altered since Incident creation - Use MSS SMF:SPECARCHIVE)

Location Based Comments
No Comments for this Location
** Attendance and Incident and Caller Location **

Remarks:

Time	Date	Opid	Termid
	09JUL14	CHS	CHS (pre 1st routing)

CREATED IN: CHS AT: 2014-07-09 14:23:15 CAD AT: 2014-07-09 14:24:53

==========

ENTERED BY: CHS (c717186) AT: 2014-07-09 14:24:23
DRUNK MALE IN STORE SHOUTING AT STAFF AND MAKING A NUSIANCE OF HIMSELF
-
HAS BEEN IN THE STORE BEFORE
-
MALE CAN BE HEARD SWEARING IN THE BACKGROUND
-
HAS BEEN THERE FOR 10 - 15 MINUTES

14:24:53 09JUL14 CHS
** **START OF DATA AUTOMATICALLY COPIED FROM OPEN PROMPT** **
OPEN CODE "202" :
USE SMF/ASB
** **END OF DATA AUTOMATICALLY COPIED FROM OPEN PROMPT** **

14:24:54 09JUL14 CHS
ENTERED BY: CHS (c717186) AT: 2014-07-09 14:24:53
DESC:
MALE / "ARAB LOOKING" / BLACK ADIDAS TSHIRT / GREY JUMPER... APPROX: MID 30'S

14:25:28 09JUL14 CHS
ENTERED BY: CHS AT: 2014-07-09 14:25:24
SMF ASB (For All Incidents Of Anti-social Behaviour)
Always consider whether the circumstances of the incident render the person concerned as vulnerable.
Remember to use SMF/VULNERABLE and/or SMF/REPEATVICTIM.
If the questions below do not appear valid, have you selected the correct opening code?
1. Has anything like this happened before?: Yes
2. Has the caller spoken to police about this or any other matter

CONTINUED ...

INCIDENT No. 5296:09JUL14

Time	Date	Opid	Termid	
				relating to ASB?: No 3. If the answer to 2 is 'Yes' when were police called (approximately)? : N/A 4. Prior to calling police today, has the person sought help from elsewhere (e.g. Local Authority, Security, Housing Association, Samaritans, Citizens Advice, BT, etc.)?: No 5. If the answer to 4 is 'Yes' please state who? : . 6. Any other relevant information? :
14:26:18	09JUL14	CHS		ENTERED BY: CHS AT: 2014-07-09 14:26:18 MALE REFUSING TO LEAVE.... SLURRING RANDOMLY IN THE BACKGROUND - NFD
14:26:33	09JUL14	CHS		ENTERED BY: CHS AT: 2014-07-09 14:26:31 SMF REPEATVICTIM (Repeat Caller / Victim) GPC Supervisor - Please note that this caller has been categorised as: 'Repeat caller' and / or 'Victim'. GPC - Prioritise any additional intelligence checks & inform relevant SNT. Consider if the person is susceptible to physical abuse, emotional or mental hurt, and liable to be easily influenced. Are they a repeat caller and/or victim of anti-social behaviour which is affecting their quality of life, or are they intimidated by the activity?
14:29:38	09JUL14	098724	H2720	^DD - PR CIRC NUTD
16:42:22	09JUL14	U95964	H2722	^ 1421CW. NO OFFENCES ALLEGED OR APPARENT. MALE HAD LEFT PRIOR TO POLICE ARRIVAL.
10:24:21	10JUL14	208760	3610C	^2301CW - THIS IS A 1ST TIME NOTIFICATION AND POLICE HAVE ALREADY ATTENDED. THE MALE HAD LEFT PRIOR TO THEIR ARRIVAL AND IT WAS RESULTED AS NO OFFENCES. ASB URN NOT REQUIRED AT THIS STAGE

Previous Actions:

Time	Date	Opid	Termid	ACTION
				SYSTEM(EXTERNAL)
14:24:53	09JUL14	CHS	CCC:CCL	O() 215:ASB - NUISANCE,202:ROWDY OR INCONSI DERATE BEHAVIOUR

CONTINUED ...

PRINTED AT 14:16 29:OCT:15 PC LEWIS (CW) 079341 INFORMATION ROOM

SINGLE INCIDENT PRINTOUT PAGE 4

INCIDENT No. 5296:09JUL14

Time	Date	Opid	Termid	ACTION
14:24:53	09JUL14	"	CCC:CCL	PI
14:25:02	"	"	"	CR(BTSS (WILLIAM HILL ORGANIZATION LTD))
"	"	"	"	PI
14:25:28	"	"	"	PI
14:26:00	"	098724	DIV:DD	AK
14:26:01	"	"	"	XP/AK/O202
14:26:18	"	CHS	CCC:CCL	PI
14:26:33	"	"	"	PI
14:26:36	"	098724	DIV:DD	AK
14:41:01	"	215730	"	AK
14:41:03	"	"	"	AK
14:41:18	"	"	"	AV/C2L
14:43:24	"	"	"	CI/C3L
14:43:27	"	230395	CCC:MDT	MA/DELIVERED TO C3L
"	"	215730	DIV:DD	DA/C2L(CU)
14:43:32	"	230395	CCC:MDT	AV/C3L
14:43:42	"	215730	DIV:DD	AK
15:05:24	"	230395	CCC:MDT	TOA/C3L
16:42:26	"	U95964	DIV:DD	DA/C3L
16:42:28	"	"	"	PS/CM
16:42:34	"	"	"	OD()
16:42:43	"	"	"	CTX()
16:42:47	"	"	"	LOCA(357 HARROW RD, W9:WILLIAM HILL)(CM)
16:42:55	"	"	"	AC()
"	"	"	"	AQ()
16:43:02	"	"	"	AR()
16:57:16	"	222255	"	LOCA((ASB URN)357 HARROW RD, W9:WILLIAM HIL L)(CM)
16:57:19	"	"	"	MA/SEEN AND CHECKED PS 413CC VALIANT
16:57:20	"	"	"	AWT/GPC
10:24:37	10JUL14	208760	"	CTX(NO OFFENCES ALLEGED OR APPARENT BY 1421 CW.)
10:24:44	"	"	"	PS/CM
10:25:11	"	192333	"	LOCA((ASB) 357 HARROW RD, W9:WILLIAM HILL)(CM)
10:25:12	"	"	"	CM

... END OF PRINT ...

PRINTED AT 14:19 29:OCT:15 PC LEWIS (CW) 079341 INFORMATION ROOM

SINGLE INCIDENT PRINTOUT PAGE 1

INCIDENT No. 8413:18JUL14

INCIDENT No. 8413 entered at 17:47 on 18JUL14 by 086025/H2755 in CCC/IR

Rec By :E (Emergency)
Call Tel [redacted]
Call Name [redacted]
Call Type:S (Staff on Duty)
Call Mail:
Cntct Tel:
Att Locn :357 HARROW RD, W9; WILLIAM HILL
Map :Page 139, Grid Reference 524785,182177
GPA :CM [Division: DD:DD]
Inc Locn :357 HARROW RD, W9; WILLIAM HILL
Map :Page 139, Grid Reference 524785,182177
GPA :CM [Division: DD:DD]
Call Locn:357 HARROW RD, W9; WILLIAM HILL
Map :Page 139, Grid Reference 524785,182177
GPA :CM [Division: DD:DD]
Opening 1:215 (ASB - Nuisance)
2:202 (Rowdy Or Inconsiderate Behaviour)
3:600 (Alcohol)
Prompt(s) existed for Opening Code(s) at time of creation
Open Text:
Urgency :R (Referred)
VRMs :
Proposal :(BOCU at 17:50/18JUL14):
CW31L CW22 CW82E 4025CW 4143CW 4311CW 4279CW 4304CW 4203CW
Assigned :
DeAssign :
TOA :
DO Name :
DO Tel :
CRIS :NOT CRIMED
Class 1 :215 (ASB - Nuisance)
Qual 1 :202 (Rowdy Or Inconsiderate Behaviour)
Res 1 :707 (Cancelled)
Clo Text :ASB URN NOT REQUIRED P203063
O Dealing:
Metops :
CHS Demid:20140718010557

Linked :

CONTINUED ...

INCIDENT No. 8413:18JUL14

Phone Field : (For previous Incidents from this phone use action:PHD or PHL - use DARIS to extend search)
Location Field : (For previous Incidents at this location use action:LCD or LCL - use DARIS to extend search)
Gazetteer Comments : (May have existed or altered since Incident creation - Use MSS SMF:SPECARCHIVE)

Location Based Comments
No Comments for this Location
** Attendance and Incident and Caller Location **

Remarks:

```
Time     Date     Opid   Termid
-------- -------- ------ --------
         18JUL14 086025 H2755    (pre 1st routing)
         ^CALLER STATES THEY HAVE A DRUNK MALE WHO IS BEING VERY ABUSIVE TO
         STAFF, HAS REFUSED TO LEAVE, ARAB MALE,A/A MIS 30S, BALDING, GREY
         HOODY WITH A BROWN VEST UNDERNEATH
17:49:54 18JUL14 086025 H2755
         ** **START OF DATA AUTOMATICALLY COPIED FROM OPENING PROMPT** **
         OPENING CODE "202":
         USE SMF/ASB
         ** **END OF DATA AUTOMATICALLY COPIED FROM OPENING PROMPT** **
17:50:33 18JUL14 086025 H2755
              **** TO BE USED IN ALL INSTANCES OF ANTI-SOCIAL BEHAVIOUR ****
          ALWAYS CONSIDER WHETHER THE CIRCUMSTANCES OF THE INDIVIDUAL OR THE
          INCIDENT RENDER THE PERSON CONCERNED AS VULNERABLE
             ** REMEMBER TO USE SMF/VULNERABLE and/or SMF/REPEATVICTIM **
         1. HAS ANYTHING LIKE THIS HAPPENED BEFORE?                      Y/N:Y
         2. HAS PERSON CONCERNED SPOKEN TO POLICE (EITHER BY TELEPHONE OR
            IN PERSON) ABOUT THIS, OR ANY OTHER MATTER RELATING TO ASB?  Y/N:Y
         3. IF ANSWER TO 2 IS 'YES', WHEN WERE POLICE CALLED?         08/07/14
         4. PRIOR TO THIS HAS PERSON SOUGHT HELP FROM ANY OTHER AGENCY?
            (e.g. LOCAL AUTHORITY,SAMARITANS,CITIZENS ADVICE, BT ETC)    Y/N:N
         IF THE ANSWER TO QUESTION 4 IS YES PLEASE STATE WHO:
         ANY OTHER RELEVANT INFORMATION:
17:50:59 18JUL14 086025 H2755
         ^INF HAS CAD REF, HE WILL CALL BACK IF MALE LEAVES PRIOR TO POLICE
         ATTENDANCE
17:56:13 18JUL14 222792 H2720
         ^ DD - LINKED CAD ADV MALE HAS LEFT AND TO CANX POLICE
17:56:26 18JUL14 222792 H2720
         ************************* NCRSCIRCS **********************************
```

CONTINUED ...

INCIDENT No. 8413:18JUL14

Time	Date	Opid	Termid

THE CIRCUMSTANCES OF THIS INCIDENT DO NOT AMOUNT TO A NOTIFIABLE CRIME BECAUSE (place the word 'YES' by either A,B,C,D or E and in ALL cases show supporting grounds under F):
A..... THERE IS CREDIBLE EVIDENCE TO THE CONTRARY:Y
B.....THE REPORT IS A GENUINE ERROR/MISTAKE:
C.RECORDED ON CRIS AS A NON-CRIME BK SPECIFIED INVESTIGATION:
D.....PREVIOUSLY REPORTED/RECORDED CRIME:
(Original incident number with CRIS no.or the CRIS number will be provided by IBO in final classification.)
E.....CRIME RECORDED BY ANOTHER AGENCY:
(As shown under Rule 1 in HOCR,e.g.UK Border Agency,RSPCA,Royal Mail)
.
F.Supporting grounds:CANX BY INFT , MALE HAS GONE
.
*** THEREFORE A NOTIFIABLE CRIME HAS NOT BEEN RECORDED ***

10:31:11 19JUL14 203063 3610C
PARTNERSHIP - Not all ASB calls will generate an AIRSPACE number and every report is assessed to ensure and identify vulnerable victims or supporting evidence of repeat calls. The SMF is reviewed and answers cross referenced with any previous incidents recorded on that telephone number of informant detail. There do not appear to be any apparent risks. I have reviewed this CAD and note that CAD indicates there are no other calls from this caller or their phone number. On this occasion this incident will be treated as an isolated incident. I have taken into account any remarks made by the officers deployed and attending the scene.

Previous Actions:

Time	Date	Opid	Termid	ACTION
17:49:54	18JUL14	086025	CCC:IR	O() 215:ASB - NUISANCE,202:ROWDY OR INCONSI DERATE BEHAVIOUR, &
17:49:54	"	"	"	O& 600:ALCOHOL
17:49:54	"	"	"	PI/(AUTOCM)
17:50:01	"	222792	DIV:DD	AK
17:50:02	"	099547	"	AK
17:50:04	"	222792	"	XP/AK/O202
17:50:33	"	086025	CCC:IR	EXP/SMF//ASB
17:50:44	"	222792	DIV:DD	CI/CW306L
17:50:58	"	"	"	AV/CW306L
17:51:04	"	232402	CCC:MDT	MA/DELIVERED TO CW306L

CONTINUED ...

PRINTED AT 14:19 29:OCT:15 PC LEWIS (CW) 079341 INFORMATION ROOM

SINGLE INCIDENT PRINTOUT PAGE 4

INCIDENT No. 8413:18JUL14

Time	Date	Opid	Termid	ACTION
17:51:08	18JUL14	"	CCC:MDT	MA/ACCEPTED BY CW306L - UNIT SHOWN ASSIGNED
17:51:10	"	099547	DIV:DD	AK
17:56:26	"	222792	"	EXP/SMF//CIRCS
17:56:28	"	"	"	ACR/NC
17:56:49	"	"	"	AC()
"	"	"	"	AQ()
"	"	"	"	AR()
17:56:52	"	"	"	DA/CW306L(CU)
17:56:54	"	"	"	PS/CM
18:03:40	"	193246	"	LOCA(357 HARROW RD, W9; WILLIAM HILL)(CM)
18:03:57	"	"	"	AWT/GPC
18:18:39	"	"	"	GF(S)CANX
10:31:19	19JUL14	203063	"	CTX()
10:31:21	"	"	"	PS/CM
10:31:41	"	222255	"	LOCA((ASB)357 HARROW RD, W9; WILLIAM HILL)(CM)
10:31:42	"	"	"	MA/SEEN AND CHECKED PS 413CC VALIANT
10:31:43	"	"	"	CM

... END OF PRINT ...

PRINTED AT 14:21 29:OCT:15 PC LEWIS (CW) 079341 INFORMATION ROOM

SINGLE INCIDENT PRINTOUT PAGE 1

INCIDENT No. 6712:26JUL14

INCIDENT No. 6712 entered at 15:43 on 26JUL14 by CHS/CHS in CCC/IR

INCIDENT WAS ENTERED "EXTERNALLY"

```
Rec By    :E (Emergency)
Call Tel :[redacted]
Call Name[redacted]
Call Type:T (Third Party)
Call Mail:
Cntct Tel:
Att Locn :357 HARROW RD, W9:WILLIAM HILL
    Map  :Page 139, Grid Reference 524785,182177
    GPA  :CM [Division: DD:DD]
Inc Locn :357 HARROW RD, W9:WILLIAM HILL
    Map  :Page 139, Grid Reference 524785,182177
    GPA  :CM [Division: DD:DD]
Call Locn:357 HARROW RD, W9:WILLIAM HILL
     Map :Page 139, Grid Reference 524785,182177
     GPA :CM [Division: DD:DD]
Opening 1:301 (Licensing)
        2:305 (Civil Disputes)
Open Text:
Urgency  :E (Extended)
VRMs     :
Proposal :(BOCU at 15:49/26JUL14):
          CW33E CW50E CW20E 4025CW 4143CW 4311CW 4279CW 4304CW 4203CW
Assigned :
DeAssign :CW31E
TOA      :16:01:42/26JUL14
DO Name  :
DO Tel   :
CRIS     :
Class 1  :305 (Civil Disputes)
Qual  1  :701 (Assistance Requested / Rendered)
Res   1  :703 (No Offences Disclosed)
      2  :705 (Advice Given)
Clo Text :
O Dealing:
Metops   :
CHS Demid:20140726007201

Linked   :explicitly to  6832:26JUL14
Linked   :implicitly to (none)
```

CONTINUED ...

INCIDENT No. 6712:26JUL14

Phone Field : (For previous Incidents from this phone use action:PHD or PHL - use DARIS to extend search)
Location Field : (For previous Incidents at this location use action:LCD or LCL - use DARIS to extend search)
Gazetteer Comments : (May have existed or altered since Incident creation - Use MSS SMF:SPECARCHIVE)

Location Based Comments
No Comments for this Location
** Attendance and Incident and Caller Location **

Remarks:

Time	Date	Opid	Termid	
	26JUL14	CHS	CHS	(pre 1st routing)

CREATED IN: CHS AT: 2014-07-26 15:43:53 CAD AT: 2014-07-26 15:49:07

==========

ENTERED BY: CHS (c710550) AT: 2014-07-26 15:45:54
^INFT
MALE IS SELLING ITEMS OUTSIDE OF THE LOCATION AND CALLER STATES THAT THE MALE IS ON WILLIAM HILL PROPERTY AND IS NOT LICENSED TO TRADE THERE
-
MALE HAS A CART WITH HIM SELLING BELIEVED TO BE DRINKS
-
BLACK MALE
PINK T-SHIRT
BLUE SHORTS
35-40YO

15:49:07 26JUL14 CHS
ENTERED BY: CHS (c710550) AT: 2014-07-26 15:46:17
CALLER STATES THE MALE IS ON THEIR BUISNESS PREMISES AND THE MALE IS REFUSING TO MOVE

15:49:07 26JUL14 CHS
ENTERED BY: CHS (c710550) AT: 2014-07-26 15:46:54
CALLER STATES THAT IT IS A COMMERCIAL PREMISES AND BY LAW IS NOT ALLOWED TO HAVE ANYBODY SELL ITEMS ON THEIR PROEPRTY

15:49:08 26JUL14 CHS
ENTERED BY: CHS (c710550) AT: 2014-07-26 15:47:24
MALE STATES THAT HE IS NOT ON THEIR PROPERTY BUT CALLER STATES THAT HE IS

15:49:18 26JUL14 CHS
ENTERED BY: CHS AT: 2014-07-26 15:49:18

CONTINUED ...

INCIDENT No. 6712:26JUL14

```
Time     Date    Opid   Termid
-------- ------- ------ --------
         REFERENCE NUMBER GIVEN
15:49:33 26JUL14 CHS
         ENTERED BY: CHS   AT: 2014-07-26 15:49:33
         CALLER HAS ONLY ASKED IF THE MALE CAN BE MOVED ON
         -
         NO FURTHER INFO
16:02:53 26JUL14 705990 H2721
         ^1982CW SPOKEN TO MALE, WORDS OF ADVICE GIVEN, AND HE HAS MOVED ON
16:03:13 26JUL14 705990 H2721
         ************************ NCRSCIRCS ***********************************
         THE CIRCUMSTANCES OF THIS INCIDENT DO NOT AMOUNT TO A NOTIFIABLE
         CRIME BECAUSE (place the word 'YES' by either A,B,C,D or E and in ALL
         cases show supporting grounds under F):
         A................ THERE IS CREDIBLE EVIDENCE TO THE CONTRARY:Y
         B......................THE REPORT IS A GENUINE ERROR/MISTAKE:
         C.RECORDED ON CRIS AS A NON-CRIME BK SPECIFIED INVESTIGATION:
         D.........................PREVIOUSLY REPORTED/RECORDED CRIME:
         (Original incident number with CRIS no.or the CRIS number will be
         provided by IBO in final classification.)
         E...........................CRIME RECORDED BY ANOTHER AGENCY:
         (As shown under Rule 1 in HOCR,e.g.UK Border Agency,RSPCA,Royal Mail)
         .
         F.Supporting grounds:NO OFFENCES
         .
            *** THEREFORE A NOTIFIABLE CRIME HAS NOT BEEN RECORDED ***
```

Previous Actions:

Time	Date	Opid	Termid	ACTION
				SYSTEM(EXTERNAL)
15:49:07	26JUL14	CHS	CCC:CCH	O() 301:LICENSING,305:CIVIL DISPUTES
"	"	"	"	PI
15:49:10	"	705990	DIV:DD	AK
15:49:18	"	CHS	CCC:CCH	PI
15:49:19	"	705990	DIV:DD	AK
15:49:33	"	CHS	CCC:CCH	PI
15:49:37	"	705990	DIV:DD	AK
15:54:18	"	223074	"	CI/CW31E
15:54:23	"	236324	CCC:MDT	MA/DELIVERED TO CW31E
15:54:32	"	"	"	AV/CW31E
15:54:37	"	705990	DIV:DD	AK

CONTINUED ...

PRINTED AT 14:21 29:OCT:15 PC LEWIS (CW) 079341 INFORMATION ROOM

SINGLE INCIDENT PRINTOUT PAGE 4

INCIDENT No. 6712:26JUL14

Time	Date	Opid	Termid	ACTION
16:01:42	26JUL14	"	DIV:DD	TOA/CW31E
16:01:55	"	"	"	AC()
"	"	"	"	AQ()
"	"	"	"	AR()
16:02:57	"	"	"	DA/CW31E
16:02:59	"	"	"	PS/CM
16:03:13	"	"	"	EXP/SMF//CIRCS
16:03:14	"	"	"	AK
16:03:28	"	"	"	AK
16:21:23	"	085763	"	CM

... END OF PRINT ...

PRINTED AT 15:52 28:OCT:15 Bryan Lewis 200892

SINGLE INCIDENT PRINTOUT PAGE 1

INCIDENT No. 8274:13NOV14

INCIDENT No. 8274 entered at 18:26 on 13NOV14 by CHS/CHS in CCC/IR

INCIDENT WAS ENTERED "EXTERNALLY"

Rec By :E (Emergency)
Call Tel :[redacted]
Call Name[redacted]
Call Type:T (Third Party)
Call Mail:
Cntct Tel:
Att Locn :357 HARROW RD,W9:WILLIAM HILL
Map :Page 139, Grid Reference 524785,182177
GPA :CM [Division: DD:DD]
Inc Locn :357 HARROW RD,W9:WILLIAM HILL
Map :Page 139, Grid Reference 524785,182177
GPA :CM [Division: DD:DD]
Call Locn:357 HARROW RD,W9:WILLIAM HILL
Map :Page 139, Grid Reference 524785,182177
GPA :CM [Division: DD:DD]
Opening 1:215 (ASB - Nuisance)
2:202 (Rowdy Or Inconsiderate Behaviour)
Prompt(s) existed for Opening Code(s) at time of creation
Open Text:
Urgency :R (Referred)
VRMs :
Proposal :(BOCU at 18:31/13NOV14):
C3L C3E CW35L CW31N CW32E CM18E CW81L CA91L LX80L YR80N
Assigned :
DeAssign :
TOA :
DO Name :
DO Tel :
CRIS :NOT CRIMED
Class 1 :215 (ASB - Nuisance)
Qual 1 :202 (Rowdy Or Inconsiderate Behaviour)
Res 1 :718 (Police Attendance Not Required)
2 :705 (Advice Given)
Clo Text :ASB URN NOT REQUIRED P203063
O Dealing:
Metops :
CHS Demid:20141113009521

Linked :

CONTINUED ...

INCIDENT No. 8274:13NOV14

Location Field : (For previous Incidents at this location use action:LCD or LCL - use DARIS to extend search)
Gazetteer Comments : (May have existed or altered since Incident creation - Use MSS SMF:SPECARCHIVE)

Location Based Comments
** Attendance and Incident and Caller Location **
HARROW RD,W9 (283 - 479)
ODDS: DB:1-147, DV:149-323, DQ:325-597, BA 599-657, QK: 659-675, FS: 677-873
EVENS: DV:2-350, DQ:362-742, QK: 744-1112, QH:REMAINDER, BA :KENSAL GRN CEM
W2:1-281 + 2-322, W9: 283-419 + 423-570, W10:421-625 + 558-742, NW10: REMAINDER
***** DURING CARNIVAL TIME,PASS ALL INCIDENTS "PI/GT" - SECTOR 1 *****
353 HARROW RD: FLAT 3 -
OCCUPANTS & CHILD/CHILDREN MAY BE AT RISK OF DOMESTIC VIOLENCE -
GRADE I - SEE SS/DD/T205
417-419 HARROW RD -
OCCUPANTS MAY BE AT RISK OF DOMESTIC VIOLENCE - GRADE I- SEE SS/DD/T103
470-474 HARROW RD: "NORTH WESTMINSTER DRUG AND ALCOHOL SERVICE" - GRADE E -
INFORM DUTY MANAGER (0207 266 6200) - WARNING **DRUGS** -
SEE SS/DD/T49 BEFORE DEPLOYMENT
478 HARROW RD: "SAINSBURY" -
WARNING CITY SAFE HAVEN - VULNERABLE CHILD/PERSON AT RISK -
GRADE I - OPS *MUST* SEE SS/DD/T104

Remarks:

Time	Date	Opid	Termid	
	13NOV14	CHS	CHS	(pre 1st routing)

CREATED IN: CHS AT: 2014-11-13 18:26:26 CAD AT: 2014-11-13 18:31:25

==========

ENTERED BY: CHS (c700971) AT: 2014-11-13 18:30:53
SMF ASB (For All Incidents Of Anti-social Behaviour)
Always consider whether the circumstances of the incident render the person concerned as vulnerable.
1. Has anything like this happened before?: Yes
2. Has the caller spoken to police about this or any other matter relating to ASB?: Yes
3. If the answer to 2 is 'Yes', when were police called (approximately)? : JUNE
4. Prior to this call, has the person sought help from elsewhere (e.g. Local Authority, Security, Housing Association, Samaritans, Citizens Advice, BT, etc.)?: No
5. If the answer to 4 is 'Yes' please state who? : NO

CONTINUED ...

INCIDENT No. 8274:13NOV14

Time	Date	Opid	Termid	
				6. Are there any health or welfare issues we need to be aware of that could help us deal with your call? (VULNERABILITY)?: No 7. If the answer to 6 is 'Yes' record details of how/why vulnerable. Record any other relevant information? : ** For 'ASB' calls, you are no longer required to complete the 'REPEAT' or 'VULNERABLE' SMFs **
18:31:25	13NOV14	CHS		** **START OF DATA AUTOMATICALLY COPIED FROM OPEN PROMPT** ** OPEN CODE "202" : USE SMF/ASB ** **END OF DATA AUTOMATICALLY COPIED FROM OPEN PROMPT** **
18:31:25	13NOV14	CHS		ENTERED BY: CHS (c700971) AT: 2014-11-13 18:31:25 IC1M F507 A/A 50'S INTOXICATED WEARING BLUE JACKET.. WAS CAUSING A DISTURBANCE INSIDE AND OUTSIDE FOR LAST 20 MINS.. HE HAS NOW LEFT LOCATION BUT CALLER IS CONCERNED HE WILL RETURN, SHE WILL CALL BACK IF HE DOES
19:34:21	13NOV14	203063	3778C	GPC PARTNERSHIP^ ONE OFF INCIDENT. NO ASB URN REQUIRED.

Previous Actions:

Time	Date	Opid	Termid	ACTION
				SYSTEM(EXTERNAL)
18:31:25	13NOV14	CHS	CCC:CCH	O() 215:ASB - NUISANCE,202:ROWDY OR INCONSI DERATE BEHAVIOUR
"	"	"	"	PI
18:31:57	"	187671	DIV:DD	AK
18:32:00	"	"	"	XP/AK/0202
18:56:54	"	088149	"	AC()
"	"	"	"	AQ()
"	"	"	"	AR()
18:56:56	"	"	"	ACR/NC
18:56:59	"	"	"	AWT/GPC
18:57:03	"	"	"	LOCA(357 HARROW RD,W9:WILLIAM HILL)(CM)
18:57:27	"	187671	"	PS/CM
19:06:55	"	088149	"	AWT/GPC
19:34:27	"	203063	"	CTX()
19:34:30	"	"	"	PS/CM
19:36:56	"	088149	"	CM
19:36:58	"	"	"	LOCA((ASB)357 HARROW RD,W9:WILLIAM HILL)(CM

CONTINUED ...

PRINTED AT 15:52 28:OCT:15 Bryan Lewis 200892

SINGLE INCIDENT PRINTOUT PAGE 4

INCIDENT No. 8274:13NOV14

Time	Date	Opid	Termid	ACTION
19:36:58	13NOV14	"	DIV:DD	)
15:51:51	28OCT15	200892	CCC:CADL	VI/p200892
15:52:08	"	"	"	IP//Bryan Lewis/1/p200892@met.police.uk

... END OF PRINT ...

PRINTED AT 17:06 28:OCT:15 PC lewis 200892

SINGLE INCIDENT PRINTOUT PAGE 1

INCIDENT No. 2727:24DEC14

INCIDENT No. 2727 entered at 11:07 on 24DEC14 by CHS/CHS in CCC/IR

INCIDENT WAS ENTERED "EXTERNALLY"

Rec By :E (Emergency)
Call Tel :[redacted]
Call [redacted]
Call Type:W (Witness)
Call Mail:
Cntct Tel:
Att Locn :357 HARROW RD, W9:william hill
Map :Page 139, Grid Reference 524785,182177
GPA :CM [Division: DD:DD]
Inc Locn :357 HARROW RD, W9:william hill
Map :Page 139, Grid Reference 524785,182177
GPA :CM [Division: DD:DD]
Call Locn:357 HARROW RD, W9:william hill
Map :Page 139, Grid Reference 524785,182177
GPA :CM [Division: DD:DD]
Opening 1:215 (ASB - Nuisance)
2:202 (Rowdy Or Inconsiderate Behaviour)
3:610 (Repeat Caller and/or Victim)
Prompt(s) existed for Opening Code(s) at time of creation
Open Text:
Urgency :S (Significant)
VRMs :
Proposal :(BOCU at 11:11/24DEC14):
CW31E CW31N CW33E CW20E LX80E XB80E SX80E 4025CW 4143CW
Assigned :
DeAssign :DD80E
TOA :11:29:15/24DEC14
DO Name :
DO Tel :
CRIS :NOT CRIMED
Class 1 :215 (ASB - Nuisance)
Qual 1 :202 (Rowdy Or Inconsiderate Behaviour)
Res 1 :703 (No Offences Disclosed)
Clo Text :NO ASB URN REQ ^ P235824
O Dealing:1807CW
Metops :
CHS Demid:20141224002986

Linked :

CONTINUED ...

INCIDENT No. 2727:24DEC14

Location Field : (For previous Incidents at this location use action:LCD or LCL - use DARIS to extend search)
Gazetteer Comments : (May have existed or altered since Incident creation - Use MSS SMF:SPECARCHIVE)

Location Based Comments
** Attendance and Incident and Caller Location **
HARROW RD,W9 (283 - 479)
ODDS: DB:1-147, DV:149-323, DQ:325-597, BA 599-657, QK: 659-675, FS: 677-873
EVENS: DV:2-350, DQ:362-742, QK: 744-1112, QH:REMAINDER, BA :KENSAL GRN CEM
W2:1-281 + 2-322, W9: 283-419 + 423-570, W10:421-625 + 558-742, NW10: REMAINDER
***** DURING CARNIVAL TIME,PASS ALL INCIDENTS "PI/GT" - SECTOR 1 *****
364 HARROW RD -
OCCUPANTS & CHILD/CHILDREN MAY BE AT RISK OF DOMESTIC VIOLENCE -
WARNING **OFFICER SAFETY ISSUE** - GRADE I - OPS *MUST* SEE SS/DD/T28
417-419 HARROW RD -
OCCUPANTS MAY BE AT RISK OF DOMESTIC VIOLENCE - GRADE I- SEE SS/DD/T103
419A HARROW RD: FLAT 12 -
OCCUPANTS/PREMISES MAY BE AT RISK OF ATTACK/HARASSMENT - **WARNING** -
GRADE I - SEE SS/DD/T179 BEFORE DEPLOYMENT
419A HARROW RD: FLAT 16 -
OCCUPANTS/PREMS MAY BE AT RISK OF ATTACK/HARASSMENT - **OSMAN WARNING** -
GRADE I - SEE SS/DD/T183 BEFORE DEPLOYMENT
470-474 HARROW RD: "NORTH WESTMINSTER DRUG AND ALCOHOL SERVICE" - GRADE E -
INFORM DUTY MANAGER (0207 266 6200) - WARNING **DRUGS** -
SEE SS/DD/T49 BEFORE DEPLOYMENT
478 HARROW RD: "SAINSBURY" -
WARNING CITY SAFE HAVEN - VULNERABLE CHILD/PERSON AT RISK -
GRADE I - OPS *MUST* SEE SS/DD/T104

Remarks:

Time	Date	Opid	Termid	
	24DEC14	CHS	CHS	(pre 1st routing)

CREATED IN: CHS AT: 2014-12-24 11:07:51 CAD AT: 2014-12-24 11:10:50

==========

ENTERED BY: CHS (c083459) AT: 2014-12-24 11:09:59
SMF ASB (For All Incidents Of Anti-social Behaviour)
Always consider whether the circumstances of the incident render the person concerned as vulnerable.
1. Has anything like this happened before?: Yes
2. Has the caller spoken to police about this or any other matter relating to ASB?: Yes

CONTINUED ...

INCIDENT No. 2727:24DEC14

Time	Date	Opid	Termid

3. If the answer to 2 is 'Yes', when were police called (approximately)? : weeks
4. Prior to this call, has the person sought help from elsewhere (e.g. Local Authority, Security, Housing Association, Samaritans, Citizens Advice, BT, etc.)?: No
5. If the answer to 4 is 'Yes' please state who? :
6. Are there any health or welfare issues we need to be aware of that could help us deal with your call? (VULNERABILITY)?: No
7. If the answer to 6 is 'Yes' record details of how/why vulnerable. Record any other relevant information? :
** For 'ASB' calls, you are no longer required to complete the 'REPEAT' or 'VULNERABLE' SMFs **

11:10:50 24DEC14 CHS
** **START OF DATA AUTOMATICALLY COPIED FROM OPEN PROMPT** **
OPEN CODE "202" :
USE SMF/ASB
** **END OF DATA AUTOMATICALLY COPIED FROM OPEN PROMPT** **

11:10:51 24DEC14 CHS
ENTERED BY: CHS (c083459) AT: 2014-12-24 11:10:13
young male in shop AA 20's had too much to drink - shouting being abusive .. he has come in with alcohol

11:10:51 24DEC14 CHS
ENTERED BY: CHS (c083459) AT: 2014-12-24 11:10:48
ic3 m AA 20's [redacted] black puffa jacket

11:13:15 24DEC14 CHS
ENTERED BY: CHS (c083459) AT: 2014-12-24 11:11:08
SMF REPEATVICTIM (Repeat Caller / Victim)
GPC Supervisor - Please note that this caller has been categorised as: 'Repeat caller' and / or 'Victim'.
GPC - Prioritise any additional intelligence checks & inform relevant SNT.
Consider if the person is susceptible to physical abuse, emotional or mental hurt, and liable to be easily influenced.
Are they a repeat caller and/or victim of anti-social behaviour which is affecting their quality of life, or are they intimidated by the activity?

11:13:16 24DEC14 CHS
ENTERED BY: CHS (c083459) AT: 2014-12-24 11:13:15
text sent
..
From Met Police. Your ref is CAD 2727/24 DEC. Police aim to attend

CONTINUED ...

INCIDENT No. 2727:24DEC14

```
Time     Date    Opid   Termid
-------- ------- ------ --------
         within 60 mins. Do not reply to text (END)
11:32:50 24DEC14 233000 DD80E
         ^^1907.. male left prior to police arrival. no offences
11:33:51 24DEC14 716812 H2720
         ************************ NCRSCIRCS **********************************
         THE CIRCUMSTANCES OF THIS INCIDENT DO NOT AMOUNT TO A NOTIFIABLE
         CRIME BECAUSE (place the word 'YES' by either A,B,C,D or E and in ALL
         cases show supporting grounds under F):
         A................ THERE IS CREDIBLE EVIDENCE TO THE CONTRARY:Y
         B......................THE REPORT IS A GENUINE ERROR/MISTAKE:
         C.RECORDED ON CRIS AS A NON-CRIME BK SPECIFIED INVESTIGATION:
         D.......................PREVIOUSLY REPORTED/RECORDED CRIME:
         (Original incident number with CRIS no.or the CRIS number will be
         provided by IBO in final classification.)
         E.........................CRIME RECORDED BY ANOTHER AGENCY:
         (As shown under Rule 1 in HOCR,e.g.UK Border Agency,RSPCA,Royal Mail)
         .
         F.Supporting grounds:NO OFFENCES
         .
            *** THEREFORE A NOTIFIABLE CRIME HAS NOT BEEN RECORDED ***
16:02:42 28DEC14 V35824 3778C
         ^CW GPC ISOLATED INCIDENT, NO VICTIM IMPACT, NO ASB URN REQ, P235824
```

Previous Actions:

```
Time     Date    Opid   Termid   ACTION
-------- ------- ------ -------- ------
                                 SYSTEM(EXTERNAL)
11:10:50 24DEC14 CHS    CCC:CCH  O() 215:ASB - NUISANCE,202:ROWDY OR INCONSI
                                 DERATE BEHAVIOUR, &
11:10:50    "      "       "     O& 600:ALCOHOL
  "         "      "       "     PI
11:11:11    "    202042 DIV:DD   AK
11:11:13    "      "       "     XP/AK/O202
11:11:20    "      "       "     AK
11:12:04    "      "       "     CI/DD80E
11:12:06    "    233000 CCC:MDT  MA/DELIVERED TO DD80E
11:12:14    "      "       "     AV/DD80E
11:12:22    "    202042 DIV:DD   AK
11:13:15    "    CHS    CCC:CCH  LOCC()(    )
  "         "      "       "     LOCI()(    )
  "         "      "       "     O(215/202/600) 215:ASB - NUISANCE, &
```

CONTINUED ...

INCIDENT No. 2727:24DEC14

Time	Date	Opid	Termid	ACTION
11:13:15	24DEC14	"	CCC:CCH	O& 202:ROWDY OR INCONSIDERATE BEHAVIOUR, &
"	"	"	"	O& 610:REPEAT CALLER AND/OR VICTIM
"	"	"	"	PI
11:13:37	"	202042	DIV:DD	AK
11:29:15	"	"	"	TOA/DD80E
11:32:55	"	716812	"	AK
11:33:29	"	"	"	AC()
"	"	"	"	AQ()
"	"	"	"	AR()
11:33:32	"	"	"	PS/CM
11:33:37	"	"	"	ACR/NC
11:33:51	"	"	"	EXP/SMF//CIRCS
11:34:28	"	717132	"	DA/DD80E
11:34:36	"	"	"	LOCA(357 HARROW RD, W9:william hill)(CM)
11:34:41	"	"	"	AWT/GPC
19:08:50	"	182976	"	LOCA((ASB/URN)357 HARROW RD, W9:william hil l)(CM)
16:02:06	28DEC14	V35824	"	LOCA((ASB) 357 HARROW RD, W9:william hill)(CM)
16:02:45	"	"	"	PS/CM
16:03:34	"	052363	"	CTX()
16:03:47	"	"	"	OD()
16:03:49	"	"	"	CM
"	"	"	"	MA/SEEN AND NOTED EO MCDAVITT -METCC
17:06:29	28OCT15	200892	CCC:CADL	VI/p200892
17:06:33	"	"	"	IP//PC lewis/1/p200892@met.police.uk

... END OF PRINT ...

PRINTED AT 17:02 28:OCT:15 PC lewis 200892

SINGLE INCIDENT PRINTOUT PAGE 1

INCIDENT No. 8119:09MAR15

INCIDENT No. 8119 entered at 19:33 on 09MAR15 by 098258/L2846 in CCC/IR

Rec By :E (Emergency)
Call Tel :[redacted]
Call Name[redacted]
Call Type:T (Third Party)
Call Mail:
Cntct Tel:
Att Locn :357 HARROW RD, W9;WILLIAM HILL
Map :Page 139, Grid Reference 524785,182177
GPA :CM [Division: DD:DD]
Inc Locn :357 HARROW RD, W9;WILLIAM HILL
Map :Page 139, Grid Reference 524785,182177
GPA :CM [Division: DD:DD]
Call Locn:357 HARROW RD, W9;WILLIAM HILL
Map :Page 139, Grid Reference 524785,182177
GPA :CM [Division: DD:DD]
Opening 1:215 (ASB - Nuisance)
2:600 (Alcohol)
Open Text:
Urgency :S (Significant)
VRMs :
Proposal :(BOCU at 19:36/09MAR15):
4025CW 4143CW 4311CW 4279CW 4304CW 4203CW 4330CW 4310CW
Assigned :
DeAssign :DD1L, DD2L
TOA :19:38:57/09MAR15
DO Name :
DO Tel :
CRIS :NOT CRIMED
Class 1 :215 (ASB - Nuisance)
Qual 1 :202 (Rowdy Or Inconsiderate Behaviour)
2 :600 (Alcohol)
Res 1 :703 (No Offences Disclosed)
Clo Text :ASB URN VACW151352
O Dealing:1035CW
Metops :
CHS Demid:20150309011168

Linked :

Location Field : (For previous Incidents at this location use

CONTINUED ...

INCIDENT No. 8119:09MAR15

action:LCD or LCL - use DARIS to extend search)
Gazetteer Comments : (May have existed or altered since Incident creation -
Use MSS SMF:SPECARCHIVE)

Location Based Comments
** Attendance and Incident and Caller Location **
HARROW RD,W9 (283 - 479)
ODDS: DB:1-147, DV:149-323, DQ:325-597, BA 599-657, QK: 659-675, FS: 677-873
EVENS: DV:2-350, DQ:362-742, QK: 744-1112, QH:REMAINDER, BA :KENSAL GRN CEM
W2:1-281 + 2-322, W9: 283-419 + 423-570, W10:421-625 + 558-742, NW10: REMAINDER
***** DURING CARNIVAL TIME,PASS ALL INCIDENTS "PI/GT" - SECTOR 1 *****
364 HARROW RD -
OCCUPANTS & CHILD/CHILDREN MAY BE AT RISK OF DOMESTIC VIOLENCE -
WARNING **OFFICER SAFETY ISSUE** - GRADE I - OPS *MUST* SEE SS/DD/T28
417-419 HARROW RD -
OCCUPANTS MAY BE AT RISK OF DOMESTIC VIOLENCE - GRADE I- SEE SS/DD/T103
419A HARROW RD: FLAT 12 -
OCCUPANTS/PREMISES MAY BE AT RISK OF ATTACK/HARASSMENT - **WARNING** -
GRADE I - SEE SS/DD/T179 BEFORE DEPLOYMENT
419A HARROW RD: FLAT 16 -
OCCUPANTS/PREMS MAY BE AT RISK OF ATTACK/HARASSMENT - **OSMAN WARNING** -
GRADE I - SEE SS/DD/T183 BEFORE DEPLOYMENT
470-474 HARROW RD: "NORTH WESTMINSTER DRUG AND ALCOHOL SERVICE" - GRADE E -
INFORM DUTY MANAGER (0207 266 6200) - WARNING **DRUGS** -
SEE SS/DD/T49 BEFORE DEPLOYMENT
478 HARROW RD: "SAINSBURY" -
WARNING CITY SAFE HAVEN - VULNERABLE CHILD/PERSON AT RISK -
GRADE I - OPS *MUST* SEE SS/DD/T104

Remarks:

Time	Date	Opid	Termid	
	09MAR15	098258	L2846	(pre 1st routing)
	^INFT..THERE IS A BANNED MALE IN THE STORE THAT IS REFUSING TO LEAVE. HE IS ALSO DRINKING ALCOHOL WHICH HE IS NOT ALLOWED TO DO IN HERE. HE HAS BEEN HERE FOR ABOUT 15 MINUTES. I HAVE ASKED HIM TO GO AND TOLD HIM HES NOT ALLOWED TO DRINK IN HERE, HE TOLD ME TO F**K OFF.			
19:37:07	09MAR15	098258	L2846	
	^INFT..HE IS BEING AGGRESSIVE, RUDE, IS SHOUTING. I DONT HAVE HIS DETS. MALE CAN BE HEARD IN THE B/G OF THE CALL.			
19:37:20	09MAR15	191938	H2720	
	^DD PR CIRC TO UNIT.			

CONTINUED ...

INCIDENT No. 8119:09MAR15

Time	Date	Opid	Termid
19:38:52	09MAR15	098258	L2846

LINE CLEARED, INFT AWARE OF CAD NO.

19:42:51	09MAR15	189558	DD1L

male left upon arrival of police. no offences alleged

19:44:08	09MAR15	191938	H2720

********** NCRSCIRCS **********

THE CIRCUMSTANCES OF THIS INCIDENT DO NOT AMOUNT TO A NOTIFIABLE CRIME BECAUSE (place the word 'YES' by either A,B,C,D or E and in ALL cases show supporting grounds under F):

A..... THERE IS CREDIBLE EVIDENCE TO THE CONTRARY:Y

B.....THE REPORT IS A GENUINE ERROR/MISTAKE:

C.RECORDED ON CRIS AS A NON-CRIME BK SPECIFIED INVESTIGATION:

D.....PREVIOUSLY REPORTED/RECORDED CRIME:

(Original incident number with CRIS no.or the CRIS number will be provided by IBO in final classification.)

E.....CRIME RECORDED BY ANOTHER AGENCY:

(As shown under Rule 1 in HOCR,e.g.UK Border Agency,RSPCA,Royal Mail)

.

F.Supporting grounds:MALE LEFT, NO OFFENCES.

.

*** THEREFORE A NOTIFIABLE CRIME HAS NOT BEEN RECORDED ***

Previous Actions:

Time	Date	Opid	Termid	ACTION
19:36:22	09MAR15	098258	CCC:IR	O() 215:ASB - NUISANCE,600:ALCOHOL
19:36:22	"	"	"	PI/(AUTOCM)
19:36:45	"	191938	DIV:DD	AK
19:37:07	"	098258	CCC:IR	PI/(AUTOCM)
19:37:29	"	191938	DIV:DD	AV/DD1L
19:37:33	"	"	"	AK
19:38:17	"	189558	CCC:MDT	VI/DD1L
19:38:26	"	"	"	MA/ACCEPTED BY DD1L - UNIT SHOWN ASSIGNED
19:38:43	"	193291	DIV:DD	AK
19:38:57	"	189558	CCC:MDT	TOA/DD1L
19:39:48	"	191938	DIV:DD	AV/DD2L
"	"	"	"	TOA/DD1L DD2L
19:43:23	"	"	"	AK
19:43:43	"	"	"	AC()
"	"	"	"	AQ()
"	"	"	"	AR()

CONTINUED ...

PRINTED AT 17:02 28:OCT:15 PC lewis 200892

SINGLE INCIDENT PRINTOUT PAGE 4

INCIDENT No. 8119:09MAR15

Time	Date	Opid	Termid	ACTION
19:43:45	09MAR15	"	DIV:DD	CTX()
19:44:08	"	"	"	EXP/SMF//CIRCS
19:44:13	"	"	"	DA/DD1L DD2L
19:44:16	"	"	"	PS/CM
19:51:15	"	193291	"	CTX(AS REMS)
19:51:16	"	"	"	ACR/NC
19:51:21	"	"	"	LOCA(357 HARROW RD, W9;WILLIAM HILL)(CM)
19:51:23	"	"	"	AWT/GPC
20:35:59	"	227211	"	LOCA((ASB URN)357 HARROW RD, W9;WILLIAM HIL L)(CM)
20:36:07	"	"	"	CTX()
20:36:10	"	"	"	PS/CM
20:59:07	"	193291	"	OD()
20:59:08	"	"	"	CM
17:02:46	28OCT15	200892	CCC:CADL	VI/p200892
17:02:52	"	"	"	IP//PC lewis/1/p200892@met.police.uk

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PRINTED AT 17:01 28:OCT:15 PC lewis 200892

SINGLE INCIDENT PRINTOUT PAGE 1

INCIDENT No. 5717:29MAY15

INCIDENT No. 5717 entered at 15:46 on 29MAY15 by CHS/CHS in CCC/IR

INCIDENT WAS ENTERED "EXTERNALLY"

Rec By :E (Emergency)
Call Tel :[redacted]
Call Name[redacted]
Call Type:W (Witness)
Call Mail:
Cntct Tel:
Att Locn :WILLIAM HILL 357 HARROW RD,W9:3NA
Map :
GPA :
Inc Locn :357 HARROW RD,W9:3NA
Map :Page 139, Grid Reference 524785,182177
GPA :CM [Division: DD:DD]
Call Locn:357 HARROW RD,W9:3NA
Map :Page 139, Grid Reference 524785,182177
GPA :CM [Division: DD:DD]
Opening 1:507 (Contact Record)
2:215 (ASB - Nuisance)
3:610 (Repeat Caller and/or Victim)
Open Text:
Urgency :S (Significant)
VRMs :
Proposal :(BOCU at 15:48/29MAY15):
C3L 4311CW 4330CW 240CW CW1202 4165CW 4262CW 1789CW 1258CW
Assigned :
DeAssign :
TOA :15:52:08/29MAY15
DO Name :
DO Tel :
CRIS :NOT CRIMED
Class 1 :215 (ASB - Nuisance)
Qual 1 :202 (Rowdy Or Inconsiderate Behaviour)
2 :600 (Alcohol)
Res 1 :703 (No Offences Disclosed)
2 :705 (Advice Given)
Clo Text :ASB URN NOT REQUIRED P009490
O Dealing:
Metops :
CHS Demid:20150529007317

CONTINUED ...

INCIDENT No. 5717:29MAY15

Linked :

Phone Field : (For previous Incidents from this phone use action:PHD or PHL - use DARIS to extend search)
Gazetteer Comments : (May have existed or altered since Incident creation - Use MSS SMF:SPECARCHIVE)

** Incident and Caller Location **
HARROW RD,W9 (283 - 479)
ODDS: DB:1-147, DV:149-323, DQ:325-597, BA 599-657, QK: 659-675, FS: 677-873
EVENS: DV:2-350, DQ:362-742, QK: 744-1112, QH:REMAINDER, BA :KENSAL GRN CEM
W2:1-281 + 2-322, W9: 283-419 + 423-570, W10:421-625 + 558-742, NW10: REMAINDER
***** DURING CARNIVAL TIME,PASS ALL INCIDENTS "PI/GT" - SECTOR 1 *****
342B HARROW RD -
OCCUPANTS/PREMS MAY BE AT RISK OF ATTACK/HARASSMENT - GRADE I - SEE SS/DD/T226
346 HARROW RD: FLAT B -
OCCUPANTS & CHILD/CHILDREN MAY BE AT RISK OF DOMESTIC VIOLENCE -
WARNING **OFFICER SAFETY ISSUE** - GRADE I - OPS *MUST* SEE SS/DD/T150
405 HARROW RD:FLAT B -
OCCUPANTS/PREMISES MAY BE AT RISK OF ATTACK/HARASSMENT - **WARNING** -
GRADE I - SEE SS/DD/T215 BEFORE DEPLOYMENT
419A HARROW RD: FLAT 12 -
OCCUPANTS/PREMISES MAY BE AT RISK OF ATTACK/HARASSMENT - **WARNING** -
GRADE I - SEE SS/DD/T179 BEFORE DEPLOYMENT
419A HARROW RD: FLAT 16 -
OCCUPANTS/PREMS MAY BE AT RISK OF ATTACK/HARASSMENT - **OSMAN WARNING** -
GRADE I - SEE SS/DD/T183 BEFORE DEPLOYMENT
470-474 HARROW RD: "NORTH WESTMINSTER DRUG AND ALCOHOL SERVICE" - GRADE E -
INFORM DUTY MANAGER (0207 266 6200) - WARNING **DRUGS** -
SEE SS/DD/T49 BEFORE DEPLOYMENT
478 HARROW RD: "SAINSBURY" -
WARNING CITY SAFE HAVEN - VULNERABLE CHILD/PERSON AT RISK -
GRADE I - OPS *MUST* SEE SS/DD/T104

Remarks:

Time	Date	Opid	Termid	
	29MAY15	CHS	CHS	(pre 1st routing)

CREATED IN: CHS AT: 2015-05-29 15:46:26 CAD AT: 2015-05-29 15:47:50

ENTERED BY: CHS (c724199) AT: 2015-05-29 15:47:51
CALLER STATES OFFICERS HAVE ATTENDED AND REMOVED THE MALE ONCE - HE HAS RETURNED AND DOING THE SAEM AS BEFORE - CONSTANTLY GOING IN AND OUT -

CONTINUED ...

INCIDENT No. 5717:29MAY15

Time	Date	Opid	Termid

SLAMMING THE DOOR -

15:48:09 29MAY15 CHS
ENTERED BY: CHS (c724199) AT: 2015-05-29 15:48:05
LINKED TO CAD 5508/29/05/2015

15:52:53 29MAY15 CHS
ENTERED BY: CHS (c724199) AT: 2015-05-29 15:52:13
SMF REPEATVICTIM (Repeat Caller / Victim)
GPC Supervisor - Please note that this caller has been categorised as: 'Repeat caller' and / or 'Victim'.
GPC - Prioritise any additional intelligence checks & inform relevant SNT.
Consider if the person is susceptible to physical abuse, emotional or mental hurt, and liable to be easily influenced.
Are they a repeat caller and/or victim of anti-social behaviour which is affecting their quality of life, or are they intimidated by the activity?

15:52:53 29MAY15 CHS
ENTERED BY: CHS (c724199) AT: 2015-05-29 15:52:53
ASB SMF ON LINKED

16:00:11 29MAY15 231912 C3L
^^^1182cw.. male advised to go home. he is obviously drunk but not bein g disorderly, just being a nusiancce in william hill by bumping in to p eople where he is unsteady on his feet due to being drunk. has been off ered las but has declined.
[redacted]

21:45:11 31MAY15 009490 3778C
^GPC-PARTNERSHIP. NOT ALL ASB CALLS WILL GENERATE AN AIRSPACE NUMBER AND EVERY REPORT IS ASSESSED TO ENSURE AND IDENTIFY VULNERABLE VICTIMS OR SUPPORTING EVIDENCE OF REPEAT CALLS. THE SMF IS REVIEWED AND ANSWERS CROSSED REFERENCED WITH ANY PREVIOUS INCIDENTS RECORDED ON THAT TELEPHONE NUMBER OR INFORMANT DETAIL. THERE DO NOT APPEAR TO BE ANY APPARENT RISKS. I HAVE REVIEWED THIS CAD AND NOTE THAT CAD INDICATES THERE ARE NO OTHER ASB CALLS FROM THIS CALLER OR THEIR PHONE NUMBER. I ALSO NOTE THAT THIS CAD NOT LOCATION SPECIFIC. ON THIS OCCASION THIS INCIDENT WILL BE TREATED AS AN ISOLATED INCIDENT. I HAVE TAKEN INTO ACCOUNT ANY REMARKS MADE BY THE OFFICERS DEPLOYED AND ATTENDING THE SCENE.

CONTINUED ...

PRINTED AT 17:01 28:OCT:15 PC lewis 200892

SINGLE INCIDENT PRINTOUT PAGE 4

INCIDENT No. 5717:29MAY15

Previous Actions:

Time	Date	Opid	Termid	ACTION
				SYSTEM(EXTERNAL)
15:47:50	29MAY15	CHS	CCC:CCH	O() 507:CONTACT RECORD,215:ASB - NUISANCE, &
15:47:50	"	"	"	O& 610:REPEAT CALLER AND/OR VICTIM
"	"	"	"	PI
15:48:09	"	"	"	PI
15:48:18	"	190656	DIV:DD	AK
15:48:32	"	191888	"	AK
15:48:43	"	190656	"	CI/C3L
15:48:49	"	"	"	AV/C3L
15:48:55	"	231912	CCC:MDT	MA/DELIVERED TO C3L
15:49:00	"	"	"	MA/ACCEPTED BY C3L - UNIT SHOWN ASSIGNED
15:49:08	"	201513	DIV:DD	AK
15:52:08	"	231912	CCC:MDT	TOA/C3L
15:52:53	"	CHS	CCC:CCH	PI
15:52:57	"	201513	DIV:DD	AK
16:00:21	"	"	"	AK
16:00:48	"	"	"	AC()
"	"	"	"	AQ()
"	"	"	"	AR()
16:00:50	"	"	"	DA/C3L(CU)
16:00:51	"	"	"	PS/CM
16:09:26	"	087836	"	LOCA(357 HARROW RD,W9:3NA)(CM)
16:09:27	"	"	"	AWT/GPC
21:36:06	31MAY15	009490	"	LOCA((ASB)357 HARROW RD,W9:3NA)(CM)
21:36:27	"	"	"	LOCA(WwILLIAM hILL (ASB)357 HARROW RD,W9:3N A)()
21:47:09	"	"	"	CTX()
21:47:19	"	"	"	LOCA(WILLIAM HILL (ASB)357 HARROW RD,W9:3NA)()
21:49:18	"	"	"	XWT
21:49:26	"	"	"	PS/CM
21:51:09	"	073883	"	ACR/NC
21:51:20	"	"	"	CTX(ASB URN NOT REQUIRED:p009490)
21:51:23	"	"	"	CM
"	"	"	"	CM
21:51:24	"	"	"	CM
17:01:54	28OCT15	200892	CCC:CADL	VI/p200892
17:01:58	"	"	"	IP//PC lewis/1/p200892@met.police.uk

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PRINTED AT 17:01 28:OCT:15 PC lewis 200892

SINGLE INCIDENT PRINTOUT PAGE 1

INCIDENT No. 5508:29MAY15

INCIDENT No. 5508 entered at 15:26 on 29MAY15 by CHS/CHS in CCC/IR

INCIDENT WAS ENTERED "EXTERNALLY"

```
Rec By    :E (Emergency)
Call Tel :[redacted]
Call Name[redacted]
Call Type:T (Third Party)
Call Mail:
Cntct Tel:
Att Locn :357 HARROW RD, W9:william hill
    Map  :Page 139, Grid Reference 524785,182177
    GPA  :CM [Division: DD:DD]
Inc Locn :357 HARROW RD, W9:william hill
    Map  :Page 139, Grid Reference 524785,182177
    GPA  :CM [Division: DD:DD]
Call Locn:357 HARROW RD, W9:william hill
     Map :Page 139, Grid Reference 524785,182177
     GPA :CM [Division: DD:DD]
Opening 1:215 (ASB - Nuisance)
        2:202 (Rowdy Or Inconsiderate Behaviour)
        3:600 (Alcohol)
          Prompt(s) existed for Opening Code(s) at time of creation
Open Text:
Urgency  :S (Significant)
VRMs     :
Proposal :(BOCU at 15:27/29MAY15):
          C3L CW50E CW40L 4311CW 4330CW 240CW CW1202 4165CW 4262CW
Assigned :
DeAssign :CW32L, C3L
TOA      :15:31:54/29MAY15
DO Name  :
DO Tel   :
CRIS     :NOT CRIMED
Class 1  :215 (ASB - Nuisance)
Qual  1  :600 (Alcohol)
      2  :701 (Assistance Requested / Rendered)
Res   1  :703 (No Offences Disclosed)
      2  :705 (Advice Given)
Clo Text :ASB URN NOT REQUIRED P009490
O Dealing:
Metops   :
CHS Demid:20150529007044
```

CONTINUED ...

INCIDENT No. 5508:29MAY15

Linked :

Location Field : (For previous Incidents at this location use action:LCD or LCL - use DARIS to extend search)
Gazetteer Comments : (May have existed or altered since Incident creation - Use MSS SMF:SPECARCHIVE)

Location Based Comments
** Attendance and Incident and Caller Location **
HARROW RD,W9 (283 - 479)
ODDS: DB:1-147, DV:149-323, DQ:325-597, BA 599-657, QK: 659-675, FS: 677-873
EVENS: DV:2-350, DQ:362-742, QK: 744-1112, QH:REMAINDER, BA :KENSAL GRN CEM
W2:1-281 + 2-322, W9: 283-419 + 423-570, W10:421-625 + 558-742, NW10: REMAINDER
***** DURING CARNIVAL TIME,PASS ALL INCIDENTS "PI/GT" - SECTOR 1 *****
342B HARROW RD -
OCCUPANTS/PREMS MAY BE AT RISK OF ATTACK/HARASSMENT - GRADE I - SEE SS/DD/T226
346 HARROW RD: FLAT B -
OCCUPANTS & CHILD/CHILDREN MAY BE AT RISK OF DOMESTIC VIOLENCE -
WARNING **OFFICER SAFETY ISSUE** - GRADE I - OPS *MUST* SEE SS/DD/T150
405 HARROW RD:FLAT B -
OCCUPANTS/PREMISES MAY BE AT RISK OF ATTACK/HARASSMENT - **WARNING** -
GRADE I - SEE SS/DD/T215 BEFORE DEPLOYMENT
419A HARROW RD: FLAT 12 -
OCCUPANTS/PREMISES MAY BE AT RISK OF ATTACK/HARASSMENT - **WARNING** -
GRADE I - SEE SS/DD/T179 BEFORE DEPLOYMENT
419A HARROW RD: FLAT 16 -
OCCUPANTS/PREMS MAY BE AT RISK OF ATTACK/HARASSMENT - **OSMAN WARNING** -
GRADE I - SEE SS/DD/T183 BEFORE DEPLOYMENT
470-474 HARROW RD: "NORTH WESTMINSTER DRUG AND ALCOHOL SERVICE" - GRADE E -
INFORM DUTY MANAGER (0207 266 6200) - WARNING **DRUGS** -
SEE SS/DD/T49 BEFORE DEPLOYMENT
478 HARROW RD: "SAINSBURY" -
WARNING CITY SAFE HAVEN - VULNERABLE CHILD/PERSON AT RISK -
GRADE I - OPS *MUST* SEE SS/DD/T104

Remarks:

Time	Date	Opid	Termid	
	29MAY15	CHS	CHS	(pre 1st routing)

CREATED IN: CHS AT: 2015-05-29 15:26:29 CAD AT: 2015-05-29 15:27:15

==========

ENTERED BY: CHS (c723102) AT: 2015-05-29 15:27:15
CUSTOMER DRINKING ALCOHOL INSIDE STORE AND REFUSING TO LEAVE

CONTINUED ...

INCIDENT No. 5508:29MAY15

Time	Date	Opid	Termid
15:27:15	29MAY15	CHS	

** **START OF DATA AUTOMATICALLY COPIED FROM OPEN PROMPT** **
OPEN CODE "202" :
USE SMF/ASB
** **END OF DATA AUTOMATICALLY COPIED FROM OPEN PROMPT** **

15:27:43 29MAY15 190656 H2722
^DD PR CIRC

15:27:52 29MAY15 CHS
ENTERED BY: CHS (c723102) AT: 2015-05-29 15:27:52
MALE - WHITE - A/A 25 - F509 - BLACK TRACKSUIT - BLACK HAT

15:28:18 29MAY15 CHS
ENTERED BY: CHS (c723102) AT: 2015-05-29 15:28:19
CALLER STATES HE HAS JUST LEFT BUT KEEPS COMING BACK IN - HAS BEEN IN TEN TIMES

15:29:33 29MAY15 CHS
ENTERED BY: CHS (c723102) AT: 2015-05-29 15:28:58
SMF ASB (For All Incidents Of Anti-social Behaviour)
Always consider whether the circumstances of the incident render the person concerned as vulnerable.
1. Has anything like this happened before?: No
2. Has the caller spoken to police about this or any other matter relating to ASB?: No
3. If the answer to 2 is 'Yes', when were police called (approximately)? :
4. Prior to this call, has the person sought help from elsewhere (e.g. Local Authority, Security, Housing Association, Samaritans, Citizens Advice, BT, etc.)?: No
5. If the answer to 4 is 'Yes' please state who? :
6. Are there any health or welfare issues we need to be aware of that could help us deal with your call? (VULNERABILITY)?: No
7. If the answer to 6 is 'Yes' record details of how/why vulnerable. Record any other relevant information? :
** For 'ASB' calls, you are no longer required to complete the 'REPEAT' or 'VULNERABLE' SMFs **

15:29:34 29MAY15 CHS
ENTERED BY: CHS (c723102) AT: 2015-05-29 15:29:34
REF GIVEN - LINE CLEARED - NFDS

15:43:44 29MAY15 190656 H2722
^1182CW NO OFFENCES MALE LEFT ADVICE GIVEN

21:30:07 31MAY15 009490 3778C
GPC PARTNERSHIP^ Not all ASB calls will generate an AIRSPACE number

CONTINUED ...

INCIDENT No. 5508:29MAY15

Time	Date	Opid	Termid

and every report is assessed to ensure and identify vulnerable victims or supporting evidence of repeat calls. The SMF is reviewed and answers cross referenced with any previous incidents recorded on that telephone number of informant detail. There do not appear to be any apparent risks. I have reviewed this CAD and note that CAD indicates there are no other calls from this caller or their phone number. On this occasion this incident will be treated as an isolated incident. I have taken into account any remarks made by the officers deployed and attending the scene.

Previous Actions:

Time	Date	Opid	Termid	ACTION
				SYSTEM(EXTERNAL)
15:27:15	29MAY15	CHS	CCC:CCH	O() 215:ASB - NUISANCE,202:ROWDY OR INCONSI DERATE BEHAVIOUR, &
15:27:15	"	"	"	O& 600:ALCOHOL
"	"	"	"	PI
15:27:18	"	190656	DIV:DD	AK
15:27:19	"	"	"	XP/AK/0202
15:27:50	"	"	"	CI/CW32L
15:27:52	"	CHS	CCC:CCH	PI
15:27:54	"	190656	DIV:DD	AV/CW32L
15:28:03	"	191888	"	AK
15:28:07	"	"	"	AK
15:28:12	"	225708	CCC:MDT	MA/DELIVERED TO CW32L
15:28:18	"	CHS	CCC:CCH	PI
15:28:21	"	191888	DIV:DD	AK
15:28:29	"	225708	CCC:MDT	MA/ACCEPTED BY CW32L - UNIT SHOWN ASSIGNED
15:28:32	"	191888	DIV:DD	AK
15:28:34	"	"	"	AK
15:28:36	"	CHS	CCC:CCH	CR()
"	"	"	"	CT()
"	"	"	"	PI
15:28:46	"	190656	DIV:DD	AK
15:29:27	"	225708	CCC:MDT	MA/ACCEPTED BY CW32L - UNIT SHOWN ASSIGNED
15:29:33	"	191888	DIV:DD	AK
"	"	CHS	CCC:CCH	PI
15:29:38	"	191888	DIV:DD	AK
15:31:54	"	"	"	AV/C3L
"	"	"	"	TOA/C3L

CONTINUED ...

INCIDENT No. 5508:29MAY15

Time	Date	Opid	Termid	ACTION
15:43:56	29MAY15	190656	DIV:DD	AC()
"	"	"	"	AQ()
"	"	"	"	AR()
15:43:58	"	"	"	CTX()
15:44:03	"	"	"	DA/CW32L C3L
15:44:05	"	"	"	PS/CM
15:50:16	"	087836	"	LOCA(357 HARROW RD, W9:william hill)(CM)
15:50:18	"	"	"	AWT/GPC
21:47:36	31MAY15	009490	"	LOCA((ASB)357 HARROW RD, W9:william hill)(C M)
21:48:56	"	"	"	XWT
21:49:00	"	"	"	PS/CM
21:51:00	"	073883	"	ACR/NC
21:51:02	"	"	"	AWT/GPC
21:53:57	"	009490	"	XWT
21:54:00	"	"	"	PS/CM
22:02:45	"	060138	"	CTX(SEE REMS)
22:02:46	"	"	"	CM
17:01:15	28OCT15	200892	CCC:CADL	VI/p200892
17:01:20	"	"	"	IP//PC lewis/1/p200892@met.police.uk

... END OF PRINT ...

PRINTED AT 17:00 28:OCT:15 PC lewis 200892

SINGLE INCIDENT PRINTOUT PAGE 1

INCIDENT No. 7823:24JUN15

INCIDENT No. 7823 entered at 17:58 on 24JUN15 by CHS/CHS in CCC/IR

INCIDENT WAS ENTERED "EXTERNALLY"

Rec By :O (Ordinary)
Call Tel :[redacted]
Call Name[redacted]
Call Type:T (Third Party)
Call Mail:
Cntct Tel:
Att Locn :O/S 357 HARROW ROAD, W9:WILLIAM HILL
Map :Page 139, Grid Reference 524785,182177
GPA :CM [Division: DD:DD]
Inc Locn :O/S 357 HARROW ROAD, W9:WILLIAM HILL
Map :Page 139, Grid Reference 524785,182177
GPA :CM [Division: DD:DD]
Call Locn:357 HARROW ROAD, W9:FLAT ABOVE
Map :Page 139, Grid Reference 524785,182177
GPA :CM [Division: DD:DD]
Opening 1:215 (ASB - Nuisance)
2:202 (Rowdy Or Inconsiderate Behaviour)
Prompt(s) existed for Opening Code(s) at time of creation
Open Text:
Urgency :S (Significant)
VRMs :
Proposal :(BOCU at 18:04/24JUN15):
CW33E CA19E 4311CW 4330CW 240CW CW1202 4165CW 4262CW 1658CW
Assigned :
DeAssign :DD80L
TOA :18:48:50/24JUN15
DO Name :
DO Tel :
CRIS :NOT CRIMED
Class 1 :215 (ASB - Nuisance)
Qual 1 :202 (Rowdy Or Inconsiderate Behaviour)
Res 1 :705 (Advice Given)
Clo Text :ASB URN NOT REQUIRED P227211
O Dealing:
Metops :
CHS Demid:20150624009426

Linked :

CONTINUED ...

INCIDENT No. 7823:24JUN15

Location Field : (For previous Incidents at this location use action:LCD or LCL - use DARIS to extend search)
Gazetteer Comments : (May have existed or altered since Incident creation - Use MSS SMF:SPECARCHIVE)

Location Based Comments
** Attendance and Incident and Caller Location **
HARROW RD,W9 (283 - 479)
ODDS: DB:1-147, DV:149-323, DQ:325-597, BA 599-657, QK: 659-675, FS: 677-873
EVENS: DV:2-350, DQ:362-742, QK: 744-1112, QH:REMAINDER, BA :KENSAL GRN CEM
W2:1-281 + 2-322, W9: 283-419 + 423-570, W10:421-625 + 558-742, NW10: REMAINDER
***** DURING CARNIVAL TIME,PASS ALL INCIDENTS "PI/GT" - SECTOR 1 *****
342B HARROW RD -
OCCUPANTS/PREMS MAY BE AT RISK OF ATTACK/HARASSMENT - GRADE I - SEE SS/DD/T226
346 HARROW RD: FLAT B -
OCCUPANTS & CHILD/CHILDREN MAY BE AT RISK OF DOMESTIC VIOLENCE -
WARNING **OFFICER SAFETY ISSUE** - GRADE I - OPS *MUST* SEE SS/DD/T150
405 HARROW RD:FLAT B -
OCCUPANTS/PREMISES MAY BE AT RISK OF ATTACK/HARASSMENT - **WARNING** -
GRADE I - SEE SS/DD/T215 BEFORE DEPLOYMENT
470-474 HARROW RD: "NORTH WESTMINSTER DRUG AND ALCOHOL SERVICE" - GRADE E -
INFORM DUTY MANAGER (0207 266 6200) - WARNING **DRUGS** -
SEE SS/DD/T49 BEFORE DEPLOYMENT
478 HARROW RD: "SAINSBURY" -
WARNING CITY SAFE HAVEN - VULNERABLE CHILD/PERSON AT RISK -
GRADE I - OPS *MUST* SEE SS/DD/T104

Remarks:

Time	Date	Opid	Termid	
	24JUN15	CHS	CHS	(pre 1st routing)
	CREATED IN: CHS AT: 2015-06-24 17:58:14 CAD AT: 2015-06-24 18:03:58			
	ENTERED BY: CHS (c723701) AT: 2015-06-24 18:03:50			
	LARGE GROUP OF PEOPLE STANDING O/S WILLIAM HILL DRINKING AND BEING INTIMIDATING, SEEM TO BE HAVING A PARTY IN THE STREET, HAVE CHAMPAGNE BOTTLES OPEN AND PALSTIC CUPS			
18:03:58	24JUN15	CHS		
	** **START OF DATA AUTOMATICALLY COPIED FROM OPEN PROMPT** **			
	OPEN CODE "202" :			
	USE SMF/ASB			
	** **END OF DATA AUTOMATICALLY COPIED FROM OPEN PROMPT** **			
18:03:58	24JUN15	CHS		

CONTINUED ...

INCIDENT No. 7823:24JUN15

Time	Date	Opid	Termid

ENTERED BY: CHS (c723701) AT: 2015-06-24 18:03:55
BEEN THERE FOR THE LAST HALF AN HOUR

18:03:58 24JUN15 CHS
ENTERED BY: CHS (c723701) AT: 2015-06-24 18:03:57
SMF ASB (For All Incidents Of Anti-social Behaviour)
Always consider whether the circumstances of the incident render the person concerned as vulnerable.
1. Has anything like this happened before?: Yes
2. Has the caller spoken to police about this or any other matter relating to ASB?: Yes
3. If the answer to 2 is 'Yes', when were police called (approximately)? : COUPLE OF MONTHS AGO
4. Prior to this call, has the person sought help from elsewhere (e.g. Local Authority, Security, Housing Association, Samaritans, Citizens Advice, BT, etc.)?: No
5. If the answer to 4 is 'Yes' please state who? : N/A
6. Are there any health or welfare issues we need to be aware of that could help us deal with your call? (VULNERABILITY)?: No
7. If the answer to 6 is 'Yes' record details of how/why vulnerable. Record any other relevant information? : N/A
** For 'ASB' calls, you are no longer required to complete the 'REPEAT' or 'VULNERABLE' SMFs **

18:04:16 24JUN15 CHS
ENTERED BY: CHS (c723701) AT: 2015-06-24 18:04:14
REF DEC, CHARTER TIME ADVISED, TEXTING SUSPENDED

18:06:48 24JUN15 096527 H2721
^102CW AWARE OF THESE CAN CALLERS BE MADE AWARE THAT WE ARE NOT GOING TO ATTEND WITHIN THE HOUR, WE HAVE LIMITED RESOURCES AND ALL BUSY.

18:59:27 24JUN15 082891 H3161
OP - INFT HAS CALLED IN CHASING AN ETA , HAVE ADVISED CALLER POL HAVE ATTENDED SHES WAS WATCHING THEM AND THEY GOT THROUGH A FEW BOTTLES OF CHAMPAGNE NOT SURE IF THEY STILL HAVE BOTTLES HAVE ADVISED HER IF SITUATION GETS WORSE TO CALL BACK AS POSS WHEN POL ON SCENE THEY ONLY HAD PLASTIC CUPS.

20:56:59 24JUN15 096527 H2721
^1637CW NO ALCHOL SEEN SPOKE TO THE MALES AND THEY LEFT AFTER BEING SPOKEN TO.

21:05:05 24JUN15 058059 H2629
GPC ^ DD - ASB URN PLSE

20:51:59 25JUN15 227211 3778C
^GPC-PARTNERSHIP. NOT ALL ASB CALLS WILL GENERATE AN AIRSPACE NUMBER

CONTINUED ...

INCIDENT No. 7823:24JUN15

Time	Date	Opid	Termid

AND EVERY REPORT IS ASSESSED TO ENSURE AND IDENTIFY VULNERABLE VICTIMS OR SUPPORTING EVIDENCE OF REPEAT CALLS. THE SMF IS REVIEWED AND ANSWERS CROSSED REFERENCED WITH ANY PREVIOUS INCIDENTS RECORDED ON THAT TELEPHONE NUMBER OR INFORMANT DETAIL. THERE DO NOT APPEAR TO BE ANY APPARENT RISKS. I HAVE REVIEWED THIS CAD AND NOTE THAT CAD INDICATES THERE ARE NO OTHER ASB CALLS FROM THIS CALLER OR THEIR PHONE NUMBER. ON THIS OCCASION THIS INCIDENT WILL BE TREATED AS AN ISOLATED INCIDENT. I HAVE TAKEN INTO ACCOUNT ANY REMARKS MADE BY THE OFFICERS DEPLOYED AND ATTENDING THE SCENE. P227211

Previous Actions:

Time	Date	Opid	Termid	ACTION
				SYSTEM(EXTERNAL)
18:03:58	24JUN15	CHS	CCC:CCH	O() 215:ASB - NUISANCE,202:ROWDY OR INCONSI DERATE BEHAVIOUR
"	"	"	"	PI
18:04:16	"	"	"	PI
18:04:18	"	096527	DIV:DD	XP/AK/0101
"	"	"	"	AK
18:04:20	"	"	"	XP/AK/0202
18:08:39	"	"	"	PR/CIRC #1 PR
18:11:55	"	"	"	CI/CW80L
18:11:57	"	233194	CCC:MDT	MA/DELIVERED TO CW80L
18:13:22	"	096527	DIV:DD	CI/DD80L
18:13:26	"	226668	CCC:MDT	MA/DELIVERED TO DD80L
18:13:38	"	"	"	AV/DD80L
"	"	SYSTEM	SYSTEM	NA/CW80L
18:13:55	"	096527	DIV:DD	AK
18:48:50	"	226668	CCC:MDT	TOA/DD80L
20:57:11	"	096527	DIV:DD	AC()
"	"	"	"	AQ()
"	"	"	"	AR()
20:57:14	"	"	"	PS/CM
20:57:16	"	"	"	DA/DD80L
21:05:07	"	058059	"	AWT/CRIS
21:05:11	"	"	"	XWT
21:05:13	"	"	"	AWT/GPC
16:15:25	25JUN15	225560	"	LOCA(O/S 357 HARROW ROAD, W9:WILLIAM HILL)(CM)
20:52:04	"	227211	"	LOCA((ASB)O/S 357 HARROW ROAD, W9:WILLIAM H

CONTINUED ...

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SINGLE INCIDENT PRINTOUT PAGE 5

INCIDENT No. 7823:24JUN15

Time	Date	Opid	Termid	ACTION
20:52:04	25JUN15	227211	DIV:DD	ILL)(CM)
20:52:12	"	"	"	CTX()
20:52:15	"	"	"	PS/CM
20:53:42	"	065839	"	ACR/NC
"	"	"	"	CM
17:00:25	28OCT15	200892	CCC:CADL	VI/p200892
17:00:31	"	"	"	IP//PC lewis/1/p200892@met.police.uk

... END OF PRINT ...

PRINTED AT 16:59 28:OCT:15 PC lewis 200892

SINGLE INCIDENT PRINTOUT PAGE 1

INCIDENT No. 9227:07JUL15

INCIDENT No. 9227 entered at 20:00 on 07JUL15 by CHS/CHS in CCC/IR

INCIDENT WAS ENTERED "EXTERNALLY"
INCIDENT IS "SUB QUEUED" TO "N"

```
Rec By    :E (Emergency)
Call Tel  :[redacted]
Call Name:[redacted] [redacted]
Call Type:W (Witness)
Call Mail:
Cntct Tel:
Att Locn  :357 HARROW ROAD,LONDON,W9:William Hill
    Map   :Page 139, Grid Reference 524785,182177
    GPA   :CM [Division: DD:DD]
Inc Locn  :357 HARROW ROAD,LONDON,W9:William Hill
    Map   :Page 139, Grid Reference 524785,182177
    GPA   :CM [Division: DD:DD]
Call Locn:357 HARROW ROAD,LONDON,W9:William Hill
     Map :Page 139, Grid Reference 524785,182177
     GPA :CM [Division: DD:DD]
Opening 1:215 (ASB - Nuisance)
        2:202 (Rowdy Or Inconsiderate Behaviour)
        3:600 (Alcohol)
          Prompt(s) existed for Opening Code(s) at time of creation
Open Text:
Urgency   :S (Significant)
VRMs      :
Proposal  :(BOCU at 20:02/07JUL15):
           CW32L CW32E 4311CW 4004CW 4330CW 240CW CW1202 4165CW 4262CW
Assigned  :
DeAssign  :CW50L
TOA       :20:14:03/07JUL15
DO Name   :
DO Tel    :
CRIS      :NOT CRIMED
Class 1   :215 (ASB - Nuisance)
Qual  1   :202 (Rowdy Or Inconsiderate Behaviour)
Res   1   :703 (No Offences Disclosed)
      2   :702 (No Trace)
Clo Text  :ASB URN NOT REQUIRED P227211
O Dealing:1639CW
Metops    :
CHS Demid:20150707011898
```

CONTINUED ...

INCIDENT No. 9227:07JUL15

Linked :

Phone Field : (For previous Incidents from this phone use action:PHD or PHL - use DARIS to extend search)
Location Field : (For previous Incidents at this location use action:LCD or LCL - use DARIS to extend search)
Gazetteer Comments : (May have existed or altered since Incident creation - Use MSS SMF:SPECARCHIVE)

Location Based Comments
** Attendance and Incident and Caller Location **
HARROW RD,W9 (283 - 479)
ODDS: DB:1-147, DV:149-323, DQ:325-597, BA 599-657, QK: 659-675, FS: 677-873
EVENS: DV:2-350, DQ:362-742, QK: 744-1112, QH:REMAINDER, BA :KENSAL GRN CEM
W2:1-281 + 2-322, W9: 283-419 + 423-570, W10:421-625 + 558-742, NW10: REMAINDER
***** DURING CARNIVAL TIME,PASS ALL INCIDENTS "PI/GT" - SECTOR 1 *****
342B HARROW RD -
OCCUPANTS/PREMS MAY BE AT RISK OF ATTACK/HARASSMENT - GRADE I - SEE SS/DD/T226
346 HARROW RD: FLAT B -
OCCUPANTS & CHILD/CHILDREN MAY BE AT RISK OF DOMESTIC VIOLENCE -
WARNING **OFFICER SAFETY ISSUE** - GRADE I - OPS *MUST* SEE SS/DD/T150
405 HARROW RD:FLAT B -
OCCUPANTS/PREMISES MAY BE AT RISK OF ATTACK/HARASSMENT - **WARNING** -
GRADE I - SEE SS/DD/T215 BEFORE DEPLOYMENT
470-474 HARROW RD: "NORTH WESTMINSTER DRUG AND ALCOHOL SERVICE" - GRADE E -
INFORM DUTY MANAGER (0207 266 6200) - WARNING **DRUGS** -
SEE SS/DD/T49 BEFORE DEPLOYMENT
478 HARROW RD: "SAINSBURY" -
WARNING CITY SAFE HAVEN - VULNERABLE CHILD/PERSON AT RISK -
GRADE I - OPS *MUST* SEE SS/DD/T104

Remarks:

Time	Date	Opid	Termid	
	07JUL15	CHS	CHS	(pre 1st routing)

CREATED IN: CHS AT: 2015-07-07 20:00:52 CAD AT: 2015-07-07 20:02:27

==========

ENTERED BY: CHS (p009138) AT: 2015-07-07 20:02:26
drunk female is barred from shop
keeps coming in
wont leave
harassing our customers
she is icl; 40's; blonde hair, pink tracksuit top and blk bottoms

CONTINUED ...

INCIDENT No. 9227:07JUL15

```
Time     Date    Opid   Termid
-------- ------- ------ --------
20:02:27 07JUL15 CHS
         ** **START OF DATA AUTOMATICALLY COPIED FROM OPEN PROMPT** **
         OPEN CODE "202" :
         USE SMF/ASB
         ** **END OF DATA AUTOMATICALLY COPIED FROM OPEN PROMPT** **
20:04:26 07JUL15 702960 H2722
         ^1639CW - I WILL DEAL AFTER CURRENT
20:05:00 07JUL15 CHS
         ENTERED BY: CHS  (p009138 ) AT: 2015-07-07 20:02:51
         SMF ASB (For All Incidents Of Anti-social Behaviour)
         Always consider whether the circumstances of the incident render the
         person concerned as vulnerable.
         1. Has anything like this happened before?: Yes
         2. Has the caller spoken to police about this or any other matter
         relating to ASB?: Yes
         3. If the answer to 2 is 'Yes', when were police called
         (approximately)? : n/k
         4. Prior to this call, has the person sought help from elsewhere (e.g.
         Local Authority, Security, Housing Association, Samaritans, Citizens
         Advice, BT, etc.)?: No
         5. If the answer to 4 is 'Yes' please state who? :
         6. Are there any health or welfare issues we need to be aware of that
         could help us deal with your call? (VULNERABILITY)?: No
         7. If the answer to 6 is 'Yes' record details of how/why vulnerable.
         Record any other relevant information? :
         ** For 'ASB' calls, you are no longer required to complete the 'REPEAT'
         or 'VULNERABLE' SMFs **
20:41:35 07JUL15 702960 H2722
         ^1639CW - ASNT
21:39:44 07JUL15 084133 H2723
         ************************* NCRSCIRCS **********************************
         THE CIRCUMSTANCES OF THIS INCIDENT DO NOT AMOUNT TO A NOTIFIABLE
         CRIME BECAUSE (place the word 'YES' by either A,B,C,D or E and in ALL
         cases show supporting grounds under F):
         A................ THERE IS CREDIBLE EVIDENCE TO THE CONTRARY:Y
         B.......................THE REPORT IS A GENUINE ERROR/MISTAKE:
         C.RECORDED ON CRIS AS A NON-CRIME BK SPECIFIED INVESTIGATION:
         D.........................PREVIOUSLY REPORTED/RECORDED CRIME:
         (Original incident number with CRIS no.or the CRIS number will be
         provided by IBO in final classification.)
         E...........................CRIME RECORDED BY ANOTHER AGENCY:
```

CONTINUED ...

INCIDENT No. 9227:07JUL15

Time	Date	Opid	Termid	
				(As under Rule 1 in HOCR,e.g.UK Visas & Immigration, RSPCA, Royal Mail) F.Supporting grounds:ON INVESTIGATION OF EVIDENCE NO OFFENCES ALLEDGED OR APPARENT AREA SEARCHED NO TRACE *** THEREFORE A NOTIFIABLE CRIME HAS NOT BEEN RECORDED ***
21:40:30	07JUL15	201620	H2629	GPC^DDC...ASB REF PLEASE
19:16:58	08JUL15	227211	3778C	^GPC-PARTNERSHIP. NOT ALL ASB CALLS WILL GENERATE AN AIRSPACE NUMBER AND EVERY REPORT IS ASSESSED TO ENSURE AND IDENTIFY VULNERABLE VICTIMS OR SUPPORTING EVIDENCE OF REPEAT CALLS. THE SMF IS REVIEWED AND ANSWERS CROSSED REFERENCED WITH ANY PREVIOUS INCIDENTS RECORDED ON THAT TELEPHONE NUMBER OR INFORMANT DETAIL. THERE DO NOT APPEAR TO BE ANY APPARENT RISKS. I HAVE REVIEWED THIS CAD AND NOTE THAT CAD INDICATES THERE ARE NO OTHER ASB CALLS FROM THIS CALLER OR THEIR PHONE NUMBER. ON THIS OCCASION THIS INCIDENT WILL BE TREATED AS AN ISOLATED INCIDENT. I HAVE TAKEN INTO ACCOUNT ANY REMARKS MADE BY THE OFFICERS DEPLOYED AND ATTENDING THE SCENE. P227211

Previous Actions:

Time	Date	Opid	Termid	ACTION
				SYSTEM(EXTERNAL)
20:02:27	07JUL15	CHS	CCC:CCH	O() 215:ASB - NUISANCE,202:ROWDY OR INCONSI DERATE BEHAVIOUR, &
20:02:27	"	"	"	O& 600:ALCOHOL
"	"	"	"	PI
20:02:29	"	702960	DIV:DD	AK
20:02:30	"	"	"	XP/AK/0202
20:02:37	"	"	"	LOCA(357 HARROW ROAD,LONDON,W9:William Hill)(CM)
20:04:11	"	"	"	CI/CW50L
20:04:13	"	205055	CCC:MDT	MA/DELIVERED TO CW50L
20:04:18	"	702960	DIV:DD	AV/CW50L
20:04:24	"	205055	CCC:MDT	MA/ACCEPTED BY CW50L - UNIT SHOWN ASSIGNED
20:04:28	"	702960	DIV:DD	AK
20:05:00	"	CHS	CCC:CCH	PI
20:05:03	"	218165	DIV:DD	AK
20:14:03	"	205055	CCC:MDT	TOA/CW50L
20:45:16	"	702960	DIV:DD	LOCA((**)357 HARROW ROAD,LONDON,W9:William Hill)(CM)
21:39:44	"	084133	"	EXP/SMF//NCRSCIRCS

CONTINUED ...

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SINGLE INCIDENT PRINTOUT PAGE 5

INCIDENT No. 9227:07JUL15

Time	Date	Opid	Termid	ACTION
21:39:55	07JUL15	"	DIV:DD	AC()
"	"	"	"	AQ()
"	"	"	"	AR()
21:39:58	"	"	"	ACR/NC
21:40:01	"	"	"	DA/CW50L
21:40:02	"	"	"	PS/CM
21:40:06	"	"	"	OD()
21:40:50	"	201620	"	AWT/GPC
23:02:03	"	197614	"	LOCA(357 HARROW ROAD,LONDON,W9:William Hill)(CM)
15:09:15	08JUL15	184405	"	AW
19:17:05	"	227211	"	LOCA((ASB)357 HARROW ROAD,LONDON,W9:William Hill)(CM)
19:17:16	"	"	"	CTX()
19:17:19	"	"	"	PS/CM
19:18:36	"	090605	"	CM
16:59:36	28OCT15	200892	CCC:CADL	VI/p200892
16:59:40	"	"	"	IP//PC lewis/1/p200892@met.police.uk

... END OF PRINT ...

PRINTED AT 16:58 28:OCT:15 PC lewis 200892

SINGLE INCIDENT PRINTOUT PAGE 1

INCIDENT No. 8871:21JUL15

INCIDENT No. 8871 entered at 19:31 on 21JUL15 by CHS/CHS in CCC/IR

INCIDENT WAS ENTERED "EXTERNALLY"

Rec By :E (Emergency)
Call Tel :[redacted]
Call Name:[redacted]
Call Type:T (Third Party)
Call Mail:
Cntct Tel:
Att Locn :O/S 357 HARROW ROAD,W9:3NA - william hill
Map :Page 139, Grid Reference 524785,182177
GPA :CM [Division: DD:DD]
Inc Locn :O/S 357 HARROW ROAD,W9:3NA - william hill
Map :Page 139, Grid Reference 524785,182177
GPA :CM [Division: DD:DD]
Call Locn:357 HARROW ROAD,W9:3NA - william hill
Map :Page 139, Grid Reference 524785,182177
GPA :CM [Division: DD:DD]
Opening 1:215 (ASB - Nuisance)
2:202 (Rowdy Or Inconsiderate Behaviour)
3:600 (Alcohol)
Prompt(s) existed for Opening Code(s) at time of creation
Open Text:
Urgency :S (Significant)
VRMs :
Proposal :(BOCU at 19:32/21JUL15):
CM18L 4311CW 1642CW 4330CW 240CW CW1202 4165CW 4262CW 1433CW
Assigned :
DeAssign :DD80L
TOA :19:50:00/21JUL15
DO Name :
DO Tel :
CRIS :NOT CRIMED
Class 1 :215 (ASB - Nuisance)
Qual 1 :202 (Rowdy Or Inconsiderate Behaviour)
Res 1 :703 (No Offences Disclosed)
Clo Text :ASB URN VACW 154385
O Dealing:1443CW
Metops :
CHS Demid:20150721011336

Linked :

CONTINUED ...

INCIDENT No. 8871:21JUL15

Phone Field : (For previous Incidents from this phone use action:PHD or PHL - use DARIS to extend search)
Location Field : (For previous Incidents at this location use action:LCD or LCL - use DARIS to extend search)
Gazetteer Comments : (May have existed or altered since Incident creation - Use MSS SMF:SPECARCHIVE)

Location Based Comments
** Attendance and Incident and Caller Location **
HARROW RD,W9 (283 - 479)
ODDS: DB:1-147, DV:149-323, DQ:325-597, BA 599-657, QK: 659-675, FS: 677-873
EVENS: DV:2-350, DQ:362-742, QK: 744-1112, QH:REMAINDER, BA :KENSAL GRN CEM
W2:1-281 + 2-322, W9: 283-419 + 423-570, W10:421-625 + 558-742, NW10: REMAINDER
***** DURING CARNIVAL TIME,PASS ALL INCIDENTS "PI/GT" - SECTOR 1 *****
342B HARROW RD -
OCCUPANTS/PREMS MAY BE AT RISK OF ATTACK/HARASSMENT - GRADE I - SEE SS/DD/T226
346 HARROW RD: FLAT B -
OCCUPANTS & CHILD/CHILDREN MAY BE AT RISK OF DOMESTIC VIOLENCE -
WARNING **OFFICER SAFETY ISSUE** - GRADE I - OPS *MUST* SEE SS/DD/T150
405 HARROW RD:FLAT B -
OCCUPANTS/PREMISES MAY BE AT RISK OF ATTACK/HARASSMENT - **WARNING** -
GRADE I - SEE SS/DD/T215 BEFORE DEPLOYMENT
470-474 HARROW RD: "NORTH WESTMINSTER DRUG AND ALCOHOL SERVICE" - GRADE E -
INFORM DUTY MANAGER (0207 266 6200) - WARNING **DRUGS** -
SEE SS/DD/T49 BEFORE DEPLOYMENT
478 HARROW RD: "SAINSBURY" -
WARNING CITY SAFE HAVEN - VULNERABLE CHILD/PERSON AT RISK -
GRADE I - OPS *MUST* SEE SS/DD/T104

Remarks:

Time	Date	Opid	Termid	
	21JUL15	CHS	CHS	(pre 1st routing)

CREATED IN: CHS AT: 2015-07-21 19:31:50 CAD AT: 2015-07-21 19:32:49

ENTERED BY: CHS (c723220) AT: 2015-07-21 19:32:49
caller states that on both sides of the shops there are 2 groups of people drinking

19:32:49 21JUL15 CHS
** **START OF DATA AUTOMATICALLY COPIED FROM OPEN PROMPT** **
OPEN CODE "202" :
USE SMF/ASB
** **END OF DATA AUTOMATICALLY COPIED FROM OPEN PROMPT** **

CONTINUED ...

INCIDENT No. 8871:21JUL15

Time	Date	Opid	Termid

19:33:11 21JUL15 CHS
ENTERED BY: CHS (c723220) AT: 2015-07-21 19:33:11
caller states that the council have been in to them about issues like this that are happening
19:33:18 21JUL15 CHS
ENTERED BY: CHS (c723220) AT: 2015-07-21 19:33:18
around 5 males drinking
19:33:35 21JUL15 705239 H2722
^DD-PLS ADVISE INFT NUTD....
19:33:55 21JUL15 CHS
ENTERED BY: CHS (c723220) AT: 2015-07-21 19:33:56
been there around 40 mins
19:34:37 21JUL15 CHS
ENTERED BY: CHS (c723220) AT: 2015-07-21 19:34:17
SMF ASB (For All Incidents Of Anti-social Behaviour)
Always consider whether the circumstances of the incident render the person concerned as vulnerable.
1. Has anything like this happened before?: Yes
2. Has the caller spoken to police about this or any other matter relating to ASB?: Yes
3. If the answer to 2 is 'Yes', when were police called (approximately)? : caller thinks poss other staff members
4. Prior to this call, has the person sought help from elsewhere (e.g. Local Authority, Security, Housing Association, Samaritans, Citizens Advice, BT, etc.)?: Yes
5. If the answer to 4 is 'Yes' please state who? : council
6. Are there any health or welfare issues we need to be aware of that could help us deal with your call? (VULNERABILITY)?: Yes
7. If the answer to 6 is 'Yes' record details of how/why vulnerable. Record any other relevant information? : customers are affected by this and they are on public road
** For 'ASB' calls, you are no longer required to complete the 'REPEAT' or 'VULNERABLE' SMFs **
19:34:37 21JUL15 CHS
ENTERED BY: CHS (c723220) AT: 2015-07-21 19:34:37
caller states that some of them are trying to come into the store but they are not allowed inside
19:35:21 21JUL15 CHS
ENTERED BY: CHS (c723220) AT: 2015-07-21 19:35:21
^op - have advised
19:35:25 21JUL15 CHS

CONTINUED ...

INCIDENT No. 8871:21JUL15

```
Time     Date    Opid   Termid
-------- ------- ------ --------
         ENTERED BY: CHS  (c723220 ) AT: 2015-07-21 19:35:25
         ref given
19:58:12 21JUL15 088149 H2629
         ^1443CW - 3 MALES AT LOC. NOT BEING ANTI SOCIAL
21:04:10 21JUL15 082633 H2723
         ************************* NCRSCIRCS **********************************
         THE CIRCUMSTANCES OF THIS INCIDENT DO NOT AMOUNT TO A NOTIFIABLE
         CRIME BECAUSE (place the word 'YES' by either A,B,C,D or E and in ALL
         cases show supporting grounds under F):
         A............... THERE IS CREDIBLE EVIDENCE TO THE CONTRARY:Y
         B.....................THE REPORT IS A GENUINE ERROR/MISTAKE:
         C.RECORDED ON CRIS AS A NON-CRIME BK SPECIFIED INVESTIGATION:
         D.......................PREVIOUSLY REPORTED/RECORDED CRIME:
         (Original incident number with CRIS no.or the CRIS number will be
         provided by IBO in final classification.)
         E.........................CRIME RECORDED BY ANOTHER AGENCY:
         (As shown under Rule 1 in HOCR,e.g.UK Border Agency,RSPCA,Royal Mail)
         .
         F.Supporting grounds:NO OFFENCES ALLEGED OR APPARENT
         .
            *** THEREFORE A NOTIFIABLE CRIME HAS NOT BEEN RECORDED ***

Previous Actions:
Time     Date    Opid   Termid   ACTION
-------- ------- ------ -------- ------
                                 SYSTEM(EXTERNAL)
19:32:49 21JUL15 CHS    CCC:CCH  O() 215:ASB - NUISANCE,202:ROWDY OR INCONSI
                                 DERATE BEHAVIOUR, &
19:32:49    "      "       "     O& 600:ALCOHOL
  "         "      "       "     PI
19:32:52    "    705239 DIV:DD   AK
19:32:55    "      "       "     XP/AK/0202
19:33:11    "    CHS    CCC:CCH  PI
19:33:13    "    705239 DIV:DD   AK
19:33:18    "    CHS    CCC:CCH  PI
19:33:20    "    705239 DIV:DD   AK
19:33:55    "    CHS    CCC:CCH  PI
19:33:58    "    705239 DIV:DD   AK
19:34:37    "    CHS    CCC:CCH  LOCA(357 HARROW ROAD,W9:3NA - william hill)
                                 (CM)
  "         "      "       "     LOCI(357 HARROW ROAD,W9:3NA - william hill)
```

CONTINUED ...

PRINTED AT 16:58 28:OCT:15 PC lewis 200892

SINGLE INCIDENT PRINTOUT PAGE 5

INCIDENT No. 8871:21JUL15

Time	Date	Opid	Termid	ACTION
19:34:37	21JUL15	"	CCC:CCH	(CM)
"	"	"	"	PI
19:34:42	"	705239	DIV:DD	AK
19:35:21	"	CHS	CCC:CCH	CR(BTSS (WILLIAM HILL ORGANIZATION LTD))
"	"	"	"	PI
19:35:25	"	"	"	PI
"	"	705239	DIV:DD	AK
19:38:28	"	088149	"	CI/DD80L
19:38:31	"	220831	CCC:MDT	MA/DELIVERED TO DD80L
19:39:42	"	"	"	AV/DD80L
19:40:08	"	705239	DIV:DD	AK
19:57:48	"	088149	"	TOA/DD80L/1950
21:03:57	"	082633	"	AC()
"	"	"	"	AQ()
"	"	"	"	AR()
21:03:59	"	"	"	OD()
21:04:02	"	"	"	ACR/NC
21:04:10	"	"	"	EXP/SMF//CIRCS
21:04:13	"	"	"	DA/DD80L
21:04:14	"	"	"	PS/CM
21:08:00	"	088149	"	LOCA(O/S 357 HARROW ROAD,W9:3NA - william hill)(CM)
21:08:06	"	"	"	AWT/GPC
02:42:25	23JUL15	191730	"	CTX()
02:42:26	"	"	"	XWT
02:42:28	"	"	"	PS/CM
02:43:18	"	081681	"	CTX(REF 154385 P234208)
02:43:20	"	"	"	CM
02:43:25	"	"	"	LOCA((ASB)O/S 357 HARROW ROAD,W9:3NA - william hill)(CM)
03:31:19	"	009490	"	CTX(ASB URN 154385)
09:29:54	"	219469	CCC:CADL	VI/p219469
09:30:11	"	"	"	IP//Armstrong 1451cw/1/p219469@met.police.uk
16:58:49	28OCT15	200892	"	VI/p200892
16:58:54	"	"	"	IP//PC lewis/1/p200892@met.police.uk

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PRINTED AT 16:57 28:OCT:15 PC lewis 200892

SINGLE INCIDENT PRINTOUT PAGE 1

INCIDENT No. 9056:22JUL15

INCIDENT No. 9056 entered at 19:40 on 22JUL15 by CHS/CHS in CCC/IR

INCIDENT WAS ENTERED "EXTERNALLY"
INCIDENT IS "TAGGED"

Rec By :E (Emergency)
Call Tel [redacted]
Call Name [redacted]
Call Type:W (Witness)
Call Mail:
Cntct Tel:
Att Locn :357 HARROW ROAD,W9:WILLIAM HILL
Map :Page 139, Grid Reference 524785,182177
GPA :CM [Division: DD:DD]
Inc Locn :357 HARROW ROAD,W9:WILLIAM HILL
Map :Page 139, Grid Reference 524785,182177
GPA :CM [Division: DD:DD]
Call Locn:357 HARROW ROAD,W9:WILLIAM HILL
Map :Page 139, Grid Reference 524785,182177
GPA :CM [Division: DD:DD]
Opening 1:215 (ASB - Nuisance)
2:202 (Rowdy Or Inconsiderate Behaviour)
Prompt(s) existed for Opening Code(s) at time of creation
Open Text:
Urgency :S (Significant)
VRMs :
Proposal :(BOCU at 19:43/22JUL15):
C3E OC331L OC341L CM18E 4148CW 4311CW 4004CW 1642CW 4330CW
Assigned :
DeAssign :CM18L
TOA :20:31:12/22JUL15
DO Name :
DO Tel :
CRIS :NOT CRIMED
Class 1 :215 (ASB - Nuisance)
Qual 1 :202 (Rowdy Or Inconsiderate Behaviour)
Res 1 :702 (No Trace)
2 :703 (No Offences Disclosed)
Clo Text :ASB URN NOT REQUIRED P228927
O Dealing:1425CW
Metops :
CHS Demid:20150722011692

CONTINUED ...

INCIDENT No. 9056:22JUL15

Linked :

Phone Field : (For previous Incidents from this phone use action:PHD or PHL - use DARIS to extend search)
Location Field : (For previous Incidents at this location use action:LCD or LCL - use DARIS to extend search)
Gazetteer Comments : (May have existed or altered since Incident creation - Use MSS SMF:SPECARCHIVE)

Location Based Comments
** Attendance and Incident and Caller Location **
HARROW RD,W9 (283 - 479)
ODDS: DB:1-147, DV:149-323, DQ:325-597, BA 599-657, QK: 659-675, FS: 677-873
EVENS: DV:2-350, DQ:362-742, QK: 744-1112, QH:REMAINDER, BA :KENSAL GRN CEM
W2:1-281 + 2-322, W9: 283-419 + 423-570, W10:421-625 + 558-742, NW10: REMAINDER
***** DURING CARNIVAL TIME,PASS ALL INCIDENTS "PI/GT" - SECTOR 1 *****
342B HARROW RD -
OCCUPANTS/PREMS MAY BE AT RISK OF ATTACK/HARASSMENT - GRADE I - SEE SS/DD/T226
346 HARROW RD: FLAT B -
OCCUPANTS & CHILD/CHILDREN MAY BE AT RISK OF DOMESTIC VIOLENCE -
WARNING **OFFICER SAFETY ISSUE** - GRADE I - OPS *MUST* SEE SS/DD/T150
405 HARROW RD:FLAT B -
OCCUPANTS/PREMISES MAY BE AT RISK OF ATTACK/HARASSMENT - **WARNING** -
GRADE I - SEE SS/DD/T215 BEFORE DEPLOYMENT
470-474 HARROW RD: "NORTH WESTMINSTER DRUG AND ALCOHOL SERVICE" - GRADE E -
INFORM DUTY MANAGER (0207 266 6200) - WARNING **DRUGS** -
SEE SS/DD/T49 BEFORE DEPLOYMENT
478 HARROW RD: "SAINSBURY" -
WARNING CITY SAFE HAVEN - VULNERABLE CHILD/PERSON AT RISK -
GRADE I - OPS *MUST* SEE SS/DD/T104

Remarks:

Time	Date	Opid	Termid	
	22JUL15	CHS	CHS	(pre 1st routing)
	CREATED IN: CHS AT: 2015-07-22 19:40:19 CAD AT: 2015-07-22 19:43:14			
	ENTERED BY: CHS (c721245) AT: 2015-07-22 19:41:51			
	ABUSIVE STREET DRINKER REFUSING TO LEAVE THE STORE, STATES SHE IS COMING IN AND OUT OF THE STORE DRINKING, WHEN SHE ISNT ALLOWED TO			
19:43:14	22JUL15	CHS		
	** **START OF DATA AUTOMATICALLY COPIED FROM OPEN PROMPT** **			
	OPEN CODE "202" :			

CONTINUED ...

INCIDENT No. 9056:22JUL15

```
Time     Date    Opid   Termid
-------- ------- ------ --------
         USE SMF/ASB
         ** **END OF DATA AUTOMATICALLY COPIED FROM OPEN PROMPT** **
19:43:15 22JUL15 CHS
         ENTERED BY: CHS  (c721245 ) AT: 2015-07-22 19:41:59
         STATES ITS BEEN HAPPENING ALL DAY
19:43:15 22JUL15 CHS
         ENTERED BY: CHS  (c721245 ) AT: 2015-07-22 19:43:03
         SMF ASB (For All Incidents Of Anti-social Behaviour)
         Always consider whether the circumstances of the incident render the
         person concerned as vulnerable.
         1. Has anything like this happened before?: Yes
         2. Has the caller spoken to police about this or any other matter
         relating to ASB?: Yes
         3. If the answer to 2 is 'Yes', when were police called
         (approximately)? : 21/07/15
         4. Prior to this call, has the person sought help from elsewhere (e.g.
         Local Authority, Security, Housing Association, Samaritans, Citizens
         Advice, BT, etc.)?: No
         5. If the answer to 4 is 'Yes' please state who? :
         6. Are there any health or welfare issues we need to be aware of that
         could help us deal with your call? (VULNERABILITY)?: No
         7. If the answer to 6 is 'Yes' record details of how/why vulnerable.
         Record any other relevant information? :
         ** For 'ASB' calls, you are no longer required to complete the 'REPEAT'
         or 'VULNERABLE' SMFs **
19:44:10 22JUL15 216327 H2721
         ^DD CIRC ALL UNITS, NUTD ON RDW - NO TAKERS
21:44:54 22JUL15 007480 H2722
         ^1425CW  FEMALE LEFT LOC NO OFFENCES
21:45:31 22JUL15 007480 H2722
         ************************* NCRSCIRCS ***********************************
         THE CIRCUMSTANCES OF THIS INCIDENT DO NOT AMOUNT TO A NOTIFIABLE
         CRIME BECAUSE (place the word 'YES' by either A,B,C,D or E and in ALL
         cases show supporting grounds under F):
         A................ THERE IS CREDIBLE EVIDENCE TO THE CONTRARY:YES
         B......................THE REPORT IS A GENUINE ERROR/MISTAKE:
         C.RECORDED ON CRIS AS A NON-CRIME BK SPECIFIED INVESTIGATION:
         D.........................PREVIOUSLY REPORTED/RECORDED CRIME:
         (Original incident number with CRIS no.or the CRIS number will be
         provided by IBO in final classification.)
         E...........................CRIME RECORDED BY ANOTHER AGENCY:
```

CONTINUED ...

INCIDENT No. 9056:22JUL15

Time	Date	Opid	Termid

(As shown under Rule 1 in HOCR,e.g.UK Border Agency,RSPCA,Royal Mail)
.
F.Supporting grounds:FEMALE LEFT LOC NO OFFENCES
.
*** THEREFORE A NOTIFIABLE CRIME HAS NOT BEEN RECORDED ***

17:45:05 23JUL15 228927 3609C
^CWGPC 1907CW NO ASB URN REQUIRED ONE OFF STREET DRINKING AND GOING INTO THE STORE DRINKING WHEN NOT ALLOWED.

17:45:10 23JUL15 228927 3609C
^CWGPC PLEASE CLOSE

Previous Actions:

Time	Date	Opid	Termid	ACTION
				SYSTEM(EXTERNAL)
19:43:14	22JUL15	CHS	CCC:CCH	O() 215:ASB - NUISANCE,202:ROWDY OR INCONSI DERATE BEHAVIOUR
"	"	"	"	PI
19:43:34	"	007480	DIV:DD	AK
19:43:35	"	"	"	XP/AK/O202
19:44:14	"	216327	"	TI/DDNUTD
19:44:55	"	007480	"	CI/CM18L
19:44:57	"	230421	CCC:MDT	MA/DELIVERED TO CM18L
19:45:01	"	"	"	AV/CM18L
19:45:07	"	007480	DIV:DD	AK
"	"	216327	"	AK
19:45:09	"	081253	"	AK
20:31:12	"	230421	CCC:MDT	TOA/CM18L
21:45:10	"	007480	DIV:DD	AC()
"	"	"	"	AQ()
"	"	"	"	AR()
21:45:15	"	"	"	OD()
21:45:17	"	"	"	DA/CM18L
21:45:20	"	"	"	ACR/NC
21:45:31	"	"	"	EXP/SMF//CIRCS
21:45:35	"	"	"	PS/CM
21:58:04	"	081253	"	AWT/GPC
21:58:09	"	"	"	LOCA(357 HARROW ROAD,W9:WILLIAM HILL)(CM)
11:45:51	23JUL15	219469	CCC:CADL	VI/p219469
17:45:17	"	228927	DIV:DD	CTX()
17:45:19	"	"	"	LOCA((ASB)357 HARROW ROAD,W9:WILLIAM HILL)(

CONTINUED ...

PRINTED AT 16:57 28:OCT:15 PC lewis 200892

SINGLE INCIDENT PRINTOUT PAGE 5

INCIDENT No. 9056:22JUL15

Time	Date	Opid	Termid	ACTION
17:45:19	23JUL15	"	DIV:DD	CM)
00:16:00	24JUL15	225138	"	PS/CM
"	"	"	"	PI
00:16:16	"	081681	"	AK
00:16:28	"	"	"	CTX(NO ASB URN REQUIRED)
00:16:30	"	"	"	LOCA((CLOSE)357 HARROW ROAD,W9:WILLIAM HILL)(CM)
00:16:31	"	"	"	CM
16:57:45	28OCT15	200892	CCC:CADL	VI/p200892
16:57:48	"	"	"	IP//PC lewis/1/p200892@met.police.uk

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PRINTED AT 16:57 28:OCT:15 PC lewis 200892

SINGLE INCIDENT PRINTOUT PAGE 1

INCIDENT No. 6955:01AUG15

INCIDENT No. 6955 entered at 17:14 on 01AUG15 by CHS/CHS in CCC/IR

INCIDENT WAS ENTERED "EXTERNALLY"
INCIDENT IS "TAGGED"

Rec By :E (Emergency)
Call Tel [redacted]
Call Name [redacted]
Call Type:V (Victim)
Call Mail:
Cntct Tel:
Att Locn :357 HARROW ROAD,W9: WILLIAM HILL
Map :Page 139, Grid Reference 524785,182177
GPA :CM [Division: DD:DD]
Inc Locn :357 HARROW ROAD,W9: WILLIAM HILL
Map :Page 139, Grid Reference 524785,182177
GPA :CM [Division: DD:DD]
Call Locn:357 HARROW ROAD,W9: WILLIAM HILL
Map :Page 139, Grid Reference 524785,182177
GPA :CM [Division: DD:DD]
Opening 1:215 (ASB - Nuisance)
2:202 (Rowdy Or Inconsiderate Behaviour)
3:600 (Alcohol)
Prompt(s) existed for Opening Code(s) at time of creation
Open Text:
Urgency :S (Significant)
VRMs :
Proposal :(BOCU at 17:16/01AUG15):
OC331E CW31L CW32L CW32E CW50L CM18L 4311CW 4330CW 240CW
Assigned :
DeAssign :
TOA :17:30:00/01AUG15
DO Name :
DO Tel :
CRIS :NOT CRIMED
Class 1 :215 (ASB - Nuisance)
Qual 1 :202 (Rowdy Or Inconsiderate Behaviour)
2 :608 (Youth Related)
Res 1 :702 (No Trace)
Clo Text :ASB URN VACW154562
O Dealing:1419CW
Metops :
CHS Demid:20150801007325

CONTINUED ...

INCIDENT No. 6955:01AUG15

Linked :

Phone Field : (For previous Incidents from this phone use action:PHD or PHL - use DARIS to extend search)
Location Field : (For previous Incidents at this location use action:LCD or LCL - use DARIS to extend search)
Gazetteer Comments : (May have existed or altered since Incident creation - Use MSS SMF:SPECARCHIVE)

Location Based Comments
** Attendance and Incident and Caller Location **
HARROW RD,W9 (283 - 479)
ODDS: DB:1-147, DV:149-323, DQ:325-597, BA 599-657, QK: 659-675, FS: 677-873
EVENS: DV:2-350, DQ:362-742, QK: 744-1112, QH:REMAINDER, BA :KENSAL GRN CEM
W2:1-281 + 2-322, W9: 283-419 + 423-570, W10:421-625 + 558-742, NW10: REMAINDER
***** DURING CARNIVAL TIME,PASS ALL INCIDENTS "PI/GT" - SECTOR 1 *****
342B HARROW RD -
OCCUPANTS/PREMS MAY BE AT RISK OF ATTACK/HARASSMENT - GRADE I - SEE SS/DD/T226
346 HARROW RD: FLAT B -
OCCUPANTS & CHILD/CHILDREN MAY BE AT RISK OF DOMESTIC VIOLENCE -
WARNING **OFFICER SAFETY ISSUE** - GRADE I - OPS *MUST* SEE SS/DD/T150
405 HARROW RD:FLAT B -
OCCUPANTS/PREMISES MAY BE AT RISK OF ATTACK/HARASSMENT - **WARNING** -
GRADE I - SEE SS/DD/T215 BEFORE DEPLOYMENT
470-474 HARROW RD: "NORTH WESTMINSTER DRUG AND ALCOHOL SERVICE" - GRADE E -
INFORM DUTY MANAGER (0207 266 6200) - WARNING **DRUGS** -
SEE SS/DD/T49 BEFORE DEPLOYMENT
478 HARROW RD: "SAINSBURY" -
WARNING CITY SAFE HAVEN - VULNERABLE CHILD/PERSON AT RISK -
GRADE I - OPS *MUST* SEE SS/DD/T104

Remarks:

Time	Date	Opid	Termid	
	01AUG15	CHS	CHS	(pre 1st routing)

CREATED IN: CHS AT: 2015-08-01 17:14:46 CAD AT: 2015-08-01 17:16:07

==========

ENTERED BY: CHS (c100374) AT: 2015-08-01 17:16:07
GRP OF 10-15 MALES AND FEMALES O/S LOCN, BLOCKING THE PAVEMENT O/S THE SHOP. BEING A NUISANCE.

17:16:07 01AUG15 CHS
** **START OF DATA AUTOMATICALLY COPIED FROM OPEN PROMPT** **
OPEN CODE "202" :

CONTINUED ...

INCIDENT No. 6955:01AUG15

Time	Date	Opid	Termid

USE SMF/ASB
** **END OF DATA AUTOMATICALLY COPIED FROM OPEN PROMPT** **

17:17:13 01AUG15 CHS
ENTERED BY: CHS (c100374) AT: 2015-08-01 17:16:39
SMF ASB (For All Incidents Of Anti-social Behaviour)
Always consider whether the circumstances of the incident render the person concerned as vulnerable.
1. Has anything like this happened before?: Yes
2. Has the caller spoken to police about this or any other matter relating to ASB?: Yes
3. If the answer to 2 is 'Yes', when were police called (approximately)? : A FEW WEEKS AGO
4. Prior to this call, has the person sought help from elsewhere (e.g. Local Authority, Security, Housing Association, Samaritans, Citizens Advice, BT, etc.)?: Yes
5. If the answer to 4 is 'Yes' please state who? : THEY ARE AWARE OF ONGOING ISSUES
6. Are there any health or welfare issues we need to be aware of that could help us deal with your call? (VULNERABILITY)?: No
7. If the answer to 6 is 'Yes' record details of how/why vulnerable. Record any other relevant information? : NONE
** For 'ASB' calls, you are no longer required to complete the 'REPEAT' or 'VULNERABLE' SMFs **

17:17:13 01AUG15 CHS
ENTERED BY: CHS (c100374) AT: 2015-08-01 17:17:13
THEY ARE INTIMIDATING OTHER CUSTOMERS AND THEY ARE NOT EVEN USING WILLIAM HILL, JUST HANGING AROUND O/S PREMS.

19:14:30 01AUG15 218165 H2721
^1419CW..THIS WAS AN ASNT NO SIGNS OF ANY DISTURBANCE AT LOC

19:14:54 01AUG15 218165 H2721
********** NCRSCIRCS **********
THE CIRCUMSTANCES OF THIS INCIDENT DO NOT AMOUNT TO A NOTIFIABLE CRIME BECAUSE (place the word 'YES' by either A,B,C,D or E and in ALL cases show supporting grounds under F):
A..... THERE IS CREDIBLE EVIDENCE TO THE CONTRARY:Y
B.....THE REPORT IS A GENUINE ERROR/MISTAKE:
C.RECORDED ON CRIS AS A NON-CRIME BK SPECIFIED INVESTIGATION:
D.....PREVIOUSLY REPORTED/RECORDED CRIME:
(Original incident number with CRIS no.or the CRIS number will be provided by IBO in final classification.)
E.....CRIME RECORDED BY ANOTHER AGENCY:

CONTINUED ...

INCIDENT No. 6955:01AUG15

Time	Date	Opid	Termid

(As shown under Rule 1 in HOCR,e.g.UK Border Agency,RSPCA,Royal Mail)
.
F.Supporting grounds:NO TRACE
.
*** THEREFORE A NOTIFIABLE CRIME HAS NOT BEEN RECORDED ***

18:21:05 02AUG15 227211 3610C
^GPC-PARTNERSHIP. AS THIS BRANCH APPEAR TO BE REGULAR CALLERS, PERHAPS THEY SHOULD CONTACT THEIR HQ RE POSSIBLE SECURITY MEASURES. I WILL TAG THIS FOR LICENSING P227211

Previous Actions:

Time	Date	Opid	Termid	ACTION
				SYSTEM(EXTERNAL)
17:16:07	01AUG15	CHS	CCC:CCH	O() 215:ASB - NUISANCE,202:ROWDY OR INCONSI DERATE BEHAVIOUR, &
17:16:07	"	"	"	O& 600:ALCOHOL
"	"	"	"	PI
17:16:35	"	205714	DIV:DD	AK
17:16:36	"	"	"	XP/AK/O202
17:17:13	"	CHS	CCC:CCH	PI
17:17:19	"	205714	DIV:DD	AK
17:17:22	"	"	"	AV/CW17L
19:14:04	"	218165	"	TOA/CW17L/1730
19:14:40	"	"	"	AC()
"	"	"	"	AQ()
"	"	"	"	AR()
19:14:43	"	"	"	ACR/NC
19:14:47	"	"	"	OD()
19:14:54	"	"	"	EXP/SMF//CIRCS
19:14:57	"	"	"	DA/CW17L(CU)
19:14:59	"	"	"	PS/CM
19:16:44	"	061411	"	Q(202)
19:16:47	"	"	"	AWT/GPC
19:20:09	"	218132	"	LOCA(357 HARROW ROAD,W9: WILLIAM HILL)(CM)
14:28:35	02AUG15	235496	CCC:CADL	VI/p235496
18:21:11	"	227211	DIV:DD	LOCA((ASB) 357 HARROW ROAD,W9: WILLIAM HILL)(CM)
18:21:19	"	"	"	CTX()
18:21:24	"	"	"	TI/CWLIC
18:21:41	"	"	"	CTX(ASB URN NOT REQUIRED P227211)

CONTINUED ...

PRINTED AT 16:57 28:OCT:15 PC lewis 200892

SINGLE INCIDENT PRINTOUT PAGE 5

INCIDENT No. 6955:01AUG15

Time	Date	Opid	Termid	ACTION
18:22:27	02AUG15	"	DIV:DD	CTX(ASB URN VACW15)
18:22:30	"	"	"	PS/CM
18:23:56	"	090605	"	CM
16:56:58	28OCT15	200892	CCC:CADL	VI/p200892
16:57:01	"	"	"	IP//PC lewis/1/p200892@met.police.uk

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PRINTED AT 16:56 28:OCT:15 PC lewis 200892

SINGLE INCIDENT PRINTOUT PAGE 1

INCIDENT No. 6861:14AUG15

INCIDENT No. 6861 entered at 17:36 on 14AUG15 by CHS/CHS in CCC/IR

INCIDENT WAS ENTERED "EXTERNALLY"

```
Rec By    :O (Ordinary)
Call Tel :[redacted]
Call Name:[redacted]
Call Type:W (Witness)
Call Mail:
Cntct Tel:
Att Locn :357 HARROW ROAD, W9
    Map  :Page 139, Grid Reference 524785,182177
    GPA  :CM [Division: DD:DD]
Inc Locn :357 HARROW ROAD, W9
    Map  :Page 139, Grid Reference 524785,182177
    GPA  :CM [Division: DD:DD]
Call Locn:357 HARROW ROAD, W9
     Map :Page 139, Grid Reference 524785,182177
     GPA :CM [Division: DD:DD]
Opening 1:011 (Drugs Offence)
        2:625 (Believed)
Open Text:
Urgency  :S (Significant)
VRMs     :
Proposal :(BOCU at 17:38/14AUG15):
          C4E CW50L 4311CW 4330CW 240CW CW1202 4165CW 4262CW 1683CW
Assigned :
DeAssign :CM18L
TOA      :18:16:06/14AUG15
DO Name  :
DO Tel   :
CRIS     :NOT CRIMED
Class 1  :314 (Suspicious Circumstances)
Qual  1  :701 (Assistance Requested / Rendered)
Res   1  :702 (No Trace)
Clo Text :
O Dealing:
Metops   :
CHS Demid:20150814009024

Linked   :

Location Field     : (For previous Incidents at this location use
```

CONTINUED ...

INCIDENT No. 6861:14AUG15

action:LCD or LCL - use DARIS to extend search)
Gazetteer Comments : (May have existed or altered since Incident creation -
Use MSS SMF:SPECARCHIVE)

Location Based Comments
** Attendance and Incident and Caller Location **
HARROW RD,W9 (283 - 479)
ODDS: DB:1-147, DV:149-323, DQ:325-597, BA 599-657, QK: 659-675, FS: 677-873
EVENS: DV:2-350, DQ:362-742, QK: 744-1112, QH:REMAINDER, BA :KENSAL GRN CEM
W2:1-281 + 2-322, W9: 283-419 + 423-570, W10:421-625 + 558-742, NW10: REMAINDER
***** DURING CARNIVAL TIME,PASS ALL INCIDENTS "PI/GT" - SECTOR 1 *****
313 HARROW RD: FLAT 2 -
OCCUPANTS & CHILD/CHILDREN MAY BE AT RISK OF DOMESTIC VIOLENCE -
WARNING **OFFICER SAFETY ISSUE** - GRADE I - OPS *MUST* SEE SS/DD/T259
342B HARROW RD -
OCCUPANTS/PREMS MAY BE AT RISK OF ATTACK/HARASSMENT - GRADE I - SEE SS/DD/T226
346 HARROW RD: FLAT B -
OCCUPANTS & CHILD/CHILDREN MAY BE AT RISK OF DOMESTIC VIOLENCE -
WARNING **OFFICER SAFETY ISSUE** - GRADE I - OPS *MUST* SEE SS/DD/T150
405 HARROW RD:FLAT B -
OCCUPANTS/PREMISES MAY BE AT RISK OF ATTACK/HARASSMENT - **WARNING** -
GRADE I - SEE SS/DD/T215 BEFORE DEPLOYMENT
470-474 HARROW RD: "NORTH WESTMINSTER DRUG AND ALCOHOL SERVICE" - GRADE E -
INFORM DUTY MANAGER (0207 266 6200) - WARNING **DRUGS** -
SEE SS/DD/T49 BEFORE DEPLOYMENT
478 HARROW RD: "SAINSBURY" -
WARNING CITY SAFE HAVEN - VULNERABLE CHILD/PERSON AT RISK -
GRADE I - OPS *MUST* SEE SS/DD/T104

Remarks:

Time	Date	Opid	Termid	
	14AUG15	CHS	CHS	(pre 1st routing)
	CREATED IN: CHS AT: 2015-08-14 17:36:39 CAD AT: 2015-08-14 17:38:01			
	ENTERED BY: CHS (c720803) AT: 2015-08-14 17:37:53			
	^caller group of males on the street - drinking and smoking cananbis - 8 males - ic3 - a.a 50 plus			
17:38:32	14AUG15	CHS		
	ENTERED BY: CHS (c720803) AT: 2015-08-14 17:38:15			
	^caller its an ongoing issue - dont know there names			
17:38:53	14AUG15	CHS		
	ENTERED BY: CHS (c720803) AT: 2015-08-14 17:38:48			

CONTINUED ...

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SINGLE INCIDENT PRINTOUT PAGE 3

INCIDENT No. 6861:14AUG15

Time	Date	Opid	Termid
	^caller - they are wrg dark clothing		
17:38:56	14AUG15	101134	H2720
	DD...PR CIRC'D		
18:15:36	14AUG15	103411	H2721
	^DD.....CM18L ETA 2 MINS		
18:21:41	14AUG15	217595	CM18L
	2304cw-area search no trace, no sign of illegal activity		

Previous Actions:

Time	Date	Opid	Termid	ACTION
				SYSTEM(EXTERNAL)
17:38:01	14AUG15	CHS	CCC:CCH	O() 011:DRUGS OFFENCE
"	"	"	"	PI
17:38:05	"	103411	DIV:DD	AK
"	"	101134	"	AK
17:38:32	"	CHS	CCC:CCH	O(011) 011:DRUGS OFFENCE,625:BELIEVED
"	"	"	"	PI
17:38:34	"	101134	DIV:DD	AK
17:38:53	"	CHS	CCC:CCH	PI
17:38:58	"	101134	DIV:DD	AK
17:39:03	"	"	"	CI/CM18L
17:39:05	"	217595	CCC:MDT	MA/DELIVERED TO CM18L
17:39:44	"	101134	DIV:DD	MA/2304CW ACCEPTS
17:39:46	"	"	"	AV/CM18L
17:40:21	"	217595	CCC:MDT	MA/ACCEPTED BY CM18L - UNIT SHOWN ASSIGNED
17:40:26	"	101134	DIV:DD	AK
18:16:06	"	217595	CCC:MDT	TOA/CM18L
18:21:46	"	085763	DIV:DD	AK
18:21:48	"	"	"	PS/CM
18:21:51	"	"	"	DA/CM18L
18:22:51	"	"	"	AC()
"	"	"	"	AQ()
"	"	"	"	AR()
18:22:53	"	"	"	ACR/NC
18:22:54	"	"	"	CM
16:56:09	28OCT15	200892	CCC:CADL	VI/p200892
16:56:13	"	"	"	IP//PC lewis/1/p200892@met.police.uk

... END OF PRINT ...

PRINTED AT 16:55 28:OCT:15 PC lewis 200892

SINGLE INCIDENT PRINTOUT PAGE 1

INCIDENT No. 8213:15AUG15

INCIDENT No. 8213 entered at 19:57 on 15AUG15 by CHS/CHS in CCC/IR

INCIDENT WAS ENTERED "EXTERNALLY"

Rec By :E (Emergency)
Call Tel [redacted]
Call Name:[redacted]
Call Type:T (Third Party)
Call Mail:
Cntct Tel:
Att Locn :357 HARROW ROAD,W9:william hill
Map :Page 139, Grid Reference 524785,182177
GPA :CM [Division: DD:DD]
Inc Locn :357 HARROW ROAD,W9:william hill
Map :Page 139, Grid Reference 524785,182177
GPA :CM [Division: DD:DD]
Call Locn:357 HARROW ROAD,W9:william hill
Map :Page 139, Grid Reference 524785,182177
GPA :CM [Division: DD:DD]
Opening 1:215 (ASB - Nuisance)
2:202 (Rowdy Or Inconsiderate Behaviour)
Prompt(s) existed for Opening Code(s) at time of creation
Open Text:
Urgency :R (Referred)
VRMs :
Proposal :(BOCU at 19:58/15AUG15):
C3E CW50N CM18L 4311CW 4330CW 240CW CW1202 4165CW 4262CW
Assigned :
DeAssign :
TOA :
DO Name :
DO Tel :
CRIS :NOT CRIMED
Class 1 :305 (Civil Disputes)
Qual 1 :602 (Call Made With Good Intent)
Res 1 :707 (Cancelled)
Clo Text :CANX PRIOR TO POL ARRIVAL
O Dealing:
Metops :
CHS Demid:20150815008952

Linked :

CONTINUED ...

INCIDENT No. 8213:15AUG15

Phone Field : (For previous Incidents from this phone use action:PHD or PHL - use DARIS to extend search)
Location Field : (For previous Incidents at this location use action:LCD or LCL - use DARIS to extend search)
Gazetteer Comments : (May have existed or altered since Incident creation - Use MSS SMF:SPECARCHIVE)

Location Based Comments
** Attendance and Incident and Caller Location **
HARROW RD,W9 (283 - 479)
ODDS: DB:1-147, DV:149-323, DQ:325-597, BA 599-657, QK: 659-675, FS: 677-873
EVENS: DV:2-350, DQ:362-742, QK: 744-1112, QH:REMAINDER, BA :KENSAL GRN CEM
W2:1-281 + 2-322, W9: 283-419 + 423-570, W10:421-625 + 558-742, NW10: REMAINDER
***** DURING CARNIVAL TIME,PASS ALL INCIDENTS "PI/GT" - SECTOR 1 *****
313 HARROW RD: FLAT 2 -
OCCUPANTS & CHILD/CHILDREN MAY BE AT RISK OF DOMESTIC VIOLENCE -
WARNING **OFFICER SAFETY ISSUE** - GRADE I - OPS *MUST* SEE SS/DD/T259
342B HARROW RD -
OCCUPANTS/PREMS MAY BE AT RISK OF ATTACK/HARASSMENT - GRADE I - SEE SS/DD/T226
346 HARROW RD: FLAT B -
OCCUPANTS & CHILD/CHILDREN MAY BE AT RISK OF DOMESTIC VIOLENCE -
WARNING **OFFICER SAFETY ISSUE** - GRADE I - OPS *MUST* SEE SS/DD/T150
405 HARROW RD:FLAT B -
OCCUPANTS/PREMISES MAY BE AT RISK OF ATTACK/HARASSMENT - **WARNING** -
GRADE I - SEE SS/DD/T215 BEFORE DEPLOYMENT
470-474 HARROW RD: "NORTH WESTMINSTER DRUG AND ALCOHOL SERVICE" - GRADE E -
INFORM DUTY MANAGER (0207 266 6200) - WARNING **DRUGS** -
SEE SS/DD/T49 BEFORE DEPLOYMENT
478 HARROW RD: "SAINSBURY" -
WARNING CITY SAFE HAVEN - VULNERABLE CHILD/PERSON AT RISK -
GRADE I - OPS *MUST* SEE SS/DD/T104

Remarks:

Time	Date	Opid	Termid	
	15AUG15	CHS	CHS	(pre 1st routing)

CREATED IN: CHS AT: 2015-08-15 19:57:16 CAD AT: 2015-08-15 19:58:56

ENTERED BY: CHS (c724416) AT: 2015-08-15 19:58:28
there was a male refusing to leave the shop and was being abusive and tghreateniung but he has left now
so they dont need pol - which iswhyu he cut off in the firsdt place
19:58:56 15AUG15 CHS

CONTINUED ...

INCIDENT No. 8213:15AUG15

```
Time     Date    Opid   Termid
-------- ------- ------ --------
         ** **START OF DATA AUTOMATICALLY COPIED FROM OPEN PROMPT** **
         OPEN CODE "001" :
         01/05/07 Consider contacting MIB 24/7 Intelligence Support on
                  68400 or 68401 when dealing with critical/serious incidents
         ** **END OF DATA AUTOMATICALLY COPIED FROM OPEN PROMPT** **
19:58:57 15AUG15 CHS
         ENTERED BY: CHS  (c724416 ) AT: 2015-08-15 19:58:56
         male at first rung 999 and cleared saying dont worry got hold of him
         whenm rung back and advised not to do that
20:00:19 15AUG15 103405 H2722
         ** **START OF DATA AUTOMATICALLY COPIED FROM OPENING PROMPT** **
         OPENING CODE "202":
         USE SMF/ASB
         ** **END OF DATA AUTOMATICALLY COPIED FROM OPENING PROMPT** **
21:15:08 15AUG15 227211 3610C
         ^GPC-PARTNERSHIP, FROM CAD IT WOULD APPEAR THAT CALLER HAS MADE A
         LAWFULL EJECTION OF THE PERSON FROM THEIR PREMISES (PROVIDING ONLY
         REASONABLE FORCE WAS USED) AND CIVIL MATTER
         P227211
```

Previous Actions:

Time	Date	Opid	Termid	ACTION
				SYSTEM(EXTERNAL)
19:58:56	15AUG15	CHS	CCC:CCH	O() 001:VIOLENCE AGAINST THE PERSON,707:CANCELLED
"	"	"	"	PI
19:58:59	"	184708	DIV:DD	AK
19:59:00	"	"	"	XP/AK/0001
20:00:19	"	103405	"	O(001/707) 215:ASB - NUISANCE,202:ROWDY OR INCONSIDERATE BEHAVIOUR
20:00:52	"	"	"	AC()
"	"	"	"	AQ()
"	"	"	"	AR()
20:01:01	"	"	"	CTX()
20:01:02	"	"	"	ACR/NC
20:01:05	"	"	"	PS/CM
20:04:22	"	069433	"	AWT/GPC
21:15:19	"	227211	"	C(215)
"	"	"	"	Q(202)
21:15:22	"	"	"	PS/CM

CONTINUED ...

PRINTED AT 16:55 28:OCT:15 PC lewis 200892

SINGLE INCIDENT PRINTOUT PAGE 4

INCIDENT No. 8213:15AUG15

Time	Date	Opid	Termid	ACTION
21:29:53	15AUG15	069433	DIV:DD	MA/SEEN & NOTED D.LOCKE METCC
21:29:54	"	"	"	CM
16:55:19	28OCT15	200892	CCC:CADL	VI/p200892
16:55:25	"	"	"	IP//PC lewis/1/p200892@met.police.uk

... END OF PRINT ...

PRINTED AT 16:54 28:OCT:15 PC lewis 200892

SINGLE INCIDENT PRINTOUT PAGE 1

INCIDENT No. 3519:25AUG15

INCIDENT No. 3519 entered at 12:12 on 25AUG15 by CHS/CHS in CCC/IR

INCIDENT WAS ENTERED "EXTERNALLY"

Rec By :E (Emergency)
Call Tel :[redacted]
Call Name [redacted] [redacted]
Call Type:W (Witness)
Call Mail:
Cntct Tel:
Att Locn :357 HARROW ROAD,LONDON,W9 : WILLIAM HILL
Map :Page 139, Grid Reference 524785,182177
GPA :CM [Division: DD:DD]
Inc Locn :357 HARROW ROAD,LONDON,W9 ;3NA
Map :Page 139, Grid Reference 524785,182177
GPA :CM [Division: DD:DD]
Call Locn:357 HARROW ROAD,LONDON,W9 ;3NA
Map :Page 139, Grid Reference 524785,182177
GPA :CM [Division: DD:DD]
Opening 1:215 (ASB - Nuisance)
Open Text:
Urgency :R (Referred)
VRMs :
Proposal :(BOCU at 12:15/25AUG15):
C4E CM18E 4311CW 4330CW 240CW CW1202 4165CW 4262CW 1698CW
Assigned :
DeAssign :205BS, 146BS
TOA :
DO Name :
DO Tel :
CRIS :NOT CRIMED
Class 1 :305 (Civil Disputes)
Qual 1 :701 (Assistance Requested / Rendered)
Res 1 :703 (No Offences Disclosed)
2 :705 (Advice Given)
Clo Text :AS PER REMS.
O Dealing:
Metops :
CHS Demid:20150825029239

Linked :

Phone Field : (For previous Incidents from this phone use

CONTINUED ...

INCIDENT No. 3519:25AUG15

action:PHD or PHL - use DARIS to extend search)
Gazetteer Comments : (May have existed or altered since Incident creation -
Use MSS SMF:SPECARCHIVE)

Location Based Comments
** Attendance and Incident and Caller Location **
HARROW RD,W9 (283 - 479)
ODDS: DB:1-147, DV:149-323, DQ:325-597, BA 599-657, QK: 659-675, FS: 677-873
EVENS: DV:2-350, DQ:362-742, QK: 744-1112, QH:REMAINDER, BA :KENSAL GRN CEM
W2:1-281 + 2-322, W9: 283-419 + 423-570, W10:421-625 + 558-742, NW10: REMAINDER
***** DURING CARNIVAL TIME,PASS ALL INCIDENTS "PI/GT" - SECTOR 1 *****
313 HARROW RD: FLAT 2 -
OCCUPANTS & CHILD/CHILDREN MAY BE AT RISK OF DOMESTIC VIOLENCE -
WARNING **OFFICER SAFETY ISSUE** - GRADE I - OPS *MUST* SEE SS/DD/T259
342B HARROW RD -
OCCUPANTS/PREMS MAY BE AT RISK OF ATTACK/HARASSMENT - GRADE I - SEE SS/DD/T226
346 HARROW RD: FLAT B -
OCCUPANTS & CHILD/CHILDREN MAY BE AT RISK OF DOMESTIC VIOLENCE -
WARNING **OFFICER SAFETY ISSUE** - GRADE I - OPS *MUST* SEE SS/DD/T150
369 HARROW RD: 'MIAH FOOD CENTRE' -
OCCUPANTS/PREMISES MAY BE AT RISK OF ATTACK/HARASSMENT - **WARNING** -
GRADE I - SEE SS/DD/T277 BEFORE DEPLOYMENT
405 HARROW RD:FLAT B -
OCCUPANTS/PREMISES MAY BE AT RISK OF ATTACK/HARASSMENT - **WARNING** -
GRADE I - SEE SS/DD/T215 BEFORE DEPLOYMENT
470-474 HARROW RD: "NORTH WESTMINSTER DRUG AND ALCOHOL SERVICE" - GRADE E -
INFORM DUTY MANAGER (0207 266 6200) - WARNING **DRUGS** -
SEE SS/DD/T49 BEFORE DEPLOYMENT
478 HARROW RD: "SAINSBURY" -
WARNING CITY SAFE HAVEN - VULNERABLE CHILD/PERSON AT RISK -
GRADE I - OPS *MUST* SEE SS/DD/T104

Remarks:

Time	Date	Opid	Termid	
	25AUG15	CHS	CHS	(pre 1st routing)

CREATED IN: CHS AT: 2015-08-25 12:12:36 CAD AT: 2015-08-25 12:15:53

ENTERED BY: CHS (c079148) AT: 2015-08-25 12:15:53
MALE CALLING A CUSTOMER HAS ASSAULTED A STAFF MEMBER, POLICE ARRIVE DON
SCENE WHILE MALE WAS ON THE PHONE, I CANNOT FIND THE WORKING CAD.

12:15:53 25AUG15 CHS
** **START OF DATA AUTOMATICALLY COPIED FROM OPEN PROMPT** **

CONTINUED ...

INCIDENT No. 3519:25AUG15

```
Time     Date    Opid   Termid
-------- ------- ------ --------
         OPEN CODE "001" :
         01/05/07 Consider contacting MIB 24/7 Intelligence Support on
                  68400 or 68401 when dealing with critical/serious incidents
         ** **END OF DATA AUTOMATICALLY COPIED FROM OPEN PROMPT** **
12:18:22 25AUG15 205714 H2720
         OP^DD - WHO ARE THE OFFICERS PLSE.. WE HAVE DEALT WITH A DRUNK FEMALE
         NO ASSAULT... HAS THE INFT SPOKEN TO POLICE?
12:18:54 25AUG15 205714 H2720
         ^DD - ALSO WHAT IS THE PREMISES?
12:20:32 25AUG15 CHS
         ENTERED BY: CHS  (c079148 ) AT: 2015-08-25 12:20:31
         ^ OP -  CALLER SAID THAT THE POLICE WERE NEARBY  DEALING WITH SOMETHING
          ELSE AND WENT  INTO THE SHOP TO HELP.
12:20:46 25AUG15 205714 H2720
         BS^DD - FYI.. OFFICERS DEALING
12:21:20 25AUG15 205714 H2720
         OP^DD - NOTED THANKS ITS BS OFFICERS ON SCENE. WE DEALT WITH SEPERATE
         INCIDENT. TA
12:21:25 25AUG15 CHS
         ENTERED BY: CHS  (c079148 ) AT: 2015-08-25 12:21:25
         THEI SWILLIAM HILL BETTING SHP. THE SUSPECT MALE  WAS TOLD TO LEAVE THE
         SHOP AND THE STAFF ARE GOING TO BANN HIM FROM THE SHOP
12:24:33 25AUG15 712797 H2727
         ^ 205BS.. THIS WAS A CIVIL DISPUTE... CONFIRMED THAT NO ONE HAS BEEN
         ASSAULTED, AND ALL PARTIES HAVE BEN ADVISED.
12:26:29 25AUG15 205714 H2720
         ************************* NCRSCIRCS ***********************************
         THE CIRCUMSTANCES OF THIS INCIDENT DO NOT AMOUNT TO A NOTIFIABLE
         CRIME BECAUSE (place the word 'YES' by either A,B,C,D or E and in ALL
         cases show supporting grounds under F):
         A................ THERE IS CREDIBLE EVIDENCE TO THE CONTRARY:Y
         B......................THE REPORT IS A GENUINE ERROR/MISTAKE:
         C.RECORDED ON CRIS AS A NON-CRIME BK SPECIFIED INVESTIGATION:
         D.........................PREVIOUSLY REPORTED/RECORDED CRIME:
         (Original incident number with CRIS no.or the CRIS number will be
         provided by IBO in final classification.)
         E...........................CRIME RECORDED BY ANOTHER AGENCY:
         (As under Rule 1 in HOCR,e.g.UK Visas & Immigration, RSPCA, Royal Mail)
         F.Supporting grounds:AS PER REMS... THIS IS A CIVIL MATTER AND NO OFF
           APPARENT OR ALLEGED
         *** THEREFORE A NOTIFIABLE CRIME HAS NOT BEEN RECORDED ***
```

CONTINUED ...

INCIDENT No. 3519:25AUG15

Time	Date	Opid	Termid
13:17:27	25AUG15	219329	03721

^HDS - GPA SAYS CM - DID BS OFFICER SDEAL WITH THIS FOR CW OFFICERS? - SHOULD THIS GO TO WEST END CENTRAL GPC - OR IS IT OURS?

13:22:40	25AUG15	712797	H2727

HDS ^ BS... AS PER THE REMS, AT THE TIME THE CAD CAM IN OUR OFFICERS WERE PASSING AND FLAGGED DOWN TO IT DIRECT... IT IS A DD CAD THAT WAS DEALT WITH BY OUR PASSING OFFICERS.

Previous Actions:

Time	Date	Opid	Termid	ACTION
				SYSTEM(EXTERNAL)
12:15:53	25AUG15	CHS	CCC:CCL	O() 001:VIOLENCE AGAINST THE PERSON
"	"	"	"	PI
12:15:56	"	103452	DIV:DD	AK
12:15:57	"	"	"	XP/AK/0001
12:20:19	"	"	"	LOCA(357 HARROW ROAD,LONDON,W9 ;3NA)(CM)
12:20:20	"	"	"	AV/205BS
12:20:32	"	CHS	CCC:CCL	CR(MALE STAFF)
"	"	"	"	PI
"	"	103452	DIV:DD	AV/146BS
12:20:51	"	082229	"	AK
12:20:52	"	205714	"	PI/BS
"	"	"	"	AK
12:21:25	"	CHS	CCC:CCL	PI
12:21:32	"	205714	DIV:DD	AK
12:22:15	"	712797	DIV:BS	AK
12:22:16	"	"	"	XP/AK/0001
12:24:44	"	"	"	PI
12:24:52	"	"	"	DA/205BS 146BS
"	"	205714	DIV:DD	AK
12:25:01	"	712797	DIV:BS	AK
12:25:03	"	"	"	PS/CM
12:25:14	"	205714	DIV:DD	AC()
"	"	"	"	AQ()
"	"	"	"	AR()
12:25:17	"	"	"	CTX()
12:25:22	"	"	"	ACR/NC
12:26:29	"	"	"	EXP/SMF//NCRSCIRCS
12:26:32	"	"	"	PS/CM
12:27:15	"	082229	"	O(001) 215:ASB - NUISANCE

CONTINUED ...

PRINTED AT 16:54 28:OCT:15 PC lewis 200892

SINGLE INCIDENT PRINTOUT PAGE 5

INCIDENT No. 3519:25AUG15

Time	Date	Opid	Termid	ACTION
12:27:25	25AUG15	"	DIV:DD	CM
12:27:40	"	081681	DIV:BS	AWT/GPC
13:17:29	"	219329	"	XWT
13:23:00	"	712797	"	PS/CM
13:25:02	"	081681	"	CM
16:54:30	28OCT15	200892	CCC:CADL	VI/p200892
16:54:37	"	"	"	IP//PC lewis/1/p200892@met.police.uk

... END OF PRINT ...

PRINTED AT 10:28 03:NOV:15 B Lewis 200892

SINGLE INCIDENT PRINTOUT PAGE 1

INCIDENT No. 6884:03OCT15

INCIDENT No. 6884 entered at 17:48 on 03OCT15 by CHS/CHS in CCC/IR

INCIDENT WAS ENTERED "EXTERNALLY"

Rec By :E (Emergency)
Call Tel :[redacted]
Call Name:[redacted]
Call Type:T (Third Party)
Call Mail:
Cntct Tel:
Att Locn :357 HARROW ROAD,W9:WILLIAM HILL
Map :Page 139, Grid Reference 524785,182177
GPA :CM [Division: DD:DD]
Inc Locn :357 HARROW ROAD,W9:WILLIAM HILL
Map :Page 139, Grid Reference 524785,182177
GPA :CM [Division: DD:DD]
Call Locn:357 HARROW ROAD,W9:WILLIAM HILL
Map :Page 139, Grid Reference 524785,182177
GPA :CM [Division: DD:DD]
Opening 1:215 (ASB - Nuisance)
Open Text:
Urgency :I (Immediate)
VRMs :
Proposal :(BOCU at 17:50/03OCT15):
C4E CW31E CW33E CW50L CM18E 4311CW 4330CW 240CW CW1202
Assigned :
DeAssign :C3L, CW88L
TOA :17:55:10/03OCT15
DO Name :
DO Tel :
CRIS :
Class 1 :215 (ASB - Nuisance)
Qual 1 :701 (Assistance Requested / Rendered)
Res 1 :703 (No Offences Disclosed)
2 :702 (No Trace)
Clo Text :ASB URN NOT REQUIRED P227211
O Dealing:1381CW
Metops :
CHS Demid:20151003032781

Linked :

Phone Field : (For previous Incidents from this phone use

CONTINUED ...

INCIDENT No. 6884:03OCT15

action:PHD or PHL - use DARIS to extend search)
Location Field : (For previous Incidents at this location use
action:LCD or LCL - use DARIS to extend search)
Gazetteer Comments : (May have existed or altered since Incident creation -
Use MSS SMF:SPECARCHIVE)

Location Based Comments
** Attendance and Incident and Caller Location **
HARROW RD,W9 (283 - 479)
ODDS: DB:1-147, DV:149-323, DQ:325-597, BA 599-657, QK: 659-675, FS: 677-873
EVENS: DV:2-350, DQ:362-742, QK: 744-1112, QH:REMAINDER, BA :KENSAL GRN CEM
W2:1-281 + 2-322, W9: 283-419 + 423-570, W10:421-625 + 558-742, NW10: REMAINDER
***** DURING CARNIVAL TIME,PASS ALL INCIDENTS "PI/GT" - SECTOR 1 *****
[redacted]
OCCUPANTS & CHILD/CHILDREN MAY BE AT RISK OF DOMESTIC VIOLENCE -
WARNING **OFFICER SAFETY ISSUE** - GRADE I - OPS *MUST* SEE SS/DD/T259
[redacted]-
OCCUPANTS/PREMS MAY BE AT RISK OF ATTACK/HARASSMENT - GRADE I - SEE SS/DD/T226
[redacted]
OCCUPANTS & CHILD/CHILDREN MAY BE AT RISK OF DOMESTIC VIOLENCE -
WARNING **OFFICER SAFETY ISSUE** - GRADE I - OPS *MUST* SEE SS/DD/T150
[redacted]-
OCCUPANTS/PREMISES MAY BE AT RISK OF ATTACK/HARASSMENT - **WARNING** -
GRADE I - SEE SS/DD/T277 BEFORE DEPLOYMENT
[redacted] "NORTH WESTMINSTER DRUG AND ALCOHOL SERVICE" - GRADE E -
INFORM DUTY MANAGER (0207 266 6200) - WARNING **DRUGS** -
SEE SS/DD/T49 BEFORE DEPLOYMENT
[redacted] -
WARNING CITY SAFE HAVEN - VULNERABLE CHILD/PERSON AT RISK -
GRADE I - OPS *MUST* SEE SS/DD/T104

Remarks:

Time	Date	Opid	Termid	
	03OCT15	CHS	CHS	(pre 1st routing)

CREATED IN: CHS AT: 2015-10-03 17:48:41 CAD AT: 2015-10-03 17:50:29
==========
ENTERED BY: [redacted] AT: 2015-10-03 17:50:18
INFT - REPORTING MALE BEING VERY BADLY - ITEMS TAKEN FROM WALL AND
THROWN AROUND.
17:50:59 03OCT15 700588 H2721
^DD CONFIRM IS THIS ASSAULT OR CRIMINAL DAMAGE
17:51:51 03OCT15 CHS

CONTINUED ...

INCIDENT No. 6884:03OCT15

Time	Date	Opid	Termid

ENTERED BY: [redacted] AT: 2015-10-03 17:50:43
OP - MALE HEARD IN B/GROUND SHOUTING.

17:51:52 03OCT15 CHS
ENTERED BY: [redacted] AT: 2015-10-03 17:51:51
DESC: black male/DARK BLUE HOODY/BEIDGE CAP/NAVY BLUE MCKENZIE TRACKSUIT/BLACK NIKE HODAL.

17:55:36 03OCT15 CHS
ENTERED BY: [redacted]) AT: 2015-10-03 17:52:46
OTHING HAS BEEN DAMAGED.

17:55:37 03OCT15 CHS
ENTERED BY: [redacted] [redacted] AT: 2015-10-03 17:53:24
SMF ASB (For All Incidents Of Anti-social Behaviour)
Always consider whether the circumstances of the incident render the person concerned as vulnerable.
1. Has anything like this happened before?: No
2. Has the caller spoken to police about this or any other matter relating to ASB?: No
3. If the answer to 2 is 'Yes', when were police called (approximately)? :
4. Prior to this call, has the person sought help from elsewhere (e.g. Local Authority, Security, Housing Association, Samaritans, Citizens Advice, BT, etc.)?: Yes
5. If the answer to 4 is 'Yes' please state who? :
6. Are there any health or welfare issues we need to be aware of that could help us deal with your call? (VULNERABILITY)?: No
7. If the answer to 6 is 'Yes' record details of how/why vulnerable. Record any other relevant information? :
** For 'ASB' calls, you are no longer required to complete the 'REPEAT' or 'VULNERABLE' SMFs **

17:55:37 03OCT15 CHS
ENTERED BY: [redacted] AT: 2015-10-03 17:54:10
REF NUMBER ADVISED LINE CLEARED

18:51:16 03OCT15 082229 H2629
^1381CW MALES MADE OF PRIOR TO POLICE ARIVAL

21:01:53 03OCT15 227211 3778C
^GPC-PARTNERSHIP. NOT ALL ASB CALLS WILL GENERATE AN AIRSPACE NUMBER AND EVERY REPORT IS ASSESSED TO ENSURE AND IDENTIFY VULNERABLE VICTIMS OR SUPPORTING EVIDENCE OF REPEAT CALLS. THE SMF IS REVIEWED AND ANSWERS CROSSED REFERENCED WITH ANY PREVIOUS INCIDENTS RECORDED ON THAT TELEPHONE NUMBER OR INFORMANT DETAIL. THERE DO NOT APPEAR TO BE ANY APPARENT RISKS. I HAVE REVIEWED THIS CAD AND NOTE THAT CAD

CONTINUED ...

INCIDENT No. 6884:03OCT15

Time	Date	Opid	Termid

INDICATES THERE ARE NO OTHER ASB CALLS FROM THIS CALLER OR THEIR PHONE NUMBER. ON THIS OCCASION THIS INCIDENT WILL BE TREATED AS AN ISOLATED INCIDENT. I HAVE TAKEN INTO ACCOUNT ANY REMARKS MADE BY THE OFFICERS DEPLOYED AND ATTENDING THE SCENE. P227211

Previous Actions:

Time	Date	Opid	Termid	ACTION
				SYSTEM(EXTERNAL)
17:50:29	03OCT15	CHS	CCC:CCH	O() 215:ASB - NUISANCE
"	"	"	"	PI
17:50:33	"	700588	DIV:DD	AK
17:51:51	"	CHS	CCC:CCH	PI
17:52:00	"	700588	DIV:DD	CI/C3L
17:52:08	"	"	"	AK
17:52:14	"	234085	CCC:MDT	MA/DELIVERED TO C3L
17:52:15	"	700588	DIV:DD	CI/CW88L
17:52:18	"	236004	CCC:MDT	MA/DELIVERED TO CW88L
17:52:19	"	234085	"	AV/C3L
17:52:22	"	700588	DIV:DD	AK
17:52:26	"	236004	CCC:MDT	AV/CW88L
17:53:23	"	700588	DIV:DD	AK
17:55:10	"	236004	CCC:MDT	TOA/CW88L
17:55:36	"	CHS	CCC:CCH	PI
17:56:24	"	700588	DIV:DD	AK
17:59:57	"	234085	CCC:MDT	TOA/C3L
18:50:52	"	082229	DIV:DD	AC()
"	"	"	"	AQ()
"	"	"	"	AR()
18:50:55	"	"	"	OD()
18:51:00	"	"	"	DA/C3L CW88L
18:51:03	"	"	"	AWT/GPC
18:51:23	"	"	"	LOCA(357 HARROW ROAD,W9:WILLIAM HILL)(CM)
21:01:58	"	227211	"	LOCA((ASB/URN) 357 HARROW ROAD,W9:WILLIAM H ILL)(CM)
21:02:07	"	"	"	CTX()
21:02:09	"	"	"	PS/CM
21:03:16	"	082229	"	CM
10:28:28	03NOV15	200892	CCC:CADL	VI/p200892
10:28:47	"	"	"	IP//B Lewis/1/p200892@met.police.uk

... END OF PRINT ...

PRINTED AT 10:27 03:NOV:15 B Lewis 200892

SINGLE INCIDENT PRINTOUT PAGE 1

INCIDENT No. 6198:30OCT15

INCIDENT No. 6198 entered at 16:24 on 30OCT15 by CHS/CHS in CCC/IR

INCIDENT WAS ENTERED "EXTERNALLY"

Rec By :E (Emergency)
Call Tel :[redacted]
Call Name:[redacted]
Call Type:T (Third Party)
Call Mail:
Cntct Tel:
Att Locn :357 HARROW ROAD,W9:WILLIAM HILL
Map :Page 139, Grid Reference 524785,182177
GPA :CM [Division: DD:DD]
Inc Locn :357 HARROW ROAD,W9:WILLIAM HILL
Map :Page 139, Grid Reference 524785,182177
GPA :CM [Division: DD:DD]
Call Locn:357 HARROW ROAD,W9:WILLIAM HILL
Map :Page 139, Grid Reference 524785,182177
GPA :CM [Division: DD:DD]
Opening 1:010 (Criminal Damage)
2:600 (Alcohol)
Open Text:
Urgency :I (Immediate)
VRMs :
Proposal :(BOCU at 16:26/30OCT15):
C3E C3N CW31E CM18E 657CO 4311CW 4330CW 240CW CW1202 4165CW
Assigned :
DeAssign :C3L, CW31L
TOA :16:30:57/30OCT15
DO Name :
DO Tel :
CRIS :NOT CRIMED
Class 1 :506 (Duplicate)
Qual 1 :600 (Alcohol)
Res 1 :703 (No Offences Disclosed)
2 :720 (Linked)
Clo Text :SEE MASTER CAD 6463 30OCT15
O Dealing:
Metops :
CHS Demid:20151030032717

Linked :

CONTINUED ...

INCIDENT No. 6198:30OCT15

Phone Field : (For previous Incidents from this phone use action:PHD or PHL - use DARIS to extend search)
Location Field : (For previous Incidents at this location use action:LCD or LCL - use DARIS to extend search)
Gazetteer Comments : (May have existed or altered since Incident creation - Use MSS SMF:SPECARCHIVE)

Location Based Comments
** Attendance and Incident and Caller Location **
HARROW RD,W9 (283 - 479)
ODDS: DB:1-147, DV:149-323, DQ:325-597, BA 599-657, QK: 659-675, FS: 677-873
EVENS: DV:2-350, DQ:362-742, QK: 744-1112, QH:REMAINDER, BA :KENSAL GRN CEM
W2:1-281 + 2-322, W9: 283-419 + 423-570, W10:421-625 + 558-742, NW10: REMAINDER
***** DURING CARNIVAL TIME,PASS ALL INCIDENTS "PI/GT" - SECTOR 1 *****
[redacted]
OCCUPANTS & CHILD/CHILDREN MAY BE AT RISK OF DOMESTIC VIOLENCE -
WARNING **OFFICER SAFETY ISSUE** - GRADE I - OPS *MUST* SEE SS/DD/T259
[redacted]
OCCUPANTS/PREMISES MAY BE AT RISK OF ATTACK/HARASSMENT - **WARNING** -
GRADE I - SEE SS/DD/T100 BEFORE DEPLOYMENT
[redacted] -
OCCUPANTS/PREMISES MAY BE AT RISK OF ATTACK/HARASSMENT - **WARNING** -
GRADE I - SEE SS/DD/T277 BEFORE DEPLOYMENT
[redacted] "NORTH WESTMINSTER DRUG AND ALCOHOL SERVICE" - GRADE E -
INFORM DUTY MANAGER (0207 266 6200) - WARNING **DRUGS** -
SEE SS/DD/T49 BEFORE DEPLOYMENT
[redacted] "SAINSBURY" -
WARNING CITY SAFE HAVEN - VULNERABLE CHILD/PERSON AT RISK -
GRADE I - OPS *MUST* SEE SS/DD/T104

Remarks:

Time	Date	Opid	Termid	
	30OCT15	CHS	CHS	(pre 1st routing)

CREATED IN: CHS AT: 2015-10-30 16:24:31 CAD AT: 2015-10-30 16:25:39
==========
ENTERED BY: [redacted] AT: 2015-10-30 16:25:39
^INFT - STATES THAT DRUNK FEMALE AT LOCATION THROWING CHAIRS AROUND
16:25:47 30OCT15 CHS
ENTERED BY: [redacted] AT: 2015-10-30 16:25:47
SHE IS CAUSING DAMGE
16:26:49 30OCT15 CHS
ENTERED BY: [redacted] AT: 2015-10-30 16:26:49

CONTINUED ...

INCIDENT No. 6198:30OCT15

Time	Date	Opid	Termid
	BLK FEMALE A/A 50-60 BLK HAIR WRG LONG BLK COAT BELIEVES FEMALE IS ON DRUGS.		
16:27:59	30OCT15	CHS	
	ENTERED BY: CHS (c098190) AT: 2015-10-30 16:27:59 CAD REF & ETA GIVEN		
16:39:34	30OCT15	700600	H2721
	^2166CW - FEMALE EJECTED, NO DAMAGE TO ANY PROPERTY.		
18:51:25	30OCT15	700600	H2721
	^DD - INFO: FEMALE SUBSEQUENTLY SECTIONED ON CAD 6463 AFTER RET TO LOCN.		
14:30:20	31OCT15	227211	3778C
	^GPC-PARTNERSHIP, PLEASE SEE MASTER CAD 6463 30OCT15 FOR RESULT.P227211		

Previous Actions:

Time	Date	Opid	Termid	ACTION
				SYSTEM(EXTERNAL)
16:25:39	30OCT15	CHS	CCC:CCH	O() 010:CRIMINAL DAMAGE
"	"	"	"	PI
16:25:47	"	"	"	PI
16:25:52	"	"	"	O(010) 010:CRIMINAL DAMAGE,600:ALCOHOL
"	"	"	"	PI
16:26:49	"	"	"	PI
16:26:57	"	198342	DIV:DD	AK
16:27:11	"	CHS	CCC:CCH	CR(BTSS (WILLIAM HILL ORGANIZATION LTD))
"	"	"	"	PI
16:27:27	"	198342	DIV:DD	CI/CW31L
16:27:29	"	231450	CCC:MDT	MA/DELIVERED TO CW31L
16:27:33	"	198342	DIV:DD	AV/C3L
16:27:44	"	231450	CCC:MDT	AV/CW31L
16:27:59	"	CHS	CCC:CCH	PI
16:28:28	"	198342	DIV:DD	AK
16:30:57	"	"	"	TOA/CW31L
16:30:59	"	231450	CCC:MDT	TOA/CW31L
16:39:46	"	700600	DIV:DD	LOCA(357 HARROW ROAD,W9:WILLIAM HILL)(CM)
18:43:22	"	231450	CCC:MDT	VI/CW31L
18:51:44	"	700600	DIV:DD	AC()

CONTINUED ...

PRINTED AT 10:27 03:NOV:15 B Lewis 200892

SINGLE INCIDENT PRINTOUT PAGE 4

INCIDENT No. 6198:30OCT15

Time	Date	Opid	Termid	ACTION
18:51:44	30OCT15	"	DIV:DD	AQ()
"	"	"	"	AR()
18:51:50	"	"	"	CTX()
18:51:52	"	"	"	ACR/NC
18:52:01	"	"	"	DA/C3L CW31L
18:52:06	"	"	"	LOCA((RES)357 HARROW ROAD,W9:WILLIAM HILL)(CM)
18:52:09	"	"	"	PS/CM
19:06:02	"	061411	"	C(314)
"	"	"	"	Q(701)
19:06:06	"	"	"	CTX(AS REMS NO OFFENCES, FEMALE REMOVED)
19:06:07	"	"	"	Q(202)
19:06:10	"	"	"	AWT/GPC
19:06:15	"	"	"	LOCA(357 HARROW ROAD,W9:WILLIAM HILL)(CM)
14:24:42	31OCT15	227211	"	CTX()
14:29:15	"	"	"	R(703)
14:29:33	"	"	"	C(214)
"	"	"	"	Q(202/600)
14:30:27	"	"	"	LOCA((ASB URN) 357 HARROW ROAD,W9:WILLIAM HILL)(CM)
14:30:29	"	"	"	PS/CM
15:41:37	"	051023	"	CM
10:27:08	03NOV15	200892	CCC:CADL	VI/p200892
10:27:32	"	"	"	IP//B Lewis/1/p200892@met.police.uk

... END OF PRINT ...

PRINTED AT 11:25 03:NOV:15 B lewis 200892

SINGLE INCIDENT PRINTOUT PAGE 1

INCIDENT No. 6463:30OCT15

INCIDENT No. 6463 entered at 16:49 on 30OCT15 by CHS/CHS in CCC/IR

INCIDENT IS "PRIORITY"
INCIDENT WAS ENTERED "EXTERNALLY"

Rec By :O (Ordinary)
Call Tel :[redacted]
Call Name:[redacted]
Call Type:W (Witness)
Call Mail:
Cntct Tel:
Att Locn :[redacted]
Map :
GPA :
Inc Locn :357 HARROW RD,W9:william hill
Map :Page 139, Grid Reference 524785,182177
GPA :CM [Division: DD:DD]
Call Locn:357 HARROW RD,W9:william hill
Map :Page 139, Grid Reference 524785,182177
GPA :CM [Division: DD:DD]
Opening 1:010 (Criminal Damage)
2:600 (Alcohol)
Open Text:
Urgency :I (Immediate)
VRMs :
Proposal :(BOCU at 19:43/30OCT15):
CW85E 657CO 3277CW CW1044 3155CW 122CW 1165CW 1324CW 1855CW
Assigned :
DeAssign :CW46L, CW89L
TOA :16:58:31/30OCT15
DO Name :
DO Tel :
CRIS :NOT CRIMED
Class 1 :309 (Concern For Safety)
Qual 1 :612 (Mental Health)
Res 1 :711 (MERLIN Entry)
2 :703 (No Offences Disclosed)
Clo Text :
O Dealing:
Metops :
CHS Demid:20151030033018

Linked :explicitly to 9209:30OCT15

CONTINUED ...

INCIDENT No. 6463:30OCT15

Linked :implicitly to (none)

Location Field : (For previous Incidents at this location use action:LCD or LCL - use DARIS to extend search)
Gazetteer Comments : (May have existed or altered since Incident creation - Use MSS SMF:SPECARCHIVE)

Location Based Comments
** Attendance Location **
[redacted]
IN OF NEAR THE SESSIONAL AREA - CONSIDER "PI/POW"
IN OR NEAR THE GOVT SECURITY ZONE CONSIDER PI/GSZ

** Incident and Caller Location **
HARROW RD,W9 (283 - 479)
ODDS: DB:1-147, DV:149-323, DQ:325-597, BA 599-657, QK: 659-675, FS: 677-873
EVENS: DV:2-350, DQ:362-742, QK: 744-1112, QH:REMAINDER, BA :KENSAL GRN CEM
W2:1-281 + 2-322, W9: 283-419 + 423-570, W10:421-625 + 558-742, NW10: REMAINDER
***** DURING CARNIVAL TIME,PASS ALL INCIDENTS "PI/GT" - SECTOR 1 *****
[redacted]
OCCUPANTS & CHILD/CHILDREN MAY BE AT RISK OF DOMESTIC VIOLENCE -
WARNING **OFFICER SAFETY ISSUE** - GRADE I - OPS *MUST* SEE SS/DD/T259
[redacted]-
OCCUPANTS/PREMISES MAY BE AT RISK OF ATTACK/HARASSMENT - **WARNING** -
GRADE I - SEE SS/DD/T100 BEFORE DEPLOYMENT
[redacted] -
OCCUPANTS/PREMISES MAY BE AT RISK OF ATTACK/HARASSMENT - **WARNING** -
GRADE I - SEE SS/DD/T277 BEFORE DEPLOYMENT
[redacted]'NORTH WESTMINSTER DRUG AND ALCOHOL SERVICE" - GRADE E -
INFORM DUTY MANAGER (0207 266 6200) - WARNING **DRUGS** -
SEE SS/DD/T49 BEFORE DEPLOYMENT
[redacted]
WARNING CITY SAFE HAVEN - VULNERABLE CHILD/PERSON AT RISK -
GRADE I - OPS *MUST* SEE SS/DD/T104

Remarks:

Time	Date	Opid	Termid	
	30OCT15	CHS	CHS	(pre 1st routing)

CREATED IN: CHS AT: 2015-10-30 16:49:21 CAD AT: 2015-10-30 16:52:06

ENTERED BY: [redacted] AT: 2015-10-30 16:51:56

CONTINUED ...

INCIDENT No. 6463:30OCT15

```
Time     Date    Opid   Termid
-------- ------- ------ --------
         inft states that female from linked has returned and is throwing chairs
         at customers
16:52:35 30OCT15 CHS
         ENTERED BY: [redacted] AT: 2015-10-30 16:52:35
         ^op.....cad ref given. line cleared.
17:16:30 30OCT15 198342 H2720
         ^ 1903CW, FEMALE DETAINED UNDER SEC 136MHA.WILL CALL UP HOSP DIRECT
17:32:27 30OCT15 700600 H2721
         ^139CW - THE FEMALE HAS BEEN SECTIONED, VAN UNIT WILL TAKE FEMALE---
         >GORDON HOSPITAL AS ST CHARLES IS FULL
18:05:26 30OCT15 198342 H2720
         ^1658CW, FEMALE DROPPED OFF
19:43:20 30OCT15 703614 H2731
         ^1903CW WE REQUIRE LAS TO TRANSPORT FEMALE FROM GORDON HOSPITAL, NO
         INJURIES BUT SHE IS IN A DRUNKEN STATE
19:45:18 30OCT15 703614 H2731
         LAS^MPS
         Organisation:LONDON AMBULANCE SERVICE          Assistance:AMBULANCE
         Location:                                     Mapref:161/529497,178671
         GORDON HOSPITAL, SW1
         MPS Contact :AD
         Number      :SEE FILE
         Caller:[redacted]
         Number:[redacted]
         Unit: Assigned:Y (Y/N) On Scene:Y (Y/N) Attending:Y (Y/N/U) ETA:   Mins
         Casualty 1    Chief Complaint:SEE BELOW
         [redacted] :Y (Y)ears (M)onths (W)eeks (D)ays [redacted]
           Severe Bleeding:N (Y/N/U)   Conscious:Y (Y/N/U)   Breathing:Y (Y/N/U)
           Chest Pain:N (Y/N/U)     Shot/Stabbed:N (Y/N/U)  (Y)es (N)o (U)nknown
         Remarks     :
         Patient Contact Number: N/A                  PR Radio Number: [redacted]
         LAS ATTENDANCE PLS TO ASSIST WITH TRANSPORTING PATIENT IN A DRUNKEN
         STATE FROM THE GORDON HOSPITAL TO A&E
19:45:21 30OCT15 LAS
         MPS^LAS   MESSAGE PROCESSED SUCCESSFULLY - REF:[redacted]
19:52:28 30OCT15 LAS
         MPS^LAS                  Reference:[redacted]
         Organisation:LAS
         Action      :POLICE
         REMARKS     :
         METROPOLITAN POLICE: POLICE requested for OTHER - FULL DETAILS BELOW
```

CONTINUED ...

INCIDENT No. 6463:30OCT15

Time	Date	Opid	Termid

,THIS CALL IS GOING TO RECEIVE AN ENHANCED TRIAGE BY METDG , IF NOT DETAILED ON INITIAL CAD PLEASE PROVIDE A PHONE/ISSI NUMBER FOR THE PATIENT/POLICE OFFICER ON SCENE AND ADVISE THEM TO KEEP THIS FREE.THANK YOU

19:58:48 30OCT15 LAS
MPS^LAS Reference:[redacted]
Organisation:LAS
Action :POLICE
REMARKS :
METROPOLITAN POLICE: POLICE requested for OTHER - FULL DETAILS BELOW
,THIS CAD IS BEING CANCELLED AFTER SPEAKING TO YOUR OFFICERS - GORDON HOSP WILL NEED TO USE THEIR OWN TRANSPORTATION OR THE HCP ON SCENE WILL NEED TO PLACE A CALL THROUGH THE NINES AS PER PROTOCOL - MANY THANKS

21:08:20 30OCT15 218165 H2731
^1676CW...LAS ARE NO LONGER REQ PLEASE CANCEL THEM

21:08:40 30OCT15 218165 H2731
LAS^MPS
Organisation:LONDON AMBULANCE SERVICE
Action :INFORMATION
UNIT: ASSIGNED:Y (Y/N) ON SCENE:Y (Y/N) ATTENDING:Y (Y/N/U) ETA: MINS
REMARKS :
PLEAS ECANCEL YOU ARE NO LONGER REQUIRED

21:15:53 30OCT15 700586 H2722
^AD CALLED LAS THEY ARE AWARE NO LONGER REQUIRED

21:48:12 30OCT15 099019 H2732
^1676CW - WE HAVE TAKEN FEM TO A&E AND HAS BEEN DE-ARRESTED FOR 136. THIS IS NO LONGER A SEC 136 AFTER DICUSSING WITH STAFF, SHE WAS JUST DRUNK, WE HAVE VOLUNTARILY (SHE HAS AGREED) TO GO TO ST THOMAS HOSP TO GET BLOODS CHECKED ETC. SHE HAS AGREED TO STAY THERE VOLUNTARILY. CLOSE CAD.

14:31:36 31OCT15 227211 3778C
^GPC-PARTNERSHIP, NO ASB URN IS REQUIRED AS PERSON WAS TAKEN INTO CUSTODY WITH MENTAL HEALTH ISSUES AND MERLIN WILL BE [redacted]

Previous Actions:

Time	Date	Opid	Termid	ACTION
				SYSTEM(EXTERNAL)
16:52:06	30OCT15	CHS	CCC:CCH	O() 010:CRIMINAL DAMAGE,600:ALCOHOL
"	"	"	"	PI

CONTINUED ...

INCIDENT No. 6463:30OCT15

Time	Date	Opid	Termid	ACTION
16:52:28	30OCT15	700600	DIV:DD	AK
16:52:33	"	"	"	AK
16:52:35	"	CHS	CCC:CCH	PI
16:52:37	"	700600	DIV:DD	AK
16:53:04	"	"	"	AV/CW46L
16:58:31	"	198342	"	TOA/CW46L
17:32:35	"	700600	"	CI/CW89L
17:32:38	"	230430	CCC:MDT	MA/DELIVERED TO CW89L
17:32:47	"	"	"	AV/CW89L
17:32:58	"	700600	DIV:DD	AK
17:57:33	"	230430	CCC:MDT	TOA/CW89L
19:42:56	"	703614	DIV:DD	LOCA(357 HARROW RD,W9:william hill)(CM)
19:43:00	"	"	"	LOCA(GORDON HOSPITAL)(CS)
19:45:18	"	"	"	EXP/LAS
19:45:21	"	LAS	CCC:LAS	AK
19:47:31	"	195185	DIV:AD	AK
19:52:28	"	LAS	CCC:LAS	CP
"	"	"	"	IMP/INFO
19:53:11	"	700586	DIV:AD	AK
19:58:48	"	LAS	CCC:LAS	IMP/INFO
19:59:03	"	700586	DIV:AD	AK
21:08:40	"	218165	"	EXP/LAS/INFO
21:08:41	"	LAS	CCC:LAS	AK
21:08:43	"	218165	DIV:AD	AK
21:25:14	"	197975	"	DA/CW46L CW89L
21:25:31	"	"	"	AC()
"	"	"	"	AQ()
"	"	"	"	AR()
21:25:34	"	"	"	ACR/NC
"	"	"	"	CM
21:31:09	"	198342	DIV:DD	PS/CM
21:38:59	"	193291	"	Q(701)
21:39:09	"	"	"	CTX()
21:39:15	"	"	"	LOCA(GORDON HOSPITAL, SW1)(CS)
21:39:18	"	"	"	AWT/GPC
21:39:20	"	"	"	XWT
21:39:23	"	"	"	AWT/CRIS
21:39:27	"	"	"	LOCA((1676CW)GORDON HOSPITAL, SW1)(CS)
21:39:29	"	"	"	LOCA((MERLIN1676CW)GORDON HOSPITAL, SW1)(CS)
21:48:20	"	099019	DIV:AD	CTX(F ---> GORDON HOSP UNDER S.136)

CONTINUED ...

PRINTED AT 11:25 03:NOV:15 B lewis 200892

SINGLE INCIDENT PRINTOUT PAGE 6

INCIDENT No. 6463:30OCT15

Time	Date	Opid	Termid	ACTION
11:22:52	03NOV15	200892	CCC:CADL	VI/p200892
11:25:20	"	"	"	IP//B lewis/1/p200892@met.police.uk

... END OF PRINT ...

General Information

Screening Decision: IN

Main

IU:	CW WESTMINSTER		
Crime Type:	C	H/O Crime Type:	I
Allegation (Prefix):			
Allegation:			
Committed on/from Date:	TUE 27/10/2015 21:59		
Committed to Date:	TUE 27/10/2015 22:05		
Reported Date:	TUE 27/10/2015 22:05		
How Notified:	NP Phone Call to Police		
Restricted? By:		Date:	
Restriction Reason:			

Flags
CW

Borough **Branch**

Service **Area (Historical)**

CW TIC/Alternate Crime Pending

OIC

Is OIC Same As Reporting Officer ?			
Investigating Officer's Rank:	TDC		
Surname:	MOHAMMED	Initials:	H
Warrant Number:	219277 Div/D Number:	Usual Relief:	N
Duty:	OA Other duty(Uniform)		
Station/Branch:	CWS Westminster South LPA		
Allocated Date/Time:	28/10/2015 09:53		
Allocation Noted?	Y	Noted Date/Time:	28/10/2015 09:53

Previous OIC Details

Usual Relief	Duty	Station Branch	Allocated Date/Time	Noted Date/Time
PC 234661 D NEWMAN				
S	AA Borough Uniform	CW	28/10/2015 01:08	28/10/2015 01:08

OIC Supervisor: DS/226071 D LUKE

Press

Suitable for Press?	Y
Restrictions:	
Is this a Specrim?	N
Date/Time:	
Was a Firearm Used?	N
Was other Weapon Used?	Y
Are there Terrorist Implications?	N
Was a Suspect present on Police arrival?	Y
No. of Suspects Present:	1
Was the Suspect(s) arrested?	Y

General Information

No. of Suspects Arrested: 1

Source System References

Source System Name	Source System Reference	Entered Date/Time	Entered By
CAD	009586/27OCT15	28/10/2015 01:06	PC /234661 D NEWMAN

Totals

Total Values:

Stolen £: Outstanding £: Damaged £:
Recovered £: Damaged On Recovery £:

Total:

VIW(s):	2	Property	0	Vehicles(s):	0
Accused:	1	Suspect(s):	1	CAIT Subject(s):	0

Drugs/Fraud

Is this CR for an arrest for possession etc. (not theft) of controlled drugs?
If Fraudulent Use-Item Used: N

DV/Hate Crime
Is this a Hate Crime/Domestic Incident/Carer Abuse? N

Domestic Incident? Forced Marriage?
Honour Based Violence? Hate Crime?
Carer Abuse?

Initial Risk Assessment (SPECSS+):
Completed by:

Initial Risk Assessment Management Supervised?
Completed by:

Current Risk Assessment (SPECSS+):
Completed by:

Form 124D Completed?
Completed by:

Form124D Supervised?
Completed by:

Received by the CSU? CSU Reference
Completed by:

LGBT Relationship?

Category of Hate Crime

Race?
Faith/Religion/Belief? Religion Name:
Homophobia?
Transphobia?
Disability?
Targeted because of Vulnerability?

Venue

Location

OMPD?
Address:
William Hill Bookmakers,357,HARROW ROAD,
LONDON,W9 3NA
Location Text:

GLU: CW Local Id: CW08 Grid Ref: 524785,182177
Watch Area:

Main

Location Type(s): FA Street JF Betting Shop

Is the Venue covered by CCTV or in a CCTV Area? Y
CCTV Options: CE CCTV Not Recovered By Police

Approach:
Entry Method:
Entry Point:
Exit Point:
Security:
Person On Premises? Y
Other Info:

Internal Transfer

Date/Time	Transferred By	Previous GLU	Previous IU

Transfer From MPS

Transfer from Met To:-
Service:
Station:
Their Reference:

Received By:-
Rank:
Number:
Surname:

Victim/Informant/Witness Details

VIW No: 1 Of: 2
Role(s): V I W

Total - Victims: 1
Total Witness: 2

CAIT Subject No:

Personal Details

Co/Public Body?
Title: [redacted]
Surname: [redacted]
Co./Forenames: [redacted]
Date of Birth: WITHHELD
Age Estimated:
App. Age or From: [redacted]
To:
Sex: [redacted]
Ethnic Appearance: [redacted]
Self Class Ethnicity: [redacted]
Occupation: [redacted]
Occupation relevant to offence: N
School or College:

GLU:
Local ID:
GridRef:
National of 1:
Passport No 1:
National of 2:
Passport No 2:
Religion:

Address Details

VIW's Address is same as VEN?
Address:
WITHHELD
GLU: WITHHELD
Local ID: WITHHELD
GridRef: WITHHELD
Home Intelligence Unit: WITHHELD

PCM: E
CNAA Reason:

Contact Details:
Home: WITHHELD
Business: WITHHELD
Mobile: WITHHELD
Other: WITHHELD
Email: WITHHELD

Victim/Informant/Witness
Details

Injury Details

Injury Degree: HE Threats Only
Injury Description:
Description/Dress:

Vulnerable/intimidated Victim/Witness? WITHHELD
Reason for Vulnerability/Intimidation: WITHHELD

Victim Interviews

Interview Type	Date of Interview	Start Time	Location	Other Persons Present	Interviewing Officer	eStatement Ref No

Actions

MG11 Taken?
Witness Albums Visited? N
Victim of Reported Crime to Police in last 12 months? N No
Is V willing for VSS to be informed? Y Yes
V Code of Practice Applicable? Y
234661 PC NEWMAN D 28/10/2015

Changed To	Entered By	Date

VCOP Actn Compl?

Fraud Cl'rup
Date:

Knows Suspect No.	How Known
1	TO Suspect/Accused known by victim in another way

Aware of Suspect No.	How Victim or Witness aware of Arrest
1	HA Present when Susp arrested

Victim/Informant/Witness
Details

Knows Accused No.	How Known
1	TO Suspect/Accused known by victim in another way

Needs

Does anyone perceive VIW to be Deaf and/or Disabled? N
If Yes, who? VIW/Other:

Details of Disability:

Physical Access Needs:

Personal Care Needs:

Medical Needs:

Communication Needs:

Sexual Orientation:
Gender Identity:

Officer's Notes:

VIW No: 1 Of: 2

VSS Info:

Local VSS Ref:
Language (If not English):
Victim Contacted by LO?
Date/Time:

Action Taken	Action Date	Entered by					Generated	Date Generated
DL Victim Care Card	28/10/2015	234661	PC	NEWMAN	D			
DR Rate Your PC Card	28/10/2015	234661	PC	NEWMAN	D			
HA VU-Arrest/Interview	28/10/2015	234661	PC	NEWMAN	D			
HX VU-Regular Update	29/10/2015	198409	PC	WHITTON	R	N		
AZ SI - General Letter	29/10/2015	198409	PC	WHITTON	R	Y		29/10/2015 10:24
EA VSS Informed	29/10/2015	198409	PC	WHITTON	R			
HC VU-Susp.Ch/Summ/TIC	29/10/2015	219277	TDC	MOHAMMED	H	Y		29/10/2015 17:37

Remarks:

Victim/Informant/Witness Details

VIW No: 2 Of: 2
Role(s): W

Total - Victims: 1
Total Witness: 2

CAIT Subject No:

Personal Details

Co/Public Body?
Title: [redacted]
Surname: [redacted]
Co./Forenames: [redacted]
Date of Birth: WITHHELD
Age Estimated:
App. Age or From:
To:
Sex: [redacted]
Ethnic Appearance:
Self Class Ethnicity:
Occupation:
Occupation relevant to offence: N
School or College:

GLU:
Local ID:
GridRef:
National of 1:
Passport No 1:
National of 2:
Passport No 2:
Religion:

Address Details

VIW's Address is same as VEN?
Address:
WITHHELD
GLU: WITHHELD Local ID: WITHHELD GridRef: WITHHELD
Home Intelligence Unit: WITHHELD

PCM:
CNAA Reason:

Contact Details:
Home: WITHHELD
Business: WITHHELD
Mobile: WITHHELD
Other: WITHHELD
Email: WITHHELD

Victim/Informant/Witness Details

Injury Details

Injury Degree:
Injury Description:
Description/Dress:

Vulnerable/intimidated Victim/Witness? WITHHELD
Reason for Vulnerability/Intimidation: WITHHELD

Victim Interviews

Interview Type	Date of Interview	Start Time	Location	Other Persons Present	Interviewing Officer	eStatement Ref No

Actions

MG11 Taken?
Witness Albums Visited? N
Victim of Reported Crime to Police in last 12 months?
Is V willing for VSS to be informed?
V Code of Practice Applicable? N

198409 PC WHITTON R 29/10/2015

Changed To	Entered By	Date

VCOP Actn Compl?

Fraud Clrup Date:

Knows Suspect No. **How Known**

Aware of Suspect No. **How Victim or Witness aware of Arrest**

Victim/Informant/Witness
Details

Knows Accused No. **How Known**

Needs

Does anyone perceive VIW to be Deaf and/or Disabled?
If Yes, who? VIW/Other:

Details of Disability:

Physical Access Needs:

Personal Care Needs:

Medical Needs:

Communication Needs:

Sexual Orientation:
Gender Identity:

Officer's Notes:
No details taken as VIW2 not at scne upon reporting. Please see him when he is work to collect detials.He witnessed the entire incident and a statment should be taken from him

Accused Details

Accused No: 1 Of: 1 PC Pending-other
Charged/Summonsed.
Surname: [redacted]
Forename(s): [redacted]
PNC File name
Surname: [redacted]
Forename(s): [redacted]

Personal Details

Occupation: [redacted] Relevant to Offence? N
School or College:

GLU: Local Id: Grid Ref:

Date of Birth: [redacted] Age: [redacted]
Sex: [redacted] Ethnic Appearance: [redacted]
Self Class Ethnicity: [redacted]
OVRO Number: Birth Place: [redacted]
National Of 1: UNITED KINGDOM
National Of 2
Passport No 1: Passport No 2:
Religion:

Address

Accused Address Same As Ven ?

Address:
[redacted]
[redacted]
GLU: [redacted] Local Id: [redacted] Grid Ref: [redacted]
Home Intelligence Unit [redacted]

Contact Details:
Home: Business:

Accused Details

Mobile: Other:
Email:

Additional Details

PNC Status: [redacted]
CRO Result: PNC Result: [redacted]
This offence circ on PNC? Previous Convictions?
Disqualified Driver? On bail at time of offence?
Arrested/Summonsed Date/Time:
How Arrested:

By:(Met)

Is Arrested By (Met) same as OIC details?
Div/D.No: Warrant No:
Rank: Inits:
Surname:
Stn/Branch: Duty at time of arrest:

By:(Non-Met)

Rank: No:
Surname:
Service: Station:

Accused Details

Info Markers

Accused considers they have a disability? N
Disability Category:

Warning Signals: Type **On PNC?**

Created by: TDC /219277 H MOHAMMED
Date/Time: 29/10/2015 17:46

Last Updated by: PC 4310CW/198409 R WHITTON
Date/Time: 30/10/2015 12:52

Known To Victim

Victim Knows Accused? Y

Known by Victim No.	How Known
1	TO Suspect/Accused known by victim in another way

Other Names

Maiden Name:

Alias Surname(s): Alias Forename(s):

Nickname(s):
Former names(s):

OTHER OFFENCES CHARGED/SUMMONSED

CR No	Judicial Disposal	Proceedings Type	Prev Rep?	Plea	Finding

OTHER OFFENCES TO BE CLEARED UP

CR No	Judicial Disposal	Proceedings Type	Prev Rep?

Accused Custody

Accused No: 1 Of: 1 [redacted]

Proceedings Type

U.R.N (Case No):	[redacted]	Original CR ID:
Custody No:	[redacted]Process/Other Ref:	
Offence in Brief:	Carried out threat to kill by returning with a kitchen knife	
Judicial Disposal:	AA Charge/further charge	
Date Entered:	29/10/2015	
By:	TDC /219277 H MOHAMMED	
Proceedings Type:	PC Pending-other	
Date Entered:	30/10/2015	
Date Charged:	28/10/2015	

Court Details

Court Appearance Type:	AA First App'nce at
Court:	2808 Westminster Mag Ct
Date/Time:	29/10/2015 09:30
Date IM Form served:	

Bail Details

Police Bail?	Y
Return to Station Date	
Court Bail?	Unknown
Conditions:	

Current Bail: Date Imposed:
Non Appearance Warrant?
Wanted Docket Ref No:

Accused Offence & Results

Accused No: 1 Of: 1 [redacted]

Court Results

Skeletal Charge:

Plea:
Finding:
Sentence:

Date Convicted: Recommended for Deportation?

Appeal Details

Appeal Notice Served?
Varied on Appeal?
If Varied:
Court: Date:

Circulations

Title	Date	Case No.	Date Cancelled

Officer's Notes:

Suspect Details

Suspect No: 1 Of: 1 Currently Eliminated? Y

Possibly identical to
Suspect No(s):
CAIT Subject No:

Names

Case Class: SU Suspected
Surname Used: [redacted]
Forenames Used: [redacted]
PNC Surname: [redacted]
PNC Forename: [redacted]
Maiden Name:

Alias Surname

Alias Forenames

Nickname

Info Markers

Do you want to create an Accused record? Y Accused Created: 29/10/2015 17:46 Accused No: 1

PNC Status: [redacted]
CRO Result:
PNC Result: [redacted]

Suspect considers they have a disability? N
Disability Category:

Warning Signal Type **On PNC?**

Created by: PC /234661 D NEWMAN
Date/Time: 28/10/2015 01:46

Last Updated by:
Date/Time:

Personal Details

Date of Birth: [redacted] Age Estimated:
App. Age or From: [redacted] To: [redacted]
Sex: [redacted]
Ethnic Appearance: [redacted]
Self Classified Ethnicity: [redacted]
Height Imperial: [redacted] Height Metric: [redacted]
Birth Place: [redacted]
Nationality(1):

Suspect Details

Nationality(2):
Passport No 1:
Passport No 2:
Dress: [redacted]
Composite Description: N
Religion:
Occupation:
School or College:

GLU: Local ID: Grid Ref:
Details of ID Docs:

Suspect Details

Personal Description

Hair
Desc: [redacted] Colour: [redacted] Texture:
Facial Hair
Type: Colour: Features:
Eye Colour Left: Eye Colour Right:
Spectacles? Spectacles Type:
Eyebrows:
Voice: Accent:
Photo-Fit Ref: Build:

Marks/Scars

Type/Position

Address

Suspect's Address is same as VEN ?

Address:
[redacted]
GLU: [redacted] Local ID: [redacted] Grid Ref: [redacted]
Home Intelligence Unit: [redacted]
Frequents:

Contact Details:
Home: Business:
Mobile: Other:
Email:

Known to Victim

VIW Knows Suspect? Y

Known by VIW No	How Known
1	TO Suspect/Accused known by victim in another way

Was the Victim or Witness aware the Suspect was arrested? Y

VIW No.	How Victim or Witness aware of arrest
1	HA Present when Susp arrested

Suspect Elimination

Suspect No: 1 Of: 1
Currently Eliminated? Y

Disposal

Circulate PNC?

Date Eliminated	Reason Eliminated	Method of Detection	How Suspect Notified	Date/Time Notified	Notified By:				
					Rank	Div/D Number	Warrant Number	Initials	Surname
28/10/2015	AA Arrested and charged	AA Charged	AE Personally	28/10/2015 21:00	TDC		219277	H	MOHAMMED

Date of Arrest	Custody No	Result	Bail Return Date/Time	Station	Entered By:					Entered Date/Time
					Rank	Div/D Number	Warrant Number	Init's	Surname	
27/10/2015	01EO/5383/15				PC		234661	D	NEWMAN	28/10/2015 01:46

Identifiable By

Identifiable By
VIW No(s):

Circulation

Title	Date	Case No	Date Cancelled

Wanted Docket Ref No:
ID by Witness Albums?
Warrant Issued? Date Warrant Issued:

Conditions:

Officer's Notes:

Support Services

IDO

IDO Request:

Request Id	Requested Date/Time	Surname	Warrant/Pay No	Accepted Date/Time	Cancel Reason	Cancel Date
1	28/10/2015 02:44				see dets pg3	28/10/2015

IDO Visit:

Request Id	Surname	Visit Date/Time	Entry Gained	Job Sheet No	Useful Marks

CPO

CPO Request:

Request Id	Requested Date/Time	Surname	Warrant/Pay No	Accepted Date/Time	Cancel Reason	Cancel Date

CPO Visit:

Request Id	Surname	Visit Date/Time	Entry Gained	Job Sheet No	Useful Marks

Photographer

Photographer Request:

Request Id	Requested Date/Time	Surname	Warrant/Pay No	Accepted Date/Time	Cancel Reason	Cancel Date

Photographer Visit:

Request Id	Surname	Visit Date/Time	Entry Gained	Job Sheet No	Useful Marks

Other

Other Request:

Request Id	Type	Requested Date/Time	Surname	Warrant/Pay No	Accepted Date/Time	Cancel Reason	Cancel Date

Other Visit:

Request Id	Surname	Visit Date/Time	Entry Gained	Job Sheet No	Useful Marks

Access Info
prop at EO custody

Features

Features/instruments

XT Knife or sharp used as threat or attempt to injure
EF Vict threatened
WK Knife or bladed instrument

Text:

IDO Text:
Prop Ref Nos

Forensic Data

Lab Reference No:

FORENSIC REFERENCES

Type	**No**

Officers Notes:

Linked Crimes

Chain ID	Removed from Chain?	Police Contact

Classification

Method

Current Position: C Classified
Method: Suspect has made threats to kill VIW after a dispute. Suspect has left, returning to venue with a kitchen knife, where more threats were made and intimated.

Classification Set by CIT:
Lock: Date:
By:

Classify

Main Classification:

	Code	Victim	Date
Initial:	S003/01	Y	28/10/2015 01:06
Current:	S035/00	Y	28/10/2015 17:51
Description:	SUBSTANT./Blackmail		

Subsidiary Classifications:

Code	Victim	Count

Confirm? Y Date: 28/10/2015 17:52
By: PC 897TP /188983 D CHEUNG
Victim Count Discrepancy:

Classification

No Crime

No Crime? Date:
Reason:
Confirm? Date:
By:

Crime Related Incident? Date:
Confirm? Date:
By:

Statistical Info

Current Status: U Undetected Crime Last Changed:
Cleared-Up Reason: Date:

Original Classification

Off.	Code	Victim	Count	Status	Outcome	Outcome Changed	Change Reason	Last Changed	Last Changed By

Confirmed Date: 28/10/2015 17:52
Confirmed By: PC 897TP /188983 D CHEUNG

Statistical Parent CR:

Administrative Detections

Home Office Rule:
Date:
By:
Explanatory Notes:

Classification

All Current Home Office
Requirements Satisfied: Date:
By:

Of Interest To

Method Index:
CP Analysis:

Victim Amendments

Date Added	Time	VIW No	By

Date Removed	Time	VIW No	By

History

Off.	Code	Victim	Count	Status	Outcome	Reason	When	By

Messages

Addressee	Date Sent	Text	Cancel Date
	02/11/2015	QQCOM	

Gen Reg No	Description

Important/Interest Crime? Date:

28/10/2015 02:35

PC 234661 D NEWMAN

PRIMARY INVESTIGATION DETAILS : 1 Immediate action
1. CAD 9586/27OCT15 attended by PC 1538CW , SC 5158CW and PC 1673CW

2. On TUESDAY 27th OCTOBER 2015 at approx. 2100 hours the suspect and VIW1 have had an argument over an ongoing issue at the venue. The argument culminated in VIW1 banning Susp from entering the premises and refusing to deal with his requests, telliing him to go to another shop. At this point SUSP has threatened VIW1, demanding his money back. Susp has said to VIW 2GIVE ME MY MONEY OR I AM GOING TO KILL YOU". Then after VIW1 again advised him to go to another shop SUSP started to say "YOU WONT GO HOME TONIGHT. YOU WONT MAKE IT HOME. I WILL WAIT FOR YOU. I WILL COME BACK FOR YOU".

SUSP has eventually left, returning as VIW1 was closing up. VIW1 was alerted to SUSP's return by VIW2 and they both then saw SUSP at the window. Pointing to VIW1 and shouting aggressively, and take a kitchen knife out and start making slashing motions towards VIW1, pointing at VIW1 and immitating cutting his throat with the knife. VIW1 was worried that these threats were real and called poice fearing his safety

3. No injury. LAS not required

4. N/A

PRIMARY INVESTIGATION DETAILS : 2 Scene
1. Scene is a betting shop, which was closed at the time the knife was seen with no customers

2-3. N/A

4. Upon arrival at the scene officers found suspect standing there, matching the description given on the phone call to police by VIW1

5-7. N/A

PRIMARY INVESTIGATION DETAILS : 3 Forensics
1. After police attendance SUSP was kept away from the knife found at the scene in order to maintain it's evidential integrity

2. BV/01 was found at the scene. It is a black handled kitchen knife with a a straight blade edge, and a silver metal blade. Ther is some red/brown stain on the blade point. It has been booked in to EO custody 105/61207/15

3. BV/01 needs to be looked at for fingermarks and the stain on the blade should be looked at too to ascertain what it is/likely to be and appropriate action taken

4-7. No injuries or other marks or immovable evidence at the scene so SOCO not called to attend

PRIMARY INVESTIGATION DETAILS : 4 Victims/Witnesses
1. All VIW1 contact details are taken. Due to VIW2 not being present as the report was taken, only his name ascertained. He will be next in work at 1600 hours on 28/10/2015, which is an ideal time to attend for a witness statement and to collate more details

2. See above Re VIW2. Shop was closed and no other known witnesses present.

3-5. N/A

6. VIW1 is very concerned that SUSP can return to the address. He is also concerned that SUSP told him that even if he didnt come back, he would send someone else to the location to kill VIW1

7. VIW1 has been emailed the CR niumber

PRIMARY INVESTIGATION DETAILS : 5 Suspects
1. Suspect is described as a[redacted]

2-3. N/A Suspect found at the scene

4. Suspect arrested by SC 5158CW at 2244 hours at the venue for Threats to Kill and Possession of a Pointed/Bladed article in Public. He was conveyed to HOLBORN POLICE STATION where detention was authorised

5. N/A

6. Due to the manner the suspect was behaving at the scne, completely denying being in possession oif a knife despite being clearly seen on CCTV and his age, it is possible there may be an underlying M/H issue

PRIMARY INVESTIGATION DETAILS : 6 Other evidence
1-3. Full CCTV coverage of the incident has been viewed by police and will be downloaded and burnt to a DVD by the security members from the venue. This will be ready on 28/10/2015 at the venue to be arranged to be picked up. VIW1 knows who SUSP is and SUSP was arrested at scene and seen on CCTV so no ID issues

4. No exact matches for the details given however there is one PNC trace for detials close to SUSPECT's. however at this time PNC has gone down. To be added at a later date

5. Discussed case with CID from the scene, advised of details of case and requested CID t oput Special Schemes on the address due to the threats from SUSP to have another person return to the location

6. N/A

28/10/2015 02:37

PC 234661 D NEWMAN

**********HOT RISK ASSESSMENT**********
******If Yes to any of these questions detail required on Dets******

VICTIM
Clear risk of further offending against victim. NO
Substantial financial loss. (Proportionate to victim's circumstances). NO
Disability/Mental health issue. (Relevant to offence &/or relevant risk/vulnerability identified). NO
Public Servant on duty. NO
Close relationship to offender. (Relevant to the offence). NO
Evidence of victimization. NO
Substantial age difference to offender. (Relevant to the offence). NO

OFFENCE
Complexity of investigation. NO
Risk of high community impact. NO
Evidence of corruption. NO
Media interest. NO
MPS Mandatory Crime. NO
Crime scene & forensic opportunities identified. NO
Sensitive material/ information involved. NO
Hazardous materials involved. NO

OFFENDER
Likely to commit further offences. NO
Mental health issues. (Relevant to offence &/or relevant risk/vulnerability identified). POSSIBLY
Repeat offender against same victim. NO
Position of trust. NO
Relevant offending history. YES
Part of organized crime gang/MPS gang matrix. NO
Borough target/Prolific priority offender. NO

28/10/2015 02:39

PC 234661 D NEWMAN

Believed there may be Council CCTV on the street in the area which caught the incident

28/10/2015 03:26

PC 234661 D NEWMAN

Suspect lives in a care home/supported living accomodation

Details of Investigation

Staff there have been spoken to they have advised he is not currently on any medication, however they state he has "Mental health issues" but could not expand or provide evidence of anything.

They also advise he has a speach impediment but seems to function well alone

Local residents who know the susepct

28/10/2015 03:26

PC 234661 D NEWMAN

have advised he is always out and about, can hold a conversation and has a laugh and joke with people

28/10/2015 07:40

CIV 58251 KV POPE

Soco txt: Memo sent to OIC to contact the local Soco to deal with the knife.

28/10/2015 09:53

TDC 219277 H MOHAMMED

OIC Changed

28/10/2015 17:47

PC 188983 897TP D CHEUNG

Service Flag CO added

28/10/2015 17:51

PC 188983 897TP D CHEUNG

Screened In

28/10/2015 17:52

PC 188983 897TP D CHEUNG

Classification confirmed

29/10/2015 10:22

PC 198409 4310CW R WHITTON

Service Flag CO deleted

29/10/2015 17:18

TDC 219277 H MOHAMMED

Late entry.....

Secondary investigation

This is a case of Threats to kill and possession of a bladed article in a public place. No injuries sustained.

H – History- victim has previously been a victim of POA whereby a customer at another branch of William Hill has been abusive and threatening towards the victim.

A – Aggravating factors- Suspect has threatened the kill victim and has attempted to carry out his threat by return at closing time with a large kitchen knife. The suspect is a regular customer at the venue as he resides close by within walking distance.

V – Victim; how vulnerable is the victim – Not vulnerable

E – Escalation; is there a linked series – ongoing victimisation – The suspect has been causing problems at the venue by leaving his feces smeared in the toilets on a number of occasions. He is a regular customer at the bookmakers and has been told he has been barred and the suspect may cause problems despite his age and therefore this may need to be managed by social services as the suspect resides in a care home. (curfew).

Risk assessment

STANDARD – Suspect has been arrested and charged and remanded.

Action plan
---

1. Contact victim, challenge, give CPA, update VCOP
2. Obtain account from witness if required
3. Collect

29/10/2015 17:18

TDC 219277 H MOHAMMED

and view CCTV footage
4. Flag report to SNT for Intel purposes

Victim

I have attended the venue and visited the victim. I introduced myself, explained the investigative process and provided him with an update. CPA given and a copy of the CCTV footage collected.

CCTV

CCTV was viewed at the scene by PC Newman and in his statement states there is good footage. I collected and viewed the footage. The footage is of good clear quality. There are 2 cameras which are positioned outside on either side of the shop.
The footage shows the suspect the crossing at the traffic lights on Harrow Road j/w Elgin Avenue at 21:57:53hrs. He crosses the road and directly to the shop front of William Hill Bookmakers at 21:59:18hrs, he has his hands behind his back while walking and once in front of the shop window looks inside and produces in his left hand a large knife looking object from behind his back. The reflection of the silver blade can be seen on the footage. The suspect is seen to wave the knife towards the window in a side to side slashing motion. He appears to be goating someone through the window, this being the victim, as though asking someone to fight. Suspect then runs the knife near to his neck as though slitting his neck.

The suspect then walks back and forth before placing the knife down. A short while later police arrive and he is detained. Victim comes out of the shop and points out the knife to officers.

Suspect

The suspect was arrested outside the venue on description where the offence has taken place. The victim was still present and has pointed

29/10/2015 17:18

TDC 219277 H MOHAMMED

the suspect out to the officers therefore no ID issues. The suspect had placed the knife on the floor prior to police arrival, and this had been witnesses by the victim. The victim pointed the Knife out to officers which the suspect was in possession of and was seized as evidence.

Forensics

The knife at this stage has not been submitted for forensics. It has been preserved for Prints and DNA should this be required.

Interview

Suspect was seen by the FME prior to interview due to his age and concerns over his mental health. The suspect is believed to suffer from Dementia and speech impediment. The FME deemed the suspect to be unfit to be detained and interview, however fit for Charge. The FME recommended that an A/A is required.

Charging decision

I discussed and provided the facts of the case to DS Luke and a decision was made for the suspect to be charged without interview as CCTV provided good evidence of the alleged offence with the following.

1. Possess an offensive weapon in a public place - Contrary to section 1(1) of the Prevention of Crime Act 1953.

2. Threats to kill - Contrary to section 16 of the Offences Against the Person Act 1861.

Conclusion

I attempted to arrange for an A/A to assist with charging the suspect via CW Adult services without success. Consideration and attempts were made to organize alternative A/A and again this proved unsuccessful.

Suspect was charged with both of the above.

Due to the seriousness of the offence I prepared an MG7 for the suspect to be remanded to

29/10/2015 17:18

TDC 219277 H MOHAMMED

appear before Westminster Magistrates on the 29/10/2015, which was authorized.

30/10/2015 12:52

PC 198409 4310CW R WHITTON

Service Flag CW added

30/10/2015 12:54

PC 198409 4310CW R WHITTON

CW CMU Administration Entry
I have checked IIP, which shows the following Judicial Proceedings

[redacted]

On 27/10/2015 at Harrow Road w9 without lawful authority or reasonable excuse, had with you in a public place, namely HARROW ROAD W9 , an offensive weapon, namely a large kitchen knife. CONTRARY TO SECTION 1(1) OF THE PREVENTION OF CRIME ACT 1953.

Date Charged 28/10/2015 21:18
Document Disposal Charged and Detained For Court
Disposal Date 28/10/2015 21:18
Method Used in Offence Produced knife to manager of betting office following disagreement

On 27/10/2015 at Harrow Rd W9 without lawful excuse made t[redacted] a threat to kill him intending that the said [redacted] would fear that the said threat would be carried out CONTRARY TO SECTION 16 OF THE OFFENCES AGAINST THE PERSON ACT 1861.

Date Charged 28/10/2015 21:18
Document Disposal Charged and Detained For Court
Disposal Date 28/10/2015 21:18
Method Used in Offence Threatened betting shop staff member with knife

Memos

Sent To **Noted By** **Completed By** **Entered By**					**Urgent?**	**Date** **Noted**	**Completed**	**Cancelled**	**Entered**
Sent: PC	234661		NEWMAN	D					
Noted: PC	234661		NEWMAN	D					
Completed: PC	234661		NEWMAN	D					
Entered: CIV	58251		POPE	KV					
					Y	29/10/2015	29/10/2015		28/10/2015

Pls contact the local soco to EO to deal with this

Sent: PC	234661		NEWMAN	D					
Noted: PC	234661		NEWMAN	D					
Completed: PC	234661		NEWMAN	D					
Entered: PC	188983	897TP	CHEUNG	D					
						29/10/2015	29/10/2015		28/10/2015

Dave..well done! Del @ Cen. CRIS Screening here - no 'HOT' R.A. was needed on this Cris. IF you want to know why, please Memo me [via this Cris] or e-mail me, & I'll guide you : regards!

Sent: TDC	219277		MOHAMMED	H					
Noted: TDC	219277		MOHAMMED	H					
Completed:									
Entered: PC	234661		NEWMAN	D					
						29/10/2015			29/10/2015

I was memo'd in relation to SOCO in error, this may be of interest to you as OIC. Thanks

Sent: TDC 219277 MOHAMMED H
Noted:
Completed:
Entered: PC 198409 4310CW WHITTON R

Y 30/10/2015

Non-OIC Changes: Custody, Details Of Investigation

Create Action/Decision/Review Screens ?
Action/Decision/Review Screens Created By:

Create CAIT Screens?
CAIT Screens Created By:

Case Mgt Administration

Is SIO Same As OIC Supervisor?
Current Senior Investigating Officer (SIO):
Allocated:

Noted?
Noted Date/Time:

Previous SIOs:

Officer	Allocated	Noted

Review Period: days Next Review Due:

Summary:

Actions:	Total:	Ready for Completion:	Completed:
Decisions:	Total:	With Rationale:	Seen By SIO:
Review:	Total:		

Initial Entry

Initial I.O.:			
Rank:	PC		
Surname:	NEWMAN	Initials:	D
Wt/Pay No:	234661	Div/D No:	

Crime Recorded by:	234661 NEWMAN PC	D
Date/Time:	28/10/2015 01:06	
Recording Unit:	CW	

Supervision

Initial entry checked?	Y
Initial entry checked by:	PC CHEUNG 897TP 188983
Date/Time:	28/10/2015 17:50

Ongoing Supervision

Date	Supervision By

Investigation complete?
Investigation complete by:
Date/Time:

Crime Report closed?
Crime Report closed by:
Date/Time:

Screening

Screening Decision:	IN Crime screened "in" for further investigation.
Reason:	91 HOT Risk
Text:	

dc t1e: 'Mandatory' Offence [= Blackmail], Knife Crime + a linked Arrest.

Screening History

Decision	Reason	Text

Completion

Date/Time CR
Last Updated: 02/11/2015 09:20

CR Completed?
Date/Time:
By (Wt.No):

Supervision

Bring Forward:

Date	**Date Entered**	**For**
Reason		
Date Cancelled	**Cancelled By**	

5.9 StaffSafe

StaffSafe is a two-way audio communication system. It is monitored by operators in a central monitoring station who will provide assistance in combating burglary and anti-social behaviour, as well as helping teams immediately after a robbery or serious incident.

StaffSafe faults are dealt with in the same way as general alarm faults. If a problem occurs, contact Central Security, they will contact the alarm company who will attempt telephone assistance. If this is unsuccessful Central Security will send an order to the alarm company for engineer attendance.

5.10 Magnetic Door Lock Procedure

1) **Introduction**

These procedures are to ensure the safety of LBO teams. Further information on installation, general use and specific activation can be found in the Maglock policy statement, which should be referred to in conjunction with this document.

2) **Procedure**

The AOM/DOM will brief the LBO team on installation or retrospectively should a shop team change significantly.

The LBO team will be briefed from a form that clearly stipulates the operating procedures (called Form 1 located on page 22). The Maglock can be activated at any time outside those stipulated where staff feel threatened or are suspicious. In these circumstances a record should be made in the shop diary and the DOM/Central Security informed immediately.

3) **Shop Team Awareness when Maglock activated**

Make sure that you and your team:

- Are aware of what is happening at the door
- Only let people in when you think it is safe to do so
- Are aware of people following others into the shop
- Retreat to the safe haven and call the Police [ensure the local police number is in the safe haven] if there is any threat to the team's safety.
- When opening the shop to commence trading – ensure the Maglock is activated whilst unlocking the front door
- Only when the team member is back behind the counter should the Maglock be deactivated

4) **At closing time - activate the Maglock <u>then</u> lock the door before you follow closedown procedures.**

- If there are any strangers or groups behaving in such a manner outside the LBO that cause you to fear for your safety activate the Maglock to prevent entry to the shop.
- Advise the covering DOM for your Area and Central Security. Make an entry of the circumstances in the shop diary.

- Remember to deactivate your Maglock before leaving the premises.

The Line Management team will then ensure that the agreed activation procedures are being followed during structured and ad-hoc visits.

A laminate card, Form 2, will also be produced. This will be fixed in a relevant place next to the activation switch [**out of sight of customers**] to reinforce to the shop team the minimum activation times.

5) **Procedure for Operational Control over Magnetic Door Locks**

- Meeting Regional Security Manager (RSM) and AOM
- The Regional Security Manager and Area Operations Manager will meet to confirm the reason for the Maglock and the activation times. The AOM will then cascade this information to the relevant DOM.
- The reason for the Magnetic Lock:

The reason may vary from anti social behaviour to a specific crime prevention recommendation. Please use Form 1 to confirm the reason for the installation of the Maglock.

6) **Meeting with District Operations Manager (DOM) and LBO Manager**

The District Operations Manager needs to meet with the LBO Manager to confirm the reason for the Maglock, it's activation times and if applicable other times it can be used. The LBO Manager then needs to communicate this information to his team and ensure they sign Form 1 and then display this on the notice board, providing it is out of sight to customers. The District Operations Manager should ensure that the laminated copy [Form 2 located on page 23] is positioned next to the Maglock activation controls providing this is out of sight to customers. It is vital that the shop team are aware these procedures do not prevent the activation of a Maglock at others times when they feel threatened or otherwise in danger. Should this occur, then an account of the incident should be recorded in the diary and the DOM informed immediately.

7) **The activation time for the Magnetic Lock:**

In the box on the attached form please specify the time the Maglock needs to be activated each day, this may be a fixed time i.e. 6pm or it may be variable i.e. after dark each day or at dusk. Also in the box please specify when the Maglock needs to be deactivated, this may be closing time but may be at 4pm if the Maglock has been fitted to prevent issues with underage at school/college closing times.

8) **Other times for activation of the Magnetic Lock:**

The Area Operations Manager may want to specify other times he would allow usage of the Maglock i.e. if a high risk exists when emptying the gaming machines or at opening and closing times. Please enter any agreed times into the box provided.

FORM 1

Primary reason for the Maglock [Should only be used for this purpose]

The time your Maglock should normally be activated and when deactivated [agreed by AOM]

1.0 Shop Team Awareness when Maglock activated

Make sure that you and your team

Are aware of what is happening at the door.

Only let people in when you think it is safe to do so.

Are aware of people following others into the shop.

Any threat to your team's safety – retreat to the safe haven and call the Police [ensure the local police number is in the safe haven].

When opening the shop for business – ensure the Maglock is activated whilst unlocking the front door, only when the team member is back behind the counter should the Maglock be deactivated.

At closing time - activate the Maglock **then** lock the door before you follow closedown procedures.

If there are any strangers or groups behaving in such a manner outside the LBO that cause you to fear for your safety activate the Maglock to prevent entry to the shop. Advise the covering DOM for your Area and Central Security. Make an entry of the circumstances in the shop diary.

_____ Shop Manager _____ Other

_____ Deputy Manager _____ Other

Remember to deactivate your Maglock before leaving the premises

FORM 2 (Laminated Notice)

The time your Maglock should be activated:

The time your Maglock should be turned off:

When you leave the shop to go home

City of Westminster | METROPOLITAN POLICE
Working together for a safer London

Problem Solving Project Initiation Document

This provides you with the structure for your Problem Solving initiative

Title	**Street Drinkers – Maida Hill market**		
Lead	**Debbie Heath**		
Date started	**10/08/15**	**Reference number**	**01/2015/WCC**
To comply with the Freedom of Information Act 2000 Please identify opposite which one applies		Not Applicable	
		Not Protectively Marked	No sensitive information currently on this document.
		Restricted	

What is your problem?

Describe the problem as known to you and partners either from your own experience and/or community concerns.

A regular group of street drinkers are using public benches in or near the Maida Hill market. (do you have exact locations and how many benches?). During the day there is a market in this area and local residents and visitors to the market use the area and the benches. During the day time hours of 09.00am to 18.00hrs during the week Mon – Fri there were issues, however, the main people have all been issued with CPN's so don't frequent the area any more. There can still be up to 5 white British people drinking there and these are persistent drinkers.

There are an increasing number of complaints to the MPS and WCC from local residents and the local councillor and MP regarding a group of people who have started to occupy the benches during the evening to sit and chat and drink alcohol.

Local residents have complained that they find them intimidating and aggressive due to their loud voices and the language used. They feel unable to use the seating due to the presence of the street drinkers. There have, however, been no reports to the MPS of any violent act or reported ASB where a resident has been the victim of harassment, alarm or distress. No arrests have been made.

From the evidence so far gathered it would appear to be some residents perception that because they are street drinkers that they are violent individuals.

Problem Definition – in one sentence state the problem as described above. You should only have one problem identified within this definition not multiple problems.

Street drinkers gathering in a location where local residents perceive them as an intimidating group due to the street drinkers behaviour.

What is your aim?

To reduce the numbers of street drinkers in the daytime by issuing CPNs and to engage with the evening group to see if they can be reduced and/or moved to a different location.

The baseline figure for the year 01.03.2015 to 01.08.2015 is 5-7 daytime drinkers and up to 25 in the evening.

Where has the demand come from to work on the problem?

Demand Group (ie. Ward Panel, Residents Assoc., Local Councillor)

Harrow Road residents
Karen Buck MP
Market Traders

Local Business Groups
Local Councillor
Annette Acik, WCC Head of Residential Services

Partners (who shares your problem?)

- WCC Licensing
- Mungosbroadway street team
- Metropolitan Police
- WCC City Inspectors Market Team
- WCC Planning Team
- WCC City Inspectors

Record here your research on the problem here?
Victim Offender Location Time (VOLT)

Divergent Research – What do external sources help towards problem ie. Google search for other Police/Council projects with the same type of problem.

Convergent Research – Internal Sources ie. various database information from WCC / MPS / RSLs that contain calls for service.

3.1 Who?

Victim

They are local residents that feel a perceived intimidation by the street drinkers. Residents report that they feel unable to use the area when the drinkers are. The victims are local residents who feel intimidated by this gathering of people and feel unable to use the area, or uncomfortable walking past, especially at night. One local resident states that people are urinating in the street and outside her property.

The people complaining include 4 local residents, WECH and the Maida Hill Neighbourhood Forum.

Offenders

Predominantly members of the local community who are gathering to be social. They are in the 40's, 50's and 60's. They day time drinkers are white British and the evening

drinkers are Afro – Caribbean and can number up to 25 at a time.

The daytime drinkers are a mixed group, some of whom live in the area, some come from surrounding areas and some are of no fixed abode. They have been spoken to by NWDAP outreach workers and offered assistance but have refused to accept this.

The evening drinkers are from the local area and gather together for social reasons. They are not thought to be problem drinkers. They have traditionally gathered in the area

3.2 What?

The street drinkers bring their cans/bottles of alcohol, mainly cheap lager in single cans, and sit on the public benches and sit and chat loudly. This group can be problematic and harass passers-by.

The evening group are drinking beer and wine and also have a ghetto blaster playing background music. The group is approximately 20-25 in size and UK residents of Afro Caribbean heritage. Research has shown they are the same group that gathers.

Think displacement? If these individuals have an alcohol problem then they will go to another location close by to drink and find another off licence.

3.3 Where?

Maida Hill Market. There are several long seated concrete benches in the market area and during the day time these are used by residents and visitors to the market.

Location is a natural meeting point due to benches and a wide open area and public toilets are situated close by. It is central to the main residential area of Harrow Road Ward and also Public Transport systems.

3.4 When?

Street Drinkers are congregating at Maida Hill Market. Some of the benches have been incorporated into the Market in the daytime, but when it closes down in the evening, the drinkers sit there. There are also public toilets nearby.

The most active complainant is concerned with the evening group and reports that it is occurring almost every evening and the Police state it is happening into the early hours, so Mon-Sun 1900 – 0000

3.5 How?

By purchasing cheap alcohol and then gathering at the location to form a group of street drinkers.

Actions

Police visit the location to engage with drinkers every time they are on late turn/nights

City Inspectors visit the area regularly when they are on late turn/nights

Warning notices and Community Protection Notice's issued to daytime drinkers, when ASB can be linked to their drinking. This is on-going.

Police have conducted a joint visit with the North West Drugs and Alcohol Programme to daytime drinkers to offer assistance with dependency – offers declined.

August and September 2015: Evening drinkers – despite the frequent visits by Police and CI's no ASB yet witnessed so it is felt that it is inappropriate to issue CPN's at this stage. If it is witnessed then we will follow this route.

28/7/15: Waste transfer notice audit conducted in the Harrow Road and targeting all businesses in the Maida Hill Place area.

September 15: New Market Inspector started and he is moving daytime drinkers on. On-going.

11/9/15: Details of those issued with warnings and CPN's circulated to Market Inspector so he is aware of who has been issued and who should stay out of the area.

9/15: Letter-drop done by CI's to all off-licenses in the area, advising them that they should not sell to street drinkers and to request they voluntarily stop selling high strength beer/cider. CI's attempting to discover where the street drinkers are getting the alcohol from. On-going.

August 2015: Contact made with a community leader in the Afro-Caribbean community. She agreed to meet with us to discuss the situation.

15/9/15; CCTV footage acquired of area from 2207 hours to 2235 hours. Showed a large group of people and a white van. Unable to get registration of van. Once van leaves, group disperses.

Week commencing 21/9/15: Trocadero centre tasked to monitor area for ASB. No returns so far.

24/9/15: Meeting held with GVA who are responsible for the economic development of the area so that they are aware of issues in this area and can incorporate this into the Harrow Road Master Plan.

25/9/15 Meeting held with community leader is aware of situation, she will approach group and assist with a meeting between the Police, Council and the drinkers and Council is to try and find an alternative location to the evening group to socialise.

25/9/15 at 0117 hours: Noise team visit to area, they witnessed loud music from amp which probably would have been audible in complainants flat, however, she did not want them to visit her. For this reason the Noise team were unable to issue a S80 notice so instead moved the group on and stopped the music. This information only came to light by NPSC researching noise visits.

28/9/15: Meeting held with Inspector XXXXXXXXXXX, of the Westminster North Safer Neighbourhoods Team, to discuss area and actions to be taken.

1/10/15: Information received from Market Inspector that group of Afro-Caribbean men gathered in area and being abusive and threatening to market traders and passers-by. Information passed to Ward PC.

2/10/15: In light of recent events, agreed that it seems the dynamics of the evening group have changed and that CPN's should be served for ASB.

2/10/15: request sent to highways to repair broken lighting under benches.

7/10/15: Market Inspector holding International Day at market with local school. I have arranged for local CI's and the local PC to visit the area whilst this is on.

Meeting to be set up week commencing 5/10/15 with enforcement agencies to discuss enforcement action in light of recent evidence of ASB.

Meeting to be set up week commencing 5/10/15 with community leader and representatives from the evening drinking group to discuss situation, especially in light of recent changes.

4/10/15 – Update from 24 hour City Inspector team Harrow Road/Maida Hill market is a default tasking for the team on every shift although not all visits have warranted UNIFORM entries. We have made over 30 visits in the last six weeks and there has been no behaviours witnessed at our times of being there that have warranted any action (considering the use of CPN's).

XXXXXXXXXXXXXX have carried out LA03 visit over the weekend with the report as copied below:

1 04/10/2015 Visited all alcohol off sales in the area of Maida Hill,

6 Great Western Road - 08/10286/LIPDPS

12 Great Western Road - 15/00131/LIDPSR

355 Harrow Road – 09/00093/LIPV

Have discussed issues raised of Street Drinking, single bottle, cans and low value/ high alcohol ABV Beers and Ciders with all three licensees or managers, 16 Great Western Road has agreed to review high ABV issues a total of 14 above 5.5, however,

has no licence condition in place to enforce.

2. After reviewing the brands drunk at the time and interviewing some local drinkers, myself (KM) and (LA) believe the alcohol brands come from another source than closest to Maida Hill. On investigation we widened the search area along Harrow road and believe 2 premises are high on the suspect list, Top Look Food & Wine 528 Harrow Road and Morgan's New Food & Wine 409 Harrow Road, we will carry out full LA03 inspections of these premises on Friday 9/10/2015 our next duty.

3. XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX

4. A total of 3 drinkers on Maida Hill at the inspection time, all amiable and not in our opinion drunk.

I have copied from the Troc this morning footage from over the weekend and have linked this to noise complaints that have come in from specific residents that do not show any evidence to corroborate the complaints. XXXXXXXX has raised, through the noise team all of the complaints that have been received through XXXXXXXXX under reference 010033549789 from record 4652 backwards. It may be of some use to map the timings and overlay this with CCTV footage to see if we have a similar result.

I have asked for an extended tasking through the Troc with better CCTV coverage across the market area for the next week. We are back on nights over the weekend and will be carrying out further LA03 inspections on the venues that XXXXXX has flagged above and in turn will run a small op from the Troc to see if we can gather further information on the behaviour in the area and consider appropriate action. I have also linked in with the noise team for the weekend so we are all joined in our approach to ASB/noise/licensing issues in and around Maida Hill.

I am happy to meet with the original complainant over the weekend to see if I can discuss the issues with them in more detail to perhaps ascertain the cause of the complaints.

5/10/15 – request sent to analyst to overlay complaints and noise reports with visits by City Inspectors so we can establish a clear picture of events.

5/10/15: Phone calls made to church halls in relation to their use in evening. All spoken to have events on in the evening and would charge a fee for use.

6/10/15: On 5 Oct 2015, at 16:09, XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX wrote:

Unfortunately this week maybe difficult as I have had to re arrange shifts for other reasons.

If not possible to meet this week I am early shifts on Sat & Sun this weekend if that

helps.

If you could mention that there have been a lot of complaints by several people including our local MP & if they could curb the frequency and noise etc that would be good. However saying that the weather is not going to be good over the next week or so and therefore I doubt they will be out.

Regards

XXXXXXXXXXXXXXX

7/10/15 – agreed with XXXXXXXX to arrange meeting on Tuesday 13th October with the evening group of drinkers.

7/10/15 "Westminster's Maida Hill Market hosted an International Day event this week showcasing cuisine from around the world for an Educational visit from years 4 and 6 of St Peters Primary School.

All food traders participated and provided hot and cold food to the visitors who were warmly welcomed by the market. The assistant Head Master and staff with 60 children attended, with who behaved excellently, despite the wet weather.

The Maida Hill Market event supported the schools own International Day festival to Educate and also Promote the market within the local community.

Support was gratefully received from the Street Trading Team at City Hall (for funding), the local Westminster City Inspectors, Area wardens and local Metropolitan Police officers (for event safety)."

9/10/15: CI visit - On arrival met with Police officer XXXXXXXXXXXX who was called ref a complaint of nuisance and drinking, he was in the process of dealing with a complainant on his phone and we offered to be of help if we had the details of the complainant, I have never personally dealt with this complainant. The police officer clearly informed the complainant that no laws were being broken and therefore he could not deal with the issues, we offered our assistance which via the P/O was refused. At approximately 2100 hours 08/10/2015 whilst there we spoke to the five persons drinking there and ensured compliance of loudspeaker removal by one of the gentlemen present.

12/10/15: Street Drinking – Maida Hill. There were groups congregating on the market area, I again spoke with XXXXXXXX who seems to be the self-agreed spokesperson. He is very amiable and want to find a way forward to find a suitable venue that could be used as a meeting place, he suggested XXXXXXXXXXXX as it has four floors that hold costumes (he states it is council funded) and feels that it is an inappropriate use of council funds and space and should be in joint use for the local community as a meeting point. I suggested he progresses this at the meeting on Tuesday. He also wheels along a mobile speaker unit that he uses to play the music, he will always turn

it off when requested but I am sure that the minute we leave it is turned back on, the more alcohol that is consumed the louder it gets. The group is very mixed in age range and whilst all appear very amiable I can appreciate the nuisance factor from noise. I have asked CCTV to provide some still from the groups on Saturday evening as XXXXXXXXXXXX has asked for photographs so he can see what it is we are dealing with.

13/10/15: We met last night with 8 of the regulars from the evening drinking/socialising group at Maida Hill last night. It was all very civilised, with each of us explaining where we were coming from and what it was we wanted to achieve.

We and the MPS, did say that we understood that there was a level of inconvenience and a perception that ASB was or could be considered a problem at the location. Residents and local councillors and the MP were aware of the issue and whilst supportive of the current stance being taken by the MPS and WCC, would find it more preferable for everybody if the group were indoors and not out.

The group led by XXXXXXXXXXXXXX fully understood what we were trying to say and were trying to find an indoor venue so they could go off street. The understanding we gained was that they were looking for more of a social club/centre as opposed to a drinking club, and indeed had some suggestions as to potential venues. The group would be making enquiries as to suitable venues and if successful would be looking to set up a bona fide venue for their benefit. When they established that properties they were looking at might be council owned we would try to ascertain the possibility of them being allowed to use said property. They stated they were willing to pay a small amount in order to get a social club and would be willing to do up a property if needed.

The final position explained was that the general thrust of the complaints was due to noise and people drinking, they did say they could see no reason why they wouldn't carry on with the activity. It was explained that if the behaviour deteriorated then enforcement action from both the MPS and WCC would inevitably have to follow. This was explained quite forcibly and accepted by all parties.

This completes the PID.

Short term responses should be put in place to resolve the issue raised by the demand group and to show that their concerns are being acted upon.

When authorisation given to proceed the PID Problem Solving Project will be given a Unique Reference Number and entered onto a spreadsheet.

All your response will be placed on an Action Log.

All meetings and updates shown on a Communication Plan as to actions coming from the meeting and how you are communicating with the partnership group working on this problem and how you are feeding back to the demand group.

Within your responses consider the use of the 5 x 5 Crime Reduction Matrix. Work through this in a problem solving meeting with partners or circulate and ask for feedback.

Remember that some boxes within the matrix may not be relevant to your problem.

This Project Initiation Document is authorised to proceed.

_____Authorising Officer

_____Date

To be completed at end of project.

Has your aim been met?

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/191498/Green_Book_supplementary_guidance_economic_social_costs_crime_individuals_households.pdf

Use the link to show socio economic cost of crime in your evaluation. Calculate based on a reduction the cost saving to the community.

Have you recognised others?
Have you shared your good practice?

Simpkin, Kerry

From: Clare Johnson <MCJ@gosschalks.co.uk>
Sent: 29 October 2015 15:27
To: Simpkin, Kerry
Subject: RE: RE: William Hill, Harrow Road GTE:00950112

Dear Kerry

I refer to your email of 26th October, and answer your questions as follows;

1. The number of Responsible Gambling Interactions completed in 357 Harrow Road during 2015 (to end of September) is 10.
2. All of these Interactions relate to potential gambling issues. Incident Report Forms relating to alcohol, substance misuse or mental health issues are categorised separately. There are 11 IRFs relating to alcohol, 4 relating to suspected drug possession. None relate to mental health concerns.
3. There are currently 11 self-exclusions in operation at 357 Harrow Road, 2 of which were completed within the shop, the other 9 relating to customers who completed forms in other William Hill shops.
4. One self-exclusion review was undertaken during 2015 (to end of September).
5. There have been 6 attempts to breach self-exclusions.
6. 12 people have worked in this shop during the last 12 months. One new starter has received induction training off the site. Of the other 11, 9 have completed 2 Gambling Commission refresher training courses, and the other 2 have so far completed one course, during 2015. One round of courses was completed in March, another round was completed in July.
7. There have been 8 IRFs relating to calls to police within the first 9 months. 3 related to drunken behaviour, 3 to abuse, 1 to threatening behaviour and 1 to people congregating outside.

I also refer to your email of 21st October, in which you asked about the number of customers banned. During 2015, three formal banning letters have been issued, on 22nd February, 25th August and 28th August.

Yours sincerely

Clare Johnson

Clare Johnson | Partner | Licensing

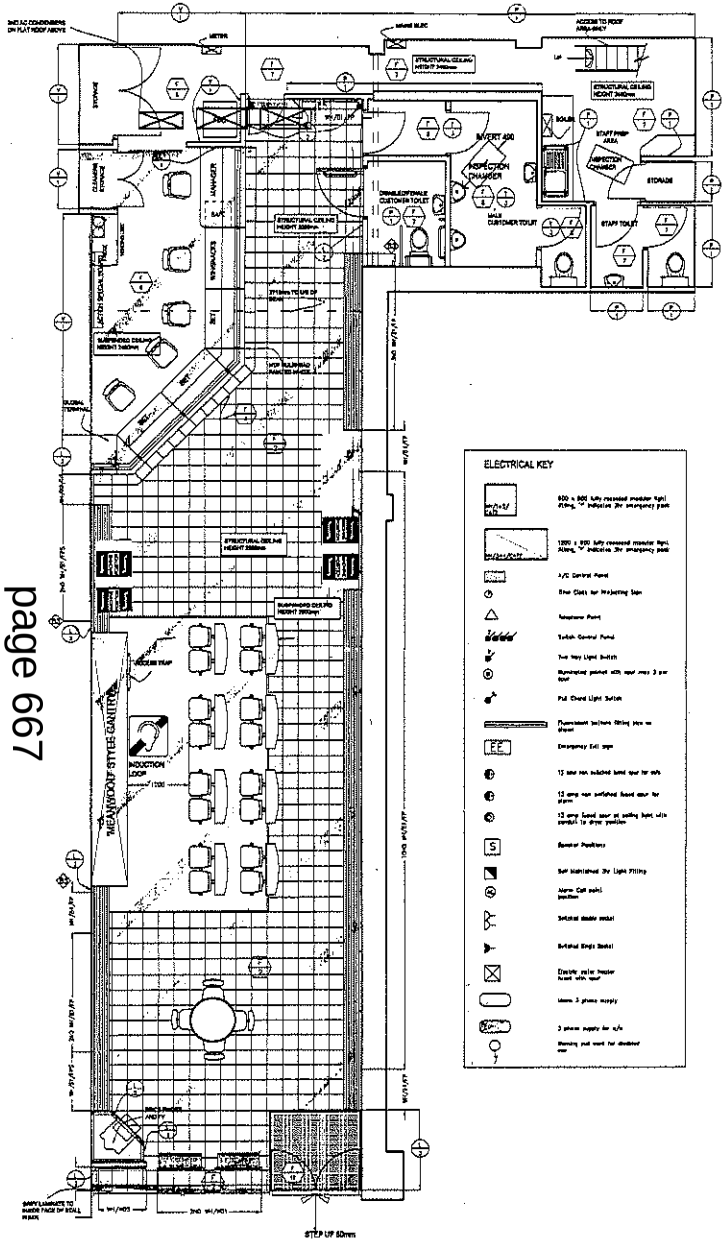
Gosschalks, Queens Gardens, Kingston Upon Hull, HU1 3DZ

DD: 01482 590243 | **F:** 0870 600 5947 | **M:** 07949 132927 | **Switch:** 01482 324252 | www.gosschalks.co.uk

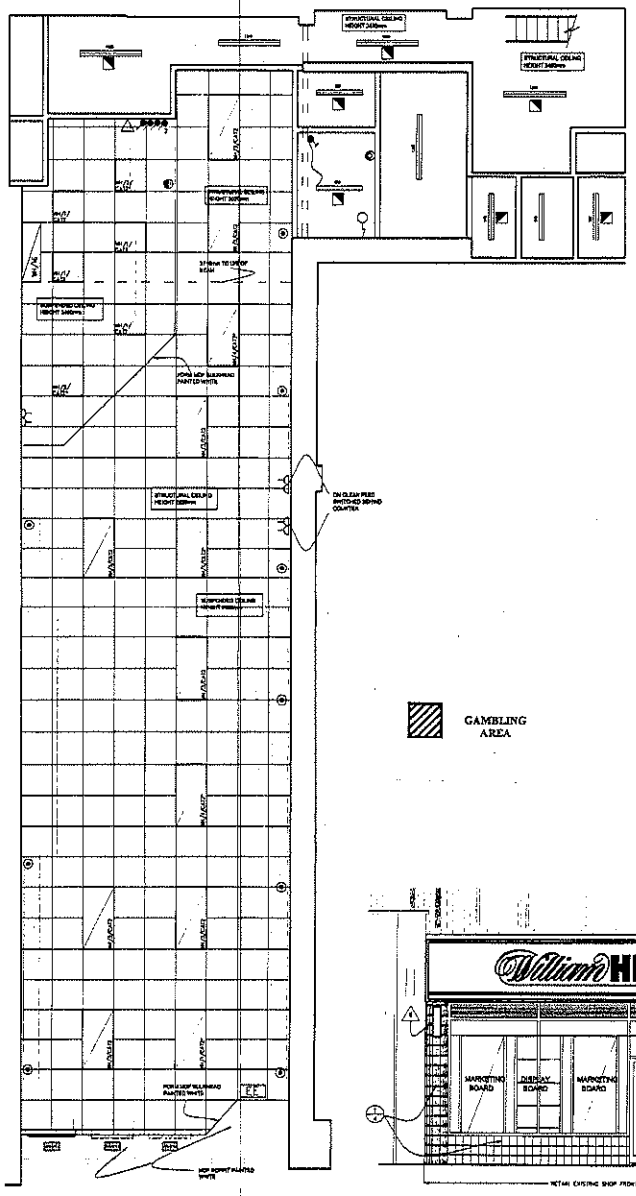
observed when corresponding with Gosschalks. To ensure regulatory compliance and to secure protection for our clients and business, emails sent to and from our server(s) may be monitored.

A list of the partners of Gosschalks is available for inspection at Queens Gardens, Hull, HU1 3DZ. Tel:01482 324252. For more information on Gosschalks, please visit our web site: www.gosschalks.co.uk - Gosschalks is authorised and regulated by the Solicitors Regulation Authority under number 61213.

LA38

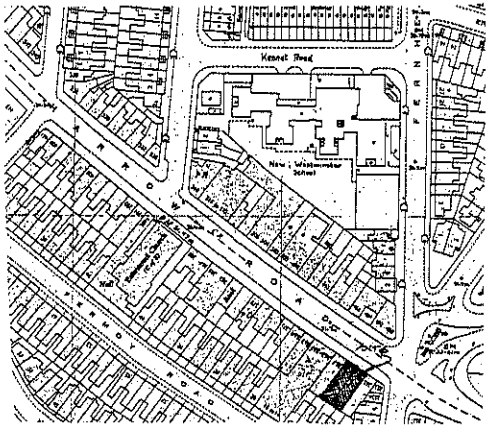


PROPOSED SHOPFITTING PLAN



PROPOSED CEILING PLAN

PROPOSED SHOPFITTING ELEVATION



SITE PLAN : 1 : 1250

Revisions.

	Date.	Approved.
A: VERSATILE FITTINGS REVISED, 2NO. GLOBAL MACHINES ADDED AND ADDITIONAL POWER POINTS SHOWN.	17/10/2002 CDH	

CITY OF WESTMINSTER
18 JUN 2007
WCC LICENSING SERVICE

DO NOT SCALE OFF THIS DRAWING

William HILL ORGANIZATION LTD.

Site. 357 HARROW ROAD
LONDON W9
3NA
LSO 'Elgin'

Description.
PROPOSED SHOPFITTING PLAN AND ELEVATION AND CEILING AND ELECTRICS PLAN

Date. 02/04/2001 | Scale. 1:50

Drawn. SIMON LOVELOCK | Checked.

Drawing Number.
AGR/LS/RF/529916/02 A

PROJECT MANAGER-GRAHAM RADLEY

73

William Hill internal CCTV footage of store – 20th July 2015

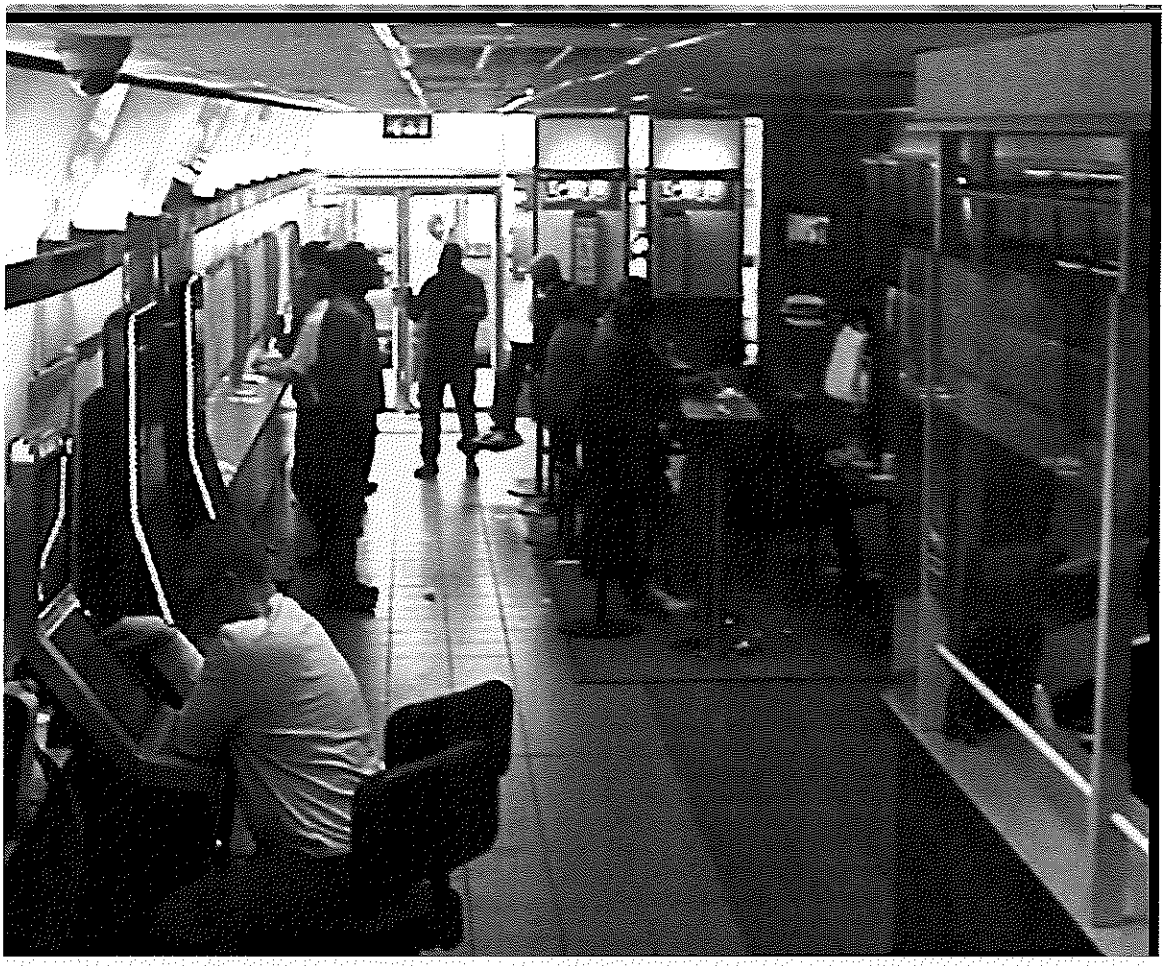
(Footage provided originally by William Hill and copies will be provided to the Licensing Sub-Committee prior to the hearing)

LA40

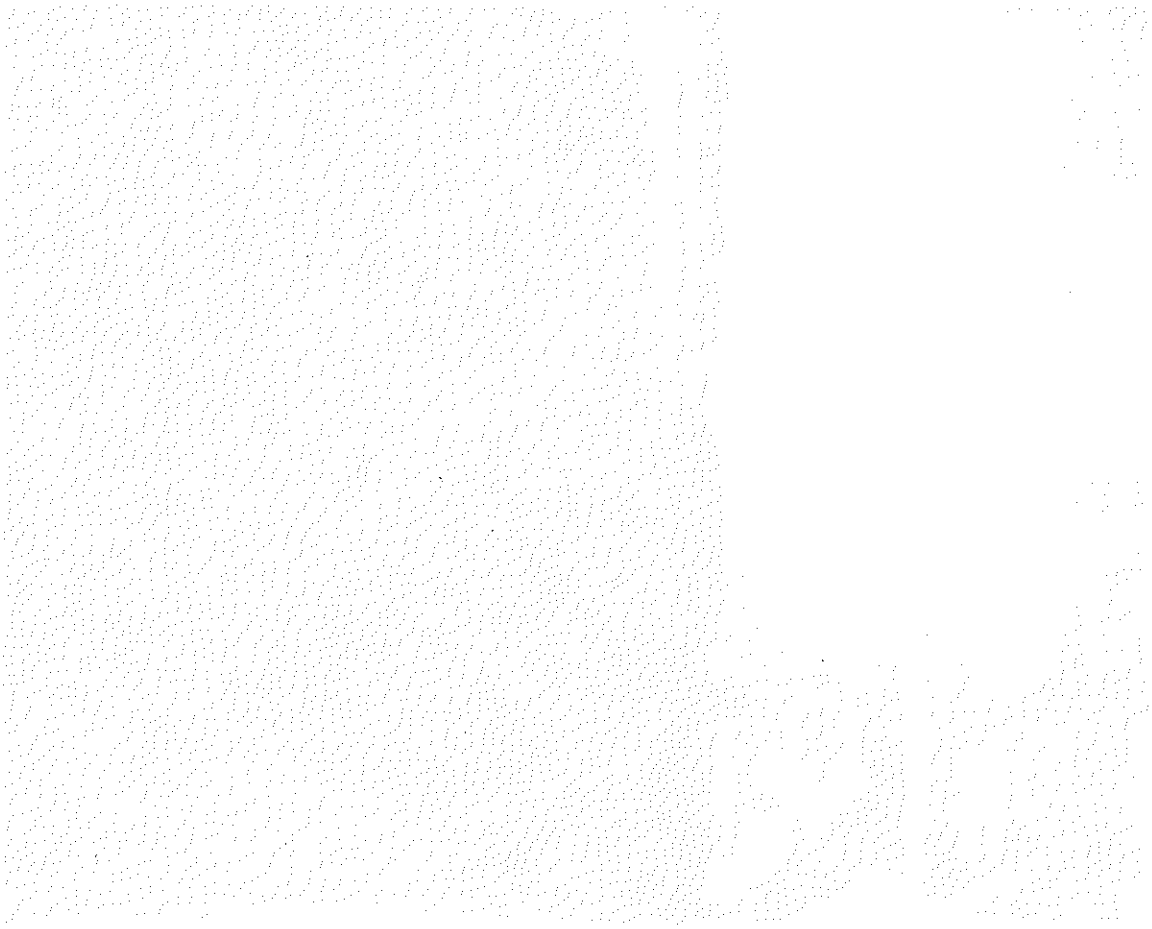
Stills from William Hill, 357 Harrow Road Internal CCTV System

Camera 1

Camera 2



Camera 4



LA41

WITNESS STATEMENT

CJ Act 1967, s.9; MC Act 1980, ss.5A(3)(a) and 5B; Criminal Procedure Rules 2005, Rule 27.1

Statement of Bryan Lewis PC4161CW ..... URN: | | | | |

Age if under 18 ..... (if over 18 insert 'over 18') Occupation: Police Constable .....

This statement (consisting of: .... **1**..... pages each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated anything in it which I know to be false, or do not believe to be true.

Signature: ..... Date: 7th October 2015.....

Tick if witness evidence is visually recorded ☐ *(supply witness details on rear)*

I am a uniformed Police Constable currently deployed on the Westminster Police Licensing Team based at Westminster City Hall, Victoria Street, London SW1E. One of my roles on the team is as a CCTV system assessor and I hold a professional BTEC qualification in the practises of CCTV design. I have served on the Police Licensing Team for about six years. I have assessed numerous CCTV systems in a range of licensed premises from basic systems in off licences up to very sophisticated systems in new West End nightclubs.

In regard to William Hill betting Shop, 357 Harrow Road, I was asked to assess the CCTV system based on a DVD recording of footage captured inside the premises, taken during the daylight hours of the 13th of August 2015. My observations were as follows. The CCTV system appears to consist of three cameras, numbered 1,2 and 4. There does not appear to be full coverage of the interior of the shop, with areas missed. There are no external cameras fitted to the outside of the shop. Camera 1 provides a view of the screened office area from the camera's location on the shop floor and the image quality is of a reasonable standard. Camera 2 is a view down the length of the shop to the street entrance glass door. Due to strong daylight from outside the building, the image quality is obscured and figures appear silhouetted up to the foreground of the picture. I would therefore describe the image quality as poor. Camera 4 appears to be a camera at the entrance directed into the shop area. The field of view is mostly obscured and therefore not satisfactory. In general, facial recognition inside the premises is only achieved when persons appear in the foreground of camera's field of view. There are no cameras directed at persons entering the premises to provide facial images.

My overall opinion of the CCTV system is that it does not meet the minimum standards of the MPS due to lack of coverage and varied image quality.

Signature: ..... Signature witnessed by: .....

Witness contact details

Home address: .....

..... Postcode: .....

Home telephone number ..... Work telephone number .....

Mobile/pager number ..... Email address: .....

Preferred means of contact: .....

Male / Female (delete as applicable) Date and place of birth: .....

Former name: ..... Ethnicity Code (16+1): ..... Religion/belief: .....

Dates of witness non-availability .....

.....

Witness care

a) Is the witness willing and likely to attend court? Yes / No. If 'No', include reason(s) on **MG6.**

b) What can be done to ensure attendance?

c) Does the witness require a Special Measures Assessment as a vulnerable or intimidated witness? Yes / No. If 'Yes' submit **MG2** with file.

d) Does the witness have any specific care needs? Yes / No. If 'Yes' what are they? (Disability, healthcare, childcare, transport, , language difficulties, visually impaired, restricted mobility or other concerns?)

Witness Consent (for witness completion)

a)	The criminal justice process and Victim Personal Statement scheme (victims only) has been explained to me	Yes	☐	No	☐	
b)	I have been given the Victim Personal Statement leaflet	Yes	☐	No	☐	
c)	I have been given the leaflet 'Giving a witness statement to police — what happens next?'	Yes	☐	No	☐	
d)	I consent to police having access to my medical record(s) in relation to this matter: (obtained in accordance with local practice)	Yes	☐	No	☐	N/A ☐
e)	I consent to my medical record in relation to this matter being disclosed to the defence:	Yes	☐	No	☐	N/A ☐
f)	I consent to the statement being disclosed for the purposes of civil proceedings e.g. child care proceedings, CICA	Yes	☐	No	☐	
g)	The information recorded above will be disclosed to the Witness Service so they can offer help and support, unless you ask them not to. Tick this box to decline their services:				☐	

Signature of witness: ..... Print name: .....

Signature of parent/guardian/appropriate adult: ..... Print name: .....

Address and telephone number if different from above: .....

Statement taken by (print name): ..... Station: .....

Time and place statement taken: .....

Appendix F1

Your RJT/ JB /097100.00733

Our 15/05830/LIREVG

Date: 12th August 2015

METROPOLITAN POLICE

Gosschalks
Attn Richard Taylor

METROPOLITAN POLICE SERVICE
Bryan Lewis PC4161CW
Westminster Police Licensing Team
Westminster City Hall
4th Floor
64 Victoria Street
London
SW1E 6QP

Telephone: 020 7641 1709
mob
Facsimile: 020 7641 2436
Email:blewis1@westminster.gov.uk

Re: William Hill 357 Harrow Road
Police Support for a Review of the Gambling Licence

With reference to the above application I am writing to inform you that the Police, as a Responsible Authority, are supporting the Review of the Gambling Act 2005 Premises Licence for William Hill, 357 Harrow Road W9 as it is our belief that the Licensing Objectives contained within the 2005 Gambling Act have not been adhered to. We will be providing evidence to support our representation.

Yours sincerely

Bryan Lewis PC4161CW

Westminster Police Licensing Team

WITNESS STATEMENT

CJ Act 1967, s.9; MC Act 1980, ss.5A(3)(a) and 5B; Criminal Procedure Rules 2005, Rule 27.1

Statement of **Iain ARMSTRONG PC 1451CW**..... URN: | | | | |

Age if under 18 **Over 18**..... (if over 18 insert 'over 18') Occupation: **Police Constable** .....

This statement (consisting of: .... **2**..... pages each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated anything in it which I know to be false, or do not believe to be true.

Signature: ..... Date: 17/09/2015.....

Tick if witness evidence is visually recorded ☐ *(supply witness details on rear)*

I am PC Iain ARMSTRONG 1451CW currently in the role of Dedicated Ward Officer (DWO) for Harrow Road Ward. The statement concerns the William Hill premises at 357 Harrow Road W9 near to the Maida Hill Market area of the Harrow Road Ward.

Historically William Hill customers have been involved in street drinking outside the establishment, there are a total of seven (7) intelligence reports since 2010 associated with William Hill. There are also reports with regards to drug dealing from the premises, nine (9) associated with William Hill.

Currently the Madia Hill Market has a significant problem with street drinkers. Recently work was conducted with William Hill with regards to a zero Tolerance towards this behaviour and this appears to have moved the problem on to the Market. In the last twelve Months there have been twenty (24) intelligence reports where Street Drinkers have been stopped and de-canned or given words of advice, these reports are concerning a total of Sixty Six (66) people. The stops have taken place within a 25 metre area of William Hill.

Currently due to street drinking four (4) people have been issued with a Community Protection Notice (CPN) warning letter and three (3) have been issued with a full CPN.

Currently one (1) person is in breach of their CPN and will be summands to court re this breach.

The following reports cover a five (5) year period:

Please note POA = Public Order Act

William Hill 357 Harrow Road W9

Total CAD's 5 Years = 16

6516292/11 - 03/11 - S4 POA
6520650/11 - 06/11 - Harassment
6564986/11 - 11/11 - S4 POA
6518947/12 - 04/12 - Assault
6538761/12 - 07/12 - Criminal Damage
6545619/13 - 09/13 - Theft

Signature: ..... Signature witnessed by: .....

Continuation of Statement of **Iain ARMSTRONG PC 1451CW** .....

6546179/13 - 10/13 - Criminal Damage
6554620/13 - 11/13 - Theft
6509799/14 - 03/14 - S4 POA
6532741/14 - 07/14 - Assault
6528318/15 - 07/15 - Assault

6536930/15 - 08/15 - GBH

In the past I have had cause to deal with a male by the name of Michael Brewster, who was a frequent patron of William Hill. He has come to notice due to him selling alcohol to other customers at the venue. Several intelligence reports detail incidents where bottles of spirits have been seized and disposed of along with a quantity of small plastic cups. Mr Brewster is now deceased and therefore has not come to notice recently, however staff at the location were aware of Mr Brewster and at no time did I see any action taken due to his behaviour.

Crime number 6536930/15 concerns an incident were a possible GBH had been committed. The victim in this was extremely drunk and a call was made to Police by staff at William Hill as she was refusing to leave. The victim was then helped whilst police were on scene by another well known street drinker who was at the location. Whilst not all the street drinkers frequent the William Hill, a proportion of them do and are joined in the local area by other drinkers.

PC 1451 CW

Signature: ..... Signature witnessed by: .....

WITNESS STATEMENT

CJ Act 1967, s.9; MC Act 1980, ss.5A(3)(a) and 5B; Criminal Procedure Rules 2005, Rule 27.1

Statement of **Iain ARMSTRONG 1451CW** ..... URN: | | | | |

Age if under 18 **Over 18**..... (if over 18 insert 'over 18') Occupation: **Police Constable 219469**.....

This statement (consisting of: .... **5**..... pages each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated anything in it which I know to be false, or do not believe to be true.

Signature: .....1451CW..... Date: .....

Tick if witness evidence is visually recorded ☐ *(supply witness details on rear)*

On Thursday 29th October 2015 I was on duty and in plain cloths. I was asked by Kerry Simpkin of Westminster City Council (WCC) licensing to view CCTV footage that was recorded between 22/07/2015 and 15/08/2015 by CCTV camera number 140 which is located at the Junction of Great Western Road W9 and Harrow Road W9. This CCTV was tasked to observe William Hill Bookmakers between 1400 hrs and 1600 hrs and again between 1900 hrs and 2100 hrs each day.

Several incidents of note had been identified by WCC officers and these were then recorded to a viewable format for me to view.

1) Wednesday 22/07/2015 at 15:28:49 - Two (2) males can be seen outside William Hill and they appear to be talking to a member of staff from the venue. Male 1 IC3 male wearing a light blue jacket appears to be drinking from a bottle, this is suspected to be an alcoholic beverage as when a female member of staff approaches the male moves his hands behind his back which in my opinion is a deliberate act in order to conceal the bottle. Male 2 IC3 male wearing a dark blue t-shirt appears to be holding a can and is drinking from this, it is a light coloured can and it can not be determined what the contents are. The IC1 female member of staff hovers near to the two males and speaks to them. She appears to be smoking. Male 2 then enters William Hill after disposing of the can and is followed by the Female member of staff.

2) Wednesday 22/07/2015 at 19:13:50 - Group of seven (7) Males are gathered outside the venue a Male wearing a white t-shirt then walks towards the entrance he appears to take a drink from a vessel and then bends down placing the vessel carefully on the floor to the left of the entrance. In my opinion this is likely to be alcohol and because it is not allowed in the venue he has placed it there in order to come back to it.

3) Wednesday 22/07/2015 at 17:27:52 - Eight (8) Males gathered outside the front of William Hill. Four males are gathered outside the door to flats above the shop. This is blocking access to the location.

4) Wednesday 22/07/2015 at 19:52:34 - Male and a female outside William Hill Female is holding a large bottle in her hand which she takes several drinks from this appears to be wrapped in a bag. In my opinion this is alcohol

Signature: .....1451CW..... Signature witnessed by: .....

and the bottle is concealed for this reason. This is a common way to avoid Police noticing that it is alcohol. Male in a white shirt is also drinking from a smaller bottle and moves towards the door and before entering again carefully places the bottle on the floor to the left of the door.

5) Thursday 23/07/2015 at 14:02:50 Elderly IC3 male stood to the right of the door he is wearing a cap. He takes a small bottle from a pocket and furtively takes several sips from the bottle. It appears that the bottle is also in a paper bag, in order to conceal the identity of the contents. He is continually looking around in order to make sure no one is watching him. He then enters William Hill.

6) Thursday 23/07/2015 14:41:00 - Group of males gathered to the right of the shop entrance they are also talking to at least one (1) member of William Hill staff, who appears to be smoking. There are Two (2) Males stood to the left of the shop in the entrance way to the flats above and they are blocking this entrance.

7) Friday 24/07/2015 14:44:00 - Three (3) males stood in the doorway of the entrance to the flats above William hill. It is raining and they appear to be gathering under an awning. An elderly female approaches with a trolley, two (2) more males approach and gather around all the males attention are focused downwards towards the trolley as if looking at what is in the trolley. The female takes an orange plastic bag from the trolley and hands three objects from this bag to three of the males. It is not clear but the female is handed small items as her hand goes out. This is likely to be money. The items handed to the males are unknown however it is possible they are stolen items from local shops that she is selling. The female then leaves the group walking towards Great Western Road. Later at 15:02:00 three men are stood in the entrance to the flat and they are all drinking from cans, a trolley can be seen in front of a male with a black jacket on. A male in a green jacket appears and speaks to the group. An object is then passed to this male and the male in green hands something small back in return. The Male in green then enters William hill. Prior to the male entering William hill the male in black routes through the trolley showing several items to the group and placing them back. It appears that he has other items to sell. These may be stolen from local shops.

8) Saturday 26/07/2015 14:20:15 - Two (2) Males outside William hill are in conversation at the end the taller male has something small and light coloured in his palm as he shakes hands with the other Male they don't have any eye contact and are looking elsewhere they quickly part company. The smaller male then enters William Hill. In my opinion this was a drugs deal which they were trying to conceal and did not have eye contact as they were checking that they were not being watched. Had this been witnessed at the time by Police officers there is ample evidence to stop and search both of these males for drugs.

9) Sunday 26/07/2015 14:49:00 to 15:49;35 Male in a Green jacket and blue jeans is seen to enter and exit William Hill a total of eleven (11) times. Whilst outside the shop he approaches many people male and female and holds them in short conversations. He can be seen with his hands out towards the people. In my opinion this the male is begging for money. By approaching people and walking with them I would class this as aggressive begging and if I were to witness this he would be arrested.

Signature: .....1451CW..... Signature witnessed by: .....

10) Monday 27/07/2015 14:00:00 - Group of nine (9) males stood outside the shop around the entrance to the shop. This is preventing easy access to the shop.

11) Tuesday 28/07/2015 14:36:18 - Male in a beige jacket and baseball cap is talking to a female with a black top she is on a mobile phone. The male stretch's out is hand towards her and passes her something small she quickly places this in her pocket. She then finishes the call and passes the phone to the male. She then takes a purse out of her bag and hands him one bank note (Unknown amount). This could be a drugs deal due to the quickness that she has pocketed the item. The item is very small and she passes a bank note and receives no change. A hit of crack or a small amount of cannabis can cost as little as £10. If I had witnessed this I would certainly approach them and speak to them and ask them to account for their actions. Depending on their answers there would undoubtedly be grounds to search.

12 Tuesday 28/07/2015 14:59:00 - Six (6) males outside the premises, that appear to be blocking the entrance to the shop.

13) Tuesday 28/07/2015 15:25:55 to 15:39:22 Male in a dark coloured Gillett exits William Hill and a Male in a light coloured t-shirt arrives on a bike an exchange takes place and the male on the bike places something small in his back pocket. The male in the dark Gillett then joins two Males near to the flats entrance they are in conversation. Male in the Gillett then takes something from his pocket and 'Palms' it to one of the males by shaking his hand. This male then walks away. The male in the Gillett then joins the male on the bike. They talk and several small items (Possibly cash) are exchanged.

Drug dealers are known to use 'Runners' usually on bikes to deliver to order drugs. This is so they have only a small amount of drugs on them at anyone time and the stash is kept nearby in a hidden place.

14) Thursday 30/07/2015 at 14:03:30 - Male in a dark jacket approaches a male leaning against the window of William Hill. The male in the dark jacket takes something small from the inside pocket and hands this to the other male. The male then hands what appears to be a bank note to the male in the jacket who then leaves no change is given. It is my opinion that this was a drugs deal due to the amount of money and the size of the item paid for. There are grounds to search on what I saw.

15) Friday 31/07/2015 at 14:10:05 - Male in a black t-shirt exits William hill. He has a can in his hand that appears to be open. The length of the can appears to be larger than the average soft drinks can such as coke. He then takes a drink and places it in the bin.

16) Monday 03/08/2015 19:52:30 to 20:53:00 - Male in a beige top hands, what appears to be a white phone to the male with an open bottle, they have an animated conversation and male in beige puts phone back in the bag. Male with bottle enters William Hills. Later Male in beige is seen in conversation with a male with suite cases. The male with suite cases appears to be examining a white phone whilst talking to the male in beige. The male in beige points and gestures to the phone. It would appear to me that they male in beige is trying to sell what looks like a smart phone to people. This could be stolen as thefts of mobile smart phones are numerous in Westminster.

Signature: ..... Signature witnessed by: .....

17) Tuesday 04/08/2015 20:28:30 - Male in blue shirt exits off licence next door to William hill and is drinking from a bottle. He lingers outside William Hill drinking and then places the bottle carefully to the left of the door and enters William Hill. The bottle appears to be brown in colour with a light label that could be a Budweiser bottle.

18) Wednesday 05/08/2015 19:54:53 - Male in a checked shirt exits William Hill and hovers outside the front. A male in a purple hoody then crosses the road towards him and they shake hands they linger in that position. The male in the checked shirt then un-zips a shoulder bag and places his hand inside. The male in the purple hoody moves about 1-2 metres away whilst the male in the checked shirt does this, he then returns and he is passed something by the male in the checked shirt. The male in the purple hoody then walks away. This in my opinion could have been a drugs deal and they would have been stopped and searched on the evidence of what I saw.

19) Friday 07/08/2015 15:23:49 to 15:57:37 - Male with a walking stick approaches William hill and places a vessel on the floor to the left of the window carefully, he then enters William hill. He then retrieves the vessel that appears to be contained in a bag. He then places it back and re-enters William Hill. He then exits a short time latter and picks the vessel up again. He unwraps the contents and takes a drink from it. He does not remove a cap so in my opinion this is a can. The fact that it is wrapped in a can makes me believe that this is a can that contains alcohol.

He then places it back on the floor and enters William Hill again. He then exits again and retrieves the vessel and takes a drink. He then wraps it up and then places it back on the floor and enters William Hill.

He exits again and retrieves the vessel and takes another drink he then places the vessel in his pocket and lights a cigarette and smokes it. Once finished he then re-enters William Hill.

20) Friday 07/08/2015 19:09:09 to 19:24:35 - Two (2) males and two (2) females exit William Hill one male, in a flat cap, then hands out what appears to be white plastic cups. He then fills the cups up after he has shielded himself from view from the shop. The male in the flat cap is known to me and he is part of a group of regular drinkers that gather on the market place. The fact that he has separate cups makes me suspect that the drinks were alcoholic and not soft drinks.

21) Saturday 08/08/2015 14:39:25 - Male in black and orange t-shirt exits William Hill and from his pocket takes out a can. He straight away takes a drink from this and does not need to open it. He then places the can in his inside pocket.

22) Tuesday 11/08/2015 20:42:30 - Male in beige shorts exits William Hill and takes a can from his pocket. He then opens it and takes a drink. The length of the can appears to be longer than a normal soft drinks can and therefore I believe that this can contained Alcohol. He then stands and drinks from this in the doorway to the flats.

23) Wednesday 12/08/2015 19:10:00 - Group of eight (8) gathered outside William Hills and a female staff member exits the shops and briefly speaks to this group before moving to outside Sam Chicken for to smoke.

24) Thursday 13/08/2015 15:25:25 - Premises was attended by LAS and a male was taken from William Hill on a

stretcher, it is unknown what the medical need of the patient was.

25) 14/08/2015 20:47:13 - Two (2) males exit William Hill with bottles in their hands one disposes of his in the bin.

26) Saturday 15/08/2015 15:59:00 - Eight people outside the premises some appear to be smoking.

PC 1451CW.

Signature: PC 1451CW Signature witnessed by: .....

Witness contact details

Home address: .....

..... Postcode: .....

Home telephone number ..... Work telephone number .....

Mobile/pager number ..... Email address: .....

Preferred means of contact: .....

Male / ~~Female~~ (delete as applicable) Date and place of birth: .....

Former name: ..... Ethnicity Code (16+1): ..... Religion/belief: .....

Dates of witness non-availability .....

.....

Witness care

a) Is the witness willing and likely to attend court? **Yes**. If 'No', include reason(s) on **MG6.**

b) What can be done to ensure attendance?

c) Does the witness require a Special Measures Assessment as a vulnerable or intimidated witness? **No**. If 'Yes' submit **MG2** with file.

d) Does the witness have any specific care needs? **No**. If 'Yes' what are they? (Disability, healthcare, childcare, transport, , language difficulties, visually impaired, restricted mobility or other concerns?)

Witness Consent (for witness completion)

a)	The criminal justice process and Victim Personal Statement scheme (victims only) has been explained to me	Yes	☐	No	☐	
b)	I have been given the Victim Personal Statement leaflet	Yes	☐	No	☐	
c)	I have been given the leaflet 'Giving a witness statement to police — what happens next?'	Yes	☐	No	☐	
d)	I consent to police having access to my medical record(s) in relation to this matter: (obtained in accordance with local practice)	Yes	☐	No	☐	N/A ☐
e)	I consent to my medical record in relation to this matter being disclosed to the defence:	Yes	☐	No	☐	N/A ☐
f)	I consent to the statement being disclosed for the purposes of civil proceedings e.g. child care proceedings, CICA	Yes	☐	No	☐	
g)	The information recorded above will be disclosed to the Witness Service so they can offer help and support, unless you ask them not to. Tick this box to decline their services:				☐	

Signature of witness: ..... Print name: .....

Signature of parent/guardian/appropriate adult: ..... Print name: .....

Address and telephone number if different from above: .....

Statement taken by (print name): ..... Station: .....

Time and place statement taken: .....

WITNESS STATEMENT

CJ Act 1967, s.9; MC Act 1980, ss.5A(3)(a) and 5B; Criminal Procedure Rules 2005, Rule 27.1

Statement of **Anna Brennan Inspector P240238**..... URN: | | | | |

Age if under 18 **Over 18**..... (if over 18 insert 'over 18') Occupation: **Police Inspector**.....

This statement (consisting of: .... **1**..... pages each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated anything in it which I know to be false, or do not believe to be true.

Signature: ..... Date: 19/09/2015.....

Tick if witness evidence is visually recorded ☐ *(supply witness details on rear)*

I am Inspector Anna Brennan currently stationed at Paddington Green Police Station. I oversee the whole of the North Cluster of Westminster, including Harrow Road Ward.

I am making this statement in relation to the Harrow Road ward and in particular the area surrounding the William Hill Betting premises at 357 Harrow Road, London W9. The premises are located near the Maida Hill Market.

Having worked in my current position since the end of March 2015, I am well aware of local issues in each of my wards. Having discussed this matter with my colleagues, it appears that previously William Hill clientele have used the street outside of the premises to drink alcohol and cause a nuisance, furthermore I have been informed that people may still be dealing drugs in and around the premises.

From my perspective, Maida Hill area is currently a hot spot for street drinking and anti-social behaviour. We have dedicated a lot of time and resources into this area, running operations to try and reduce crime and disorder in this area associated with street drinkers. We have also worked with the Council to try and resolve this issue by taking a zero tolerance stance in the area. This has helped to keep control of the area, although due to budget cuts and reduced numbers of officers, I have to assess each area in terms of priority. This is one of my main areas and is very resource intensive. When officers are not there patrolling, we see the drinkers moving back to the area.

Because of the drinking, we have also seen a huge rise in crime of a violent nature in the area. We have had one GBH linked to a person who has frequented William Hill. I have concerns that further serious crimes may occur, hence why this is a hotspot in terms of risk for my area. In addition a large number of damage offence are directly linked to the betting shops where the public damage machines on the premises.

The residents and businesses in the area have suffered from crime and disorder in this area for a long period of time and this is further exacerbated by the drinkers who frequent the area to use the betting shops. I see no benefits to the local area of having anti social behaviour and violence on their doorstep. I would welcome the closing of William Hill or stringent controls placed on the premises.

Signature: ..... Signature witnessed by: .....

Witness contact details

Home address: .....

..... Postcode: .....

Home telephone number ..... Work telephone number .....

Mobile/pager number ..... Email address: .....

Preferred means of contact: .....

Male / ~~Female~~ (delete as applicable) Date and place of birth: .....

Former name: ..... Ethnicity Code (16+1): ..... Religion/belief: .....

Dates of witness non-availability .....

.....

Witness care

a) Is the witness willing and likely to attend court? **Yes**. If 'No', include reason(s) on **MG6.**

b) What can be done to ensure attendance?

c) Does the witness require a Special Measures Assessment as a vulnerable or intimidated witness? **No**. If 'Yes' submit **MG2** with file.

d) Does the witness have any specific care needs? **No**. If 'Yes' what are they? (Disability, healthcare, childcare, transport, , language difficulties, visually impaired, restricted mobility or other concerns?)

Witness Consent (for witness completion)

a)	The criminal justice process and Victim Personal Statement scheme (victims only) has been explained to me	Yes ☐	No ☐			
b)	I have been given the Victim Personal Statement leaflet	Yes ☐	No ☐			
c)	I have been given the leaflet 'Giving a witness statement to police — what happens next?'	Yes ☐	No ☐			
d)	I consent to police having access to my medical record(s) in relation to this matter: (obtained in accordance with local practice)	Yes ☐	No ☐	N/A ☐		
e)	I consent to my medical record in relation to this matter being disclosed to the defence:	Yes ☐	No ☐	N/A ☐		
f)	I consent to the statement being disclosed for the purposes of civil proceedings e.g. child care proceedings, CICA	Yes ☐	No ☐			
g)	The information recorded above will be disclosed to the Witness Service so they can offer help and support, unless you ask them not to. Tick this box to decline their services:		☐			

Signature of witness: ..... Print name: .....

Signature of parent/guardian/appropriate adult: ..... Print name: .....

Address and telephone number if different from above: .....

Statement taken by (print name): ..... Station: .....

Time and place statement taken: .....

WITNESS STATEMENT

CJ Act 1967, s.9; MC Act 1980, ss.5A(3)(a) and 5B; Criminal Procedure Rules 2005, Rule 27.1

Statement of **Anna Brennan Inspector P240238**..... URN:

Age if under 18 **Over 18**..... (if over 18 insert 'over 18') Occupation: **Police Inspector**.....

This statement (consisting of: .... **1**..... pages each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated anything in it which I know to be false, or do not believe to be true.

Signature: ..... Date: 19/09/2015.....

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From my perspective, Maida Hill area is currently a hot spot for street drinking and anti-social behaviour. We have dedicated a lot of time and resources into this area, running operations to try and reduce crime and disorder in this area associated with street drinkers. We have also worked with the Council to try and resolve this issue by taking a zero tolerance stance in the area. This has helped to keep control of the area, although due to budget cuts and reduced numbers of officers, I have to assess each area in terms of priority. This is one of my main areas and is very resource intensive. When officers are not there patrolling, we see the drinkers moving back to the area.

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The residents and businesses in the area have suffered from crime and disorder in this area for a long period of time and this is further exacerbated by the drinkers who frequent the area to use the betting shops. I see no benefits to the local area of having anti social behaviour and violence on their doorstep. I would welcome the closing of William Hill or stringent controls placed on the premises.

Signature: ..... Signature witnessed by: .....

Witness contact details

Home address: .....

..... Postcode: .....

Home telephone number ..... Work telephone number .....

Mobile/pager number ..... Email address: .....

Preferred means of contact: .....

Male / ~~Female~~ (delete as applicable) Date and place of birth: .....

Former name: ..... Ethnicity Code (16+1): ..... Religion/belief: .....

Dates of witness non-availability .....

.....

Witness care

a) Is the witness willing and likely to attend court? **Yes**. If 'No', include reason(s) on **MG6.**

b) What can be done to ensure attendance?

c) Does the witness require a Special Measures Assessment as a vulnerable or intimidated witness? **No**. If 'Yes' submit **MG2** with file.

d) Does the witness have any specific care needs? **No**. If 'Yes' what are they? (Disability, healthcare, childcare, transport, , language difficulties, visually impaired, restricted mobility or other concerns?)

Witness Consent (for witness completion)

a)	The criminal justice process and Victim Personal Statement scheme (victims only) has been explained to me	Yes	☐	No	☐	
b)	I have been given the Victim Personal Statement leaflet	Yes	☐	No	☐	
c)	I have been given the leaflet 'Giving a witness statement to police — what happens next?'	Yes	☐	No	☐	
d)	I consent to police having access to my medical record(s) in relation to this matter: (obtained in accordance with local practice)	Yes	☐	No	☐	N/A ☐
e)	I consent to my medical record in relation to this matter being disclosed to the defence:	Yes	☐	No	☐	N/A ☐
f)	I consent to the statement being disclosed for the purposes of civil proceedings e.g. child care proceedings, CICA	Yes	☐	No	☐	
g)	The information recorded above will be disclosed to the Witness Service so they can offer help and support, unless you ask them not to. Tick this box to decline their services:				☐	

Signature of witness: ..... Print name: .....

Signature of parent/guardian/appropriate adult: ..... Print name: .....

Address and telephone number if different from above: .....

Statement taken by (print name): ..... Station: .....

Time and place statement taken: .....

WITNESS STATEMENT

CJ Act 1967, s.9; MC Act 1980, ss.5A(3)(a) and 5B; Criminal Procedure Rules 2005, Rule 27.1

Statement of Bryan Lewis PC4161CW ..... URN: | | | | |

Age if under 18 ..... (if over 18 insert 'over 18') Occupation: Police Constable .....

This statement (consisting of: .... **1**..... pages each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated anything in it which I know to be false, or do not believe to be true.

Signature: ..... Date: 7th October 2015.....

Tick if witness evidence is visually recorded ☐ *(supply witness details on rear)*

I am a uniformed Police Constable currently deployed on the Westminster Police Licensing Team based at Westminster City Hall, Victoria Street, London SW1E. One of my roles on the team is as a CCTV system assessor and I hold a professional BTEC qualification in the practises of CCTV design. I have served on the Police Licensing Team for about six years. I have assessed numerous CCTV systems in a range of licensed premises from basic systems in off licences up to very sophisticated systems in new West End nightclubs.

In regard to William Hill betting Shop, 357 Harrow Road, I was asked to assess the CCTV system based on a DVD recording of footage captured inside the premises, taken during the daylight hours of the 13th of August 2015. My observations were as follows. The CCTV system appears to consist of three cameras, numbered 1,2 and 4. There does not appear to be full coverage of the interior of the shop, with areas missed. There are no external cameras fitted to the outside of the shop. Camera 1 provides a view of the screened office area from the camera's location on the shop floor and the image quality is of a reasonable standard. Camera 2 is a view down the length of the shop to the street entrance glass door. Due to strong daylight from outside the building, the image quality is obscured and figures appear silhouetted up to the foreground of the picture. I would therefore describe the image quality as poor. Camera 4 appears to be a camera at the entrance directed into the shop area. The field of view is mostly obscured and therefore not satisfactory. In general, facial recognition inside the premises is only achieved when persons appear in the foreground of camera's field of view. There are no cameras directed at persons entering the premises to provide facial images.

My overall opinion of the CCTV system is that it does not meet the minimum standards of the MPS due to lack of coverage and varied image quality.

Signature: ..... Signature witnessed by: .....

Witness contact details

Home address: .....

..... Postcode: .....

Home telephone number ..... Work telephone number .....

Mobile/pager number ..... Email address: .....

Preferred means of contact: .....

Male / Female (delete as applicable) Date and place of birth: .....

Former name: ..... Ethnicity Code (16+1): ..... Religion/belief: .....

Dates of witness non-availability .....

.....

Witness care

a) Is the witness willing and likely to attend court? Yes / No. If 'No', include reason(s) on **MG6.**

b) What can be done to ensure attendance?

c) Does the witness require a Special Measures Assessment as a vulnerable or intimidated witness? Yes / No. If 'Yes' submit **MG2** with file.

d) Does the witness have any specific care needs? Yes / No. If 'Yes' what are they? (Disability, healthcare, childcare, transport, , language difficulties, visually impaired, restricted mobility or other concerns?)

Witness Consent (for witness completion)

a)	The criminal justice process and Victim Personal Statement scheme (victims only) has been explained to me	Yes	☐	No	☐	
b)	I have been given the Victim Personal Statement leaflet	Yes	☐	No	☐	
c)	I have been given the leaflet 'Giving a witness statement to police — what happens next?'	Yes	☐	No	☐	
d)	I consent to police having access to my medical record(s) in relation to this matter: (obtained in accordance with local practice)	Yes	☐	No	☐	N/A ☐
e)	I consent to my medical record in relation to this matter being disclosed to the defence:	Yes	☐	No	☐	N/A ☐
f)	I consent to the statement being disclosed for the purposes of civil proceedings e.g. child care proceedings, CICA	Yes	☐	No	☐	
g)	The information recorded above will be disclosed to the Witness Service so they can offer help and support, unless you ask them not to. Tick this box to decline their services:				☐	

Signature of witness: ..... Print name: .....

Signature of parent/guardian/appropriate adult: ..... Print name: .....

Address and telephone number if different from above: .....

Statement taken by (print name): ..... Station: .....

Time and place statement taken: .....

Details of public representations relating to 15/05830/LIREVG – Wiliam Hill

1. North Paddington Society

I write on behalf of the North Paddington Society to make a representation under s200(5) Gambling Act 2005 as an 'interested party' in respect of the above application. I confirm that we represent persons sufficiently close to the premises to be affected by the use of the premises, and are duly authorised to make this representation.

Introduction

The North Paddington Society is a longstanding amenity society. We were set up by 'residents to ensure local views are heard and represented on issues relating to their welfare and the area they live in. Residents can become members.

Together with active local community groups, we are applying to be designated as a Neighbourhood Area under the 2012 Localism legislation for the benefit of all of those who live and work in the area, to be known as the Maida Hill Neighbourhood Area, and subsequently as the Maida Hill Neighbourhood Forum.

Residents living in this area share common environmental and social issues and concerns. We have an ethnically diverse population and a broad socio-economic mix with a strong sense of local community. Housing density is very high -our ward is statutorily overcrowded, and open spaces are at a premium. There is a shortage of green landscape.

We have a greater than ward average of older people with support needs, and far above average levels of people with mental and physical ill health; along with a growing number of young families. There is a higher than average unemployment rate.

The area is dominated by the Harrow Road retail area, which is in decline and presents a depressing aspect for residents. Local people have worked hard to turn Maida Hill Place into a friendly and flourishing space - an example of the commitment of residents to develop this area into a thriving and positive community. Maida Hill Place could act as a catalyst to attract more quality retail outlets into the area, and with it enterprise and employment opportunities.

This branch of William Hill is located in an extremely sensitive and important location and the problems which have been experienced and issues which have been noted by our members are therefore of great concern to us. We are aware of the numerous references to the William Hill shop in representations made against a recent application made in for a premise in close proximity to 357 Harrow Road by another operator.

The application

We are aware that the licensing authority has initiated a review of the premises licence under s200 Gambling Act 2005, on the grounds that the authority has 'received a complaint and other information about the premises which indicates that:

The premises have breached conditions attached to the premises licence by permitting alcohol onto the premises. The premises are associated with crime and disorder, in that the premises are used by persons who are drunk, under the influence of alcohol or on drugs, and in that drug dealing and the sale of stolen goods have taken place on the premises. That the premises are further associated with crime and disorder, in particular in that groups of people under the influence of drugs or alcohol frequently congregate outside the premises, and abuse and threaten other members of the public and local residents. That there is a risk that vulnerable persons may be harmed by using the premises for gambling due to their impaired judgement through alcohol or drugs. That these problems have been brought to the attention of the licence-holder by residents and that no positive action has been taken.'

These are all matters of which we are aware. No doubt the individual residents concerned will make representations detailing their experiences, but we would like to support them as the local amenity society.

We recognise that the licensing authority is under a statutory duty under s153(1) Gambling Act 2005 to 'aim to permit' the use of premises for gambling, subject to compliance with certain factors.

It is clear to us that the use of the premises under its current licence is not reasonably consistent with the 'licensing objectives' and therefore remedial action is needed to address the issues.

We feel that the use of the premises for gambling raises issues:

- in relation to relevant guidance issued by the Gambling Commission under s25 Gambling Act 2005 ('the Guidance'),
- in relation to the 'licensing objectives'
- in relation to the City Council's Statement of Principles ('SoP').

In particular, we do not think that the use of the premises for gambling is 'reasonably consistent' with the 'licensing objectives'.

The licensing objectives

Preventing gambling from being a source of crime and disorder, associated with crime and disorder or being used to support crime

In our representation in respect of a recent application for a premises licence made by another operator, we noted that we were very concerned that customers would hang around that premises and cause crime and/or disorder, severe nuisance, anti-social behaviour or worse, for example if they are under the influence of alcohol or have lost significant sums on gaming machines. This was founded at least in part upon evidence that this is precisely what occurs at the William Hill premises

It is well documented anecdotally and in the media how gaming machines can be the source of some problems. There have been reports in the press that the machines are used for money laundering. Disorder such as attacking machines and abusing

staff seems to be commonplace. This is more likely to occur if customers' inhibitions are lowered by intoxication.

The Westminster 2014 ward profiles for Harrow Road and Westbourne confirm that these areas have higher than average levels of burglary and significant problems associated with violence against the person, criminal damage, robbery and drug crime. The Maida Hill Junction where this premises is located is already a hotspot for a considerable amount of criminal and antisocial behaviour and we feel that the use of this premises for gambling contributes to this. For instance, we are aware that there are suggestions that stolen goods are sold in the premises.

Protecting children and vulnerable persons from being harmed by gambling

Although some people are able to gamble responsibly a significant proportion are, sadly, not able to do so. We are concerned in particular that children and vulnerable persons are not being harmed or exploited by the use of the premises for gambling.

The Gambling Commission's Guidance (para 5.5) considers 'vulnerable persons' to be 'people who gamble more than they want to; people who gamble beyond their means; and people who may not be able to make informed or balanced decisions about gambling due to mental health needs, learning disability or substance misuse relating to alcohol or other drugs.'

The location of this premise is key to a consideration of whether or not vulnerable people as defined above are sufficiently protected. The Harrow Road and Westbourne wards are areas of high social and economic deprivation. The percentage of social housing in the wards is approaching 50% in comparison with a Westminster ward average of only 14%. The Harrow Road ward contains a significant number of bed-sit and one bed flats housing vulnerable residents with mental health and other support needs. At 17% and 18% the workless rate in both wards is twice the Westminster average. The proportion of residents in the wards seeking Jobseekers Allowance, Employment Support Allowance and Incapacity Benefit, Lone parents and Out of work Benefits are more than twice the Westminster and National averages. (Westminster 2014 Ward profiles). The Maida Hill Junction has been associated with aggressive begging, street drinking and as a resting place for homeless people.

The licence holder will no doubt have procedures and staff training in place to identify vulnerable persons? However, it seems clear from the evidence that we have seen that this is insufficient at present to ensure that vulnerable people are not harmed by gambling.

The definition of 'vulnerable persons' includes people who gamble more than they want to; people who gamble beyond their means; and people who may not be able to make informed or balanced decisions about gambling due to a mental impairment, alcohol or drugs.' There are a number of sensitive locations and premises in the immediate and near vicinity, including:

The Westminster Drug Dependency Project, 470 Harrow Road

The North Westminster Community recovery Team, 7a Woodfield Road

Queen Elizabeth II School, Kennet Road (Special school for pupils aged 5-19 with severe learning difficulties)

St Peter's Primary School, Chippenham Mews

Westminster Academy, Harrow Road

Paddington academy, Oakington Road

St Mungos, 217 Harrow Road (41 bed hostel for men over 50 with alcohol and mental health problems)

We are concerned about the effect that the gaming machines (FOBTs) have on vulnerable individuals, especially those who may have been drinking. It seems that the FOBT machines increasingly predominate over 'traditional' betting, which seems to be against the spirit of the 'primary purpose' of a betting shop, if not against the letter of the law itself.

We assume that the Applicant has robust policies and procedures in place to prevent under 18s from entering the premises, as per para 14.2 of the SoP. We do note however that all major operators presumably have such procedures but a procedure is only as good as its implementation, and we understand that results of test purchases often reflect badly on the industry in general. Do test-purchasing statistics demonstrate children and other vulnerable people will not be harmed or exploited by gambling?

The City Council's 'Statement of Principles'

The following sections are relevant:

Policy OBJ1 preventing gambling from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime

Policy OBJ3 sets out the criteria and considerations which the licensing authority will take in to account regarding protecting children and other vulnerable persons from being harmed or exploited by gambling

Policy LOC1 – re: 'sensitive locations'

Conclusion

We appreciate that gambling is a legitimate leisure activity. However, we do not feel that the use of this premises for gambling is under its current licence reasonably consistent with the licensing objectives.

We hope that the licensing authority considers the matter in due course and ensures that measures are put in place to enable the premises to operate in a more appropriate manner.

We look forward to being notified of the hearing date.

Yours sincerely

Andy Watson

2. **Regan Hook**

To whom it may concern,

As a long term resident (over 20 years) of the Harrow Road area, I see groups of people gathering outside William Hill (357 Harrow Road, W9 3NA) on their forecourt every day.

They are frequently drinking and causing disorder, and do intimidate passers-by including children and young people. Their continued prescence out side the premises also makes it difficult for those users of wheelchairs those pushing prams to get by. Anti-social behaviour is common outside the premises, and more often than not the patrons are under the influence of alcohol and/or drugs. It sets a bad example when children can see adults who are not in control of themselves.

I have witnessed this on a regular basis during the 20 years I've lived in the area, and as far as I can tell, there have been no signs of anything being done by William Hill or Westminster Council to improve the situation. The failure of William Hill to comply with licensing regulations puts residents of the area, including the many vulnerable people in the neighbourhood under significant risk, and it also encourages problem gambling.

I would like this letter to be considered as support for the Licensing Department's review 15/05830/LIREVG.

Kind regards,

Regan Hook

3. **Lola Martin**

To whom it may concern

I have heard that the gambling licence of William Hill , at 357 Harrow Road is about to be reviewed

I have lived in the area now for over 7 years and that business has always been a blot on the landscape..The drunks that hang around outside the shop lear at the women passing by, behave in an unsettling manner and just make the area unpleasant in general.

I personally cannot even bear to stand at the pedestrian crossing, it is very rare one does get to stand there without something going on behind your back . Ithas been like it for years and has never, ever shown any improvement, in actual fact it is getting worse. I am fed up of feeling unsafe.

As a single woman living and travelling to work in the area I would be much happier if the business was not there at all. There are far too many betting shops in the area attracting all the wrong kinds of people. We are currently waiting to what is happening with the Bet Fred request. It is getting ridiculous around here, soon there will be nothing but betting shops on harrow Road. What are you people thinking ?

I would like this letter to be considered as support for the Licensing Department's review 15/05830/LIREVG. Kind regards,

Lola Marlin

4a. A. Andolina

Dear Sirs,

I have been living in the area for about 12 years - throughout all this time the situation outside William Hill has only worsen. The place is a magnet for the worst individuals descending on this area of West London - every day, without any discouragement or without any challenge from anybody, groups of people gather outside William Hill (357 Harrow Road, W9 3NA). They are constantly drinking, dealing drugs, hassling people, causing disorder, and intimidate passers-by. Anti-social behaviour is common outside the premises, and more often than not the patrons are under the influence of alcohol and/or drugs.

The very same people then move to the Maida Hill square, where - totally unchallenged - they continue to drink and consume drugs as well as continuing to being a total nuisance to passers by and residents alike. It's extraordinary nobody is doing anything about this for so many years.

I have read that you have been asking for photos, but it's crystal clear to anybody what's going on and I personally find it extraordinary that no Council official cannot go to this very spot on the Harrow Road and record what I have been describing. Even a 10 year old would be able to see and document what goes on.

I have witnessed this on a regular basis during the years I've lived in the area, and as far as I can tell, there have been no signs of anything being done by William Hill to improve the situation. The failure of William Hill to comply with licensing regulations puts residents of the area, including the many vulnerable people in the neighbourhood under significant risk, and it also encourages problem gambling.

I would like this letter to be considered as support for the Licensing Department's review 15/05830/LIREVG.

Kind regards,

a. Andolina

4b. Mr Alessandro Andolina - 60a Walterton Road, Maida Hill, London

8:52 AM on 06 Aug 2015 As a resident, I vehemently object to this application. The William Hill betting shop is magnet for the worst individuals in the area. Drugs and drinks are constantly consumed in full view of the passers by and the people standing just outside the shop window are a nuisance to anybody happening to walk by. It's not a difficult scenario for anybody to spot and it's crystal clear what goes on outside the shop as well as inside it. The very same people then hover and graze across the street, into the maida hill square where they continue - totally unchallenged - to consume drugs and drinks and to be a nuisance to most residents and passers by. I wish somebody would do something tangible to stop all this.

5. Henry King

Dear Sir/Madam,

As a resident of Hormead Road, I see groups of people gathering outside William Hill (357 Harrow Road, W9 3NA) every day. They are frequently drinking and causing disorder, and intimidate passers-by. Anti-social behaviour is common outside the premises, and more often than not the patrons appear to be under the influence of alcohol and/or drugs.

I have witnessed this on a regular basis during the time I've lived in the area, and as far as I can tell, there have been no signs of anything being done by William Hill to improve the situation. The failure of William Hill to comply with licensing regulations puts residents of the area, including the many vulnerable people in the neighbourhood under significant risk, and it also encourages problem gambling.

I would like this letter to be considered as support for the Licensing Department's review 15/05830/LIREVG.

kind regards,

Henry King

6a. Blair Thorburn

Dear Sir/Madam

Re: William Hill, 357 Harrow Road, London W9

Application for review of betting shop premises licence

I write as an 'interested party' to make a relevant representation in respect of the review of the premises licence initiated by the licensing authority.

I understand that the review has been initiated because 'The licensing authority has received a complaint and other information about the premises which indicates that: The premises have breached conditions attached to the premises licence by permitting alcohol onto the premises. The premises are associated with crime and disorder, in that the premises are used by persons who are drunk, under the influence of alcohol or on drugs, and in that drug dealing and the sale of stolen goods have taken place on the premises. That the premises are further associated with crime and disorder, in particular in that groups of people under the influence of drugs or alcohol frequently congregate outside the premises, and abuse and threaten other members of the public and local residents. That there is a risk that vulnerable persons may be harmed by using the premises for gambling due to their impaired judgement through alcohol or drugs. That these problems have been brought to the attention of the licence-holder by residents and that no positive action has been taken.'

I have experienced problems with the use of the premises and so I support the review and wish to add my comments in order that they can be taken into account by the Licensing Sub-Committee when it comes to determine the review.

My representation is made on the basis of :

- preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime

- protecting children and other vulnerable persons from being harmed or exploited by gambling.

I live at 361 Harrow Road, 4 metres above the proposed premises. I am attaching photos from my window to demonstrate the proximity to my home.

These same photos are also core evidence to support my concern. These photos were taken on the following days July 4, 7, 20, 22 at various times in the day; the earliest being 9:30 in the morning. Clearly customers of William Hill are drinking on the premises all day long breaching the following:

19.10 No music, dancing or other entertainment is permitted on betting premises. This includes

any form of entertainment such as apparatus producing sound or visual images which do

not fall within paragraph 19.9 or machines which do not come within the categories of

machine explicitly allowed in betting premises under section 172(8) of the Act.

19.11 The consumption of alcohol on the premises is prohibited.

William Hill has known their licence is being reviewed. All of the attached photos have been taken within this period. In the photos it is possible to see notices from the council about the review displayed in the windows of William Hill. It would be expected that during this period of 'heightened awareness' customers and William Hill would be compliant however these photos of customers drinking demonstrate that this is not the case. It is unlikely that William Hill will manage the situation any better when they are not under review and therefore their licence must be suspended.

It is particularly disappointing that it appears that these issues have been brought to the attention of the licence holder by residents, yet no effective action has been taken. This was demonstrated on July 20 2015. On this day a man outside the doors to William Hill was photographed (item 2015-07-20 19.55.55) less than a metre away from the Council's notice in the window. As a concerned resident and to help William Hill manage the situation I went inside to inform the employee behind counter. I introduced myself as a neighbour and explained that as they have notices posted about the review of their licence they needed to know a man was drinking outside the front doors. The employee responded 'so what'. Unfortunately she did not pick up on the incident which is her job to manage. I explained further that this is an area where

drinking is not allowed. The employee said she could not leave the counter. This example demonstrates:

A. William Hill staff does not manage the situation in line with gambling regulations.

B. William Hill staff does not respond to resident's concerns.

Unfortunately the situation became more complex when the same William Hill employee was photographed outside (smoking in a blue William Hill uniform) meters away from the same man drinking (photograph 2015-07-20 20.08.28). Unfortunately the drinking had not been managed and the presences of the employee seems to condone the behaviour.

I would ask that the Licensing Sub-Committee considers the way that the premises operates. Unfortunately I have no faith that William Hill will operates consistent with the licensing objectives as the employees have demonstrated disregard to the review period and resident's concerns. For these reasons I think the license should be suspended.

The location of gambling premises is important in terms of the licensing objectives and the Council's Statement of Licensing Policy for gambling premises. It needs to be pointed out located across the street from William Hill is the Westminster Drug Project at 474 Harrow Rd and Westminster's Queen Elizabeth II Jubilee School. This is a special school for pupils aged between 5 – 19 years, with severe learning difficulties and profound and multiple learning difficulties. Around the corner is the North Westminster Assessment and Brief Treatment Team working with people with mental health problems. All three of these local services greatly increase the likelihood or vulnerable children & adults in the area.

I look forward to being kept updated with the progress of the review.

Yours sincerely

Blair Thorburn

6b. Mr Blair Thorburn - 361 Harrow Road, London, W9 3NA

9:17 AM on 08 Aug 2015 I live meters away from William Hill and support the council's investigation into whether William Hill have complied with the licence. I follow this with a separate email which includes photographs of customers drinking daily on the premise. This demonstrates that William Hill fails to comply with the licence. It must be pointed out that these photos have been taken during this review period when there are clear notices from the council in the window yet despite this William Hill continues to breach regulations. On one occasion during this period I went in to tell staff that there were customers drinking. Not only did staff fail to respond appropriately, they were later photographed standing next to the drinking appearing to condone this illegal behaviour. This collection of evidence demonstrates that William Hill does not regulate itself nor respond appropriately to residents. The location of gambling premises is important in terms of the licensing objectives and the Council's Statement of Licensing Policy for gambling premises. It needs to be

pointed out located across the street from William Hill is the Westminster Drug Project at 474 Harrow Rd and Westminster's Queen Elizabeth II Jubilee School. This is a special school for pupils aged between 5 - 19 years, with severe learning difficulties and profound and multiple learning difficulties. Around the corner is the North Westminster Assessment and Brief Treatment Team working with people with mental health problems. All three of these local services greatly increase the likelihood or vulnerable children & adults in the area.

7. MAYA VUKSA

I have been a resident of Maida Hill for 12 years and write to support Westminster Licensing Department's review of the Gambling Licence for the William Hill at 357 Harrow Road.

Over the years I have witnessed endless incidents of anti-social behaviour by large groups who congregate within the premises and on the forecourt. The smell of alcohol is clearly evident with individuals often distributing alcohol from soft drink bottles into plastic cups, or drinking directly from cans or spirits bottles loosely concealed in small plastic bags. The smell of marijuana is also often evident.

There is no doubt that these premises are associated with crime and disorder or that the clientele are often under the influence of alcohol or drugs.

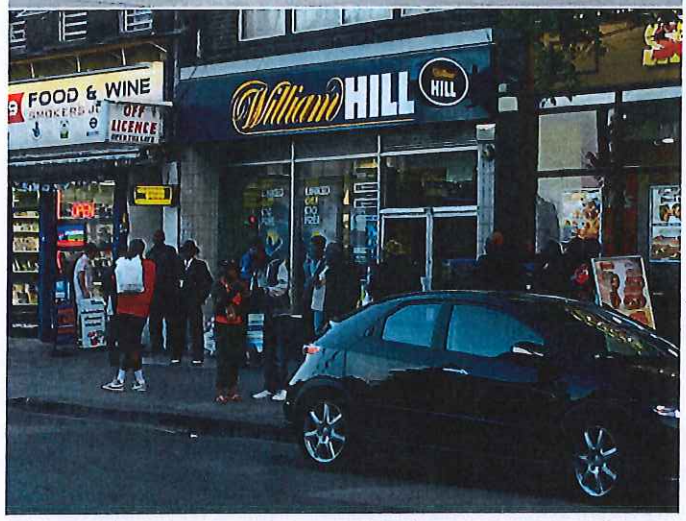
There has been talk that the William Hill provides a social hub for a group of men and women with nowhere else to go. The problem with this idea is that for every one of those individuals who gather inside and outside William Hill, drinking, intimidating passers by and causing disorder, there are dozens and dozens more local residents and business owners whose daily lives are blighted by their antisocial behaviour and William Hill's complete inability to manage the problem over the years. There are many elderly and frail residents who also have nowhere to go, but stay at home. They stay at home more than they might because Maida Hill is an intimidating place, in most part due to the historic and relentless culture of antisocial behaviour and petty crime emanating from the William Hill and it's clientele. My own father, who moved in with us for the 6 months before he passed away, preferred to avoid Harrow Road for this very reason.

The problems at William Hill have not only blighted the lives of individuals, but have severely tarnished the image of Maida Hill and meant that the area has struggled to lift itself out of economic decline.

William Hill is entirely responsible for this historic mismanagement and now that the license review notice has been posted on the door of the premises, they are also responsible for the displacement of these drinkers, from their premises and their forecourt, to other parts of Maida Hill- most obviously to the benches on Maida Hill Place. There is absolutely no point them sending observers to monitor the situation now; the Hawthorne Effect has clearly occurred in the last few weeks. However, there is a historic precedent for this phenomena at William Hill. In the past, on the occasions when the police have monitored the situation more closely, the same has happened, but as soon as the authorities take their eyes off, the problems return.

Unfortunately the problem has been left to become so deep rooted, that it is likely that nothing short of closure of these premises will provide Maida Hill with the opportunity to restore it's reputation as a safe place to live, work and visit.

I attach photographic evidence below of typical scenes outside the William Hill premises.



MAYA VUKSA, Fermoy Road, London, W9

8. Karen Dwyer

I have lived above William Hill (WH) since March 2003. Since this time there has always been a congregation of drinkers outside the premises. They drink alcohol, smoke drugs and harass passersby. Many use WH as a meeting place to buy/sell stolen goods, buy/sell drugs and cheap alcohol and organise prostitution. The betting shop legitimises the presence of those use the spot to network in criminal behaviour. I hear shouting, swearing, fighting, police sirens throughout the day. I am constantly stressed by the aggression and the constant drama.

Over the last 6 years or so, on many occasions, I have approached WH, asking them to address this issue. My main concerns were that the drinkers were hostile, aggressive, and attracted other forms of crime and anti-social behaviour, including prostitution and drugs. WH refused to acknowledge that there was a problem and offered no means or interest in addressing the problem.

Between 2011 and 2012 several members of the group outside WH began to make sexually offensive comments towards me when I passed by the shop (which I cannot avoid as it is next to the entrance door to my home). These comments began as lesser offensive remarks and quickly escalated to incredibly intimidating and insulting comments about what the individuals would like to do to me sexually and instructions for me to carry out sexual acts on them.

At one point the comments became threatening, I vaguely recall the phrasing as something like "see/wait what I will do to you". This is when I contacted the police. I was called to Belgravia police station to make a statement and to identify the individual who had made this particular threat. I positively identified the man. He denied the accusations of making inappropriate sexual comments and threatening me. The only witnesses were his friends and thus in the absence of other evidence, he was released without charge. This man later left the area, but the sexual comments from the rest of the group continued.

On another occasion, I was washing the windows of my flat. I was trying to avoid splashing any water below, and mindful of potential spillage, I requested passers-by walk closer to the road that the shop fronts. One of the WH crowd took exception to my request and threw a bottle of orange juice up at my flat. This bounced off my head and into my flat. As I tried to explain to him that I was doing everything in my power to avoid splashing anyone, he felt my request "disrespectful" and shouted threats up to me, including his statement that he would "smash my fucking face in". I called the police. They said that there was nothing that they could do since the individual had left the area at that point. I have not since washed the windows in my flat, terrified that this will incite further tensions between myself and the WH congregants.

I have called the police on many occasions reporting individuals drinking outside WH. The police have responded to these calls and de-canned these individuals. Unfortunately, by the time the police turn up, the individuals have often left the scene. I understand that the caveats to the Westminster by-law on no drinking in the borough prevent the police from checking a drink container for alcohol if it is not in a vessel marked as containing an alcoholic drink. Many of these individuals are aware of this and decant their drinks into soft drink bottles. Others wrap a plastic or paper bag around the bottle or can to prevent police from being able to ask to inspect the vessel for alcohol. I am also aware that with the cuts to the police numbers, this is not the most important use of police time. I have since stopped phoning the police as I feel I am wasting their time/resources and since the drinkers can dodge police action quite cleverly.

On 16th June as I was talking to a neighbour and his newborn baby in the street, a woman and her companion, both of who had been standing outside WH and drinking from beer cans several minutes earlier, threw a beer can at the pram that skidded

under a lorry. She then returned back to WH to rejoin her friends. I spoke to the manager of WH (Charles), asking him to watch out for this woman as she was drinking alcohol on his premises and being anti-social. He was extremely irate at my request. He explained that he felt as much a victim of these individuals as the rest of the community did. He continued that although he tried to prevent drinking inside the shop, it was impossible for him and his staff to control the drinking on the WH shop front. He explained that the counters were so far back in the shop that he could not see the drinking, the screens in the window blocked his view of the shop front outside anyway, and that the drinkers did not listen to him if he asked them to stay off the WH premises. He said that they had cameras for the shop front but that he could not view the footage as it was only accessible to a central security office. I explained that I often saw customers going into WH with drinks. He said that it was a difficult situation for him. He emphasised heavily his lack of complicity in the problem and his victimhood. He also felt that the junction was a hotspot for trouble as people came from other areas to hang out in WH and the local area, and that he was having to deal with non-locals exacerbating the problem.

I contacted WH head Office (yet again), asking to speak to the areas manager. Tony Avery (the District manager) called back and seemed oblivious to the problem when I explained to him what had happened on the 16th June and the ongoing issues. I asked to meet with him on a visit to WH. Tony Avery called me on Friday 31st July 2015 and requested that I meet with him the following week. I agreed and met him on Thursday 5th August 2015.

I met with Tony Avery and Brian Minihane (senior planning and licensing manager) on the 5th accompanied by Petra Kauraisa. Both myself and Ms Kauraisa were struck by Mr Avery and Mr Minihane's lack of understanding of the situation and the absence of any proposal to resolve the problem. While we accept their point that they are in the process of gathering information to work out how to proceed in addressing problems, (i) they have been made aware of this situation for over 6 years) and (ii) they failed to make the link between the ASB/crime that exists outside the shop and the very same problems that happen inside.

Mr Avery and Mr Minihane stated that WH do not agree with residents' accounts of the problems at the shop. They do not see there being a problem inside the actual shop but are of the belief that there are only problems of ASB and crime outside the shop. Furthermore, they hold the belief that their customers are not responsible for the ASB/crime but attribute it to the non-WH customers who loiter around the pavement off WH's forecourt. However, this simply does not capture the shape or scale of the problem.

I attempted to explain to Mr Avery and Mr Minihane that the ASB and crime within WH generates the problems that occur outside. I have witnessed alcohol, drugs and stolen goods being taken into the shop, and I have observed the consumption of alcohol inside WH by looking in through the front glass door of the shop as I walk by. Moreover, I have been into WH many times over last 12 years (delivering their mail wrongly addressed to me, to report incidents of ASB and crime, to discuss building issues, such as mice problems, etc...) and on a number of these occasions I have witnessed people drinking alcohol inside, many of who are the very same people causing trouble outside. In fact on Tuesday 4th August 2015 in the evening, as I was

talking to an employee of WH (who was still on shift) near the shop, a WH customers came over and offered us both an alcoholic drink (we both declined).

The aggression associated with the drinking continues also today. On Thursday 30th July 2015 a regular from outside William Hill who had just bought a small bottle of alcohol began threatening an elderly local outside William Hill. He claimed that the elderly man (who told me he was 78 years old) had "disrespected him" and that he would "batter him". When myself and a member of staff from smokers junction tried to calm the situation by encouraging him to let it go, I was told that I would "get battered too".

I have attempted over the last 6 or so years on numerous occasions to encourage WH senior management to address the serious ASB and crime on William Hill 357 Harrow Road. I have been unsuccessful on every occasion. Only since the review was submitted by Westminster have I managed to get the attention of Mr Avery. I should not have had to wait over 6 years for the company to listen to my very serious complaints.

While I appreciated MR Avery and Mr Minihane's efforts in meeting with me on 5th August 2015 and discussing the issues residents have faced for many years, unfortunately, I am unconvinced that senior management understand the issues myself and other resident have attempted to describe. For these two reasons, I have lost confidence in WH's ability to rectify the problem, and strongly support the review of their gambling licence.

9. Councillor Crockett

I would like to report continued antisocial behaviour emanating from these premises. I am a local resident. It is bad enough as a burly 6'7" chap walking past at some times of the day when there are loud, shouting and apparently aggressive men congregating outside with brown paper bags containing tins of drink, but for my wife it is a cause of fear and a requirement to cross the street.

I would like to join the call upon the Council to investigate the renewal of this premises' gambling licence. The removal of this shop would greatly improve the ambiance of this somewhat grubby corner of Westminster, I call home.

Cllr Thomas Crockett, Maida Vale Ward

City of Westminster

10 Objector wishes to remain anonymous

"We already have too many betting shops in this small area, and we notice that there have been aggressive people around losing their money and reacting in desperation. Most of the people going into William Hill have a can of beer disguised in a bag. I know some of the people who go inside and they are very poor. They are addicted to gambling.

I've been into William Hill several times and most of the customers are the same every time. Many have been drinking, and you can smell the marijuana from the

other side of the road, coming from outside William Hill. I've seen people wheeling and dealing drugs

What is the image that we're giving to our children? What are the answers to their questions about these people? The gambling machines in these places attract the children, so do the TVs and the dog races. It looks like a fairground.

The aggressive temperament of someone who loses their money in there. The simplest thing will spark a dispute and a fight after losing the money. The swearing is unbearable"

11. Anthea Ameer

As a resident of Maidahill, I see groups of people gathering outside William Hill (357 Harrow Road, W9 3NA) every day. They are frequently drinking, smoking drugs and causing disorder, and intimidate passers-by - this is a regular occurrence.

Anti-social behaviour is common outside the premises as is people exchanging smoke and other things, and more often than not the patrons are under the influence of alcohol and/or drugs. Subsequently, I cross the street in order to pass them or prevent my children from going to the shops in order to avoid them.

I have witnessed this on a regular basis during the years I've lived in the area (over the past 12 years) and as far as I can tell, there have been no signs of anything being done by William Hill to improve the situation. The failure of William Hill to comply with licensing regulations puts residents of the area, including the many vulnerable people in the neighbourhood under significant risk, and it also encourages problem gambling.

I would like this letter to be considered as support for the Licensing Department's review 15/05830/LIREVG.

Faithfully,

Anthea Ameer, Fermoy Road, London W9 3NH

12. Julie Bundy

I am a local resident of some 20 years and now a business owner at 2-4 Fernhead Road W9 (Maida Hill Place), a business set up specifically to sustain positive change in the Harrow Road retail area. The business is located adjacent to Maida Hill Market, almost directly opposite William Hill.

I originally became involved in my community, alongside many others, as I was so concerned about the levels of crime and anti-social behaviour in the area I was bringing up my family in.

Eventually I became the Manager of the Harrow Road Neighbourhood Partnership, a local area renewal partnership, with 23 Board members derived from the statutory and voluntary sectors, local businesses, and the community - including 2,500 "Street Reps" - local residents who signed up to be part of regular meetings and information sharing in the W9 area. I was involved with HRNP from 2004-2011. I took on the lease at 2-4 Fernhead Road in 2011. I have therefore been witness to activity both

inside and outside William Hill in both a professional and local capacity for many years..

Crime and fear of crime and anti-social behaviour have always been the heart of and remain the locus of community concerns HRNP gained the evidence for community priorities through extensive consultation, public meetings, focus groups, surveys and six-weekly Neighbourhood Gatherings which the Police and other agencies always attended.

William Hill and the issue of crime, disorder and anti-social behaviour were inevitably on the agenda at Board meetings during this period. Gambling was always at the heart of these issues both as a source of crime and disorder and due to its association with crime and disorder.

The problems of the supply of Class A drugs and "aggressive begging" associated with the sale of drugs became so prevalent that Westminster Council and the Metropolitan Police began special operations from 2006 onwards – this is documented under WCC's "One City" strategy from 2006 and records will be held by MPS of these activities.

A WCC and MPS- led "Governance Group" were formed and HRNP was the local organisation leading on these initiatives in partnership with statutory enforcement service including: MPS, Environmental Health, Planning and Licensing bodies. As such I was part of information-sharing protocols working with the MPS operational superintendent, Chief Inspector and Police Commander alongside key Department Directors and Deputy CEO of Westminster City Council. These parties and other senior officers were involved in intelligence gathering and covert operations, test purchases and legislative initiatives such as the imposition of a group dispersal zone and anti-social behaviour orders, which led to custodial sentences of 5-6 years.

The nature of the business and the locality of William Hill exacerbate crime and disorder in the area - gambling and contributed then and contribute now in the following ways;

The nature of the business draws and attracts individuals who blend into gambling activity in order to commit criminal activity. Individuals enter William Hill when MPS or other enforcement officers arrive at Maida Hill market and surrounding area, however, the location is also used for direct sale of drugs and stolen goods.

These activities are widespread and once again the area is becoming a magnet for crime and anti-social behaviour. I witness this activity seven days a week and can see individuals entering, leaving and gathering outside William Hill on a daily basis.

Families and those with young children have told me directly that they do not want to come to our café, as they are concerned about crime and disorder. This situation is allowed to proliferate as the individuals concerned have a "home' in William Hill which is warm and dry and provides a "headquarters" for them to continue their illegal trade.

Alongside direct criminal activity comes the phenomena of "aggressive begging" which is also on the increase. Individuals with drug, alcohol and gambling addictions

approach local residents for money. This activity has a particular impact on young people, our significant population of vulnerable residents, and the elderly.

It used to be the case that people would walk a long way round to avoid the "Prince of Wales Junction". Pensioners would have their money stolen on the way back from the Post Office in Harrow Road and young children would be approached for their lunch money on the way from school. I strongly support a review of William Hill's Licence to ensure, like other businesses in the area, they are compliant and do not further contribute to making the Harrow Road a more dangerous, difficult and unpleasant place to live and to do business.

Julie Bundy

Maida Hill Place Ltd, 2-4 Fernhead Road, London W9 3ET

13. Petra Kauraisa

As a resident of Harrow Road, I welcome and support Westminster Council's review of the gambling license of William Hill (357 Harrow Road, W9 3NA) 15/05830/LIREVG.

I have lived on Harrow Road for two years, and during these years, William Hill has been a constant eyesore and source of problems. Customers are gathering outside the store every single day and evening, drinking openly and harassing passers-bys. The store is on my way to the tube station and most bus stops, so I pass by often. William Hill is by far the most mismanaged shop in the area, and it's clear that the management permits behaviour that is not acceptable to other establishments on this (or any other) street – and that's not in accordance with licensing regulations.

I'm not able to provide specific dates of instances, simply because the problem is constant and on-going on a daily basis, and it has been consistent for the past two years. It is definitely a rare occasion when there is NOT a crowd of people drinking alcohol from cans, bottles and plastic cups outside William Hill. I've also witnessed drugs changing hands, and drugs being smoked outside the store on several occasions.

As a woman, I regularly and frequently get harassed when I walk past the shop, and I've learned to walk quickly and keep my gaze down as I walk by, to avoid getting calls and comments from the crowd.

It's a long-standing tradition that William Hill functions as a social club for individuals who cause great concern and disruption for the greater community. It's a relatively small group of people whose behaviour sets the tone for the entire area, and makes all residents to adjust their behaviour to them. Some are local, but we've also heard that people come from other areas in London to socialize in and around William Hill. A friend of my neighbour travels from Wembley every day to drink at William Hill, and has done so for years.

I have witnessed William Hill breach licensing regulations on the following points:

• Permitting alcohol onto the premises.

• The premises are associated with crime and disorder.

• The premises are used by persons who are drunk, under the influence of alcohol or on drugs.

• Drug dealing has taken place on the premises

• Groups of people under the influence of drugs or alcohol frequently congregate outside the premises, and abuse and threaten other members of the public and local residents.

• There is a risk that vulnerable persons may be harmed by using the premises for gambling due to their impared judgement through alcohol or drugs.

I've talked to employees at the The Co-op (located across the street from William Hill) who have knowledge of goods stolen from them, primarily bottles of alcohol, are sold inside William Hill on a regular basis, and they regard it as a major problem. Several conversations with a community worker, who frequently goes into the William Hill, have also informed me of the fact that stolen goods are often brought into the shop and sold.

• Not taking action on problems that have been brought to the attention of the licence-holder.

Karen Dwyer, who lives above William Hill, has been trying for many years to get the management to deal with all the problems inside and around the store, as they have a very direct and very negative effect on her quality of life. Ms. Dwyer has tried to arrange a meeting with the management for several years, to no avail. Now that the license is up for review, the management offered to meet Ms. Dwyer, and I also attended the meeting. We met with the District Manager and the Director of Licensing, who were both very amenable and pleasant.

Despite our repeated questions, the representatives failed to present a single strategy on how the premises would change. They asked us if we thought CCTV or "plugs" in the pavement (making it less comfortable to stand on) would help. As I'm not a security expert, I was unable to advise them on this. However, I highly doubt that the simple act of installing CCTV would do much to change the culture of anti-social behaviour and disorder, which has been allowed to prevail for the better part of a decade. There is already CCTV in place, which the Council has accessed for evidence, and that has done absolutely nothing to alleviate the problems. They also mentioned that they would adopt a "zero-tolerance attitude", which of course begs the question why they haven't done so several years ago. They mentioned that they did not plan on replacing the staff, even though the current staff is clearly and consistently failing in upholding the licensing objectives.

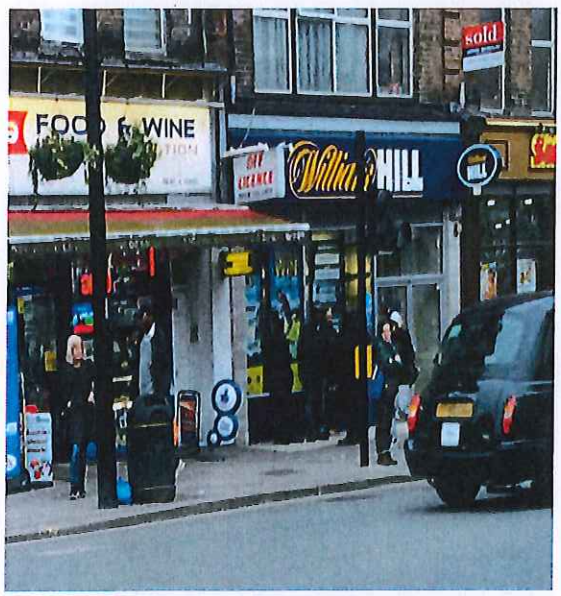
It was mentioned that they had been in talks with the Council a few years back, but "we didn't hear from them so we assumed that the problems had stopped". This shows both that the central management completely lacks oversight and insight into the store. When asked, it was clear that they made no efforts whatsoever to follow up and make sure that the problems had actually stopped.

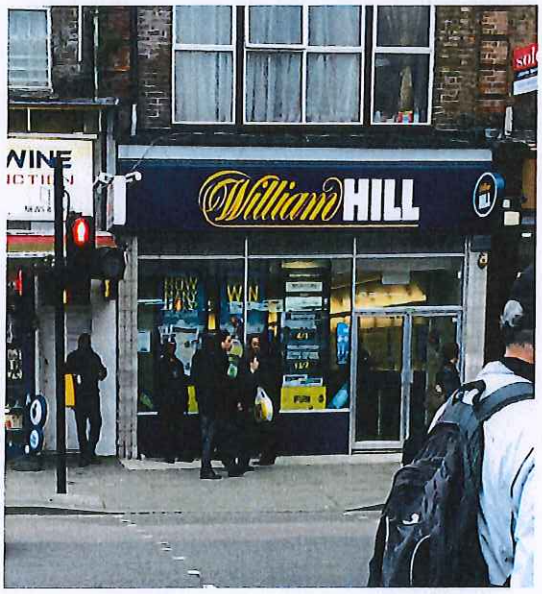
Despite our questioning, it was somewhat unclear if the management had been aware of the magnitude of the problems at the store. On one hand, they expressed shock and dismay at the situation, and agreed that it needs to change. On the other hand, they told us that they had been in the aforementioned, halted, conversation with the Council, and that they get on average approx. a dozen calls per year from the staff about anti-social behaviour in the store. Upon question, they were not able to tell us a single change which had been made as a result of these calls. Also, since the problems are daily, we asked what it would take for staff to call management, but we did not get a clear answer.

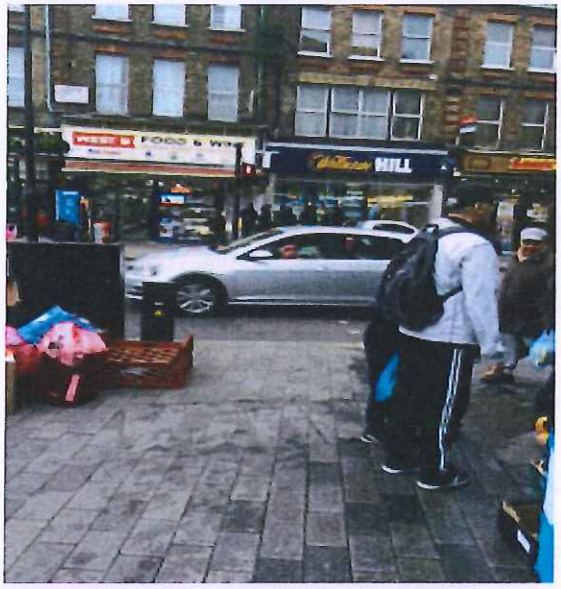
We also asked what had been done about the similar problems at a nearby William Hill (now closed), and we suggested that the same measures may be applied here. The response was simply that the store had been shut for financial reasons, and no efforts of improving the ASB-situation were mentioned, which gave the impression that no applicable lessons have been learned.

After having witnessed the situation outside the store, talked to representatives for William Hill, and heard the stories of other residents, business owners and organizations, I'm completely convinced that William Hill is the single biggest cause of problems on Harrow Road, and that the central management has not made any effort to ensure that the business complies with licensing regulations, despite the long-standing and obvious breaches.

In support of my representation, I'm submitting photos as well as some of the statements that we got for the hearing for Betfred's license application, which mentions the problems with that William Hill is causing in the area.






William HILL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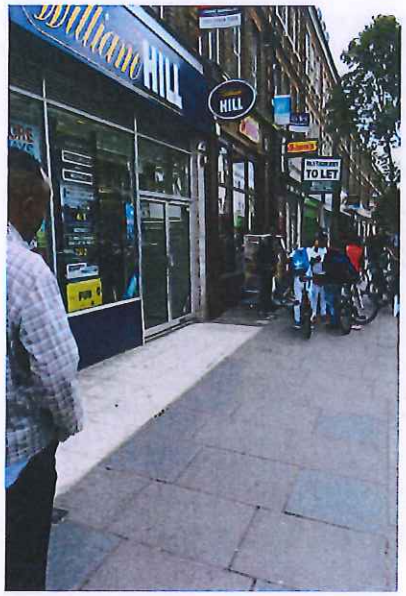

William Hill

357 Harrow Rd, W9 3NA

(430 ft from 351 Harrow Rd, W9 3RA)

May and June, 2015

Kind regards, Petra Kauraisa, W9 3NF

Ms Kauraisa submitted the following 3 statements from Father Henry Everett of St Mary Magdalene & St. Peter's, Shumel Ahmed on behalf of the Muslim community and Mandy Crowford on behalf of the Westminster Society for People with Learning Disabilities with her representation:

14. Father Henry Everett

I write as the Vicar of St.Mary Magdalene & St.Peter's, Paddington. St. Peter's Church is located at 59 Elgin Ave, which is only one block away from the proposed location of the licensing application from Betfred, and while the proposed site is in Emmanuel parish, it is right on the boundary with St.Peter's parish.

I am aware of and support the concerns of the local community in opposing this application. I would argue that a new betting shop at this particular location is not consistent with the 'licensing objectives' for gambling premises, particularly the 'crime and disorder' objective, and the objective of protecting children and other vulnerable persons from being harmed or exploited by gambling.

Our congregation includes many vulnerable adults and children, and a betting shop in the proposed location would considerably heighten their risk of becoming victims of crime, and also of being lured into crime and anti-social behavior. The Maida Hill junction is a major transport hub, with young people changing buses there on their way to and from school, and the presence of another betting shop can only make that more hazardous.

This area has a particularly high number of vulnerable adults with mental health needs, and they tend to use cafes near the proposed premises, and to hang around the market (directly opposite) which is bound to make them particularly liable to be lured into gambling. Our support work with these people shows us the danger that gambling poses for them.

We have all observed the disorder, violent altercations, and drug-related incidents that occur outside other betting shops in the vicinity, and so it is reasonable to expect that such crime would be multiplied by the presence of a further betting shop. I am aware that betting shop proprietors disown responsibility for what happens outside their premises, but it is manifestly the case that disputes on the pavement outside are linked to the premises within.

I confirm that I am happy for this letter to be used in support of the objections to this application.

Yours faithfully

Father Henry Everett, Vicar of St.Mary Magdalene & St.Peter, Paddington

15. Shumel Ahmed

I would like to add my support to the objections against a betting shop on 351 Harrow Rd. I am one of the local Muslim community who prays in the prayer room on Great Western Rd, which is located directly across the street from the former pub where Betfred would like to open a betting shop.

Just like the general population of the area, our congregation includes many vulnerable adults and children, most of whom have to pass by the location in question to access our prayer room.

In addition to this there are already 2 betting shops within 40 yards of each other. When walking with our children past betting shops people are standing around drinking alcohol, smoking and using foul language giving our children wrong ideas. Also after they finish drinking, they leave their glass bottles lying on the main road and street which could cause serious damage if anyone stepped or fell onto it.

There is constant street drinking on the piazza, and people congregate outside the existing betting shops to drink and do drugs. We work hard to protect and support our congregation, but we are concerned that they risks from the surrounding areas will be even greater if this license is granted.

Because of the problems surrounding the existing betting shops, in addition to the many news agents and stores that sell alcohol at all hours of the day and night, it is my firm belief that the problems with crime, disorder and anti-social behaviour around the Maida Hill Market, and on our doorstep, will be increased by the addition of a betting shop on this corner.

Yours sincerely,

Shumel Ahmed, Walterton road w9 3pj

16. Mandy Crowford

The Westminster Society for People with Learning Disabilities operates supported living for individuals with learning disabilities on Great Western Road, directly opposite the proposed location of Betfred's new betting shop. We also run a Drop in service at 389 Harrow Road where people with learning disabilities and their families visit daily many of whom are vulnerable to exploitation.

We provide children and adults with learning disabilities with a supportive environment and the opportunities to achieve greater levels of independence in every area of their life. Because of their high vulnerability, our clients can easily become victims of crime such as theft and bullying and harassment which is something we experience in this area already. We are therefore very concerned that a betting shop in the proposed location will increase this risk and mirror our experiences of other betting shops in the local area.

In short, a betting shop in the former Prince of Wales will expose vulnerable persons to considerable risks of being harmed or exploited by gambling in an area which already has a number of betting shops available to use and I would therefore like to ask the Council to take this into consideration when considering the licensing application.

Yours sincerely, Mandy Crowford

17. Wilford Augustus

As the former Conservative Candidate for Harrow Road, I firmly stand in support of the residents of the ward in their desire to improve and make the Maida Hill junction and Harrow Road area a safer and more pleasant environment to live and work in.

Whilst out campaigning in the area, I personally witnessed on several occasions - groups of men - apparently under the influence of alcohol, frequently congregate outside the premises of William Hill on Harrow Road (357 Harrow Road, W9 3NA).

At one point I went over to converse with them and realised several of them were inebriated and were out on the pavement in from of William Hill's premises drinking alcohol from disposable white cups. I believe this type of conduct contributes to a less safe environment - especially for women in the area - and is associated with crime and disorder in the area.

It is apparent that William Hill is not in compliance with their responsibility to ensure public safety as a byproduct of their services, and I stand with the residents of Harrow Road who would like to see William Hill's license revoked, or far more stringent conditions applied to their license at 357 Harrow Road, W9 3NA, by Westminster City Council - as I too would like to see far less predatory businesses of this nature in their neighbourhood.

I would like this letter to be considered as support for the Licensing Department's review 15/05830/LIREVG.

WILFORD L. AUGUSTUS

Former Conservative Candidate for Harrow Road

18. Joan Kench

As a resident of Harrow Road area, I see groups of people gathering outside William Hill (357 Harrow Road, W9 3NA) every day. They are frequently drinking and causing disorder, and intimidating passers-by. Anti-social behaviour is common outside the

premises, and often, the patrons are under the influence of alcohol and/or drugs. The smell of alcohol and cannabis is evident when walking by.

I have witnessed this on a regular basis during the 9 years I have lived in the area, and there is no evidence of anything being done by William Hill to improve the situation. The failure of William Hill to comply with licensing regulations puts residents of the area, including the many vulnerable people in the neighbourhood under significant risk, and it also encourages problem gambling. These places bring nothing to our community, in fact they are poison and immoral, preying on vulnerable citizens.

Your duty as a council is to safeguard your constituents as a whole, by not allowing businesses such as these to continue operating in our area. They only take from our community; they give nothing back.

In this area, we need to attract businesses other than betting shops. The current shops on

I would like this letter to be considered as support for the Licensing Department's review 15/05830/LIREVG.

Best regards,

Joan Kench, Hormead Rd, W9 3NG

19. Councillor Guthrie McKie

I understand that the licence for these premises is to be reviewed. I suport a review of the licence and would urge the Licensing Committe to revoke the licence.

The local comunity together with their local Councillors and the Council have been trying for some time to build up a more postive business environment along the Harrow Road. Too often the area has been blighted by groups indulging in alcohol and drug abuse. The area has a number of groups and organisations who work with vulnerable people.

There is a constant group of people standing outside William Hill's, often carrying alcohol for personal use in the street. William Hill has been reminded of their duty to ensure that such groups do not congregate outside their premises. They have consistenly failed to put in place measures to stop this.

Councillor Guthrie McKie

20. Councillor Tim Roca

I am writing to make representations as an 'interested party' in relation to the review under section 201 of the Gambling Act 2005 of the premises licence in force at William Hill, 357 Harrow Road.

I am a recently elected Councillor (23 July 2015) for the Harrow Road Ward, the boundaries of which include the premises under review and a large number of residents affected by the Betting shop. I have had the opportunity through my own experience and through speaking to many residents in the course of the recent

campaign, to come to the clear conclusion that the premises in question are associated with crime and disorder and that there is a very real risk to vulnerable people. This necessarily means in my view that the conditions of the licence for the premises are being breached.

On 21 July at approximately 6-30pm whilst on the way to Fermoy Road from the Maida Hill Market, I saw that some fellow campaigners had been stopped by a man at the corner of Harrow Road and Great Western Avenue. This is approximately 10 feet from William Hill. The man had wandered over from outside of William Hill (where people regularly congregate from the shop) and was clearly under the influence of alcohol. I went over to ensure my colleague was alright. The gentlemen speaking to my colleague was incoherent, at times aggressive and at others amiable. The exchange last 4-5 minutes before we were able to head off again to our intended destination. This incident and others mean I sympathise deeply with the reports I had from more elderly residents that they felt intimidated at times walking past the betting shop or through the Market area.

A number of residents, particular on Fermoy, Walterton and Hormead Roads raised concerns with me regarding the behaviour they had witnessed or been subjected to in the vicinity of William Hill. The picture that was painted in terms of antisocial behaviour linked to the premises was disturbing and the stories consistent and widespread. It is clear to me having spoken to a great many people during the course of the campaign that there is justified anxiety on the part of the majority of residents based on their own personal experience.

I think it is important to note that in so far as drugs and alcohol are concerned with the premises, they pose a significant risk to vulnerable people in the area. I hope this will be borne in mind during the review.

Finally, I would observe that the notice of the review has in and of itself led to a temporary reduction in some of the issues associated with the premises. I hope that this does not create a false impression of the very real problems that the shop is linked to.

Yours sincerely

Councillor Tim Roca, Member for Harrow Road Ward

21. Ms Geraldine Cooper-Brown - 28 Edbrooke Road, London, W9 2DG

9:57 AM on 11 Aug 2015 I would like to see William Hill's licence for 357 Harrow Road revoked. As a local resident who shops daily at Harrow Road my experience of the locality is significantly marred by the excessive presence of betting shops and the people that visit them and hang around the area.

I am a parent of young teenagers and I am dismayed that my family feels intimidated by the people who frequent the local bookmakers. I think it is tragic that my children do not feel safe in their own neighbourhood.

Desperate looking characters clearly under the influence of alcohol and / or drugs are a regular sight (and sound!) around the William Hill shop and surrounding area. I am

sick of stepping over and around vomit on the pavement and steering my kids away from people swaying on their feet and swearing.

The entire area needs a clean up and to be made safe for families to visit, shop and dine. A major first step would be to do away with the betting shops. It is not possible to imagine the Maida Hill market surviving and thriving and becoming a hub for the community if the stall holders and shoppers have to contend with drugged up, despondent gamblers swaying across the square and slumping on the benches and ground.

Please help to make Maida Hill a safe and successful community for all our residents and businesses.

22. Mr Sanjay Patel - 383 Harrow Road, London, W93NA

9:45 PM on 13 Aug 2015 If the license is granted, this will encourage lots of negative behaviour e.g stealing, drunk and disorderly outside premises, antisocial behaviour, begging etc. This will intimidate and make lots of people, including myself very uncomfortable. Please take this into consideration as I run my family business there and I want to feel nothing but safe whilst working.

Thank you

23. Mrs Tracy Dennis - 35 Porters Field, Braintree, CM7 1FB

10:58 AM on 15 Aug 2015 Members of my family live on the Harrow Road and I therefore visit the area on a regular basis. However, unfortunately my family live very close to William Hill and so it is impossible to avoid passing this shop on my visits. Sadly, I have become so uncomfortable and frightened by the events taking place at William Hill that I will no longer come to this area, but ask my family to meet elsewhere.

The level of anti-social behaviour and crime taking place in and around William Hill, 357 Harrow Road has reached ridiculous proportions. On a regular basis I have observed people drinking and smoking drugs, fighting, arguing, aggression, begging, and harassment. This area has long been associated with these problems but we should be seeing a reduction in these problems and a cleaning up of the area. Instead there is a business that operates in a way that allows lawlessness to exist on its premises and for the community to be terrorized by these individuals.

My children are scared to walk past William Hill because it is an incredibly intimidating part of the street, partly because the crowds that gather outside William Hill are so huge, and this was the main reason why I decided we would no longer make trips to the Harrow Road. I have experienced harassment from the men who loiter around the shop and as my daughters reached their teens, I was not prepared for them to be subject to the same harassment.

I feel incredibly sorry for the residents of the area who have to face this intolerable situation on a daily basis. I know local residents have spoken to William Hill about these problems and requested action. It really is time for the council to take serious action on this matter to protect residents and their visitors.

I therefore fully support this review.

24. Miss Linda Wisdom - Flat 3, 357-361 Harrow Road, London

11:11 PM on 24 Jul 2015 As a resident living nearby these premises, I support the need to review the license for William Hill. I agree that there has been breached conditions relating to alcohol and drugs, with drunk and under the influence persons being allowed on premises and also the large amounts of drunk people and disorderly persons who regularly congregate outside the premises almost on a daily basis, with potential drug dealings and crimes taking place which needs to be investigated.

25. Mr John Lynch - 35 Hormead Road, London, W9 3NQ

11:32 AM on 16 Aug 2015 William Hill on the Harrow Road, has a sense of lawlessness, with men hanging around outside, and going in and out of the betting shop, drinking booze and forming an intimidating group. I live nearby and see the same scene whenever I go past. It's not unusual to see aggro and tension outside, and it feels like there's always a possibility of fights breaking out. What appears to be prostitution, or advantage being taken of extremely drunk women, is not uncommon.

I would like to see this negative spot on the Harrow Road removed if possible, or at least for management to take their role seriously and help protect vulnerable people from being taken advantage of.

26. Ms Alison Sage - 48a Hormead Road, London, W9 3NQ

7:28 PM on 11 Aug 2015 I have lived in the neighbourhood for nearly 30 years. Over the past few years, I have been increasingly aware of the way the Prince of Wales junction has been blighted. Numerous council initiatives to improve the area have been affected by the people spilling out of William Hill. Often they are drinking - or seem to have been - and are incapable for this or another reason and they harass and beg passers by for money. It is threatening and uncomfortable on a busy street, which is full of families and children, and which could be a much more positive and pleasant place to be.

I have never seen William Hill do anything to improve or contain the situation.

27. Mrs Charlotte Caulfield - Flat 8, 362 Harrow Road, London

2:30 PM on 21 Jul 2015 I would like to object to the renewal of this gambling license. I have owned my property since 2000, and these premises has been a focal point for anti-social behaviour during the whole of this 15 year period.

People loiter outside the shop throughout the day and late at night. Often those people are drinking alcohol/drunk and smoking drugs (cannabis, sometimes crack/meth).

Local residents are often heckled for change, intimidated and subject to verbal abuse.

There are frequent noisy outbursts, and occasionally violent scuffles between those congregating.

Litter is dropped and persons have been seen to urinate publically on the wall/our communal doorway.

There has never been any evidence of William Hill management taking their community role seriously by getting disruptive people moved on. There seems to be an acceptance that this type of behavior is perfectly acceptable in this location. It isn't, this is a residential area with many families. I respectfully request, that the council seriously consider the renewal of this license. The area is well-served by betting shops (Paddy Power is just along the street) and the management of those shops take their community responsibilities more seriously. There will be no loss of amenity should this license be revoked.

Yours faithfully

Charlotte Caulfield

28. Mr Ahmed Khoshnaw - Safin Salon, 353 Harrow Road, Maida Hill, London

4:38 PM on 12 Aug 2015 I've been here 5 years. I see at least 1 - 3 times a week always a problem outside William Hill. People fighting, some very bad people waiting outside.

It's very bad for my business and Harrow Road. Customers say Harrow Road is scary. Especially ladies who come here.

Outside I smell hashish very strong every day.

Usually between 7 and 10 people standing outside William Hill. They are always drinking. Every single day I hear really bad, loud shouting. They catcall to women who pass, causing distress.

The same people who regularly stand outside William Hill smoking hashish, also drift over to my shop, smoking and drinking outside.

I walk past William Hill 10 times a day, some of these people who are outside are elderly. They need somewhere to go that is suitable.

29. Mr Abdul Ahad - Harrow Road, london, w9 3na

9:56 AM on 06 Aug 2015 I support Westminster council's review of William Hill's licence.

This premises is a hotbed of anti-social behaviour and crime. People stand outside taking drugs,selling drugs, and drinking alcohol, getting drunk and harrassing local residents. There are often prostitutes there too hassling people for trade. There is also begging.

I have been approached many many times by people outside the shop asking me if I want to buy cannabis or crack cocaine.

The people who stand outside often gather in large crowds and it gets very lively. They intimidate local residents by being drunk and aggressive and by shouting and spitting in the street and by spilling over across the other shop fronts.

These people stand there for hours and go in and out of William Hill all day long with their beer cans and lucozade bottles filled with alcohol.

I have been present while one resident discussed this problem with members of the William Hill staff outside the shop but they refused to accept there is a problem (although customers were standing there with beer cans). One of the staff members became very hostile and aggressive and one customer standing outside the shop (with a bottle of wine in his hand) asked if the staff member needed help "dealing with her" (the customer).

I was really shocked by the aggression shown towards her.

I have also witnessed people selling goods outside the shop, which I believe to be stolen. I have then seen these people go inside William Hill. I assume they are selling stolen goods inside.

This part of the Harrow Road seems lawless and it is the residents who suffer.

30. Mr G BIRCHALL - 114 Ashmore Road, Londin, W9 3DQ

7:20 PM on 15 Aug 2015 Betting shops are not helping the regeneration of Harrow Road.

31. Mrs Lizette Novo - 10 Great Western Road, London, W9 3NN
Received:

5:49 PM on 14 Aug 2015 I run a business on the Great Western Road. I hear a lot of comments from my customers that they are not happy to walk around the Harrow Road or send their children shopping because they are scared of the people inside William Hill.

I have also seen these people hanging outside the shop drunk and I also find these people frightening because they are drunk. I also suspect they are taking drugs and there are prostitutes there.

William Hill customers make the area feel unsafe. We need to resolve this problem so that people can feel more secure in the area.

32. Mr Mohamed Mansour - 4 great western road, London, W9 3nn

3:36 PM on 06 Aug 2015 Dear sir

I am against the renew of the licence

What we find in the front of the shout and drunks and drug dealer

And fight and shout all the time

This place become for all the pad things to happen on it.

Some of them try to sold stolen item to just make gambling .

For this please stope from renew the licence to make our area save from problem.

33. Mr Ali Shoukour - , flat 5, 373a Harrow Road

5:42 PM on 10 Aug 2015 As a resident of Harrow Road, I see groups of people gathering outside William Hill (357 Harrow Road, W9 3NA) every day. They are frequently drinking and causing disorder, and intimidate passers-by. Anti-social behaviour is common outside the premises, and more often than not the patrons are under the influence of alcohol and/or drugs.

I have witnessed this on a regular basis during the years I've lived in the area, and as far as I can tell, there have been no signs of anything being done by William Hill to improve the situation. The failure of William Hill to comply with licensing regulations puts residents of the area, including the many vulnerable people in the neighbourhood under significant risk, and it also encourages problem gambling.

I would like this letter to be considered as support for the Licensing Department's review 15/05830/LIREVG.

34. Mr Pejman Eftekhari - 8 Great western road, london, w9

5:48 PM on 10 Aug 2015 I am a business owner in the area. I see groups of people gathering outside William Hill (357 Harrow Road, W9 3NA) every day. These people are drinking and causing anti-scial behaviour, and they intimidate passers-by.

These people are often under the influence of alcohol and/or drugs. Sometimes they come into my shop and harrass my staff and mu customers.

I have witnessed this on a regular basis during the years I've run my business. I have seen no efforts on the part of WH to improve the situation in spite of the fact that many people have complained about the problem. This situation puts residents of the area, including the many vulnerable people in the neighbourhood under significant risk, and it also encourages problem gambling.

35. Mr Knut Olav Rygnestad - Flat 4, 1 Great Western Road, London

1:53 PM on 05 Aug 2015 I'm a neighbour living close to these premises. This area has a lot of council houses and hostels for vulnerable people such as alcoholics and

homeless people, and unfortunately William Hill has been a social gathering point for alcoholics in the area for some time. They will stand outside the shop and drink throughout the day, gradually getting aggressive towards passers-by. The shop is located right next to the busy Prince of Wales junction, and pretty much directly across the street there is a hostel for homeless people, and a drug recovery clinic not five minutes down the road. Because of the already existing problem with antisocial behaviour associated with this betting shop, and the close proximity of facilities aimed towards vulnerable people, I don't think it would be responsible to allow this betting shop to keep its license.

36. Mr Sayed Hashimi - 375 Harrow Road, London, W9 3NA

3:48 PM on 15 Aug 2015 I am very pleased to hear that the council is finally reviewing the licence of William Hill.

I have been a business owner on the Harrow Road for 18 years. During this time, I have always encountered problems with William Hill caused by the anti-social behaviour of the people using the shop. The biggest problem is that everyday I typically observe large groups of drinkers, many very drunk, and who often cause a disturbance. This creates a very unpleasant environment, in particular one that is hostile and threatening. While the police are often called to deal with the trouble this seems to have very little impact of the overall reduction in problems related to this business. It clearly needs a more serious approach to tackle these long-term problems.

My main issue is that these people also come to my shop and beg for money, which I assume they will spend on gambling or alcohol. This is problematic because it frightens my customers and also because it requires me to be extra vigilant as people frequently try to steal products from my shop, and have on many occasions succeeded. I believe that some of these people are William Hill customers as I have seen them hanging around outside the shop.

37. Mrs Anne Rust - 36 Elgin Avenue, Maida Hill, London

9:26 PM on 15 Aug 2015 It's intimidating trying to pass this group constantly gathering outside these premises. The language is at times rather blue to say the least. Spitting is also a constant bind which is also a health hazard. Drinking alcohol. This is an area of families with children that shop in the Harrow Road Children and in fact anyone should not be subjected to any of what happens outside of these premises. This area is in need of a drastic make over as it is without these people dragging it further into the gutter. it is unfair to say the least and the sooner something positive is done to sort this problem the better.

38. Mr indra patel - 486 harrow rd, london, w9 3qa

5:00 PM on 15 Aug 2015 groups of people congregat outside and harrass passing women . also young girls hang arround older men and give them sexual favours for a quick drink and drugs

39. Mr Ibrar Qureshi - 363-365 Harrow Road, London, W9 3NA

8:31 AM on 04 Aug 2015 I think the review should take place

Considering that these premises always have had problem relating to anti social behaviour

As a neighbour have experienced many times people arguing fighting and drinking outside of shop

It doesn't give people much comfort seeing sometimes people standing outside the doors holding drinks and cans in their hand

And smoking

40. Ms Heather St Louis - 12 Enbrook Street, London, W10 4SF

10:27 AM on 31 Jul 2015 I am writing in support of the review by the Licensing Authority in order that the appropriate action is undertaken where necessary whether that be a revocation of the licence or to implement certain conditions that are monitored and reviewed.

I have seen just like in other parts of North Westminster when a place becomes increasingly popular, with varied activity becomes frequented by known and "aspiring" drug addicts/dealers.

There is posturing, crossing of palms but not in handshake form, people entering the establishment neither to place a be or use the WC facilities, drinking, verbal abuse, physical altercations and arguments as well as discriminatory behaviour. Worse in the summer months. I have to walk past there, I shop in the Harrow Road. I avoid as much as possible, I shouldn't have to be afraid, intimidated or anxious by what falls out of the William Hill.

Children, vulnerable people inclusive of those with mental health concerns, learning difficulties, gambling, drug and alcohol addictions are affected, exploited and the community is harmed by this.

William Hill is a source of crime and disorder and is associated with it.

I haven't seen anything that William Hill has undertaken to address the situation.

41. Ms Elaine Arthur - 35 Hormead Road, Maida Hill, London

11:07 AM on 16 Aug 2015 I am a local resident of Maida Hill and live close to the Harrow Road. Every time I go to the shops I pass William Hill, and witness the same thing. A group of men drinking alcohol standing outside, often the starting point of anti-social behaviour, that feeds into the anti-social behaviour of the alcohol drinkers that stand around on the piazza opposite. I have seen fighting, and drunken behaviour. I have seen the anxious reaction of some of our vulnerable members of the community to the intimidating group of men. I worry for our vulnerable residents (with learning difficulties) being influenced by the behaviour of these men, who form a powerful group on the street. I would not want to confront these people. The energy given off into our community is not positive. It sucks in people with little money or prospects, and traps them into the cycle of poverty and addiction.

42. Mr Mark Hamblett - 62a Walterton Road, London, W9 3PH

4:23 PM on 05 Aug 2015 As a long term resident (over 10 years) of the Harrow Road area, I see groups of people gathering outside William Hill (357 Harrow Road, W9 3NA) on their forecourt every day.

They are frequently drinking and causing disorder, and do intimidate passers-by including children and young people. Their continued presence outside the premises also makes it difficult for those users of wheelchairs those pushing prams to get by. Anti-social behaviour is common outside the premises, and more often than not the patrons are under the influence of alcohol and/or drugs. It sets a bad example when children can see adults who are not in control of themselves and is intimidating for everyone.

I have witnessed this on a regular basis during the 10 years I've lived in the area, and as far as I can tell, there have been no signs of anything being done by William Hill or Westminster Council to improve the situation. The failure of William Hill to comply with licensing regulations puts residents of the area, including the many vulnerable people in the neighbourhood under significant risk, and it also encourages problem gambling.

I would like this letter to be considered as support for the Licensing Department's review 15/05830/LIREVG.

43. Mr David Collins - 139 Bourne Terrace, London, W2 6PB

1:42 PM on 15 Aug 2015 I am a resident in Westminster, who often goes to Maida Hill to meet with friends and other residents. This is an important part of my social life as a retired 70 year old man.

I support the council's review of William Hill 357 Harrow Road because I am fed up with the continual abuse and harassment I face every time I pass this premises. This place is full of drunken men, begging, shouting, abusing people, causing trouble, and

passing out in the street. We often see the police and ambulances coming to deal with these people. It is evident that William Hill themselves do not address these problems caused by their customers, which negatively affect the community and make people feel unsafe.

We need the council to sort out this problem.

44. Miss valerie fenwick-stankley - 22-24 Great Western Road, london, w9 3nn

7:12 PM on 12 Aug 2015 I have a learning disability and I have epilepsy so I can be very vulnerable at times. I live near William Hill in community housing.

If I have to walk past William Hill I feel very vulnerable because there are a lot of drunk people outside. I feel I can't relax in my area. A lot of these people beg for money and this makes me uncomfortable.

They need to clean up this shop so people can feel free to walk past. People should be able to walk around without people hassling them.

45. Mr Muhammad Khan - 16 Great Western Road, London, W9 3NN

7:02 PM on 14 Aug 2015 I am resident in the area and I support the review of the William Hill licence for a number of reasons.

Firstly, many of the people who use William Hill drink alcohol and become drunk and aggressive towards residents. I often see them outside the shop with alcoholic drinks in their hands.

We find them intimidating and disrespectful towards women in the community and this prevents them from walking past there.

Most of the children are also scared to walk past William Hill because of the shouting, swearing and aggression shown by these people.

I also see prostitutes outside the shop and I have witnessed many people smoke drugs there, and there is often a strong smell of cannabis.

I have also witnessed people sell stolen goods there. I have been approached myself many times. Recently I was offered a stolen bicycle.

William Hill do not seem to have made any efforts to resolve this problem.

46. Mr Joaquin Soriano - Flat 2, 357-361 Harrow Road, London

11:03 AM on 08 Aug 2015 I support the review of William Hill's licence.

I am a resident on the Harrow Road.

I walk past William Hill every day and I witness the drinking and crime here.

Large groups of men gather in front of William Hill and they spread onto the pavement and in front of the other shops.

There is often trouble inside and outside William Hill. There is often arguments and fighting.

Sometimes I can smell cannabis.

There are prostitutes outside the shop.

It is very intimidating for my family to walk past these people.

People also beg outside William Hill.

This spot on the Harrow Road is a dangerous area.

47. Mrs Patricia Smith - 204d Gloucester Terrace, london, W2 6HT

1:52 PM on 15 Aug 2015 I am a retired W2 resident who uses the Maida Hill facilities. When I come to the area I often face abuse from the William Hill customers who come over from the shop and harass us on the junction. They are often drunk, they beg for money and cigarettes, and they hassle residents. On Thursday this week I was almost assulted by one of the people.

We need this area to clean up.

48. Henry King - 9A Hormead Road, London, W9 3NG

Dear Sir/Madam,

As a resident of Hormead Road, I see groups of people gathering outside William Hill (357 Harrow Road, W9 3NA) every day. They are frequently drinking and causing disorder, and intimidate passers-by. Anti-social behaviour is common outside the premises, and more often than not the patrons appear to be under the influence of alcohol and/or drugs.

I have witnessed this on a regular basis during the time I've lived in the area, and as far as I can tell, there have been no signs of anything being done by William Hill to improve the situation. The failure of William Hill to comply with licensing regulations puts residents of the area, including the many vulnerable people in the neighbourhood under significant risk, and it also encourages problem gambling.

I would like this letter to be considered as support for the Licensing Department's review 15/05830/LIREVG.

Kind regards,

Henry King

9a Hormead Road, London W9 3NG

49. Anonymous – at request

As a resident of Walterton Road, close to the Harrow Road, I walk past William Hill (357 Harrow Road, W9 3NA) most days. Until the public notices went up on the William Hill windows, there were always people standing around drinking alcohol and using foul language, giving our children wrong ideas. After they finish drinking, they leave their glass bottles lying on the main road and street, which could cause serious damage if anyone stepped or fell on it.

People congregate there, getting drunk and taking drugs. It is intimidating to walk past them. Anti-social behaviour is frequent, and there are arguments and the threat of violent behaviour.

As Muslims taking our children to prayer, we have to walk past these groups of people. Their presence is felt far beyond just the outside space of William Hill, and they have a disruptive influence.

50. Anonymous – At request

"We already have too many betting shops in this small area, and we notice that there have been aggressive people around losing their money and reacting in desperation. Most of the people going into William Hill have a can of beer disguised in a bag. I know some of the people who go inside and they are very poor. They are addicted to gambling.

I've been into William Hill several times and most of the customers are the same every time. Many have been drinking, and you can smell the marijuana from the other side of the road, coming from outside William Hill. I've seen people wheeling and dealing drugs

What is the image that we're giving to our children? What are the answers to their questions about these people? The gambling machines in these places attract the children, so do the TVs and the dog races. It looks like a fairground.

The aggressive temperament of someone who loses their money in there. The simplest thing will spark a dispute and a fight after losing the money. The swearing is unbearable"

Statement of Brian Minihane

Brian Minihane will say as follows:

Introduction

1. I am the Senior Planning and Licensing Manager for William Hill Organization Limited. I am duly authorised to give evidence on behalf of William Hill in this matter. I have prepared a bundle of documents to accompany this statement.

2. I make this statement to assist the licensing sub-committee with regard to the review application made by Westminster City Council in respect of the William Hill betting office at 357 Harrow Road.

3. I have been employed by William Hill for 24 years. I have worked my way up through shop management and line management. For the last 15 years I have worked in the development/licensing department. I have given evidence before Magistrates Courts and Crown Courts in connection with licensing applications and objections under the Betting Gaming and Lotteries Act 1963. Since 2007 I have been involved with liaising with local licensing authorities regarding licensing applications under the Gambling Act 2005.

4. William Hill is the UK's largest betting operator with around 2300 licensed betting shops. William Hill is a FTSE 250 company with high levels of corporate governance and an infrastructure designed to ensure regulatory compliance in all areas.

5. Regulatory compliance, particularly compliance with the three Gambling Act licensing objectives, is a key priority for William Hill. There is a dedicated centralised compliance team which is accountable to the Corporate Responsibility Committee (committee of the main PLC board). This team monitors daily compliance reports from every shop and monitors trends as well as dealing with line management over specific issues. This structure is dependent upon William Hill personnel reporting matters of concern from the shops to the central compliance team in order that any concerns/issues may be addressed.

Training

6. The cornerstone of compliance is training. William Hill has a training department. There are 23 full-time training officers employed by William Hill, to ensure that all shop staff operate in accordance with the company's thorough policies and procedures. These full time training officers are supported by a network of experienced shop managers who provide further training support to shop teams within localised areas. The total amount invested annually in training shop teams is in the region of £3.9 million.

7. Any new shop employee commences the full training programme which starts with 2 days off site training. This training is focused on the licensing objectives and is tested after the initial 2 days. Only after satisfactory completion of days 1 and 2 may a CSA (customer service assistant) start to work within a shop environment. Thereafter there is a full program of update and refresher training which is all tailored towards compliance and the licensing objectives. New colleagues are regularly trained and tested over the first 6 months of employment. I produce at BM1 a document entitled Gambling Commission Shop Team Training Approach Summary which provides details of the training given.

8. All William Hill shops have a betting office manual (the LBO manual) and a Gambling Commission manual which detail the company's policies and procedures. Copies of both of these documents have been produced to Westminster City Council in the past.

9. The consumption of alcohol in a William Hill betting office is prohibited. Signage is displayed advising customers that this is the case. Shop staff are all trained to ensure that alcohol is not consumed within our betting shops.

   The LBO manual states that "the consumption of alcohol by any person in an LBO is prohibited". This message is also highlighted to all staff during their induction on the first 2 days of working for William Hill, before they enter one of our betting shops.

10. I produce at BM2 a copy of the company's door notice and at BM3 a copy of the security notice which is displayed within all William Hill betting shops. Both notices make it clear that alcohol is not permitted on the premises.

Engagement with Westminster City Council

11. As far as I am aware, through specific discussions with operational and developmental colleagues, William Hill has historically enjoyed a good relationship with Westminster City Council. Representatives from the company have met with officers of the licensing department on many occasions and company documentation has been provided. In the event that there have been problems at any of our betting offices then we have been able to work in partnership with Westminster to ensure that any issues are dealt with in a timely and effective fashion.

12. A good example of this relates to a William Hill betting office at 203 Victoria Street. On 26th September 2013, officers from the Metropolitan Police Service contacted Francis Keegan in the licensing department at Westminster City Council. This related to men using the William Hill shop that were believed to be engaged in ticket touting and whose presence in the area caused an intimidating atmosphere which was causing problems to the business next door.

13. Mr Keegan contacted William Hill and following discussions with the police, a number of changes were implemented which resulted in confirmation from the police that the steps taken had been effective and that the situation was resolved and no further action was necessary. I attach e-mail correspondence relating to these matters at BM4.

14. William Hill has also engaged with Westminster in attending Betwatch meetings, which are occasionally organised by Westminster's licensing department in association with the police. As far as I am aware, there have been 5 meetings during the last 2½ years (April, June and October 2013, July 2014, May 2015), all of which have been attended by members of the William Hill security department.

William Hill 357 Harrow Road

15. According to our records, William Hill has operated the betting office at 357 Harrow Road for over 30 years. A photograph of the shop is shown at BM5, which was taken on 12th October 2015.

16. Up until very recently, the shop was staffed by the following colleagues: –

    Charles Bourne– Manager – 6 years in shop
    Daniel Okoro– deputy Manager – 1 year in shop
    Alima Tejan-Jalloh– customer service assistant – 1 year in shop
    Emma Manning – customer service assistant – 2 years in shop
    Anthony McEvoy – customer service assistant – 1 year in shop

17. Since the review proceedings were issued in respect of 357 Harrow Road, I have liaised with colleagues in a number of departments, reviewing the records of our engagement with and inspection by the authorities, relating to these premises. There is email correspondence from Kerry Simpkin dated 1st September 2011 which preceded the application made by Coral for a new premises licence at 381 Harrow Road.

18. The email of 1st September 2011 indicates that as part of the issues identified relating to the location of the Coral's application, a significant amount of concern had been raised relating to the William Hill premises in Harrow Road. A meeting was arranged thereafter.

19. I produce the email correspondence at BM6. This details police engagement with the premises and it is clear from the emails that whilst there were concerns about anti-social behaviour and drinking in the area, the issue was a geographical one rather than one relating to the operation of our betting shop. There were a small number of people who drink on the streets in the area. They would congregate in the area around William Hill and the off licence next door.

20. Between the end of 2011 and the beginning of 2014, as far as I am aware, there was no contact with Westminster City Council with regard to any concerns about this betting office. This was discussed with Westminster City Council officers at a meeting that I had at City Hall on 9th September 2015 when I was told that following the discussions in 2011 brought about by the Coral's application, the Olympics had then become the main focus of Westminster City Council.

21. The next correspondence with Westminster City Council arose in January 2014.

22. I produce email correspondence between Klaudija Green (Community Protection Office, Harrow Road and Queens Park), Dave Stratford (security investigator for William Hill) and Tony Avery (District Operations Manager for William Hill). That email correspondence is produced at BM7.

23. A meeting was held at City Hall on 9th January 2014. The meeting followed a complaint of anti-social behaviour in the street outside the William Hill shop at 357 Harrow Road which crossed over to Maida Hill Market. It was decided that there would be a multi-agency partnership approach as a part of a wider problem solving solution involving William Hill, Westminster City Council Community Protection and the police. William Hill would serve banning letters to any customer who engaged in anti-social behaviour towards members of the public outside the premises and these would be enforced by the police. It was agreed that posters relating to Westminster and William Hill's policy on anti-social behaviour would be created and displayed within the shop and that the William Hill shop staff would do what they could to ensure that our customers did not congregate outside the shop. I produce an example of the poster displayed at BM8. It was accepted that many of those congregating were not William Hill customers but that there was likely to be a small amount of crossover.

24. Thereafter, there were further meetings between the stakeholders with William Hill sharing barring letters and posters for display within the betting office. The posters were amended following a meeting on 12th March to include the Westminster Betwatch logo.

25. This partnership approach resulted in an email from Klaudija Green dated 23rd June 2014 which is produced at BM9. It is clear that the partnership approach seemed to be working well and that there were apparently no further incidents of anti-social behaviour. The e-mail from Klaudija ends by confirming the success of the joint approach:

> ***"It is a great way to show what WCC, William Hill and Metropolitan Police are doing together to improve issues surrounding ASB in and around betting shops".***

26. That email of 23rd June 2014 was the last email received by William Hill from a Westminster City Council officer relating to these premises, before the review proceedings were issued.

27. I am now aware that criticism of William Hill resurfaced during the Betfred application which was made in March 2015 and heard by the licensing committee on 30th June 2015.

28. I have seen the evidence adduced in that case and note the statement of PC Ian Armstrong who states:

> ***"Currently the Maida Hill Market has a significant problem with street drinkers. Recently work was conducted with William Hill with regard to a zero tolerance towards this behaviour and this appears to have moved the problem on to the market."***

29. It is clear to me that as late as this summer, the view of the police was that issues were geographical rather than caused by the operation of William Hill, 357 Harrow Road.

Actions Immediately upon the Issue of Review Proceedings

30. Immediately that review proceedings were issued (20thJuly 2015) I arranged an investigatory meeting. That took place on Thursday 23rd July. I met with the area operations manager, the district operations manager, the security investigator for

this betting shop and the shop manager. All of the allegations raised within the review application papers were discussed. The manager advised that the cause of the problems was the street drinkers hanging around outside. The manager did not accept that there was any problem of drinking within the shop although he readily accepted that drinking did take place on the street outside the shop. The system that was operating at the time (the system agreed between Klaudija Green and Tony Avery) was that William Hill customers would be barred if they were seen to be involved in anti-social behaviour in the area outside the shop.

31. At the meeting on 23rd July it was agreed that the current system would be supplemented by attempts to discourage our own customers from standing outside the shop at all.

32. The manager's view was that there were two distinct groups with a minimal crossover. The first group was the larger group of street drinkers who hung around outside our shop and the off-licence next door. The second group was the William Hill customers who go outside to smoke. Often, the William Hill customers are known to the street drinkers but few of the street drinkers actually use the shop.

33. I also instructed our solicitors immediately. A site visit was undertaken on 24th July at which it was agreed that our solicitors would contact Westminster City Council (WCC) Licensing Department to arrange a meeting whilst I would contact Klaudija Green, PC Ian Armstrong and Karen Dwyer to arrange meetings with them. In addition, it was agreed that we would instruct Adrian Studd to produce an independent report with regard to the issues raised within the review application papers. I have recently viewed that report, which has been submitted by Mr Studd, and I am therefore fully aware of the comments that he has made, with regards to both the William Hill shop, and also the surrounding area.

34. I contacted PC Armstrong and Klaudija Green by e-mail on 27th July. I received an email from Klaudija Green on 4th August indicating that all correspondence should go through Kerry Simpkin at the licensing authority. I received no reply from PC Armstrong.

35. I am also aware that more recently, our security investigator, Dave Stratford, has also e-mailed PC Armstrong, as has Theresa Mulligan, one of the new shop managers. As far as I am aware, neither has yet received any response.

36. Notwithstanding that, we were able to arrange a meeting with Karen Dwyer. That meeting took place on 6th August and her fellow resident, Petra Kauraisa also attended. The purpose of that meeting was fact finding. We had not yet received the representations and I wanted to hear first-hand the issues of the local residents. This was especially so in the light of the fact that the last contact from WCC had been on 23rd June 2014 which was the email from Klaudija Green indicating that there were no issues with the shop.

37. My intention was not to come up with the solution at the meeting but to listen and ascertain what the residents believed were the issues. Thereafter, I wanted to discuss these issues with the police and WCC and thereby come up with a solution as to how to address the residents' concerns. At that stage, the only evidence in support of the review was that served alongside the review papers – the single page statements of Klaudija Green, Summet Amand-Patel and David Woods, a statement from Paul Green, some historical police reports, email correspondence between Nick Nelson and Karen Dwyer/Petra Kauraisa relating to the Betfred application and the review application itself.

38. A meeting was also arranged with WCC. This was originally scheduled for 2nd September but ultimately did not take place until 9th September.

39. In the meantime, investigatory meetings took place with all of the shop staff. The result of those meetings were that all of the staff had on occasions required customers to leave the shop as they were drinking or suspected of drinking alcohol within the shop.

40. This information had not been reported upwards past the shop manager. The shop team felt that they were dealing with it appropriately on the ground.

41. William Hill requires full reporting of such incidents to the district manager or security manager. That reporting requirement had not been met by the shop staff.

42. On 2nd September 2015 further representations were received from WCC. A clear theme of drinking outside the shop was developing with some allegations of drinking inside it.

43. These were confirmed at the meeting with Westminster City Council at 2pm on 9th September. At that meeting, I was shown a photograph taken by a council officer within the shop. This was accompanied by a statement which alleged that the customer photographed may have been drinking alcohol within the shop.

44. It was clear at the meeting with WCC that the officers felt that the staff were at fault. It was agreed at the meeting that we would go away and, now in possession of evidence, could implement proposals.

45. An emergency meeting was held within William Hill later that afternoon, and a package of measures was identified. Details of those measures are contained within an email sent to Kerry Simpkin at 16.58 on 9th September which is produced at BM10.

46. All of the shop staff were replaced with effect from 14th September 2015. The shop staff have been replaced with a handpicked team. This team was selected to ensure that they were confident and experienced in being able to deal with the types of issues that they may encounter in this shop, all having previously worked in challenging environments. There are now 2 managers, a deputy manager and 3 customer service assistants allocated to the shop. The shop is not single manned at all and there are 2 people on the premises from 8am. During busy periods, there is also a floor walker. I have spoken to the members of the new shop team, and they are all fully aware of William Hill policies and procedures, including the policy relating to alcohol.

47. William Hill has replaced the CCTV system. At the meeting on 9th September, with WCC, there was criticism of the quality of the CCTV pictures. William Hill has replaced the entire system. There has also been an increase in the number of cameras from 3 to 7. There are now 2 external CCTV cameras.

48. In addition to the CCTV cameras, there is an overt monitor behind the counter and a further overt monitor positioned by the entrance. This ensures that all people entering the shop are immediately aware that CCTV is in operation throughout the premises.

49. A new policy has also been introduced relating to the consumption of drinks within the shop. The new policy requires that customers may only consume drinks purchased within the shop or provided by shop staff. Notices to this effect have been displayed within the shop. A copy of that notice is attached at BM11.

50. We have also revised the previous posters relating to alcohol and ASB. These revised posters are now on display internally and externally, and can be seen at BM12.

51. We have also removed one of the marketing boards closest to the door to give a better view of the area outside the shop to the William Hill team and also a better view into the shop, by members of the safer neighbourhood team and MPS officers. The view through the front window is shown in the second photograph at BM5, taken on 12th October 2015.

52. Furthermore, William Hill has been in discussions with the landlord to ascertain whether or not there is anything that can be done to dissuade people from congregating outside the premises. The area immediately outside the premises is sometimes referred to as William Hill's "forecourt". It is important to note that this is not part of our demise although it does belong to our landlord. The landlord has agreed that we may take measures to dissuade people from congregating outside. I have spoken to the local authority highways department, to ask whether there are any measures that they would suggest, but I was told by Jamie Walsh that the best approach in combatting any problem of street-drinkers congregating outside is to dial 101. This again suggests the need for a more joined up approach between

parties. However, if there are any suggested solutions put forward by anyone else in terms of possible amendments to the forecourt area, we would be willing to consider them.

Comments on specific issues raised in the letters of representation

53. I have seen the original email correspondence from Dr Dwyer (which was served with the review application) and the subsequent representations that were sent to our solicitors on 2nd and 10th September.

54. In the email sent on 23 June, Dr Dwyer describes contact made with William Hill following an incident on 16th June. I have investigated this and can confirm that this call was made to our customer relations department on 18th June. Later the same day, The District Operations Manager, Tony Avery called Dr Dwyer to arrange a meeting. (Dr Dwyer and Tony Avery had been in contact in April 2014 when Dr Dwyer raised concerns about the potential for people to climb scaffolding erected at the shop. Initial contact in that case had been on 17th April and the scaffolding was alarmed by 22nd April). Tony Avery offered to meet Dr Dwyer on Saturday 20th June but as she was unwell, Dr Dwyer indicated that she could not meet then. Matters were left on the basis that a meeting would be held at a later date.

55. It is not correct therefore to say in the email of 23rd June that "(Mr Avery) *has yet to offer a date to meet and discuss the issues."*

56. I have read all of the representations concerning this licence review process. They all contain the common theme that this area suffers from problems caused particularly by street-drinkers, and that appears to be undisputed. However, it is clear that most of the representations refer to the problems being in the vicinity rather than inside the William Hill shop. In addition, many of the references to what may have happened within the premises are based on hearsay. The previous shop team have reported that the only person that has complained to them directly, as far as they can recollect, is Dr Dwyer.

57. Clearly, the shop team inside the William Hill unit have made some errors in managing the situation at these premises. The main error being that they have

failed to bring matters to the attention of their senior managers. William Hill would expect shop managers to highlight potential issues within their shop, so that they can receive the necessary support from the senior team, and relevant departments within William Hill, in order that any issues can be resolved as expeditiously and effectively as possible. Unfortunately, in this case, this information was not cascaded upwards, and as a result, William Hill did not respond as it would normally.

58. There does appear to be some confusion relating to the "forecourt" area immediately outside of the William Hill premises. The web-page set up on the Maida Hill Neighbourhood Forum (BM13), designed to encourage support for the licence review, contained the following statement: *"Please note that "premises" also include the forecourt, so street-drinking outside the shop is considered to be drinking on the premises".* I believe that this error could have caused confusion amongst some of the people submitting representations, as there are numerous references to the forecourt area within these representations, and a possible misunderstanding of the absolute responsibility of William Hill.

59. In terms of the situation outside the shop, again the senior managers and security department of William Hill have not had any contact since June 2014, from either the Licensing Authority or the Police, to either highlight the re-occurrence of problems in the locality, or to request any action from William Hill. We always seek to work with both the Police and Local Authorities in a collaborative manner to do what we can to assist, when problems exist in an area. But we cannot respond to events we are unaware of. Our most recent correspondence, in June 2014, had suggested that there would be a collaborative approach and the parties would work together.

60. There are comments within some of the representations which suggest that there has been an improvement in the situation since the review application was made. Clearly, William Hill has actioned a number of points as detailed earlier, and it is a positive sign that improvements had become apparent even at the time the representations were written. My understanding from the new shop team is that

the improvements have continued, and with the collaboration of all parties, I am sure this will continue to be the case.

Conclusion

61. It is clear to me that street-drinking has been a particular problem in the Maida Hill area for a number of years, and I can understand the frustrations of local residents as a result of the issues this causes. My view is that the sale of cheap, strong alcohol in nearby off-licences is the root cause of these problems, with the sale of single cans by some of these shops adding further to the problem.

62. The congregation of groups of street-drinkers is a problem for both residents and businesses in the area. I have read comments relating to the ability of the police to stop this behaviour, and the difficulties they face in stamping it out. I can fully appreciate that it is a difficult problem to deal with, as these street drinkers will conceal the alcohol in numerous ways, placing drinks in pockets, concealing them in plain bags which are often supplied by the off-licences, or pouring the alcohol into non-alcoholic drink cans and bottles.

63. Should the street-drinking issue be allowed to continue in the area, it will inevitably impact on some businesses and cause them, as well as the residents, to encounter problems.

64. This shop team had been trained with regards to the prohibition of alcohol inside any William Hill premises. However, they appear to have failed to adhere to the rules and implement the training that they had received. I do not believe that they were totally complacent on all occasions, but it is clear that they did not ensure that company policies were always met, with regards to the prohibition of alcohol.

65. William Hill encourages its shop teams to escalate problems to Line Managers so that appropriate support can be obtained from relevant experienced departments, wherever problems occur. Although there was an awareness of the street-drinking issues in this locality, there was no feedback from the shop team to suggest that there were problems within the shop itself.

66. We accept that there has been a partial lack of communication within William Hill, due to this shop team not passing on important information relating to this shop. This has resulted in a shortage of appropriate actions being undertaken by William Hill. This is regrettable, and I apologise for it on behalf of the company, but now that William Hill have been made fully aware of the situation, appropriate measures have been put in place to help combat the issues which previously existed.

67. Our Line Manager and security personnel had dealt previously with Westminster Council and the police, where the discussions centred around the problem of street-drinking outside the shop and in the surrounding area. It appears that there was agreement between the parties that the problems had been reduced during the middle of 2014.

68. As soon as the problems were highlighted to William Hill as a result of receiving the licence review application, I have been fully involved with this matter. William Hill has now put a number of measures in place, above and beyond those already in place, as detailed above, including the replacement of the entire shop team. These are designed to not only ensure that the consumption of alcohol does not take place on our premises, but also in an effort to help to improve the external environment around this shop too.

69. The changes which have been made within the physical features and operating procedures of this shop are shown in the risk assessment and action plan summary at BM14. The main actions undertaken are as follows:

- Shop team replaced with a team selected to be able to deal with the types of issues which can exist in this location.
- CCTV upgraded, increased cameras within shop, and the addition of cameras outside the shop.
- Monitor behind counter for staff to easily view all camera images.
- External lighting installed.
- Overt monitors showing people that CCTV is in operation.
- Removal of a marketing board to enable a clearer view in and out of the shop.
- Replacement entrance doors fitted, with the addition of a mag-lock.

- Revised notices clarifying actions on ASB/drinking within and immediately outside the shop.
- Revised policy on the consumption of any drinks within the premises.

70. I can confirm that all of the actions listed at BM14 have been put in place. A proposed list of licence conditions is also attached at BM15, which are suggested as an option to be added to the premises licence for this shop.

71. I am confident that the new shop team, along with the addition of further security measures, and the awareness of the previous situation amongst senior William Hill personnel, will ensure that this shop now fully operates within company policies. I am pleased that some improvement is already apparent.

72. William Hill would also like to work towards a more collaborative approach with both the police, Westminster Council, and residents where necessary. That previously joined up approach does appear to have gone astray here. Working together is clearly the most effective way to resolve issues that may occasionally occur within or close to any of our shops, but more importantly, it will limit the likelihood of problems escalating, or even occurring in the first instance.

73. Problems within any business are often a reflection of the problems that exist in the locality, and it is clear from many of the representations that the problems at this location are not just related to William Hill. The newspaper article attached at BM16 also confirms this. The street-drinking culture in this location is not caused by William Hill. However, William Hill are also keen to play our part, where we can, in helping to improve the external situation, and we will do what we can to assist the police and Local Authority in improving the area.

74. The contents of this statement are true to the best of my knowledge and belief.

Brian Minihane

21st October 2015

Gambling Commission Shop Team Training Approach Summary

When	What
Day 1, Day 2 – before entering the shop (Workshop based in remote venue)	- Who are the Gambling Commission - Three types of license - The Three Key Areas - Implications of Non-Compliance - William Hill Compliance Team - Keeping Gambling crime free ➢ Proceeds of Crime ➢ What to look out for - Being open and fair ➢ Fair Deal Rules ➢ Make sure the price is right - Protecting children and the vulnerable ➢ What does vulnerable look like ➢ If someone is drunk, on drugs or mentally unstable ➢ Age verification ➢ Approved identification ➢ Guess their Age (activity) ➢ Know when to say no ➢ Two types of incident ➢ Report attempted underage Gambling ➢ Self Exclusion ➢ Report Self Exclusions
Day 3 onwards In –Shop	CSA completes additional in shop training with colleagues (using LBO Manual and Distance Learning folders) in order to complete Training Log 1. The CSA and the Duty Manager both sign the CSA off against the following: - 'I understand my responsibilities in relation to the Gambling Commission' - 'I can easily locate the Yellow Box file (Social Responsibility/ Self Exclusion) and am reviewing the content at the start of each shift' Training Log 2 which covers Weeks 4-8 replicates the above sign off, so there is a double-check that the knowledge is being retained and implemented. Training Log 3 which covers Weeks 8-12. The CSA and Duty Manager both sign the CSA off against the following: - 'I consistently apply the Think 21 policy, approaching customers, checking and verifying ID' - 'I know how to complete an Incident report and what information needs to be included and how to process it' - 'I check the Self Exclusion, Yellow Box File at the start of every shift'

	- 'I understand my responsibilities in relation to the Gambling Commission'
Week 12 **Workshop Based**	CSA completes a probationary written assessment which contains some questions focussed around Gambling Commission issues.
Week 12 – 16 **In Shop**	Training Log 4, replicates the Training Log 3 sign off, so there is a double-check that the knowledge is being retained and implemented.
Week 16 **Keeping Compliant Workshop**	Acts as a recap of what they have covered and learnt so far. Contains a 'True or False' exercise based on common issues.
Weeks 16-26 **In Shop**	Training Log 5, is a much lengthier detailed sign off which covers the following: - 'I understand my responsibilities in relation to the Gambling Commission and understand the implications of non-compliance' - 'I regularly review the Gambling Commission Manual and ensure all procedures are being consistently followed in the LBO' - 'I manage Think 21 and actively approach customers and verify the ID given' - 'I am aware of the compliance documentation which needs to be completed e.g. Daily Totals Report and I know how to complete them' - 'I understand the Self Exclusion process and know how to complete a Self Exclusion form' - 'I know how to complete an Incident Report accurately providing all the information needed' - 'I understand what Staff Led Interaction means and know how best to approach a customer who may be vulnerable' - ' I understand the key indicators of Money Laundering and POCA and can explain what action needs to be taken if I suspect this has occurred in an LBO' - 'I understand the importance of the company Fair Deal Rules when dealing with customer complaints/ concerns and can do so in a fair and appropriate manner' - 'I understand the process to follow if Gambling Commission Officer or other Local Authority Representative (e.g. Local licensing, police etc visits and LBO'
Week 26 **Workshop Based**	CSA completes a Final written assessment which contains some questions focussed around Gambling Commission issues.

Ongoing training methods are reviewed regularly to ensure the right training approach is being used, to ensure we meet our responsibilities.
Continuous learning and development is conducted via distance learning as follows:

- ✓ 3 – 4 Cycles per year of Gambling Commission focused workbooks, which **all** shop based staff are required to complete. Content is determined by ensuring all topics are covered regularly, patterns in reporting and any new changes colleagues need to be aware of.
- ✓ Shop Teams are given 3 weeks to complete workbooks and then register completion via EPOS

- ✓ Weekly reports highlight who has/has not completed, target of 100% completion by end of Week 3
- ✓ Any gaps highlighted to Area Training Officer who chases up at a local level
- ✓ District Training Co-ordinators, visit every shop in their patch and check that all books have been completed and then carry out GC focussed testing to check for knowledge and understanding of GC principles and responsibilities.
- ✓ DTC reports back any issues, which the Area Training Officer will deal with at a local level. This could be in the form of additional training, or escalation of issue to Senior Management.

BM2

THINK 21

Look under 21? You will need ID to come in

WELCOME.

OPENING TIMES.

Mon - Fri*	-
Saturday	-
Sunday	-

All major Debit cards accepted in this shop

*Excludes Bank Holidays

08705 18 17 15 Customer Helpline
General/Shop Enquiries

No smoking. It is against the law to smoke in these premises

No one under the age of 18 is permitted in these premises

SECURITY NOTICE.

William Hill will actively support the prosecution of any person committing offences at these premises. The following security measures are in place at this shop:

Please remove all face coverings before entering these premises

Alcohol is not permitted in these premises

For the protection of our customers, our employees and our business, and for the purposes of crime prevention and detection, CCTV images are recorded and monitored

This shop is fitted with a security alarm system

All cash is protected by an anti hold-up device. Staff cannot override or affect its operation

In an emergency out of hours please contact: **0113 291 2000**

William HILL
THE HOME OF BETTING

0800 44 40 40 **williamhill.com**

NATIONAL GAMBLING HELPLINE 0808 8020 133 gambleaware.co.uk

0208 750

001

BM3

SECURITY NOTICE.

William Hill will actively support the prosecution of any person committing offences on these premises.
The following security measures are in place at this shop:

NO SMOKING
It is against the law to smoke on these premises

NO UNDER 18s
No one under the age of 18 is permitted on these premises including children

NO ALCOHOL
Alcohol is not permitted on these premises

NO HELMETS
Please remove all face coverings before entering these premises

SECURITY ALARM
This shop is fitted with a security alarm system

TIME LOCKED SAFE
All cash is protected by an anti hold-up device Staff cannot override or affect its operation

CCTV
For the protection of our customers, our employees and our business, and for the purposes of crime prevention and detection, CCTV images are recorded and monitored.

William HILL
THE HOME OF BETTING

From: Keegan, Francis [mailto:fkeegan@westminster.gov.uk]
Sent: 13 November 2013 15:16
To: Chris.J.J.Butler@met.pnn.police.uk; Brian Minihane
Cc: Gerry.I.Wood@met.police.uk; Ian.J.Bosher@met.police.uk; Richards, Heath; Nelson, Nicholas
Subject: William Hill 203 Victoria Street SW1 - Meeting availability

FILE NOTE

On 13 Nov 2013 the following met at City Hall

F Keegan (WCC)
H Richards (WCC)
Chris Butler (Police)
Ian Trimble (William Hill)
Matt Russell (William Hill)
Brian Minihane (William Hill)

We discussed the police concerns (see below for email of 26 Sept), and William Hill's response of 25 Oct (see below).

We also discussed the recent visit of concern by Heath Richards (WCC).

PC Butler confirmed that the steps taken have been effective, and that he is now much happier with the venue. The steps taken with greatest impact were the installation of a new manager, and the fact that it is now possible to see into the shop from the street.

William Hill's representatives confirmed that the steps will not be reversed, and they hope to continue to work cooperatively with the Council and the Police.

The meeting was, I feel, useful and productive and William Hill said they felt the police intervention had caused them to learn some important lessons.

The maters raised are now closed and will remain so unless new matters of concern come to light.

Mr Minihane handed me a new plan of the venue showing some minor changes to the positioning of gaming machines (etc.). After the meeting I gave the new plans for the venue to Nick Nelson, who will put them on file. He confirmed that no application to vary the licence is necessary.

Francis Keegan
WCC Premises Licensing Inspector Team Manager

-----Original Message-----
From: Brian Minihane [mailto:bminihane@williamhill.co.uk]

Sent: 25 October 2013 12:49
To: Keegan, Francis
Cc: Richards, Heath
Subject: RE: William Hill 203 Victoria st

Dear Francis

Following our various correspondence both by e-mail and on the telephone, I would like to summarise what actions have been taken so far.

Our line managers and security investigator have, as you are no doubt aware, been in discussion with PC Chris Butler, including meeting him at the location to discuss concerns. They have worked together to propose a number of improvements which have or will shortly be incorporated.

These improvements include the following:

1. A new manager (Stanchev) has been in the shop since the end of September

2. William Hill have requested greater visibility from the police and this has been immediately forthcoming from both PC Butler and the local SNT

3. Police are aware of barring notices being available from William Hill, to be issued as requested by police

4. Removal of one of the marketing display boards in the front window to allow much better visibility into and out of the shop (see attached photo to illustrate this)

5. Alterations to the positions of gaming machines

6. Mag-lock to be fitted to the main entrance door

It does appear that the new manager is working well with the police, with support from William Hill line managers and security, and I believe the situation to be greatly improved. We aim to continue to work in this manner, and would obviously welcome further input from your department. I believe that now would be a good time to meet, so that we can all put faces to names and continue our joint approach, discussing in more detail the actions taken so far along with the planned approach going forward.

If you don't mind, it would probably be easiest for you to liaise with PC Butler to arrange a suitable date, and we are more than happy to attend at your offices if that is okay. If you are able to suggest some dates that both yourselves and PC Butler would be available, I will come back to you to confirm all the relevant William Hill people are also available.

I hope the above update is of assistance, but if you do require further clarification of any of the points raised prior to our meeting, please let me know.

I look forward to hearing from you,

Kind regards
Brian

Brian Minihane
Development Manager

T: 07740 735475 (shortdial 7375)
E: bminihane@williamhill.co.uk

William Hill, Greenside House, 50 Station Road, Wood Green, London N22 7TP.

From: Chris.J.J.Butler@met.pnn.police.uk [mailto:Chris.J.J.Butler@met.pnn.police.uk]
Sent: 26 September 2013 18:39
To: Keegan, Francis
Cc: Christopher.M.Sadler@met.police.uk; Karl.Rogers@victoriabid.co.uk; george.pudney@btp.pnn.police.uk; Sean.P.Doyle@met.police.uk; Ian.J.Bosher@met.police.uk; Bruce.W.Middlemiss@met.police.uk
Subject: William Hill Bookmakers, 203 Victoria Street, London SW1

Dear Francis

I would like to bring a matter to your attention.

I attended the Cornish Bakehouse earlier this afternoon, which is next door to William Hill, at 205 Victoria Street.

The Cornish Bakehouse staff reported that they have been experiencing anti-social behaviour from the 'clientele' that frequents William Hill during the day and early evening. These are predominantly adult males, who are mainly involved in ticket touting in the areas surrounding Victoria Railway Station and Victoria Coach Station.

The Cornish Bakehouse has a small number of metal tables and chairs outside it's venue, for use by their customers, who in the main are foreign visitors to London. On a daily basis, usually mid evening, the William Hill 'clientele' pitch themselves up on this outside furniture. They are very intimidating to passing members of the public, and frequently go inside the venue and help themselves to handfuls of sugar sachets. They are not permitted to do this. Every time the venue staff directly challenges this anti-social behaviour, they are subjected to verbal abuse and threats of violence.

Aswell as being attributable to the ticket touting and anti-social behaviour in the Victoria area, to my knowledge, there has been a couple of minor disorder incidents between members of this 'clientele' inside William Hill. I witnessed the aftermath of an incident on Tuesday afternoon, where I saw a member of William Hill staff walk off down Victoria Street placating a male, who I know to be a member of the 'clientele'. To my knowledge, nobody reported this incident to police, no details are known about any of the parties involved, and no-one has been forthcoming.

On an officer safety perspective, I find that when the 'clientele' are resident within William Hill, the feeling and mood in the venue is very unsettled and intimidating. I am not sure what sort of effect that this atmosphere has upon other members of the public visiting the venue to place bets, but personally, I take it to be an extremely daunting place.

The officers copied into this email each have vested interests in the Victoria area within their respective police units and departments. There is a current initiative to reduce local personal theft issues in identified Victoria hot-spots, and it is possible that some members of the 'clientele' may have some involvement with this.

In the first instance, I would be very grateful if this matter could be brought to the attention of the William Hill management, so that they may be given an opportunity to provide an account of their own observations, and work with the local authority to find a solutions to these issues.

Very best regards

Chris Butler

Chris Butler | **Constable** | **STC** | Roads Policing Unit |Victoria Improvement Project Team

MetPhone none| **Telephone** 020 7027 5334 | **Email** christopher.butler@met.pnn.police.uk
Address Room 531, 5th Floor, 172 Buckingham Palace Road, LONDON, SW1W 9TA


NEWS & MAGS
OFF LICENCE
OPEN TILL LATE
William HILL
sold
WESTERN UNION
ALL MOBILE PHONE
UNLOCKING
REPAIRS
RESTAURANT
TO LET


Costcutter

Martin Mcinerney

From: Simpkin, Kerry [ksimpkin@westminster.gov.uk]
Sent: 18 October 2011 11:19
To: Clark Dunstan
Cc: Martin Mcinerney
Subject: RE: William Hill, Harrow Road, London

Hi Clark

Just to let you know in addition to myself the following people will be attending for the Council and Police.

- Gareth Cleary – Premises Licensing Inspector, Westminster City Council
- Caroline Tredwell - Neighbourhood Crime Reduction Officer(Queens Park & Harrow Road), Westminster City Council
- Iain Armstrong – PC, Safer Neighbourhood Team (Harrow Road), Metropolitan Police Service
- Cherie Whitley – PS, Westminster Police Licensing Team, Metropolitan Police Service

I may have a few documents (crime stats, etc) that we may wish to discuss at the meeting on Monday which I will send to you later this week so that you have time to look at them. It may be useful if you could have a look through your records relating to the Harrow Road premises and let us know what issues or problems you have had that are ongoing or have been dealt with by you.

This meeting is to discuss the issues that have been identified around your premises and what can be done to reduce/eliminate those issues. This is an informal meeting to discuss the issues that the Police and Council have around this particular premises and agree an action plan to attempt to combat these specific issues.

Kind regards
Kerry

From: Clark Dunstan [mailto:cdunstan@williamhill.co.uk]
Sent: 18 October 2011 11:00
To: Simpkin, Kerry
Cc: Martin Mcinerney
Subject: RE: William Hill, Harrow Road, London

Kerry,

10am 24th is ok for myself and Martin.

Regards,

Clark

-----Original Message-----
From: Simpkin, Kerry [mailto:ksimpkin@westminster.gov.uk]
Sent: 13 October 2011 13:55
To: Clark Dunstan
Subject: RE: William Hill, Harrow Road, London

Clark

Can we make the meeting 10am? If so then I'll book everything.

Thanks
Kerry

From: Clark Dunstan [mailto:cdunstan@williamhill.co.uk]
Sent: 03 October 2011 11:49
To: Simpkin, Kerry
Subject: Re: William Hill, Harrow Road, London

Kerry,

That date is ok for us.

Regards,

Clark
Clark Dunstan
Development Manager
William Hill

07740 735471
F Net 7371 (Mobile)
0208 918 3912
F Net 3912 (Office)

From: Simpkin, Kerry <ksimpkin@westminster.gov.uk>
To: Clark Dunstan
Sent: Thu Sep 29 15:32:53 2011
Subject: RE: William Hill, Harrow Road, London

Hi Clark

How about the 24th October at 11am at Westminster City Hall, 4th Floor, 64 Victoria Street?

Thanks
Kerry

From: Clark Dunstan [mailto:cdunstan@williamhill.co.uk]
Sent: 28 September 2011 10:27
To: Simpkin, Kerry
Subject: Re: William Hill, Harrow Road, London

Kerry,

Any dates after the 19th October?

Regards,

Clark
Clark Dunstan
Development Manager
William Hill

07740 735471
F Net 7371 (Mobile)
0208 918 3912
F Net 3912 (Office)

From: Simpkin, Kerry <ksimpkin@westminster.gov.uk>
To: Clark Dunstan
Sent: Mon Sep 26 16:19:49 2011
Subject: RE: William Hill, Harrow Road, London

Hi Clark

Yes we do need to have a meeting re this premises. Sorry I was on leave for the last few weeks too. When are you free? Could you give me some dates when you are all available? I will find out when the Police are available and confirm the time, date and location.

Thanks
Kerry

Mr Kerry Simpkin
Assistant Service Manager

Environmental Health Consultation and Licensing
Premises Management Delivery Unit
Westminster City Council
4th Floor South
64 Victoria Street
London SW1E 6QP

Tel: 020 7641 1840
Fax: 020 7641 7815
E-mail: ksimpkin@westminster.gov.uk
Team E-mail: generallicensing@westminster.gov.uk
Web: www.westminster.gov.uk

You can now apply online for the majority of licensing regimes that the authority is responsible for. Please visit www.westminster.gov.uk/licensing and following the relevant links to apply.

please don't print this e-mail unless you really need to

From: Clark Dunstan [mailto:cdunstan@williamhill.co.uk]
Sent: 26 September 2011 16:18
To: Simpkin, Kerry
Subject: RE: William Hill, Harrow Road, London

Kerry,

I am now back off annual leave and wondered if a meeting was still required.

Kind Regards,

Clark Dunstan
Development Manager

T: 020 8918 3912
M: 07740 735471
E: cdunstan@williamhill.co.uk

William Hill, Greenside House 50 Station Road London N22 7TP

From: Simpkin, Kerry [mailto:ksimpkin@westminster.gov.uk]
Sent: 05 September 2011 10:06
To: Clark Dunstan
Subject: RE: William Hill, Harrow Road, London

Hi Clark

I know you haven't responded to this email yet but the date I've stated is no longer possible for us. Can you let me know if you or your colleagues could make a meeting week commencing 12th September?

Thanks
Kerry

From: Simpkin, Kerry
Sent: 01 September 2011 10:50
To: 'cdunstan@williamhill.co.uk'
Subject: William Hill, Harrow Road, London

Hi Clark

I hope you are well? We are currently dealing with an application for a betting shop in Harrow Road. As part of the issues identified relating to the location for that particular premises a significant amount of concern has been raised relating to your premises in Harrow Road. I have had a discussion with the Neighbour Policing Team and we would like to me with representatives of William Hill to discuss the issues next Friday (9th September) if possible.

The main issues relate to the customers of William Hill standing outside that particular premises drinking and on a number of occasions causing issues with local residents. I have copied some of the comments made by the Police Neighbourhood team relating to the issues outside your premises.

We currently have issues with People drinking out the front of William Hill 357 HARROW ROAD W9 they have in turn caused ASB with local residents.

People have been De-Canned / issued with a PND and this has been CRIMINT'ed. There is also a Harassment CRIS with regards to a Victim that lives above WILLIAM HILL where by a Customer (Drinking in front of the shop) has been harassed by this person.

I appreciate that it can be difficult to manage these types of issues and will need a joint approach with the Police. Obviously as a Licensing Authority we are concerned that customers from your premises may be causing crime or disorder and as such we would like to arrange this meeting to discuss the issues and how we can all try to address them.

Could you let me know if you and your colleagues are available to attend a meeting at either Westminster City Hall, Victoria Street or Harrow Road Police Station on the 9th September. If you can attend then I will confirm the location and time of the meeting.

Kind regards

Kerry

Mr Kerry Simpkin
Assistant Service Manager

Environmental Health Consultation and Licensing
Premises Management Delivery Unit
Westminster City Council
4th Floor South
64 Victoria Street
London SW1E 6QP

Tel: 020 7641 1840
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please don't print this e-mail unless you really need to

From: Green, Klaudia <kgreen1@westminster.gov.uk<mailto:kgreen1@westminster.gov.uk>>
Sent: 10 January 2014 13:16
To: Dave Stratford
Cc: Tony Avery; Iain.Armstrong@met.pnn.police.uk<mailto:Iain.Armstrong@met.pnn.police.uk>
Subject: William Hill, 357 Harrow Road, W9 3NA antisocial behaviour meeting at City Hall

Dear Dave/Tony,

Many thanks for attending meeting at City Hall and for the example of barring letter attached.

At the meeting we have discussed William Hill customers and non customers, who are potentially engaging in antisocial behaviour on your private forecourt and further crossing over to Maida Hill Market and engaging in further ASB.

We have decided on few action points following this meeting which are as follows:

- Multi agency partnership approach as part of a wider problem solving solution (William Hill, Westminster City Council Community Protection, Police and any other partners identified at the time as part of this process.

- Proposal of serving Banning Letters not just for abusing branch staff as it currently stands but for any other customer who engages in antisocial behaviour towards members of the public outside the premises. These will be enforceable by Police if they are breached (however we need to confirm this with the Police going forward).

- Branch staff not to engage in smoking outside the premises, but to have their own designated area to smoke away from the customers. This will stop any non professional engagement between the staff members and customers.

- William Hill, 357 Harrow Road, W9 to be potentially refurbished next month which will help with the image of the premises and how approachable/perceived branch is towards antisocial behaviour engagement.

- Meeting will be arranged between Police, Community Protection and William Hill which will be two fold and consist of a visit to premises as well as sit down meeting to discuss further joint approach to ASB outside William Hill.

I hope that all has been incorporated in the above summary, but if you wish to add anything, please do let me know.

Going forward, I will arrange a potential meeting going forward possibly towards the end of this month.

With my best wishes,
Klaudija Green
Community Protection Officer
Harrow Road and Queens Park

Community Protection
Street Management

Westminster City Hall
64 Victoria Street
London SW1E 6QP

020 7641 3518
kgreen1@westminster.gov.uk<mailto:chardy@westminster.gov.uk>
www.westminster.gov.uk<http://www.westminster.gov.uk/>

From: Dave Stratford [mailto:dstratford@williamhill.co.uk]
Sent: 09 January 2014 17:19
To: Green, Klaudia
Subject: William Hill barring letter

Hello Klaudia, thanks for arranging the meeting today. Attached is an example of a barring letter from our branch at 43/45 Chippenham Road, W9 2AH that was issued by the company in September 2013.

regards
David Stratford

Security Investigator
Mobile: 07740 735412
Featurenet: (72) 7304
Email: dstratford@williamhill.co.uk<mailto:dstratford@williamhill.co.uk>

BM8

William HILL

#

WILLIAM HILL IS WORKING IN PARTNERSHIP WITH METROPOLITAN POLICE

PERSONS DRINKING ALCOHOL, OR INVOLVED IN ANY OTHER FORM OF ANTI SOCIAL BEHAVIOUR INSIDE OR DIRECTLY OUTSIDE OF THESE PREMISES WILL BE BARRED FROM ALL

WILLIAM HILL PREMISES

ALL INCIDENTS WILL BE REPORTED TO THE POLICE

POLICE HAVE ACCESS TO CCTV ON THESE PREMISES

THANK YOU FOR YOUR CO-OPERATION

BETWATCH

CITY OF WESTMINSTER

Supported by

City of Westminster and Metropolitan Police — Working together for a safer London

BM9

From: Green, Klaudia <kgreen1@westminster.gov.uk<mailto:kgreen1@westminster.gov.uk>>
Sent: Monday, June 23, 2014 2:26:00 PM
To: Tony Avery
Subject: William Hill ASB/Notices

Hi Tony,

Please note that I was in Harrow Road the other day and went inside William Hill Elgin and Kilburn Lane branches to speak to staff and see if there are any antisocial behaviour issues.

I have noticed that Elgin branch has approximately 3-4 copies of ASB notice which we worked together on and it is very clear what will and won't be tolerated when it comes to customers engaging in antisocial behaviour inside and outside your premises (private forecourt).

This seems to be working really well as I didn't witness or heard about any further incidents of the above.

It is also worth noting that I have not received any complaints thus far from Kilburn branch. The reason for my visit was to see if you have rolled out ASB letters across all branches or just one.

I really think that it would be beneficial if we could think in terms of rolling this out city wide as it seems to be working really well in Elgin branch.

Please could you consider, discuss with your colleagues and let me know what you think.

It is a great way to show what WCC, William Hill and Metropolitan Police are doing together to improve issues surrounding ASB in and around betting shops.

Looking forward hearing from you soon,

Klaudija Green
Community Protection Officer
Harrow Road and Queens Park Wards

Community Protection
Street Management

Westminster City Hall
64 Victoria Street
London SW1E 6QP

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www.westminster.gov.uk<http://www.westminster.gov.uk>

From: Richard Taylor
Sent: 09 September 2015 16:58
To: ksimpkin@westminster.gov.uk
Subject: William Hill, 357 Harrow Road

Dear Kerry

Thank you for meeting with Brian Minihane and I earlier this afternoon. William Hill Organization, at the highest level, now understands the reasons for the review and the concerns of local residents. It appears that complaints lodged in the past have been made at a local level which had not been passed on.

As we discussed, I will detail actions that William Hill propose to take to ensure that the issues contained within the review papers and those you have highlighted this afternoon do not recur. The measures that William Hill propose are as follows:-

1. The entire existing shop team will be removed from the premises. All staff will be replaced with a handpicked team with experience of operating in challenging environments. Those who have been working within the shop for William Hill will be no longer be employed at these premises.
2. A comprehensive CCTV system to a specification acceptable to the Metropolitan Police Service will be installed at the premises.
3. That CCTV system will include external cameras.
4. An overt CCTV monitor will be displayed behind the counter highlighting to customers that CCTV recordings are taking place.
5. A new front door will be installed at the premises. This will feature a magnetic door lock which may be used as appropriate by the new shop team.
6. Notices will be displayed within the premises advising customers that only drinks purchased within the premises, or supplied by shop staff may be consumed on the premises.
7. Notices will be displayed within the premises advising customers that William Hill has a 'Zero tolerance' policy on alcohol consumption, within its betting offices. The notices will state that anyone found to be drinking alcohol, or believed to be drinking alcohol, will be asked to leave immediately and barred from entry to the premises in the future.
8. Notices will be displayed within the premises, indicating that any persons involved in anti-social behaviour within, or immediately outside the premises will be barred from entering and the police will be notified.
9. William Hill will liaise with the Metropolitan Police Service with regard to whether it would be advantageous to modify or remove the marketing boards in the shop front.
10. William Hill will liaise with its landlord to ascertain whether potential measures can be implemented in the area directly outside its betting office. This is the area in which people congregate. You will remember that this is not part of William Hill's demise but the company will attempt to work with the landlord and indeed the licensing authority to see whether or not there is any action that can be taken to prevent people congregating in this area.

I hope to reach a situation where the licensing authority will confirm that it will not seek revocation of the premises licence at the review hearing. William Hill is committed to working with the licensing authority to ensure that its operations are wholly compliant within the terms of the Gambling Act 2005, the LCCP and its operation does not cause any difficulties to its neighbours.

I appreciate that any agreement between ourselves does not bind the licensing committee when it comes to make its decision with regard to the review. It may well be, that we can agree that the issues raised above may be reduced to conditions to be imposed upon the premises licence upon review.

I would be grateful if you could confirm whether this action plan satisfies you. If you require anything further or have any suggestions or amendments then please do not hesitate to contact me and I will take instructions from William Hill with regard to whether or not those amendments can be implemented.

Thank you again for your time this afternoon.

I look forward to seeing you shortly.

Kind regards

Richard

Richard Taylor | Partner | Licensing

Gosschalks, Queens Gardens, Kingston Upon Hull, HU1 3DZ

DD: 01482 590216 | **F:** 0870 600 5958 | **M:** 07949 132931 | **Switch:** 01482 324252 | www.gosschalks.co.uk

BM11

NO EXTERNALLY PURCHASED DRINKS.

Only drinks purchased within the premises, or supplied by shop staff may be consumed on these premises.

Any person found or believed to be consuming drinks that have not been provided on the premises, will be asked to leave immediately.

William HILL
THE HOME OF BETTING

BM12

NO ALCOHOL.

In partnership with the Metropolitan Police, William Hill operates a zero tolerance policy on alcohol consumption.

Any person found to be drinking alcohol, or believed to be drinking alcohol, within or directly outside of these premises, will be asked to leave immediately and barred from entry in the future.

William HILL
THE HOME OF BETTING

METROPOLITAN POLICE

William Hill always support prosecution

William Hill (Harrow Rd) Licence review - please write in..

Last Updated: Wednesday, 05 August 2015 14:08

Westminster Council is currently reviewing the gambling license of William Hill (357 Harrow Road, W9 3NA). This has been prompted by information that was presented by the community in the Betfred-process.

We would like to ask the local community to support the Council in the efforts to make William Hill comply with licensing regulations, and make Harrow Road a safer place to live and work. The council has the option to either revoke William Hill's license or to apply significantly more stringent conditions upon their license.

If you have any evidence, photos, or written statements to provide, please email it to gambling@westminster.gov.uk or go submit a comment online: http://idoxpa.westminster.gov.uk/online-applications/search.do?action=simple&searchType=LicencingApplication

The deadline to submit materials is 16 August, 2015.

Any of the following behaviour would indicate that William Hill has breached conditions attached to the licence:

- Permitting alcohol onto the premises.
- The premises are associated with crime and disorder.
- The premises are used by persons who are drunk, under the influence of alcohol or on drugs.
- Drug dealing has taken place on the premises
- The sale of stolen goods have taken place on the premises.
- Groups of people under the influence of drugs or alcohol frequently congregate outside the premises, and abuse and threaten other members of the public and local residents.
- There is a risk that vulnerable persons may be harmed by using the premises for gambling due to their impared judgement through alcohol or drugs.
- Not taking action on problems that have been brought to the attention of the licence-holder.

NO ANTI-SOCIAL BEHAVIOUR.

In partnership with the Metropolitan Police, William Hill operates a zero tolerance policy on anti-social behaviour.

Anyone suspected of involvement with anti-social behaviour within or directly outside of these premises, will be asked to leave immediately, barred from entry and the police will be notified.

William HILL
THE HOME OF BETTING

Please Note: Your activity is being monitored on CCTV.

METROPOLITAN POLICE

	Risk	Likelihood	Impact	Actions to reduce risk	Timescale	Target outcome
Local Area	Anti-social behaviour immediately outside the shop	high	high	Those involved barred from entry to the premises, and reported to police	Done	Reduced levels of ASB outside the shop
				Improved communication with SNT	Attempts made	
	Street drinking congregation immediately outside shop	high	high	Notices in shop front clarifying actions on ASB/drinking	Done	No customers drinking outside - lack of association
				SNT called to deal with congregating groups outside premises	as required	SNT involved to ensure dispersal of drinkers
				External cctv installed	Done	Shop team and SNT have images available to enforce no drinking policy
				External lighting installed	Done	Deterrent to drinking, and improved CCTV views for staff awareness and evidential requirements
				Investigate measures to deter use of forecourt, with landlord	Attempts made	Discourage congregation outside premises
	Proliferation of establishments selling strong/cheap alcohol	high	high	Liaise with LA/police to tackle issues arising	TBC	Reduction of street drinking in area, improved community relations
	Local people being unaware of our policies or responsibilities	high	high	Involvement in neighbourhood forums	TBC	Community engagement. Improved awareness of responsibilities, limitations and actions of William Hill
	Perceived association with street drinking culture / low level asb	high	high	Liaison with local people/SNT/LA and resolve underlying issues.	TBC	Collaborative approach to improving local environment
	Inadequate liaison between shop team and SNT	high	high	Contact SNT to improve communication and agree collaborative procedure between key stakeholders	Attempts made	Improved communication with SNT, reducing drinking/ASB
	Non-enforcement of 'no drinking zone'	high	high	Contact SNT to improve communication and agree collaborative procedure between key stakeholders	Attempts made	Improved street scene
				Customers barred from shop if found drinking immediately outside	Done	Ensure that William Hill customers are not part of the street drinking group

	Risk	Likelihood	Impact	Actions to reduce risk	Timescale	Target outcome
Physical features of shop	Inadequate CCTV coverage	high	medium	CCTV system upgraded to the newest system, with additional cameras installed inside the shop and new cameras installed externally	Done	All areas of shop fully covered by CCTV
	Staff unable to view live images	medium	medium	Install monitor behind counter	Done	Clear surveillance/recordings now available Supplementary images available to staff
	Lack of provision of evidential images regarding events outside shop	high	medium	External cameras installed to assist MPS	Done	Ability to provide images as requested by police
	Staff unaware of activity immediately outside shop front	high	high	External cameras installed, with pictures on overt monitor	Done	Increased awareness of activity immediately outside premises
				External lighting installed	Done	
				Removal of marketting board to open shopfront	Done	
	Ability of staff being able to view customers approaching shop	high	high	External cameras installed, with pictures on overt monitor	Done	Increased awareness of customers approaching the entrance
				External lighting installed	Done	
				Removal of marketting board to open shopfront	Done	
	Ability to control access when appropriate	medium	medium	Installation of a door mag-lock	Done	Ability to control access if required
	Ability for police to easily view inside whilst passing	medium	medium	Opening up shopfront by removing marketing board	Done	Police able to view inside readily
	Deterrent to customers causing potential issues	medium	medium	Overt CCTV monitors showing recording taking place	Done	Customers aware they are on CCTV both inside and outside the premises

	Risk	Likelihood	Impact	Actions to reduce risk	Timescale	Target outcome
Operational procedures	Staff complacency	high	high	Replace entire shop team	Done	Hand-picked seasoned shop team ensuring managerial supervision at all times
	Staff familiarity with customers	medium	medium			
	Shop team not engaging with customers regarding alcohol related issues	medium	high	Replace entire shop team, periodic refresher ASB courses.	Done	Team able to tackle issues appropriately, ensuring awareness of zero tolerance policy with customers
	Staff not implementing company policy and procedure with regards to alcohol	medium	high	Zero tolerance policy on alcohol consumption	Done	No alcohol allowed in the shop, staff fully aware of no alcohol policy
				Floorwalking by staff	Done	Customers fully aware of zero-tolerance policy
	Line management not fully aware of issues	medium	high	Replace entire shop team	Done	Line management fully informed of problems
				Line management visiting schedule	Done	Line management on site to increase first-hand awareness of issues and respond accordingly
	Incident Reporting not being completed properly (IRFs = Incident Report Forms)	medium	medium	IRFs to be produced daily by new shop team and ciculated to DOM/security	Done	Daily incident report form completion, ensures all incidents are recorded, however minor
	Local complaints not being responded to	high	medium	Shop team to record all complaints/observations and review with line managers	As required	Local observations are communicated to the appropriate person within William Hill, and acted on where required
	Customers drinking or concealing drinking within shop	high	high	Enforcement that only drinks purchased within premises can be consumed. Notices to this effect.	Done	Zero alcohol in shop
				Customers barred from entry to the premises	Done	
	Customers unaware of drinking prohibition	low	high	Zero tolerance policy on alcohol consumption, signage to that effect	Done	
	Staff unable to tackle problem customers in shop	high	high	Staff safe system to provide additional support to new team	Done	Reduced problems in shop
	Anti-Social Behaviour inside shop	low	high	Customers asked to leave, barred, reported to police	Done	Reduced asb inside shop

A letter to the licensing department could look like the sample letter below. If you have witnessed any specific incident(s) of street drinking, disorderly behaviour, abuse to passers-by, etc, please feel free to describe it/them in as much detail as you'd like. The licensing department also welcomes any photos or videos to be submitted with the representation. Please note that "premises" also include the forecourt, so street-drinking outside the shop is considered to be drinking on the premises.

Sample Letter:

As a resident of Harrow Road, I see groups of people gathering outside William Hill (357 Harrow Road, W9 3NA) every day. They are frequently drinking and causing disorder, and intimidate passers-by. Anti-social behaviour is common outside the premises, and more often than not the patrons are under the influence of alcohol and/or drugs.

I have witnessed this on a regular basis during the years I've lived in the area, and as far as I can tell, there have been no signs of anything being done by William Hill to improve the situation. The failure of William Hill to comply with licensing regulations puts residents of the area, including the many vulnerable people in the neighbourhood under significant risk, and it also encourages problem gambling.

I would like this letter to be considered as support for the Licensing Department's review 15/05830/LIREVG.

Kind regards,

(signed)

Source - http://www.maidahillforum.org.uk/latest-news/78-william-hill-harrow-rd-licence-review-please-write-in.html (Accessed - 11/8/15)

William Hill 357 Harrow Road – Proposed Conditions

1. The premises shall install and maintain a comprehensive CCTV system as per the minimum requirements of a Metropolitan Police Crime Prevention Officer. All entry and exit points will be covered enabling frontal identification of every person entering in any light condition. The CCTV system shall continually record whilst the premises is open for licensable activities and during all times when customers remain on the premises. All recordings shall be stored for a minimum period of 31 days with date and time stamping. Recordings shall be made available immediately upon the request of Police or authorised officer throughout the preceding 31 day period.

2. A staff member from the premises who is conversant with the operation of the CCTV system shall be on the premises at all times when the premises are open to the public. This staff member must be able to show a Police or authorised council officer recent data or footage with the absolute minimum of delay when requested.

3. The CCTV system shall include external CCTV cameras.

4. Notices indicating that CCTV is in use at the Premises shall be placed at or near the entrance to the Premises and within the Premises.

5. A monitor shall be placed inside the Premises above the front door showing CCTV images of customers entering the Premises.

6. The licensee shall:
a) 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.
b) 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.

7. The front window shall be kept 50% clear of all advertising material.

8. The licensee shall place and maintain a sign at the entrance to the Premises stating that access to the premises will be excluded to the following people:

· Anyone who is under the age of 18;
· Anyone who appears to be under the age of 21 and is unable to provide proof of age that they are over the age of 18;
· Anyone who is barred from the premises;
· Anyone who has alcohol on their person.

9. The licensee shall install and maintain a full counter screen at the Premises.

10. The licensee shall install and maintain a "safe haven" to the rear of the counter

11. The licensee shall install and maintain a magnetic door locking system for the customer toilet operated by staff from behind the Counter.

12. The licensee shall install and maintain an ultra violet lighting system in the customer toilet.

13. The licensee shall install and maintain a magnetic door locking system on the front door.

14. The licensee shall take reasonable steps to prevent street drinking of alcohol directly outside the Premises and to ban from the Premises those who do so.

15. The licensee shall place a notice visible from the exterior of the Premises stating that drinking of alcohol directly outside the Premises is forbidden and that those who do so will be banned from the Premises.

16. The licensee shall implement a policy of banning any customers who engage in crime or disorder within or directly outside the premises and notices to that effect shall be displayed inside and outside the premises.

17. The licensee shall appoint a named Police and Community Liaison Officer with the authority to implement change at the premises.

18. A telephone number and e-mail address for the Police and Community Liaison Officer shall be supplied to police and licensing officers and to community representatives upon request.

19. The licensee shall provide the Police and Licensing Authority with the following information as soon as practicable upon request and for such a time as the Police and Licensing Authority deem it necessary:

· A copy of the incident summary
· A list of those customers banned and the reasons for banning,
· Such other information or documentation as required by the Police or Licensing Authority.

20. If at any time the police or licensing authority supply to the premises names and/or photographs of individuals which it wishes to be banned from the premises, the licensee shall use all reasonable endeavours to implement the ban including through staff training.

21. The licensee shall develop and agree a protocol with the police as to incident reporting, including the type and level of incident and mode of communication, so as to enable the police to monitor any issues arising at or in relation to the premises.

22. The licensee shall provide its staff and management with telephone numbers for the Safer Neighbourhood Team.

23. The licensee shall place and maintain a sign at the entrance which states that "Only drinks purchased on the premises may be consumed on the premises".

24. There shall be no cashpoint or ATM on the premises.

Wood&Vale

St John's Wood & Maida Vale Express

Thursday September 24, 2015

MP calls for action on street drinkers

Karen Buck calls on council to act after seeing evidence for herself

Hannah McGrath
hannah.mcgrath@archant.co.uk

Karen Buck is calling for action

A Westminster MP has called for urgent action to tackle the rising blight of street drinkers in Maida Vale after claims the problem is "completely out of control".

Karen Buck, Labour MP for Westminster North, said she was stunned to find around 30 raucous street drinkers gathering in Maida Hill as she walked through the piazza at the junction of Elgin Avenue and Harrow Road at around 9pm last Thursday evening.

She said: "I was walking back home from a meeting through the piazza and I have never seen it like that, I was really stunned by it. There were about 18 raucous drinkers gathered around one bench and more on the other side."

Ms Buck, who says there has been a marked escalation in the number of noisy revellers congregating in Maida Vale's public spaces in recent months, said residents are "really unnerved", with some suggesting benches be removed to discourage problem drinking.

She added: "Personally I didn't fear them and I wouldn't say I felt threatened because I know the area but there was a young child walking behind me with their parent who said they were frightened and they did not want to go through the square.

"We need urgently for someone to get a grip on this."

The MP's calls for join action from council and police enforcement teams come in the wake of Met police proposals to axe all PCSO's from safer neighbourhood patrols in Westminster.

She said: "Police cuts can only make matters worse, our safer neighbourhood teams have been reduced to nothing now."

Despite joint working with police and council officials for over a year to crackdown on problem street drinkers, the MP said she had yet to see "any concrete evidence of this being done."

A spokesman for Westminster Council said they were aware of the issue and a dedicated inspector has been appointed to tackle the problem in the area.

He added: "We have been in regular contact with the police and have requested an increase in patrols.

"We have also contacted local off-licences to remind them of their responsibilities regarding the sale of high strength alcohol to those who are already intoxicated or known street drinkers.

Adrian Studd, Independent Licensing Consultant.

Introduction.

I have been instructed to carry out observations at William Hill Licensed Betting Office, 357 Harrow Road, Westminster, W9 3NA and to comment on evidence that has been provided in support of the review.

I will observe and comment on the operation of the William Hill premises, the conduct of customers and others in the vicinity and how the operation of William Hill impacts on the objectives for gambling premises.

I will also conduct observations in the area to identify issues outside the control of William Hill that have an impact on the Gambling Act objectives and in particular how nearby alcohol licensed premises impact on the Licensing Act objectives and the impact this has on the area generally.

Personal summary – Adrian Studd.

I retired from the police service on 2nd November 2012 having completed 31 years exemplary service with the Metropolitan Police in London. Between January 2012 and my retirement I was employed as the Chief Inspector in charge of licensing for the London Olympic Games 2012. In this role I headed up a team of officers with responsibility for supervision of licensing compliance at all the Olympic venues, including the Olympic park. In addition I was responsible for ensuring that any associated events were properly licensed, sufficiently staffed and operated in accordance with the licensing legislation and best practice in order to ensure the safe and effective delivery of the Olympic Games. In addition to leading my team I visited and worked with both the Olympic park management and many other venues, reviewing their policies and procedures and ensuring that the Games were delivered safely and securely. The success of this operation not only protected the reputation of the MPS but provided positive benefits for the profile of the MPS and the United Kingdom. I have been awarded an Assistant Commissioners Commendation for this work.

Prior to this role, between Jan 2002 and January 2012, I was employed first as an Inspector and then as a Chief Inspector on the MPS Clubs and Vice Unit (Now SCD9 Serious and Organised crime command). My responsibilities over this period focussed on licensing and included day to day supervision of the licensing team that had a London wide remit to support the Boroughs with

licensing activity. Providing both Overt and Covert support for policing problem licensed premises across London. My team worked with premises when licensing issues were identified in order to address these problems through the use of action plans in order to raise their standards. Where this failed I would support the Boroughs with evidence for use at review hearings if required.

I devised and implemented the MPS strategy 'Safe and Sound' which seeks to improve the safety of customers at licensed premises by reducing violent and other crime, in particular gun crime and the most serious violence. I also developed the Promoters Forum and risk assessment process, together these initiatives contributed to an overall reduction in violence in London of 5% and of the most serious violence and gun crime at licensed premises by 20% whilst I was there.

From 2004 until 2008 my role included representing the MPS and ACPO licensing lead both in London and Nationally. In this role I developed key partnerships with industry, NGOs and Government departments in order to improve the standards at licensed premises. I sat on the BII working party and helped develop the national training for Door Supervisors and worked with the SIA to successfully introduce the new regime within London. I sat on a number of Government working parties and worked closely with the alcohol harm reduction team on identifying best practice and ensuring this was used both within London and nationally by police and local authorities

I have been involved with Best Bar None for a number of years and have successfully helped a number of boroughs implement the initiative. I am a trained Purple Flag and Best Bar none assessor and until my retirement sat on the Board for Best Bar None in the Royal Borough of Kensington and Chelsea. For the last five years I have been in charge of licensing for the Notting Hill Carnival, the largest street carnival in Europe. During this time I have contributed to a reduction in violence overall at the Carnival and delivered increased seizures of illegal alcohol, reduction of unlicensed alcohol sales and a reduction in alcohol related violence. In addition to the above I have attended a large number of internal MPS training and qualification courses, I am trained in conducting health and safety risk assessments and hold the National Certificate for Licensing Practitioners, issued by the British Institute of Innkeeping (BII).

<u>The objectives under Section 25 Gambling Act 2005.</u>

- 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.

Licensing Act 2003 objectives.

- The prevention of crime and disorder
- Public Safety
- The prevention of public nuisance
- The protection of children from harm

Contents.

1. Overview of vicinity.

1.1 William Hill Licensed Betting Office (LBO) is situated at 357 Harrow Road, London, W9 3NA, in the Harrow Road ward of Westminster City Council. The area is mixed use with residential accommodation and a diverse selection of shops that includes a large number of independent traditional retailers such as butchers and greengrocers, independent convenience stores and off-licences and national chain stores.

1.2 Immediately next door at 355 Harrow Road is 'West 9' a convenience store and off licence open late. In addition to alcohol this shop sells lottery and scratch cards and mobile phone top up cards. It has a mobile phone repair counter set up outside the front of the shop that attracts customers to wait outside while waiting for service and repairs.

1.3 To the other side of the premises at 359 is Sam's Chicken, a fast food take away chicken shop that is open until midnight Sunday to Thursday and 02.00 Friday and Saturday. These premises are popular with William Hill customers, street drinkers and others using the area.

1.4 There are six alcohol off-licensed premises within a few minutes' walk from William Hill that also have an impact on the area and the promotion of the licensing objectives. In particular Food and Wine at 409 Harrow Road, Top Look at 528 Harrow Road, West 9 at 355 Harrow Road and Champers at 6 Great Western Road.

1.5 Opposite the William Hill premises is the Prince of Wales market area that is an open paved area that provides seating and is a focus for street drinking groups as recorded in the statement of Paul Green on 7/7/15, which is supported by my own observations.

Street drinking in Market, 12/8/15, 15.18 hrs.

1.6 There are very good public transport links with a number of bus routes running past the premises and along surrounding roads. There are bus stops on both sides of the road close to the premises. Westbourne Park underground station is five minutes' walk away.

2. Ward Profile.

2.1 Westminster City Council produces an area profile of all of their wards that provides a large amount of information about that ward. I refer to the latest Ward profile dated May 2014 and attach a link at Annex 'A'.

2.2 The total number of crimes reported on the ward for the previous year was 794 which equates to 6.6 crimes per 100 residents. The Westminster average is 24.1 crimes per 100 residents indicating Harrow Road Ward has a crime rate 73% below the Westminster average.

2.3 Crime on the Ward has decreased by 9% in the previous year (Westminster average is 13% decrease).

2.4 The residents perceive the top anti-social behaviour (ASB) issues to be dog fouling, drug use/dealing, rubbish/litter, parents not taking responsibility and teenagers hanging around.

2.5 Looking at Total Notifiable Offences (TNOs) Harrow Road Ward is lower in all areas than the Westminster average with the exception of residential burglary. In particular drug crime is 83% lower than average and theft and handling is 84% lower than the Westminster average.

2.6 There is a Controlled Drinking Zone in force across the whole of the City of Westminster, including Harrow Road Ward that allows the police to stop street drinking and seize alcohol and receptacles under the Police and Criminal Justice Act 2001.

2.7 Short term 'Dispersal Zones' have been used in various parts of the city to break up street drinking 'schools' and disrupt patterns of street drinking (WCC Statement of Licensing Policy), I am unaware if this tactic has been used in this ward.

3. Historical situation.

3.1 I am unable to comment on the situation that existed prior to my observations, which I understand includes evidence of a male who was seen drinking alcohol on the premises from a can of lager concealed in a brown paper bag.

3.2 I understand that the staff who worked at the premises when this incident took place have now been moved and a new team brought in to manage the premises. This would appear to be a proportionate and responsible approach to the issue by William Hill.

3.3 However, it should also be noted that the customer was drinking super strength 9% Skol lager in a single can from a plain bag provided by the off-licence, apparently in a clear attempt to assist the male to get around the street drinking ban that is in force in Westminster. The very fact that the receptacle was concealed indicates his knowledge that his conduct was not permitted.

3.4 This is a very irresponsible way of retailing alcohol. The ready availability of cheap, strong alcohol in single cans, provided in plain bags, is a common feature of areas that suffer from problem levels of street drinking. Tackling these irresponsible premises is key to preventing the problem and street drinking in an area.

3.5 There is evidence provided in the form of e mails and press cuttings of the historical success of partnership work between the local authority, police and William Hill. These include e mails on 10/1/14 and 23/6/14 from Klaudija Green, the community protection officer, praising the success of the partnership work with William Hill.

3.6 This partnership work, together with enforcement of regulations such as the street drinking ban and work to reduce the availability of cheap, strong alcohol is the way in which the problems evident in the area, in particular those caused by the problem drinkers, will be effectively dealt with.

3.7 There is also a press article by local MP Karen Buck who witnessed the problem of street drinkers and intimidating behaviour when walking in the Maida Vale area, in particular the market area where drinkers congregated around the benches.

3.8 There is no mention of problems outside William Hill but the issues of street drinkers congregating around the benches that I witnessed were evident. The evidence within the article supports my findings of the core problem and highlights the lack of enforcement activity by police or local authority. It also recommends consideration be given to removing the street furniture that attracts the problem drinkers.

4. Observations.

4.1 I conducted observations over three days, Wednesday the 12th August, Friday 14th August and Saturday 15th August between the hours 12.00 and 22.30. The weather was warm and mainly dry with some showers on the Friday evening. The period of observation was sufficient in my experience to form a clear view of the issues in the locality.

4.2 During this time I posed as a customer and observed activity within William Hill for a number of hours on each day. I also visited the nearby Paddy Power and Coral betting shop. I observed William Hill from the outside, visited a number of convenience stores, take away outlets and restaurants in the area and observed the street drinking in the vicinity.

4.3 The area was busy at all times during my observations with a diverse range of people shopping, socialising, using the restaurants and take away outlets and going to and from the public transport links.

4.4 I found that the William Hill shop was attractively furnished and kept in a clean and tidy condition. There were always at least 2 members of staff on duty with one regularly walking the floor and interacting with customers.

4.5 The shop was mixed use with the majority of customers using the over the counter facilities and watching various horse and dog races, including virtual racing, on the screens. There are four gaming machines but it was unusual for more than two to be in use at any one time and it was clear the primary use of the premises was for betting.

4.6 The customers I saw over the three days comprised a regular clientele of about 10, including one female, and they appeared to spend all their day inside the premises, chatting, drinking tea or coffee, placing bets and occasionally eating. It had an atmosphere akin to a social club, particularly on the Wednesday and Friday.

4.7 On the Saturday the regulars were still there but there were also new faces that I had not seen on the weekdays who were watching racing and placing bets. Many of the customers appeared to smoke and went outside the premises during the day to do so.

4.8 At no time did I see any alcohol being consumed, or any drinks that appeared to contain alcohol such as cans hidden in plain bags, or the decanting of alcohol into soft drink cans in the vicinity for consumption inside the premises. Customers were well behaved and the atmosphere was good.

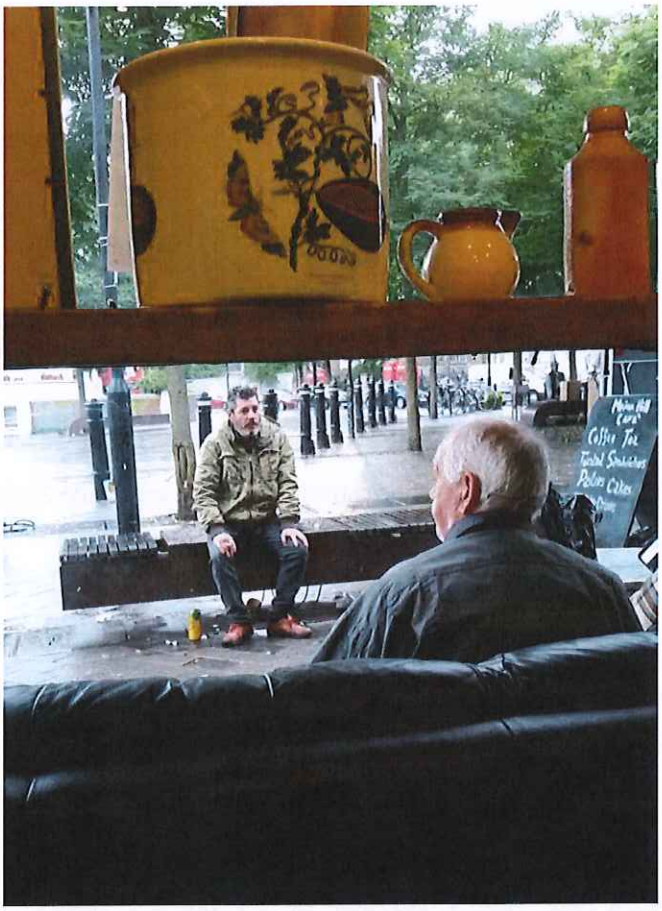
4.9 There was no evidence of any goods, stolen or otherwise, being brought into the premises or being handed about or sold. I did not overhear any conversations about goods being available, bought or sold.

4.10 Overall the betting shop and clientele were similar to most of the betting shops that I have visited both as a police officer and since retirement as an independent licensing consultant. That is essentially a social club for older males in their late 50's and 60's.

4.11 Over the three days it became apparent that there is a small but significant group of street drinkers that spend a large proportion of their time on the street, in particular in the market area, socialising, eating and drinking and visiting various premises.

4.12 This group generally do not use the betting shops, however there were two individuals who I saw socialising and drinking with the street drinkers who I also saw using both the William Hill and Paddy Power betting shops.

4.13 The street drinkers mainly use the bench in the market area, including the bench outside Maida Hill Café. During the three days there were always some street drinkers in the market area. The most I saw at any one time was at 19.00 hours on Wednesday 12th August when there were a total of thirteen street drinkers using the benches.



Drinking on bench outside Maida Hill cafe, 14/8/15, 16.26 hrs

4.14 These drinkers made little attempt to disguise their drink; some had them in unmarked black bags that are provided by a number of the local off licences, others just drank from the bottles or cans or decanted them into coke or similar cans. There were no police or other enforcement officers in the area and the drinkers were allowed to continue unchallenged.

4.15 At 16.50 on 12/08/15 I was in Maida Hill café when I saw a black male sitting on the bench outside the café. He was eating chicken and chips from a 'Sam's Chicken' box.

4.16 When the chicken was finished he decanted a miniature bottle of spirits into lemonade can and sat on the bench drinking it. I saw the male later at 17.25 inside the Paddy Power betting shop still drinking from what appeared to be the same lemonade can he had decanted the alcohol into. Over my three days of observations this male was often around and I saw him in both Paddy Power and William Hill betting shops.

4.17 At 16.30 on Friday 14th August I was outside Maida Hill cafe when I noticed 2 street drinkers sitting on the bench outside the café. They made comments towards two females who walked past, I did not hear what was said but it caused the females to look at them and then walk past. There were fewer street drinkers at this time due to showery weather.

4.18 At 16.50 on 14th August I observed a small group standing in the market under a gazebo drinking from a bottle of sparkling wine. One of these was a black male with long, grey dreadlocks that I had previously seen helping out on one of the market stalls. Again there was no police presence or enforcement action of any kind.

4.19 By 20.00 on 14th August the rain had stopped and there were 3 street drinkers back on the usual bench.

4.20 On Saturday 15th the weather was again warm and dry and there were 6 street drinkers sitting on the usual bench in the market area drinking. There were just 2 stalls open at 16.00 which were selling fresh fish and fruit and veg.

4.21 At 16.30 I saw a male standing outside the (closed) Prince of Wales public house drinking from a can in a plain bag. During the Saturday evening Sam's Chicken was particularly busy, attracting customers who used the betting shops, street drinkers and others in the area.

4.22 At 18.20 I observed a male, who I had seen on the previous days chatting to customers outside William Hill, sitting on the market bench with some of the street drinkers drinking from a can of Black Storm strong lager.

4.23 I had not seen him inside any of the betting shops and he was not part of the regular street drinking group but appeared to loiter in the area generally, socialising with the groups who use the outside spaces and with betting shop customers who smoke outside.

4.24 The problem of street drinkers attempting to access alcohol locally is illustrated by the hand written signs that are displayed outside the Costcutter store on the corner of the market stating that they do not sell alcohol; this appears to have been written in response to repeated requests for alcohol.

Costcutter signs stating no alcohol is sold.

5. Alcohol Sales.

5.1 The connection between public alcohol consumption at problem levels and the incidence of associated crime and disorder and anti-social behaviour is well documented; it is this that has driven the introduction of DPPOs in many boroughs.

5.2 As part of my observations I considered the price and availability of alcohol in the vicinity of William Hill and the market area where the street drinkers congregate. Casual observation revealed that there were at least Six (6) Off Licensed premises within a few minutes' walk of the market.

I. West 9 food and wine, 355 Harrow Road.
II. Food and Wine, 409 Harrow Road.
III. Top Look, 528 Harrow Road.
IV. Co-op, 504 – 506 Harrow Road.
V. Great Western food and wine, 12 Great Western Road.
VI. Champers, 6 Great Western Road.

5.3 Three of these premises sell the strong, cheap alcohol cans favoured by street drinkers. For example food and wine at 409 Harrow Road sells a selection including Black Ace cider which is 7.5% abv at 99p for a 500ml can.

5.4 Top Look at 528 Harrow Road sells a large selection including Crest Super lager which is 10% abv at £1.70p for a 500 ml can and ciders at 7.5% abv from 99p. 10% is very strong for a lager, approximately twice the strength of most premium lagers.

5.5 The cheapest I saw was at 'Champers' at 6 Great Western Road (50 metres from William Hill and the market area). I bought a can of white cider at 7.5% abv for 89p for a 500ml can. It was supplied in an unmarked black bag similar to that I had seen the street drinkers using to disguise their alcohol.

5.6 To identify the number of units in a can it is necessary to multiply strength (ABV) x volume (ml) divided by 1000. For the 500ml can of lager of 10% proof the calculation is 10 x 500 divided by 1000 making 5 units.

5.7 The recommended maximum number of units consumed daily is 2-3 for adult females and 3-4 for adult males. It can be seen that a single can of this very strong lager provides twice the daily recommended units for a female adult and more than the daily recommended intake for a male adult.

5.8 Considering the white cider bought at Champers at the selling price of 89p makes an individual unit cost of 24 pence. This is the cheapest I have seen and to put this in context the minimum unit price introduced in Scotland is currently 50 pence and recent proposals (now shelved) for minimum pricing in England would have set the unit price at around 45 pence.

5.9 The evidence provided by local authority officers, which supports my own observations, clearly indicates street drinking at problem levels in the vicinity. However, over the course of my three days observations I saw no interventions by the police or enforcement of the DPPO, despite witnessing many examples of alcohol consumption in the street, nuisance drinking in public, public drunkenness and the associated anti-social behaviour.

6. Licensing authority evidence.

6.1 It is stated in the 'notice of intention to hold a review of a premises licence' that drug dealing and the sale of stolen goods has taken place on the premises. In support of this the licensing authority has provided just four (4) intelligence reports supplied by police and four (4) Integrated Intelligence Platform (IIP) checks. These reports date back to 21/02/13, a period of 2 ½ years.

6.2 To have just 4 intelligence reports and 4 IIP reports for a licensed premises over a period of at least 2 ½ years is in my view very low. I have analysed these reports and I do not consider that any of them are credible or provide any evidence of crime taking place at the premises.

6.3 **CWRT00876662-21/02/13.** This report apparently refers to seeing a known prostitute who has convictions for assault on police and drugs offences coming out of William Hill. She is said to be under the influence of alcohol, though not said to be drunk.

6.4 There is no explanation given as to why this is included in the evidence and there is no evidence of any offence being committed. The officer states that he was observing the location due to an increased amount of anti-social behaviour associated with the premises.

6.5 However there is no evidence here of such behaviour and no other reports relating to this period of observation, this indicates to me that there was no anti-social behaviour taking place. This report should be disregarded.

6.6 To support the suggestion that drug dealing takes place at the premises one intelligence report **CWRT0098760/14** is supplied. This report states that a 'source' has stated that numerous people sell crack in the premises, that you can go into the West End and purchase crack and describes an IC3 (Black) male he says deals in crack. No grading is given for this information.

6.7 This information was provided 1 ½ years ago to police and has not been brought to the attention of the premises management. Police have not conducted any drug operations at the premises; no action has been taken by any authority in relation to the information.

6.8 I consider that the police did not take this information seriously or act on it in any way. Had they been concerned they would have approached the management of the premises and/or conducted a drug enforcement operation.

6.9 This information is irrelevant to this review and does not provide any evidence of drug dealing at the premises. It should be disregarded.

6.10 **CWRT00922127-24/02/15.** This report appears to refer to begging for cigarettes in the area. No explanation is given as to why this is included in the evidence, it appears to be because William Hill is mentioned to identify the area he is seen begging in. The report does not provide any evidence of offences at the premises and should be disregarded.

6.11 **CWRT00873801-17/01/13.** This report refers to a male seen drinking from a can of lager, in a brown bag, in the street outside William Hill's premises. There is no suggestion that he had been into the premises or was connected to it in any way.

6.12 It appears likely that the can came from the West 9 convenience store directly next door to William Hill or from Champers around the corner in Great Western Road, a favourite with the street drinkers. It is not clear why this information is relevant to the betting shop.

6.13 It appears to me that it is more relevant to street drinking problems and to the off-licence that sold him the single can in a plain brown bag in order to attempt to disguise the fact that it is alcohol. There does not appear to have been any attempt to deal with the premises that supplied lager for consumption in the street, contrary to the alcohol control zone. It is irrelevant to this review and should be disregarded.

6.14 **IIP check 24.4.15.** This incident refers to a missing person report for a vulnerable adult found in the shop. No further details are given. It appears to me that a vulnerable adult has been found in the shop and police called to deal with the person.

6.15 Under such circumstances the premises would be acting in a responsible manner and it should be regarded as positive for the premises and not as reflecting negatively on it.

6.16 **IIP 30.10.14.** This refers to a CAD report which relates to a drunk male trying to kick over a motor cycle outside the premises. Again no explanation is given as to how this relates to the premises. It is not suggested that either male had anything to do with the premises, it is merely used as a landmark.

6.17 More information may be available from the CAD message, however that is not supplied. There is no evidence that relates to William Hill or the operation of the premises and this report should be disregarded.

6.18 **IIP 18.07.14,** This IIP entry refers to a report of fraud that has been taken from another William Hill shop. No further details are included. It clearly refers to another premise and is irrelevant to this review and should be disregarded.

6.19 **IIP 10.7.14.** This refers to a missing person, an elderly male. He is known to frequent 'betting shops in the area'. There is no connection to William Hill and no evidence of any offences. This refers to a circulation to try and trace a missing person, it has no relevance to this review and there is no reason for it to be included in evidence. It should be disregarded.

6.20 As can be seen none of these reports provide any evidence of any offences, crime or disorder at William Hill premises. They are irrelevant to this review and no explanation is given as to why they have been included.

6.21 Some, such as the vulnerable adult found, may even be evidence of responsible practices by the premises staff. However insufficient details are provided to make a full analysis.

6.22 It appears to me that searches on CRIMINT and IIP have been done using the location and everything that comes up has then been included, despite none of it reflecting negatively on the operation of the premises.

6.23 To state in the review application that drug dealing takes place at the premises based on a single, unsubstantiated piece of information that has not been acted on in any way is completely unjustified and lacks any credibility.

6.24 **Handling Stolen Goods.** The grounds for review refer to the premises being used for the sale of stolen goods. This appears to be based solely on the statement of Petra Kauraisa who states that a resident saw stolen goods being sold in the shop.

6.25 There is no evidence given regarding dates or what the goods were or how this individual knew the goods were stolen. It is also stated that the manager of the Co-op across the street from William Hill mentioned that merchandise stolen from their store is being sold in William Hill. Again there is no description of goods or dates or any other information to support these allegations.

6.26 It is clear that these allegations have not been made to police. Had they been reported the CRIMINT and IIP checks would have identified them. Had there been any allegation of crime made to police there would be CRIS reports with details.

6.27 There is no evidence to support these allegations that are unsubstantiated and made by a single person based on accounts from third parties. In my view they lack credibility and do not provide any evidence of handling stolen goods or any other offence at the premises. There was no evidence of such activity at the shop during my observations.

Statement of Paul Green Senior City Inspector.

6.28 This statement refers to observations conducted by Mr Green outside the premises on 26th June 2015 and appears to be included to support the allegation that the premises are associated with crime and disorder.

6.29 In paragraph 2 Mr Green refers to a group sitting on pallets that had come from the premises next door to William Hill, West 9, and drinking from plastic or polystyrene cups. The group were observed pouring drink from plastic bottles into the cups but it is not stated what these bottles contained or suggested that they contained alcohol.

6.30 It is noted the group were good natured, not loud and not drunk, with the exception of a single elderly female who was drinking from small bottle of wine. No drug dealing or taking was seen.

6.31 It is not stated that the any of the group went into or came from William Hill or that they were connected in any way to the premises. It appears more likely to me that they were there due to the access to cheap alcohol at the convenience store next door, West 9 or at Champers around the corner.

6.32 At 22.00 the group moved across the road and continued their drinking in the Prince of Wales street market area sitting on the benches.

6.33 This observation indicates the root of the problem which is not the William Hill betting shop but the availability of cheap alcohol at the nearby convenience stores and the presence of a street drinking 'school'.

6.34 These drinkers are attracted to the area by the alcohol availability and by the fitted street furniture provided by the local authority in the market area that allows them to consume it on the street in relative comfort.

6.35 It is clear that despite the ban on street drinking in the area and the powers that are available to police no enforcement action was taken on this occasion. It appears that no attempt was made to identify where the drunk female obtained her small bottle of wine despite evidence that the sale of this, to a drunken person, may have constituted an offence.

6.36 Enforcement action against irresponsible retailing of alcohol would be more appropriate, and effective, than the review of the licence of William Hill or any other betting shop in the area that have no direct control over the behaviour of street drinkers outside their premises.

6.37 Mr Green conducted further observations on 27th June. At 20.30 he noted that there were no pallets outside the betting shop and no people there either. He went into the premises and noted 5 customers but there were apparently no concerns.

6.38 Mr Green again went into the premises at 21.30, on this occasion he noticed 2 males outside the premises, one of them was holding a bottle of beer. Inside the premises a can of Stella Artois was seen on a table but it is not noted if anyone was drinking from it.

6.39 On this occasion there were about 12 customers inside. One is noted as an elderly white male who was unkempt and slurring his speech, apparently he had been seen earlier staggering across Harrow Road.

6.40 It is not noted that he was drunk or that he was drinking anything inside the premises. It may be that he was suffering from an injury or illness that produces these symptoms. No investigation was carried out to ascertain if this was the case, the implication being that he was drunk.

6.41 Mr Green notes that during the time of his observations, from 20.30 until 21.50, a small crowd of males and females were socialising in the Prince of Wales market area, using the benches and decanting drinks into plastic cups. They were not drunk, loud or causing a nuisance.

6.42 On this occasion evidence is given of a lager can inside the premises, however there is no evidence of anyone drinking from it; it may have been an empty that had been consumed elsewhere and discarded in the premises.

6.43 I have spoken to the William Hill management about the issue of drinking in the premises. This is not permitted and staff are vigilant to prevent it, however they do occasionally find empty, discarded cans inside the premises.

6.44 It appears that again this evidence primarily indicates the prevalence of street drinking in the area. Fuelling this is the availability of cheap alcohol and the open area of the market with seating close by. William Hill is incidental to these issues, not the cause of them.

6.45 If William Hill were not there the street drinkers would still use the vicinity to purchase their alcohol and consume it on the seats in the market area. The lack of any enforcement, particularly of the controlled drinking zone, encourages this behaviour.

Statement of Dr. Karen Dwyer.

6.46 Doctor Dwyer describes behaviour that clearly amounts to alcohol related nuisance and anti-social behaviour and is typical of the behaviour found where street drinkers congregate.

6.47 The behaviour she describes is said to take place close to William Hill's premises, however it is all taking place outside. It appears to me that this is the same group of street drinkers that are seen by Mr. Green and that congregate in the Prince of Wales market area and outside this and other premises.

6.48 Their behaviour is fuelled by the availability of cheap, strong alcohol close by and the market area opposite that provides good facilities for their street drinking. It is likely that some of them use William Hill, and they will also use other nearby shops such as take away food and convenience stores and off-licences.

6.49 Their use of William Hill is incidental to their use of the area. They will continue to use the area while there is the availability of cheap, strong alcohol, the open spaces and seating provided in the market area and a lack of enforcement of the Controlled Drinking Zone. The solution to the problem lies in tackling the root cause, the alcohol availability and misuse, not the symptoms.

6.50 Dr. Dwyer refers to what she considers to be limitations on the legislation that she states has prevented the police conducting enforcement activity and she specifically mentions the decanting of alcohol into unmarked plastic cups and cans of alcohol being consumed that are supplied by local off-licences in plain bags.

6.51 Her assumption that the police are unable to act is incorrect. The powers for police and other authorised persons come from the Police and Criminal Justice Act 2001 and individuals can be required to stop drinking, surrender any alcohol and any open or sealed containers.

6.52 The circumstances described by Dr Dwyer are precisely those that the Act was created to combat and it has been used effectively in a number of areas. Individuals very quickly realise that if they attempt to drink in a certain area they will be dealt with robustly and that is very effective in preventing them using that area and thereby eliminating the issues that go with their drinking.

6.53 Guidance on Designated Public Place Orders is contained in Home Office guidance: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/183513/Guidance_on_designated_public_place_orders_DPPOs_-_for_local_authorities_in_England_and_Wales.pdf

Councillor Tim Roca.

6.54 Cllr Roca describes concerns he has about the conduct of individuals in the vicinity of William Hill and in the area generally. The behaviour he describes, particularly that taking place at the junction of Harrow Road and Great Western Avenue, supports my observations of the behaviour of the problem drinkers who congregate in the market area and migrate across the road to access alcohol.

6.55 In his final paragraph he notes that as a result of the review process there has been a reduction in some of the issues associated with the premises, this is an indication of what can be achieved by partnership work when the issues are brought into focus and tackled.

7. Conclusions.

7.1 Harrow Road in the vicinity of William Hill is a very busy area with those accessing public transport, shoppers and residents. There are at least six off-licences in the vicinity of William Hill, three of which sell the strong, cheap alcohol favoured by street and problem drinkers provided in plain plastic bags at low prices. The prices are significantly below what is considered a responsible unit price.

7.2 Most supermarkets and many responsible independent retailers do not stock these 'super strong' lagers and ciders, or if they do they are sold only in multi packs. Inevitably this cheap, single availability will attract street drinkers and others to the area to purchase these drinks.

7.3 There were many occasions where street drinking, including problem drinking, was taking place in public but I did not see any enforcement of the DPPO that is in place. I saw very little police presence in the vicinity and individuals drinking openly from cans of alcohol, or from

cans in unmarked bags, appeared to have no concern that they may be stopped or have their alcohol confiscated.

7.4 There is a small but significant group who effectively spend their time living on the street in the vicinity of the market. They take advantage of the availability of cheap strong alcohol, they purchase cheap take away food and use street furniture such as the benches in the market and facilities such as the public toilets to pursue this lifestyle.

7.5 A small number of these individuals frequent William Hill, most do not. Their use of the premises is incidental to the nuisance they cause in the area, not the cause of it. They all frequent various shops and premises in the area such as the off licences and Sam's Chicken next door to William Hill.

7.6 While it may appear to the casual observer that the nuisance in the area is linked to the operation of William Hill it was apparent to me during my observations that this was not the case and that William Hill is suffering from the 'Landmark' effect.

7.7 It is clear that the root of the problem is the street drinkers attracted to the market area by the street furniture and the availability of cheap, strong alcohol close by. These drinkers use the pedestrian crossing directly outside William Hill in order to access their cheap alcohol from 'Champers' and other off-licences and the cheap take away food such as Sam's Chicken leading to them, on occasion, loitering outside William Hill and other premises close by.

7.8 This movement back and forth also brings them into contact with the busy area outside 'West 1' where customers are waiting while phone repairs take place, where there is access to the flats above the shops and where the smokers stand outside William Hill.

7.9 I saw no evidence that the smokers outside William Hill caused a nuisance, however some of the street drinkers did loiter around outside William Hill waiting for the crossing, talking to the smokers and generally mingling with the numerous people using that corner of the road.

7.10 This inevitably leads to some conflict when these problem drinkers are challenged on their behaviour by residents or others using the pavement.

7.11 Based on my observations and experience the behaviour of these individuals, in this area, is as a consequence of;

- The ready availability of strong, cheap alcohol,
- Availability of convenient pedestrian area in the market containing benches and public toilets,
- Lack of high visibility policing and enforcement of DPPO,
- Apparent acceptance of the low level nuisance caused by street drinkers.

8. Recommendations.

8.1 In light of the wealth of evidence that the root of the problem is the street and problem drinkers attracted to the area it is clear that the way forward is not by removing William Hill's right to trade but by tackling the problems identified.

8.2 Even if William Hill were not there at all, the street drinkers will still be attracted by the market area facilities and by the availability of cheap, strong alcohol. The way to combat these problems is through the partnership work that has proved successful in the past, together with a review of the market area and enforcement activity against the irresponsible off-licences in the area.

8.3 There is no single solution to these issues, it requires a multi-agency response led by the local police problem solving team, but involving the local authority with retailers, landlords and residents taking part in a holistic approach. William Hill are not the root cause of the problem but, working together with the other authorities, they can be part of the solution.'

8.4 There is a wealth of experience and advice available, in the Home Office problem solving guides. In addition every Ward will have a policing team assigned to it who have received 'problem solving' training. It is important to put in meaningful interventions to address the root cause, not just tackle the symptoms.

8.5 At the root of the problem is the unchallenged street drinking, fuelled by the ready availability of cheap, strong alcohol. Only by tackling this will problem solving be successful.

8.6 Key to reducing the nuisance in the area is addressing the availability of strong, cheap alcohol. I saw evidence of drunks being served alcohol and the manner of sale in some premises such as individual cans and micro bottles, very cheap unit price and the use of plain bags to provide cover is irresponsible.

8.7 These issues could be addressed through pro-active partnership, the use of licence conditions where appropriate and the use of enforcement where offences are taking place.

8.8 To take one well-known example, the town of Ipswich reports a 49% reduction in street drinker incidents for the first 6 months of their initiative banning sales of super-strength alcohol. *(See Annex 'C' attached for media report on impact of banning super-strength alcohol sales in Ipswich).*

8.9 Other initiatives that have been successfully used elsewhere in similar situations include the removal or redesign of street furniture, improvements to lighting, tidying up an area to give more pride in it, securing open areas so they cannot be misused, additional street patrols such as police or street wardens and enforcement of appropriate legislation such as DPPOs.

8.10 William Hill customers are required to stand outside smoking and consequently are using the same space as the problem drinkers and others loitering by the crossing, those using the mobile phone counter outside the shop next door and those accessing the flats above the shops. This can lead to the impression of a large and potentially intimidating group associated with William Hill.

8.11 As has been identified in the past a partnership approach is required to tackle this including the William Hill and phone shop managers, residents and police/local authority in order to develop a street management plan and improve the supervision of the outside space.

8.12 I saw no evidence of drinking inside the William hill shop. This may be in part because of heightened vigilance by shop staff in response to these issues. I would encourage William Hill to continue its efforts to ensure that these problems of street drinking in the locality are not permitted to seep into their premises.

I understand that my duty is to the court and this report has been prepared in compliance with that duty. All matters relevant to the issues on which my expert evidence is given have been included in this report. I believe the facts I state in this report are honest and true and that the opinions I have expressed are correct to the best of my judgement. The fee for this report is not conditional on the outcome of the case in anyway whatsoever.

Adrian Studd, Independent Licensing Consultant.

19/10/15.

Annex 'A' Harrow Road Ward Profile.

http://transact.westminster.gov.uk/docstores/publications_store/wardprofiles/harrow-road-may-2014-ward-profile.pdf

Annex 'B'-Ipswich banning super-strength alcohol initiative.

An East Anglian town has seen a dramatic fall in street disorder since most of its shopkeepers banned the sale of super-strength alcohol. Suffolk police said there had been a 49 per cent reduction in "street drinker events" in Ipswich during the first six months of the voluntary Reducing the Strength campaign.

The experiment was launched by police and the Co-op in September amid concern at the behaviour of itinerant drinkers intoxicated by the likes of Tennent's Super and Carlsberg Special Brew.

At the time, the Government was backing plans for a minimum price for alcohol to stop supermarkets and off-licences selling ultra-cheap strong cider and beer. Although the Coalition has reportedly since ditched its national plan, Ipswich is half-way through the first year of its local initiative.

At its outset, 53 stores halted the sale of cheap beers, lagers and ciders with an alcohol volume of at least 6.5 per cent. Now, 80 shops are taking part including Tesco, Debenhams, M&S, BHS, Waitrose, Sainsbury's and Aldi, equating to two-thirds of the town's 122 stores.

Updating the public on progress, Suffolk police said that between last September and this March the public had reported 94 "street drinker events" to police, compared with 191 events during the same period in the previous year, a drop of 49.2 per cent.

Local businesses have also reported positive effects, with surveys revealing a 20 per cent fall in the number of people stating they witnessed "a high level of street drinking around their premises." But there was no change in the number of reported crime and anti-social behaviour outside stores owned by the Co-op. Police said that was against a background of falling incidents of crime and anti-social behaviour across the town.

Tim Newcomb, Assistant Chief Constable at Suffolk police, said: "We wanted to reduce the number of stores selling these products and to reduce the amount of crime and anti-social behaviour occurring in and around off-licensed premises in the town.

"We are far from being able to say that we have fully achieved these aims, but we can say that we are seeing some clear improvements and that the campaign is helping us move towards an even safer town.

"Our results directly related to this campaign in relation to crime and ASB [anti-social behaviour] are limited at this point, but are set against the backdrop of fantastic work carried out by police and partners to tackle issues connected with street drinking in Ipswich. Reducing the Strength will add to these results and will help in providing these vulnerable people with routes out of their chaotic lifestyles."

The police praised the "fantastic support" independent and national retailers had given the scheme, adding that many had shared its view that removing the products would help the community.

Assistant Chief Constable Newcomb added: "There are still a third of these stores in Ipswich that are continuing to sell these items however, and we will now work with these businesses, along with our partners, to further discuss the benefits of the campaign."

A significant number of police forces and public-sector agencies across the UK have been in contact with Suffolk police to discuss the campaign, which has the backing of Ipswich Borough Council, Suffolk County Council and NHS Suffolk.