



City of Westminster

# Licensing Sub-Committee Report

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| Item No:           |   |
| Date:              | 21 April 2022   |
| Licensing Ref No:  | 22/00920/LIGN - New Premises Licence  |
| Title of Report:   | Game Nation<br>147 - 149 Wardour Street<br>London<br>W1F 8WD  |
| Report of:         | Director of Public Protection and Licensing   |
| Wards involved:    | West End  |
| Policy context:    | City of Westminster Statement of Principles for Gambling  |
| Financial summary: | None  |
| Report Author:     | Karyn Abbott<br>Senior Licensing Officer  |
| Contact details    | Telephone: 0207 641 6500<br>Email: <a href="mailto:kabbott@westminster.gov.uk">kabbott@westminster.gov.uk</a> |

## 1. Application

| 1-A Applicant and premises        |   |                       |
|-----------------------------------|---|-----------------------|
| <b>Application Type:</b>          | New Gambling Premises Licence, Gambling Act 2005  |                       |
| <b>Application received date:</b> | 31 January 2022   |                       |
| <b>Applicant:</b>                 | Family Leisure Holdings Limited   |                       |
| <b>Premises:</b>                  | Game Nation   |                       |
| <b>Premises address:</b>          | 147 - 149 Wardour Street<br>London<br>W1F 8WD   | <b>Ward:</b> West End |
| <b>Premises description:</b>      | <p>According to the application, this premises plans to operate as an adult gaming centre (AGC). The application has been made under Section 159 of the Gambling Act 2005 (2005 Act).</p> <p>AGC premises licences allow the holder of the licence to make gaming machines available for use on the premises. Persons operating an AGC must hold a gaming machines general operating licence from the Gambling Commission (the Commission) and must seek a premises licence from the licensing authority.</p> <p>An AGC premises licence is entitled under the Act to make available for use a number of category B gaming machines not exceeding 20% of the total number of gaming machines which are available for use on the premises and any number of category C or D machines.</p> <p>There are no default operating hours for an AGC however the applicant has applied for Monday to Sunday 09:00 to 03:00.</p> <p>The Council's Pleasure Fairs (Amusement Premises) Byelaw restricts the hours permitted for premises that provide amusement machines, such as AGC's within Westminster between the hours of 12 midnight and 9am.</p> |                       |
| <b>Premises licence history:</b>  | This premises is currently licensed under the Licensing Act 2003 (19/07324/LIPT). A full licence history can be seen at <b>Appendix 5</b> of this report.   |                       |
| <b>Premises in the vicinity:</b>  | <p>Wardour Street, is a one-way street that runs north from Leicester Square, through Chinatown, across Shaftesbury Avenue to Oxford Street. The premises are located at 147-149 Wardour Street and the application relates to part basement only. The ground floor and the remaining part basement will be occupied by a Family Entertainment Centre (FEC).</p> <p>There are 4 hostels and 5 faith groups within a 250m radius of the premises. There are 22 licences under the Gambling Act 2005, this includes 2 lottery registrations, 1 Adult Gaming Centre and 19 gaming machine permits</p> <p>There are 70 residential properties within a 75 metre radius of the premises.</p> <p>A full detailed list of gambling premises can be viewed at <b>Appendix 7</b> of this report.</p>   |                       |

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| <b>Applicant submissions:</b>        | The applicant has submitted a supplementary bundle with an updated LARA Report which can be found at <b>Appendix 3</b> of this report.                                     |
| <b>Interested Party Submissions:</b> | Richard Brown from Westminster's Citizens Advice Bureau has submitted a supplementary bundle in respect of [REDACTED]; [REDACTED] which can be found at <b>Appendix 4.</b> |

## 2. Consultation

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| <b>Consultation procedures</b>  |
| <p>2.1 The application was advertised in accordance with the Gambling Act 2005 (Premises Licence and Provisional Statement) Regulations 2007 both on the premises and in the local press. The 28 day consultation period started from the date the application was received.</p> <p>2.2 Local residents and businesses within a 50 metre radius of the proposed premises were written to outlining the application and how they can make representations to the Authority within the statutory period.</p> <p>2.3 Emails were also sent to each Ward Councillor whose wards are subject to these applications advising them of the application.</p> |

## 3. Representations

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| <b>3-A Responsible Authorities</b>   |                             |
| <b>Responsible Authority:</b>  | Metropolitan Police Service |
| <b>Representative:</b>   | PC Tom Stewart              |
| <b>Received:</b>   | 21 February 2022            |
| <p><u>Re: Application for a new Adult Gaming Centre - 22/00920/LIGN 147 - 149 Wardour Street London W1F 8WD</u></p> <p>Dear Westminster Licensing Team,</p> <p>The Metropolitan Police Service (MPS) object to this application as the premises is likely to undermine the following Licensing Conditions:</p> <ul style="list-style-type: none"> <li>Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.</li> </ul> <p>The location of the intended premises is within the West End Cumulative Impact Area, which should be taken into consideration when determining this application as Wardour street sees a significantly higher than average amount of crime and anti-social behaviour, associated with the night-time economy. This is a direct result of premises in the area that are licensed under the LA03 Act as well as premises licenced under the Gambling Act. It is the belief of the MPS that if this application were to be granted, the premises would attract a level of crime and anti-social behaviour to the area.</p> <p>The MPS acknowledges the conditions offered in the application. However, I do not believe that these undertakings will mitigate the issues raised. This is primarily based on the intended hours of operation.</p> <p>If the sub-committee were minded to grant the application, the MPS would respectfully request that the hours were reduced to 09:00 – 00:00. These hours replicate those in the Westminster City Council Pleasure Fairs (Amusement Premises) Byelaw, of which section 3(1) provides that "The manager shall not keep the amusement premises open between the hours of <b>12 midnight and 9am.</b>"</p> |                             |

Respectively submitted for your consideration.

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| <b>Responsible Authority:</b> | Licensing Authority |
| <b>Representative:</b>        | Kevin Jackaman      |
| <b>Received:</b>              | 24 February 2022    |

I write in relation to the application submitted on behalf of Family Leisure Holdings Limited for a new Adult Gaming Centre for the above mentioned premises under the Gambling Act 2005 (the Act).

As a responsible authority under section 157 of the Gambling Act the Licensing Authority has considered your application in full. The Licensing Authority has concerns relating to this application as minimal information has been provided that would show how this premises, if granted would promote the following licensing objectives:

- 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.

#### Vulnerability

The council's definition of vulnerable persons when considering applications of this types is that it relates to groups that include 'people who gambling 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'.

For the purposes of this application, it would be useful for the applicant to provide their definition of vulnerability and what it means to their operation.

The Licensing Authority notes that this premises is situated on Wardour Street with a large number of licensed premises in the immediate vicinity. The area is an attraction to vulnerable persons and in particular those with problems with gambling and/or alcohol or drug abuse problems. The Licensing Authority note that there are 4 hostels within 250 metres of the premises catering for vulnerable people. Due to the premises location, the local area profile is something that should be considered when determining this application.

Attached as Appendix A is a copy of Westminster's Localised Gambling index map. This shows the areas in Westminster where people are more at risk from gambling based on the demographic of the area and the facilities and services in the area that may attract vulnerable people to the area. The Licensing Authority note the location of the premises and the high risk attributed to the surrounding area.

Given the close proximity of the above, the Licensing Authority is of the view that the premises fall within a "sensitive location".

#### Location and History of the Premises

Wardour Street, is a one-way street that runs north from Leicester Square, through Chinatown, across Shaftesbury Avenue to Oxford Street. The premises are located at 147-149 Wardour Street and the application relates to part basement only. The ground floor and the remaining part basement will be occupied by a Family Entertainment Centre (FEC). There will be a completely separate entrance for the Adult Gaming Centre (AGC) with no access form the to AGC from the FEC and vice versa.

After doing a 250 metre radius search of the premises the Licensing Authority has identified 1218 residents and 22 licences under the Gambling Act 2005, this includes 2 lottery registrations, 1 Adult Gaming Centre and 19 gaming machine permits. A further search on our GIS mapping has revealed 4 hostels and 5 faith groups. (attached at appendix B and C)

It is noted that the applicant already trades an Adult Gaming Licence and Family Entertainment Centre at 89-91 Wardour Street, which it has traded without issue since at least 2005. It is proposed that the applicant will in effect be moving the existing premises operation from 89-91 Wardour Street to the new premises at 147-149 Wardour Street.

Attached is a Google map search of the area showing the location of the existing and proposed premises. (attached at appendix D)

It is noted that in the current application, the applicant is seeking hours of 09:00 to 03:00 Monday to Sunday inclusive.

It would be helpful if the applicant could advise if there is to be any change to the operating style of the premises for example:

- Is there an increase in hours from the current hours traded at the current premises?
- Will there be any increase in the number of gaming machines?

The applicant is advised of Westminster City Council Pleasure Fairs (Amusement Premises) Byelaw which regulates the hours during which amusement premises may be open to the public.

Pursuant to Byelaw 1(a) "These byelaws shall apply only to pleasure fairs within the meaning of Section 75(2) of the Public Health Act 1961 which are amusement premises". Pursuant to Byelaw 2(a) "Amusement premises means any place used wholly or mainly to provide..." "automatic or other machines intended for entertainment or amusement."

Adult Gaming Centres are classified as amusement premises that are subject to the provisions of the Byelaw and must consequently comply with any such requirements set out in that Byelaw.

Byelaw 3(1) provides that "The manager shall not keep the amusement premises open between the hours of **12 midnight and 9am.**"

A copy of the Pleasure Fairs (Amusement Premises) byelaws is attached for information as Appendix E.

#### Policy considerations

Policy LOC1 of Westminster's Statement of Licensing Principles for Gambling states that 'a sensitive location is defined as any premises which is within close proximity or on a main route to a school, educational institution, hostel or other sensitive locations where there is the potential for exposing children, young people or other vulnerable persons to gambling'. The proposed location of this new adult gaming centre must be considered as part of this application due to the local area profile and its potential to impact upon the promotion of the 3 gambling objectives.

Paragraph 27.1 of Westminster's Statement of Licensing Principles for Gambling states 'Adult gaming centres (AGCs) premises licences allow the holder of the licence to make gaming machines available for use on the premises. An AGC premises licence granted after the 13th July 2011 may make available for use a number of category B gaming machines not exceeding 20% of the total number of gaming machines which are available for use on the premises and

any number of category C or D machines’.

Paragraph 27.2 goes on to state ‘Gaming machines are a form of gambling which is attractive to children and AGC’s will contain machines of a similar format to the Category D machines on which children are allowed to play. However, no-one under the age of 18 is permitted to enter an AGC and applicants must be aware of the location of and entry to AGC’s to minimise the opportunities for children to gain access’.

The Licensing Authority notes that within the risk assessment it states that Signage & window display not to attract under 18s, and advise under 18’s access is prohibited.

Can the applicant provide further submissions as to the placement of this signage in the windows to show its visibility from outside the premises and explain further what checks will be in place in terms of ID checks? Is it proposed for SIA door staff to be present and conduct these checks?

Paragraph 27.3 states ‘Because gaming machines provide opportunities for solitary play and immediate payouts, they are more likely to engender repetitive and excessive play. The council in considering premises licences will specifically have regard to the need to protect children and vulnerable persons from harm or being exploited by gambling and will expect the applicant to satisfy the authority that there will be sufficient measures to, for example, ensure that under 18 year olds are not attracted to, or gain access to, the premises.’

As stated previously the Licensing Authority notes that this premises is situated in close proximity to a large number of licensed premises. Due to the nature of those businesses they can attract a variety of age groups including the vulnerable. Due to the premises location, the local area profile is something that should be considered when determining this application.

Policy AGC1 states ‘Applications will be determined, subject to relevant criteria in policies OBJ1, OBJ2, OBJ3 and other policies within the Statement of Licensing Principles for Gambling’.

Policy OBJ1 states ‘To prevent gambling from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime, the Licensing Authority will apply the following criteria and take into account the following considerations, where relevant, in determining applications.

Paragraph 11.1 states ‘Whether the premises make or will make a contribution to the levels of crime and disorder and whether the applicant has demonstrated that he has, or intends to, implement sufficient controls to prevent gambling from being a source of, and/or associated with crime or disorder, or being used to support crime, if the application is granted.’

Paragraph 11.1.1 states ‘Where an area is known for high levels of crime the council will consider carefully whether gambling premises are suitable to be located there, and whether additional conditions may be necessary, such as the provision of CCTV, minimum levels of staffing and licensed door supervisors, etc.’

Paragraph 11.1.4 states ‘Whether the layout, lighting and fitting out of the premises have been designed so as to minimise conflict and opportunities for crime and disorder.’

Policy OBJ2 states ‘To ensure that gambling is conducted in a fair and open way, the Licensing Authority will apply the following criteria and take into account the following considerations, where relevant, in determining applications.’

Paragraph 12.1.2 states ‘Whether sufficient management measures are proposed or are in place to ensure that gambling is conducted in a fair and open way.’

Paragraph 12.1.3 states ‘Whether the management and operation of the premises is open and

transparent.'

Paragraph 12.1.4 states 'Whether the operators of the premises have been or will be fully cooperative with enforcement agencies.'

It would be useful for the applicant to provide further information into their operation of other licensed premises under the Gambling Act 2005 to obtain an understanding of their management and operation of such premises.

Policy OBJ3 states 'To protect children and other vulnerable persons from being harmed or exploited by gambling, the Licensing Authority will apply the following criteria and take into account the following considerations, where relevant, in determining applications.'

Paragraph 13.1 states 'Whether there are appropriate measures in place to protect children and other vulnerable persons from being harmed or exploited by gambling.'

Paragraph 13.1.1 asks the Licensing Authority to consider whether the operator has a specific training programme for staff to ensure that they are able to identify children and vulnerable people and take appropriate action to be reasonably consistent with this objective to exclude them from the premises or parts of the premises.

The applicant has stated in the risk assessment that there will be training for staff. Although the applicant has advised this, there is no actual content about what measures or training staff undertake. Therefore it would be useful for the applicant to provide details of what training staff will undertake in terms of identifying vulnerable people and providing sufficient and effective support to those people?

The Licensing Authority notes within the risk assessment that the premises will have notices and leaflets promoting Gamcare which is a charity supporting those with gambling addictions. Information on the following points would be useful in assessing the considerations of paragraph 13.1.1 above:

- Does the applicant have a referral scheme in place, in regards to self-exclusion?
- Is the onus on the individual to self exclude from a premises? If so, how does an individual go about this?
- What links does the premises have with local services to provide support?
- Will the applicant propose to advertise any promotional material associated with the premises? This could encourage the use of the premises by children or young people.
- How will the applicant control customers from bringing alcohol onto the premises to consume whilst gaming? Or entering the premises in an intoxicated state?

Should this application for an Adult Gaming Centre be granted a list of Mandatory Conditions will be attached to the licence. These have been included with this representation as Appendix F.

The Licensing Authority require the applicant to confirm the number of machines/categories of those machines, that will be at the premises. It would also assist if the applicant could provide an updated plan showing the location of the machines and the location of CCTV cameras.

The Licensing Authority submit this as a formal representation to this application and look forward to receiving further submissions from the applicant on the points raised above.

**Please see Appendix 2 for supporting documents to the Licensing Authority Representation.**

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| <b>3-B Other Persons</b>                     |  |
| <b>Name:</b>                                 | ██████████   |
| <b>Address and/or Residents Association:</b> | ██████████<br>████████████████████<br>██████████<br>██████████ |
| <b>Received:</b>                             | 3 February 2022  |

I would be very concerned if this 3am licence was granted in the cumulative impact area in Soho. Noise nuisance and crime levels are already higher in Soho than any other part of Westminster (45% of all violent crime in Westminster is in the cumulative impact area) and we already have number of Gambling premises in Soho. This site used to be a retail shop which had no noise issues whatsoever. The noise of people leaving and arriving by Taxi or pedicab or other transport this late is unacceptable given the number of residents close to the premises. Recently we have seen fighting and anti-social behaviour increasing as the numbers of drinkers roaming the streets of Soho at night has increased. The police are completely unable to maintain order in Soho at night and appear to have given up this will only make the situation worse.

**Further Submissions on 22nd February 2022**

Dear Sir

Objection on 147 Wardour Street

My name is ██████████ ██████████ the ██████████. This a ██████████ from 147 Wardour Street which is just a ██████████.

I have lived in Soho since 1991 in the same flat.

My main concern is to convey to the committee the nature of Soho at night post Al Fresco. Broadly there are large numbers of intoxicated customers, fighting in the street is not unusual and very few police officers or effective security in evidence. I think the idea of offering access to gambling to this group of vulnerable intoxicated people is dangerous, risks harm to those people and risks an increase in crime and disorder.

I would also like to remind the committee that Soho is also a residential community with a school, nursery, multiple churches and a community with families. We have our share of vulnerable residents.

I have made a short video that conveys what Soho is like at night. It was taken at various times after October 2021 from my bedroom window. It shows the level of activity and cumulative impact and the number of intoxicated people that would be exposed to the risk of gambling were this licence to be granted. This was taken just a few yards from 147 Wardour Street.

The video can be viewed at

<https://cas5-0-urlprotect.trendmicro.com:443/wis/clicktime/v1/query?url=https%3a%2f%2fyoutu.be%2fn81IA82cKHs&umid=2f6d7ddd-764a-46ad-9997-ae703fc0ee1f&auth=f23bd3b3794c7a5914053bd0a99b1b4837b89b14-36077a305b27c3b573b63248ecbc97383741e792>

As chair of the Soho Society I am really keen for Soho to return to some form of normality post pandemic - the outdoor activity at night has never been like this before 2020. The addition of further gambling to the mix in the cumulative impact area which is already under enormous pressure would be a further blow to residents.



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| <b>Name:</b>                                 | ██████████                             |
| <b>Address and/or Residents Association:</b> | ██████████<br>██████████<br>██████████ |
| <b>Received:</b>                             | 7 February 2022                        |

I wish to express my deep concern on behalf of ██████████ Street London, regarding the gambling licence scheduled to be granted at 147-149 Wardour St.

Our shop is in very close proximity to this address and as much of our contents is Harry Potter related, we attract a young audience. It is essential that our customers can feel safe and protected when attending our stores and are free of the presence of harmful influences on Wardour Street.

I refer to the licensing objective for the protection of children and other vulnerable persons from being harmed or exploited by gambling, as mentioned in your letter dated 1st February 2022. We wish to contest this licence from being granted on the above grounds. I look forward to hearing from you soon in regards to this matter.

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| <b>Name:</b>                                 | ██████████   |
| <b>Address and/or Residents Association:</b> | ████████████████████<br>██████████████████<br>██████████<br>██████████ |
| <b>Received:</b>                             | 19 February 2022   |

This premises has no gambling footprint. In the past it was a retailer, then a gallery, recently it must have acquired a license for a restaurant which failed to open.

We have many vulnerable adults, struggling with addictive behaviours both in the social housing immediately in the vicinity of this premises, as well as homeless in and around St Anns Court. This premises is located close to NHS service for people who are homeless in Westminster at 13 Great Chapel Street, London, W1F8FL. It is also close to CentrepoinTs on Dean Street and Berwick St which help care for younger homeless and vulnerable people. With so many vulnerable people drawn to Soho, already suffering with addictive behaviour with drugs and alcohol, to add gambling to their problems is irresponsible of the council.

This application is for an AGC to be open 9am to 3am, 7 days per week. Dispersing crowds of people after consuming alcohol is a noisy process, if these people (now inebriated and hence vulnerable) are able to enter a gaming environment once the pubs have closed, they will loiter longer in the area, causing antisocial behaviour which disturbs residents over a longer period of time.

Many families with children pass these premises en route to our local primary school, Soho Parish School. These young children are considered vulnerable.

According to NHS England people suffering with severe addiction issues who were referred to gambling clinics between April and December 2021, increased by 16.2% on referrals made during the same period in 2020.

With so many social problems already at large in Soho, the addition of a new premises license to attract our vulnerable until 3am in the morning 7 days a week is not welcome.

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| <b>Name:</b>                                 | [REDACTED]   |
| <b>Address and/or Residents Association:</b> | [REDACTED]<br>[REDACTED]<br>[REDACTED]<br>[REDACTED] |
| <b>Received:</b>                             | 20 February 2022                                     |

As a retailer neighbouring this premises, we are concerned about the associated crime and disorder from gambling establishments. Crime and disorder will have a negative impact for my staff and customers, as well as for my business. The impact statement from the applicant does not reassure me that they have sufficient staff to mitigate these negative externalities. Further Submission received 22.02.2022

As a retailer neighbouring this premises, I believe that we are an 'interested party' for the purposes of Gambling Act 2005. We are concerned that the application is not consistent with the licensing objectives of:

- o preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime
- o protecting children and other vulnerable persons from being harmed or exploited by gambling.

I understand that the Council's policy for gambling applications sets out various provisions related to these issues, including policies regarding the location of gambling premises and measures to protect the vulnerable. I do not see how either of these factors have been or an be addressed in the application.

Crime and disorder from this establishment will have a negative impact for my staff and customers, as well as for my business. The impact statement from the applicant does not reassure me that they have sufficient staff to mitigate these negative externalities, or indeed have taken account properly of the circumstances of the location in this part of Soho which is very different from, say, the southern end of Wardour Street.

We see people in the locality who would clearly fit the definition of 'vulnerable persons' both during the day and at night time. It I hard to see how, in Soho, an applicant for an establishment where the main purposes is to provide gaming machines would not risk further harm to these individuals.

I understand that the Guidance to which the Council must pay regard and its own policy both allow the council to refuse applications in appropriate circumstances, and I would ask that the Council refuse this application.'

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| <b>Name:</b>                                 | [REDACTED]                             |
| <b>Address and/or Residents Association:</b> | [REDACTED]<br>[REDACTED]<br>[REDACTED] |
| <b>Received:</b>                             | 22 February 2022                       |

I object to the below application.

**Ref: 22/00920/LIGN : 147-149 Wardour St**

1. Adult Gaming Licence (slots machines) - the application relate to part basement
2. Family Entertainment Centre on the ground floor (slot machines and games) this centre does not require a licence and is not part of this application
3. Operating times : Mon - Sun 9am to 3am

Our school is a short distance away from the premises and I believe this application contravenes the aspects of the Gambling Act 2005 and other relevant policies set out below. In the past we have experienced drug problems and a break in to our premises. Bringing a gambling premises

to the area will attract crime in a way that the bars and restaurants do not. A 'family entertainment centre' is wholly inappropriate and will be designed to attract children. Some pupils in our school walk home alone along Wardour Street and I believe this could provide a location for children to have inappropriate interactions with unknown adults, or to be lured in.

**Policy OBJ1: Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.**

**Criteria : 11.1** *'Whether the premises make or will make a contribution to the levels of crime and disorder and whether the applicant has demonstrated that he has, or intends to, implement sufficient controls to prevent gambling from being a source of, and/or associated with crime or disorder, or being used to support crime, if the application is granted.'*

**11.1.1:** *'Where an area is known for high levels of crime the council will consider carefully whether gambling premises are suitable to be located there....'*

**Protecting children and other vulnerable persons from being harmed or exploited by gambling, Policy OBJ3**

13.2 of the policy states; *'The Licensing Authority will expect applicants to consider the measures necessary to be reasonably consistent with the licensing objective of protecting children and other vulnerable persons from being harmed or exploited by gambling. The location of the premises may be a significant factor if for example the premises are located near a school, hostel or other sensitive premises. Other policies specifically deal with location although the applicant will have to demonstrate that there are suitable control measures to be reasonably consistent with this objectives.'*

13.4 acknowledges the Act and Commissions Guidance does not define vulnerable persons, however the Commission states, *' it will be 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 balance decisions about gambling due to a mental impairment, alcohol or drugs.'*

**Location Policy, LOC1**

15.1: *'..... it considers that the location of gambling premises can be a major factor on the promotion of the licensing objectives. The council will pay particular attention to the suitability of a location for gambling activity in terms of the objective of the protection of children and vulnerable persons from being harmed or exploited by gambling, and the effect of crime and/or disorder on residents and on those working in and visiting the area.'*

It defines a sensitive location *'as any premises which is within close proximity to go on a main route to a school, other educational institution, hostel or other sensitive locations where there is the potential for exposing children, young people or other vulnerable persons to gambling'*

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| <b>Name:</b>                                 | ██████████       |
| <b>Address and/or Residents Association:</b> | ██████████       |
| <b>Received:</b>                             | 24 February 2022 |

Many thanks for your help and advice in regards to the above application, over the last few days.

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It is my belief that a new Adult Gaming Centre (AGC) venue on Wardour Street would be

detrimental to the local community and would risk substantial additional ASB and I object strongly to this application. Other members of the Soho community, including the Soho Society and representatives of MPS have similar concerns.

Firstly, the nature of Soho in general, but particularly Wardour Street, means there is a high density of young people frequenting local bars and restaurants. As a major thoroughfare, Wardour Street has high foot fall and a higher proportion than might be considered usual are likely to be intoxicated to some level. This is particularly true at night. The proposed venue is therefore likely to attract a particularly vulnerable group, which makes this an inappropriate location. The large number of late night venues (passed midnight) exaggerates this issue and underlines the inappropriate nature of the location and - even more so - the late operating hours proposed. There can be no question of this venue operating based midnight without a disproportionate and unacceptable level of risk to those individuals.

Secondly, local crime statistics highlight the area of Wardour Street to Greek Street as one of the worst areas for Theft-Person in London, with very high rates of opportunistic crime, with thieves preying on those that are already soft targets. The presence of this proposed venue will exaggerate those issues, not least by potentially delaying the departure from Soho of those who should be heading home. Over 40% of those in Soho at night report feeling "unsafe". Gambling venues will only exacerbate this issue.

Third, this is already an area recognised as being under stress through cumulative impact of all forms of licensed premises. An additional venue of such a high-impact nature can only serve to disproportionately harm the local community.

Further, the site is on the route used by young children who attend Soho Parish School, a primary located in Soho, when they are on their way for some external activities and large groups of 20-30 frequently pass the site. This direct exposure is not helpful and would seem to risk increasing exposure to gambling and lessening protection of children from gambling. This is in addition to the comparatively high number of children living in nearby housing and as Cabinet Member for Young People in Westminster, this causes me particular concern.

Overall, I cannot believe that this license, should it be granted, would do anything other than bring disproportionate harm to Soho by exaggerating an existing crime problem and causing more anti-social behaviour issues, with children and other vulnerable groups in the front line. It is unacceptable and made worse by the proposed late termination hour, which should under no circumstances go beyond midnight given nearby outlets.

However, based on the information I have received from my questions, it is the intention of the applicant to close the larger venue at 89-91 Wardour Street that they already operate. Thus, the new premises would lead to a reduction in the total number of gaming units. But this is not clearly stated in the application as far as I am aware and is not imposed as a condition or requirement. My objection to the new application has to therefore remain unless the applicant wishes to resubmit with that as a binding condition, at which point I may reconsider.

Many thanks for your time in consideration of this matter.

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| <b>Name:</b>                                 | ██████████                             |
| <b>Address and/or Residents Association:</b> | ██████████<br>██████████<br>██████████ |
| <b>Received:</b>                             | 27 February 2022                       |

I would like to oppose this as chair of the ██████████, on the grounds that:  
(1) This is a particularly residential part of Soho, with blocks of flats in the near vicinity with young children who would be likely to pass this venue on the way to and from school and nursery.

- (2) Also to be licensed in this particular part of Soho until 3 am would not promote any of the licensing objectives.
- (3) It is likely to lead to further crime in the area. Soho already has one of the highest crime rates in Westminster, and is this a CIZ.
- (4) Seemingly, the applicants already have two other premises in Wardour Street - one at the Chinatown end of the street, which also has a large number of betting shops, etc; and one in the block below the applicant premises, which is also a residential part of Soho, and in addition has a number of 3am licences.

This would not promote any of the WCC licensing objectives, would encourage crime and other public disorder, and should not be granted, and certainly not until 3 am.

|  |  |
|--|--|
| <b>Name:</b>                                 | ██████████   |
| <b>Address and/or Residents Association:</b> | ██████████<br>██████████<br>██████████<br>██████████ |
| <b>Received:</b>                             | 24 February 2022                                     |

We write to make a relevant representation as an interested party under s158 Gambling Act 2005 to the application for a new Adult Gaming Centre (AGC) premises Licence.

The ██████████ strongly objects to this application on the grounds of preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime, and protecting children and other vulnerable persons from being harmed or exploited by gambling.

About The ██████████

The ██████████, established in 1972, is a charitable company limited by guarantee established. The society is an amenity group recognised by Westminster City Council and its charitable objectives are to make Soho a better place to live, work or visit by preserving and enhancing the area's existing diversity of character and uses, and by improving its facilities, amenities and environment.

### **Application summary New Gambling Licence**

- Adult Gaming Centre, application relates to part basement only
- The ground floor and part basement occupied by a Family Entertainment Centre
- Operation times: Monday to Sunday 9am - 3am

### **The ██████████ Position**

The application proposes a new Adult Gaming Centre open Monday to Sunday until 3am, a Family Entertainment Centre is also proposed these opening hours are unknown. This gambling centre is in the heart of Soho originally on the site of a retail shop, its current planning use is for a restaurant.

The applicant fails to provide the number of Category B machines, the number of Category C and D, and the capacity of the centre. These types of centres with these slot machines attracts those people on low incomes and the vulnerable, all of whom live, visit or work in Soho. The number of category B3 machines is a highly material factor.

Soho is a vibrant place known for its creative industries, shops, theatres, restaurants, bars and nightlife, it attracts people from all over the world, it is also home to over 2,600 people including families.

One third of whom live in social housing and one third of homes or families with children (see below).

This area displays three very different and well defined phases over a 24 hour period;

**Phase 1 Daytime:** children being taken to school or nursery, workers arrive followed by visitors in the area to shop, eat and drink, we also see some drug dealers and beggars looking for money for their next fix.

This leads to **Phase 2, the early evening:** which attracts another group of people, people coming into the area to go to the theatre or cinema to eat in the many restaurants and drink in the many bars, the level of crime increases people start to get drunk and leave their property out on display, they become victims of crime, the number of drug dealers starts to increase and people with criminal intent move in.

**The 3rd phase is late at night:** this is when the area really takes a dark and downward turn, the number of drug dealers increase, they hang around the streets waiting to approach intoxicated people, the number of vulnerable people increases.

Soho is at the forefront of the evening and night time economy with its numerous restaurants, bars, members clubs and entertainment establishments. The area is densely populated in the evening and night time with people out on the streets, resulting in high levels of crime and disorder, noise nuisance and anti-social behaviour. In Soho **there are 109 licensed premises with a terminal hour between 01:00 - 03:30, capacity for 93 premises being 20,178.**

Wardour Street and those streets that surround it has a high concentration of late night licences, there are 10 significant late night venues within the vicinity of these premises;

**Wardour Street 03:00: Village** (capacity 400). **The Residence** (388). **100, Wardour St** (872), **Freedom** (275). **St. Moritz** (120).

**Brewer Street (east) 03:00: Madame Jojo's** (capacity 300). **Sophisticats** (100).

**Walker's Court: 04:00: The Box** (capacity 288). **01:00: Boulevard** (486).  
**Total capacity = 3,229**

It is therefore unsurprising that Soho has been identified by the Westminster City Council as under stress because of the cumulative effect of the concentration of late night and drink led premises and night cafes has led to serious problems of disorder and/or public nuisance affecting residents, visitors and other businesses, this area sits within the designated West End Cumulative Impact Zone.

According to the councils own figures 45% of all violent crime that occurs in Westminster occurs in the Westminster Cumulative Impact Zone - essentially Soho, Leicester Square and a small part of Covent Garden.

To this the proposal is to add a third Adult Gaming Centre in Wardour Street where the the applicant already operates two other AGCs. This area must have been chosen in part because of the large number of evening and late-night premises and the high number of people on the streets who will be attracted to a gaming centre.

Whilst we accept that this application does not fall within the Council's Statement of Licence Policy, the Cumulative Impact Assessment which forms the evidential basis for the 'cumulative impact' policies provides clear *prima facie* evidence of the challenges inherent in Soho particularly in the evenings and night time. For instance, the Statement of Principles for Gambling focuses on whether an area is known for crime and disorder. The CIA confirms that the area does have high levels of crime and disorder. A key plank of the licensing policy is if dispersal from Soho. A late night gambling establishment would drive the proverbial 'coach and horses' through this policy aim.

The 3am terminal hour is a concern and falls outside the current Gambling Policy Byelaw for

Pleasure Fairs of 00:00. Furthermore, although not in force at the time of writing the proposed new Gambling Policy 2022 identifies new Gambling Vulnerability Zones, these being areas of significant concern associated with the adverse risk from a gambling operation on crime, disorder, children and vulnerable people, importantly these premises fall within the West End East GVZ. The policy also proposes within its Hours Policy to refuse applications for applications outside core hours for premises located within a GVZ; core hours being for Adult Gaming Centres, Licensed Family Entertainment Centres and Unlicensed Family Entertainment Centres 09:00 to 00:00.

We have presented an overview of Soho during the day and night time, how the area changes from a relatively family friendly and safe space to an area which attracts more vulnerable people and criminals operating into the night. We now consider this application in relation to the licensing objectives.

### **Licensing Objectives and Location**

We object to this application under the following objectives.

### **Policy OBJ1: Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.**

**Criteria : 11.1** *'Whether the premises make or will make a contribution to the levels of crime and disorder and whether the applicant has demonstrated that he has, or intends to, implement sufficient controls to prevent gambling from being a source of, and/or associated with crime or disorder, or being used to support crime, if the application is granted.'*

**Considerations: 11.1.1:** *'Where an area is known for high levels of crime the council will consider carefully whether gambling premises are suitable to be located there....'*

We are concerned with the location of these premises and the retention of people in Soho, as the Statement of Licensing Policy 2021 D5 highlights this concern, retention contributes to the cumulative impact, it attracts criminals who target vulnerable people.

The Council's own Cumulative Impact Assessment 2020 presents overwhelming evidence of the year on year increase in cumulative impact in the West End Zone 1. ***It highlights the rate of crime as 10 - 13 times higher between 6pm - 6am compared to the borough average.*** It goes on to detail the number and types of crimes in the West End as follow:-

- **Public realm crimes:** (serious violence, robberies, theft and drug offences), alcohol-related callouts incidents, anti-social behaviour and demands on services were prevalent in Westminster between 2017 and 2019, among the highest in London and the country. All incidents observed concentrated in the West End many occurring in the evening and at night as well as weekends.

#### **Total incident type 2017-2019:**

- **Serious violent crimes Night, 795** - proportion of Borough's incidents (31%).
- **Robberies Night, 2237 (33%).**
- **Theft and Handling Night, 24,407 (33%).**
- **Drug Offences Night, 1529 (40%).** Noise Complaints Night, 1389 (16%).
- **Reactive Waste Management, 6630 (10%).**
- **Ambulance call outs** to locations of licensed premises, 5353 (22%).
- **Anti-Social behaviour** on transport Night, 592 (13%), Anti-Social behaviour MPS, 9662 (16%). **Total = 50,594.**
- **Data description of incidents in 2017-2019** found all incident categories observed varied both in space and time. Many occurred in the evening and at night and on weekends when alcohol related activities typically peak. Incidents were primarily concentrated in the West End where licensed premises are disproportionately concentrated.

- **Robberies:** clustered within the West End, Charing Cross, Oxford Street in the evening and night.
- **Serious violent crimes:** recorded between **6pm and 6am** concentrated overwhelmingly in the West End.
- **Drug related crimes:** Westminster recorded the highest volume of drug offences of any borough between 2017-2019. Half of crimes were reported (48%) in the evening and night time. Drug related crimes between **6pm - 6am** were significantly clustered in and around the West End to varying degrees.
- **Theft and Handling:** most common crime type in the borough, in the evening and night they are particularly concentrated in the West End and along Oxford Street.

These premises are situated in the heart of the late night entertainment area, this area is a known hotspot of crime and disorder, crime statistics between September 2019 to February 2020 shows high levels of crimes,

Specific crime statistics (September 2019 to February 2020) for this area shows an overall total figure for all crimes as **1,397** this is further broken down by street below.

**Old Compton St :** Robbery = 19. Theft person = 162. Violence with injury = 47. All crime = 429

**Wardour St :** Robbery = 6. Theft from person = 70. Violence with injury = 22. All crime = 301

**Dean St :** Robbery = 12, Theft person = 57, Violence with injury = 30, All crime = 280.

**Greek St :** Robbery = 12, Theft person = 76, Violence with injury = 33, All crime = 244

**Frith St :** Robbery = 13, Theft person = 46, Violence with injury = 23, All crime = 143.

For residents living in Soho these results are unsurprising, Soho transforms in the evening and night-time into an area which feels very unsafe and where levels of crime and disorder are high. As evidenced above criminal activity associated with the large number of late-night venues and the numbers of people on the streets results in high levels of serious crime, in our view the inclusion of a new AGC will contribute to this.

In Soho the majority of robberies take place at night, people are targeted as they leave venues which is evidenced by the crime figures. Alongside this is drug dealing which is a particular problem, groups of dealers congregate to sell drugs and specifically target people, there are more dealers in the area at night than during the day, this is directly linked to the large number of late night venues and people out on the streets which creates this market.

The objective also raises the issue of nuisance,

**11.1.3:** *‘Whilst issues of nuisance are not included specifically in the gambling objectives, the council may consider, when making decisions on the applications for premises licences, that extreme instances of public nuisance and persistent public nuisance may constitute disorder and criminal offences.’*

Residents live along Wardour Street and streets that surround it, due to the high number of licensed premises coupled with it being a major dispersal route to two main underground stations residents are already disturbed by people who just hang around and those walking through the street causing late night noise, disturbance from pedicabs playing loud music, waiting taxis, anti-social behaviour including street fouling. The attraction of this AGC will increase nuisance and crime and disorder in the area.



### **Protecting children and other vulnerable persons from being harmed or exploited by gambling, Policy OBJ3**

13.2 of the policy states; *'The Licensing Authority will expect applicants to consider the measures necessary to be reasonably consistent with the licensing objective of protecting children and other vulnerable persons from being harmed or exploited by gambling. The location of the premises may be a significant factor if for example the premises are located near a school, hostel or other sensitive premises. Other policies specifically deal with location although the applicant will have to demonstrate that there are suitable control measures to be reasonably consistent with this objectives.'*

13.4 acknowledges the Act and Commissions Guidance does not define vulnerable persons, however the Commission states, *' it will be 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 balance decisions about gambling due to a mental impairment, alcohol or drugs.'*

There are over 2,600 people living in Soho, with a number living on and near Wardour Street in social housing provided by Soho Housing Association,

- Clarion House with 22 flats opposite these premises at 4, St. Anne's Court.
- Wardour House at 106-112 with 16 flats.

Of the number of people living in Soho 32% have children under the age of 18 years, around 425 children in total. The local Soho Parish primary school is situated on Great Windmill St and the Soho Family Centre Nursery on Brewer Street, families will past these premises on their way to school and nursery.

30% of accommodation in Soho is public housing, including the above it is also situated in Berwick Street, Meard Street, Brewer Street, Ingestre Place, Dean Street, Archer Street, Marshall Street, Dufours Place, Gt. Windmill Street, Gt. Pulteney Street and Bridle Lane all housing children and families and vulnerable people.

A dedicated medical centre for homeless people also exists close by, originally on Great Chapel Street the centre is moving to the Soho Centre for Health and Care at 1, Frith Street in late February. Clients using this centre are extremely vulnerable a high proportion suffering from mental health issues and drug and alcohol addictions.

The Risk Assessment identifies Centrepoint a homeless charity for young adults on Dean Street, however Centrepoint has another premises one street away from the proposed AGC at 25, Berwick Street, it provides short stay direct access accommodation for homeless young adults aged 16 to 25 years, again an extremely vulnerable group.

There's another group of vulnerable people who exist in Soho at night, this is linked to the number of licensed premises and the number of people who have been drinking and taking drugs creates a group who with the loss of inhibitions will be attracted to this centre as a way to extend the night out. Not all will be visibly intoxicated or high on drugs but they remain vulnerable. Drugs and alcohol aside, not all vulnerabilities are readily identifiable and Soho with its late night offering not only attracts people on a night out, but those with other vulnerabilities who just wander the streets. We note that the applicant has suggested that a single member of staff will be responsible for ensuring that the people using its machines are not intoxicated by drugs or alcohol.

It is also in close proximity to Chinatown where it is well known restaurant staff are frequent visitors to gaming centres and betting shops increasing the risk of this group becoming addicted to gambling.

### **Location Policy, LOC1**

15.1: *'..... it considers that the location of gambling premises can be a major factor on the promotion of the licensing objectives. The council will pay particular attention to the suitability of a location for gambling activity in terms of the objective of the protection of children and vulnerable persons from being harmed or exploited by gambling, and the effect of crime and/or disorder on residents and on those working in and visiting the area.'*

*It defines a sensitive location 'as any premises which is within close proximity to go on a main route to a school, other educational institution, hostel or other sensitive locations where there is the potential for exposing children, young people or other vulnerable persons to gambling'*

For all the reasons described above the location of these premises is of particular concern, it is situated near social housing accommodation with children and families and vulnerable adults, route to the local primary school, during the evening and night time the area attracts large numbers of people on a night out and others with vulnerabilities, crime, disorder and nuisance increases and in close proximity to Chinatown.

### **Conclusion**

This application is for a new Adult Gaming Centre in Soho. It is not consistent with the licensing objectives and no set of conditions can mitigate against the impact we think is inevitable due to the location of this premises and lack of gambling activity here in the past. We therefore respectfully request this application is rejected outright.

## **4. The Gambling Act 2005**

- 4.1 The Licensing Authority must under Section 153(1) of the Act exercise its functions relating to premises licensing with an aim to permit the use of the premises for gambling in so far as it thinks fit and in accordance with the relevant codes of practice, guidance, reasonably consistent with the licensing objectives and in accordance with the Council's Statement of Principles.
- 4.2 The Licensing Authority can take into account a representations relating to an application for a premises licence from either an interested party (a person living sufficiently close to the premises to be likely to be affected by the authorised activity or has a business interest that may be affected or represents persons in either of these two groups) or a responsible authority (Licensing Authority, Gambling Commission, Police, Fire Authority, Environmental Health and HM Revenue and Custom). Any representations must be relevant and not frivolous or vexatious.
- 4.3 Section 152 of the Act provides that a premises licence may not be issued in respect of premises if a premises licence already has effect in relation to the premises, except for a track premises licences. The Explanatory Notes for section 152 state "The general position for premises licensing is that premises may only be subject to one premises licence at a time... The effect of this requirement is to limit the principal activity on the premises to the provision of facilities for a particular type of gambling activity."
- 4.4 The Act, via regulations also imposes mandatory and default conditions that promote the licensing objectives. A list of these Mandatory and Default conditions are attached at Appendix 5 to this report.
- 4.5 A premises licence issued by the Authority will be subject to the mandatory and default conditions for that licence type. However, paragraph 9.27 of the guidance states;

Section 169 of the Act gives licensing authorities:

"The ability to exclude from premises licences any default conditions that have been imposed under Section 168;" and "The power to impose conditions on the premises licences that they issue."

## 5. Policy & Guidance

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| The following policies within the City Of Westminster Statement of Principles for Gambling apply: |  |
| <b>Policy OBJ1 applies</b>  | <p>To prevent gambling from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime, the Licensing Authority will apply the following criteria and take into account the following considerations, where relevant, in determining applications and reviews:</p> <p><b>Considerations:</b></p> <ol style="list-style-type: none"> <li>1. Where an area is known for high levels of crime the council will consider carefully whether gambling premises are suitable to be located there, and whether additional conditions may be necessary, such as the provision of CCTV, minimum levels of staffing and licensed door supervisors, etc.</li> <li>2. Whether there is a history of crime or disorder associated with the premises or its use by those involved in crime to associate or dispose of the proceeds of crime.</li> <li>3. Whilst issues of nuisance are not included specifically in the gambling objectives, the council may consider, when making decisions on the applications for premising licenses, that extreme instances of public nuisance and persistent public nuisance may constitute disorder and criminal offences.</li> <li>4. Whether the layout, lighting and fitting out of the premises have been designed so as to minimise conflict and opportunities for crime and disorder.</li> <li>5. Whether sufficient management measures are proposed or are in place to prevent the premises being a source of, or associated with crime or disorder, or used to support crime either as a place of association or to avoid apprehension.</li> </ol> |
| <b>Policy OBJ2 applies:</b>   | <p>To ensure that gambling is conducted in a fair and open way, the Licensing Authority will apply the following criteria and take into account the following considerations, where relevant, in determining applications and reviews:</p> <p><b>Considerations:</b></p> <ol style="list-style-type: none"> <li>1. Whether the layout, lighting and fitting out of the premises have been designed so as to ensure gambling is conducted in a fair and open way.</li> <li>2. Whether sufficient management measures are proposed or are in place to ensure that gambling is conducted in a fair and open way.</li> <li>3. Whether the management and operation of the premises is open and transparent.</li> <li>4. Whether the operators of the premises have been or will be fully cooperative with enforcement agencies.</li> <li>5. Whether the Commissions Codes of Practice have been complied with.</li> </ol>  |
| <b>Policy OBJ3 applies:</b>   | <p>To protect children and other vulnerable persons from being harmed or exploited by gambling, the Licensing Authority will apply the following criteria and take into account the following considerations, where relevant, in determining applications and reviews.</p> <p><b>Considerations:</b></p> <ol style="list-style-type: none"> <li>1. Has the operator a specific training programme for staff to ensure that they are able to identify children and vulnerable people and take appropriate action to be reasonably consistent with this objective to exclude them from the premises or parts of the premises.</li> <li>2. If the premises is an adult only environment has the operator</li> </ol>   |

|                             |   |
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|                             | <p>taken effective measures to implement an appropriate proof of age scheme to ensure that no one under the age of 18 is admitted to the premises or restricted areas.</p> <p>3. Whether the layout, lighting and fitting out of the premises have been designed so as to not attract children and other vulnerable persons who might be harmed or exploited by gambling.</p> <p>4. Whether sufficient management measures are proposed or are in place to protect children and other vulnerable persons from being harmed or exploited by gambling.</p> <p>5. Whether any promotional material associated with the premises could encourage the use of the premises by children or young people.</p> |
| <b>Policy AGC1 applies:</b> | Applications and reviews will be determined, subject to the relevant criteria in policies OBJ1, OBJ2, OBJ3 and other policies within this statement.  |
| <b>Policy LOC1 applies:</b> | Applicants for new or variation applications of premises licences within a sensitive location must include detailed information as to how the proposals will be reasonably consistent with the gambling objectives and policies OBJ1, OBJ2 and OBJ3 A sensitive location is defined as any premises which is within close proximity or on a main route to a school, other educational institution, hostel or other sensitive locations where there is the potential for exposing children, young people or other vulnerable persons to gambling.  |

## 6. Gambling Commission Guidance

- 6.1 The Gambling Commission have produced guidance for local authorities in relation to the 2005 Act. The information in this section of the report relates to the relevant points within the Guidance which members may wish to consider.
- 6.2 Paragraphs 7.5 of the GLA describes what may be considered as a premises, it states that:
- “...There is no reason in principle why a single building could not be subject to more than one premises licence, provided they are for different parts of the building, and the different parts of the building can reasonably be regarded as being different premises. This approach has been taken to allow large, multiple unit premises such as pleasure parks, tracks, or shopping malls to obtain discrete premises licences, where appropriate safeguards are in place. However, licensing authorities should pay particular attention if there are issues about sub-division of a single building or plot and should ensure that mandatory conditions relating to access between premises are observed.”
- 6.3 Paragraph 7.32 of the GLA states:
- “...they [Licensing Authorities] should be aware of the following:
- “Entrances to and exits from parts of a building covered by one or more premises licences should be separate and identifiable so that the separation of different premises is not compromised and people do not ‘drift’ into a gambling area. In this context it should normally be possible to access the premises without going through another licensed premises or premises with a permit customers should be able to participate in the activity named on the premises licence.’
- 6.4 Paragraph 7.33 of the GLA sets out factors that the Licensing Authority can use to assist in determining whether premises are truly separate. These factors may include:
- Is a separate registration for business rates in place for the premises?

- Is the premises' neighbouring premises owned by the same person or someone else?
- Can each of the premises be accessed from the street or a public passageway?
- Can the premises only be accessed from any other gambling premises?

6.5 The Gambling Commissions Guidance to Licensing Authorities (GLA) states in paragraph 7.20 that “The Gambling Act 2005 (Mandatory and Default Conditions) Regulations set out the access provisions for each type of premises. The broad principle is that there can be no access from one licensed gambling premises to another, except between premises which allow access to those under the age of 18 and with the further exception that licensed betting premises may be accessed from other licensed betting premises. Under-18s can go into FECs, tracks, pubs and some bingo clubs, so access is allowed between these types of premises.”

6.6 Paragraph 7.21 of the GLA states: “It should be noted that the Gambling Act 2005 (Mandatory and Default Conditions) Regulations define street as ‘including any bridge, road, lane, footway, subway, square, court, alley or passage (including passages through enclosed premises such as shopping malls) whether a thoroughfare or not’. This is to allow access through areas which the public might enter for purposes other than gambling, for example, access to casinos from hotel foyers.”

6.7 Paragraph 7.22 of the GLA states “There is no definition of ‘direct access’ in the Act or regulations, but licensing authorities may consider that there should be an area separating the premises concerned, for example a street or cafe, which the public go to for purposes other than gambling, for there to be no direct access.”

6.8 The Committee can, if it feels minded impose conditions on the premises licence. Paragraph 9.28 of the Guidance states that

“Licensing authorities should make decisions on conditions on a case-by-case basis, and in the context of the principles of s.153. They must aim to permit the use of premises for gambling and so should not attach conditions that limit their use except where it is necessary in accordance with the licensing objectives, the Commission’s codes of practice and this guidance, or their own statement of policy.”

6.9 The guidance goes further to state that authorities should not turn down applications for premises licences where relevant objections can be dealt with through the use of conditions. If the authority does decide that the only way to address a particular concern is through conditions it must be proportionate to the circumstances which they are seeking to address.

6.10 The guidance encourages licensing authorities to ensure that premises licence conditions are relevant to the need to make the proposed building suitable as a gambling facility, directly related to the premises and the type of licence applied for, or fairly and reasonably related to the scale and type of the premises and reasonable in all other respects (see paragraph 9.31 of the guidance).

6.11 Local authorities are also prevented from attaching conditions relating to certain matters. Paragraph 9.32 of the guidance sets out the relevant sections of the Act where conditions may not be imposed.

“...The relevant sections are:

- s.169(4) prohibits a licensing authority from imposing a condition on a premises licence which makes it impossible to comply with an operating licence condition

- s.172(10) provides that conditions may not relate to gaming machine categories, numbers, or method of operation
- s.170 provides that membership of a club or body cannot be required by attaching a condition to a premises licence (the Act specifically removed the membership requirement for casino and bingo clubs and this provision prevents it being reinstated)
- s.171 prevents a licensing authority imposing conditions in relation to stakes, fees, winnings or prizes.

## **7. The Council's Statement of Principles**

- 7.1 The Licensing Authority's Statement of Principles set out the council's policy considerations in relation to applications made under the Gambling Act. The Statement reemphasises the Authority's position in relation to Section 153 of the Act and sets out the principles and policies that the Authority will adopt when considering and determining Gambling Act applications.
- 7.2 The Council's Statement or Principles location policy (LOC 1) sets out that the authority will pay particular attention to the suitability of a location for gambling activity in terms of the objective of the protection of children and vulnerable persons from being harmed or exploited by gambling. It is the authority's view that the applicant should establish if there are any sensitive premises or locations within close proximity to the proposed gambling premises. Applicants should, in addition to their application submit information as to how they plan to promote this objective. A plan showing the location of schools, places of religious worship and hostels within a 250 metre radius of the premises is attached to this report as Appendix 6.
- 7.3 The Council's Policy relating to Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime (OBJ1) sets out the criteria as to whether the premises make or will make a contribution to the levels of crime and disorder and whether the applicant has demonstrated that he has, or intends to, implement sufficient controls to prevent the premises being a source of, and/or associated with crime or disorder, or being used to support crime, if the application is granted".
- 7.4 The Council's policy relating to the Protection of children and other vulnerable people from being harmed or exploited (OBJ 3) sets out the criteria that the authority will consider when determining an application. The authority will have to be satisfied that the applicant has appropriate measures in place to protect children and other vulnerable persons from being harmed or exploited by gambling.

## **8. Options for Members**

- 8.1 When determining the application the Committee will need to consider the Gambling Act 2005, the relevant Guidance to Licensing Authorities, the policies contained within the Council's Statement of Principles and the licensing objectives.
- 8.2 Section 152 of the Act provides that a premises licence may not be issued in respect of premises if a premises licence already has effect in relation to the premises, except for a track premises licences. However, this section does not prohibit the Licensing Authority from determining the application.
- 8.3 Members need to be satisfied that if the application were to be granted there would be no breach of mandatory conditions and the granting of the application would not have a detrimental impact on the licensing objectives.

## 9. Equality Implications

The Council in its capacity as Licensing Authority has a duty to have regard to its public sector equality duty under section 149 of the Equality Act 2010. In summary, section 149 provides that a Public Authority must, in the exercise of its functions, have due regard to the need to:

- (a) eliminate discrimination harassment, victimisation and any other conduct that is prohibited by or under this Act;
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
- (c) foster good relations between persons who share a relevant protected characteristics and persons who do not share it.

Section 149 (7) of the Equality Act 2010 defines the relevant protected characteristics as age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

## 10. Appendices

|                   |  |
|-------------------|--|
| <b>Appendix 1</b> | Premises plans                                       |
| <b>Appendix 2</b> | Licensing Authority supporting documents             |
| <b>Appendix 3</b> | Applicant supporting documents                       |
| <b>Appendix 4</b> | Interested Party Supplementary Bundle                |
| <b>Appendix 5</b> | Premises history                                     |
| <b>Appendix 6</b> | Proposed conditions                                  |
| <b>Appendix 7</b> | Residential map and list of premises in the vicinity |

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**If you have any queries about this report or wish to inspect one of the background papers please contact the report author.**

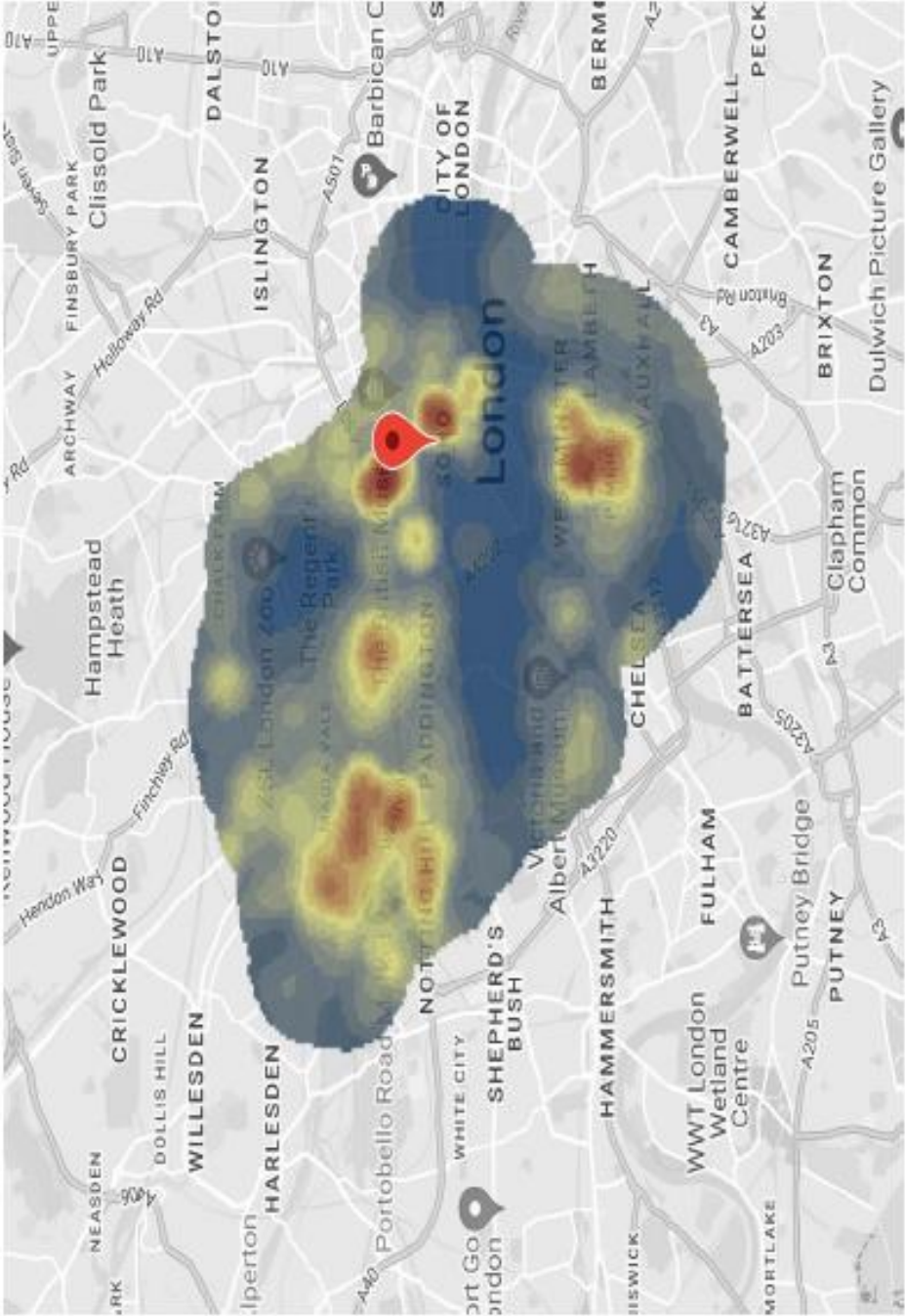
**Background Documents – Local Government (Access to Information) Act 1972**

|           |  |                                |
|-----------|--|--------------------------------|
| <b>1</b>  | Gambling Act 2005  | N/A                            |
| <b>2</b>  | Statement of Principles for gambling in Westminster                              | 31 January 2019                |
| <b>3</b>  | Gambling Act 2005 (Premises Licence and Provisional Statements) Regulations 2007 | N/A                            |
| <b>4</b>  | Guidance to Licensing Authorities  | April 2021                     |
| <b>5</b>  | Gambling Commission Licence conditions and codes of practice                     | March 2011                     |
| <b>6</b>  | Metropolitan Police Service  | 21 <sup>st</sup> February 2022 |
| <b>7</b>  | Licensing Authority  | 24 <sup>th</sup> February 2022 |
| <b>8</b>  | Representation 1   | 3 <sup>rd</sup> February 2022  |
| <b>9</b>  | Representation 2   | 7 <sup>th</sup> February 2022  |
| <b>10</b> | Representation 3   | 19 <sup>th</sup> February 2022 |
| <b>11</b> | Representation 4   | 20 <sup>th</sup> February 2022 |
| <b>12</b> | Representation 5   | 22 <sup>nd</sup> February 2022 |
| <b>13</b> | Representation 6   | 24 <sup>th</sup> February 2022 |
| <b>14</b> | Representation 7   | 27 <sup>th</sup> February 2022 |
| <b>15</b> | Representation 8   | 27 <sup>th</sup> February 2022 |
| <b>16</b> | Representation 9   | 24 <sup>th</sup> February 2022 |

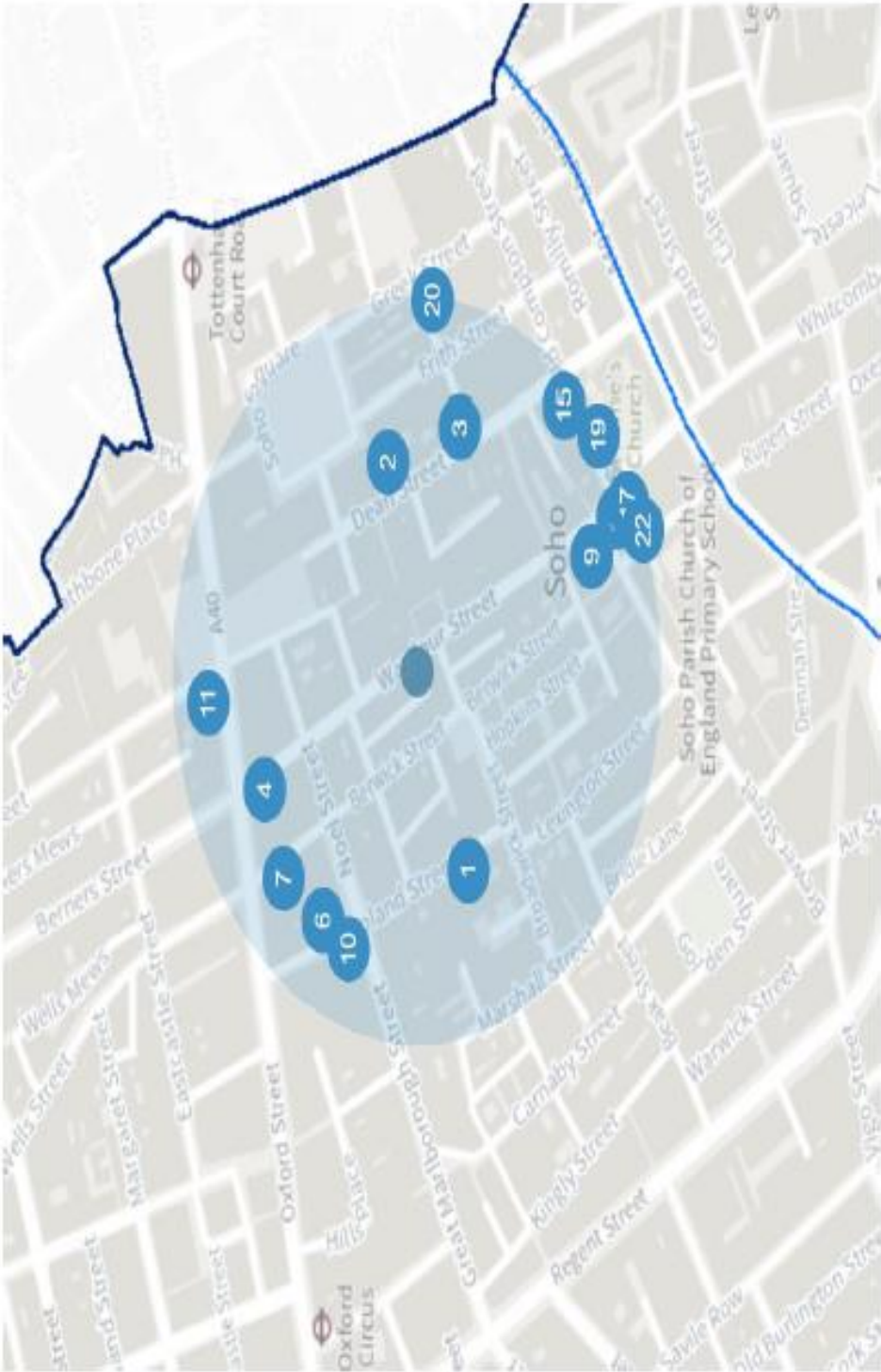




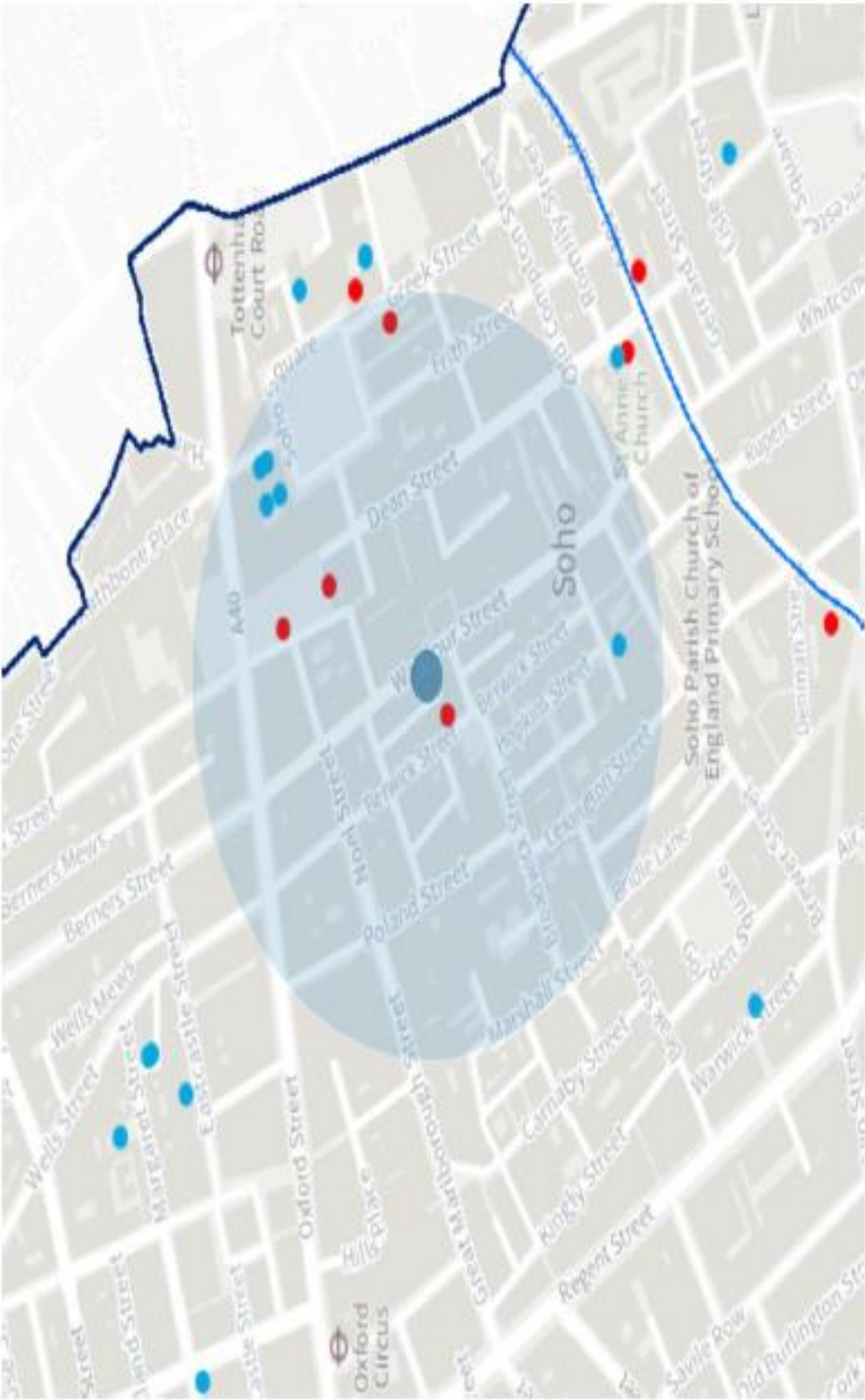
Appendix A



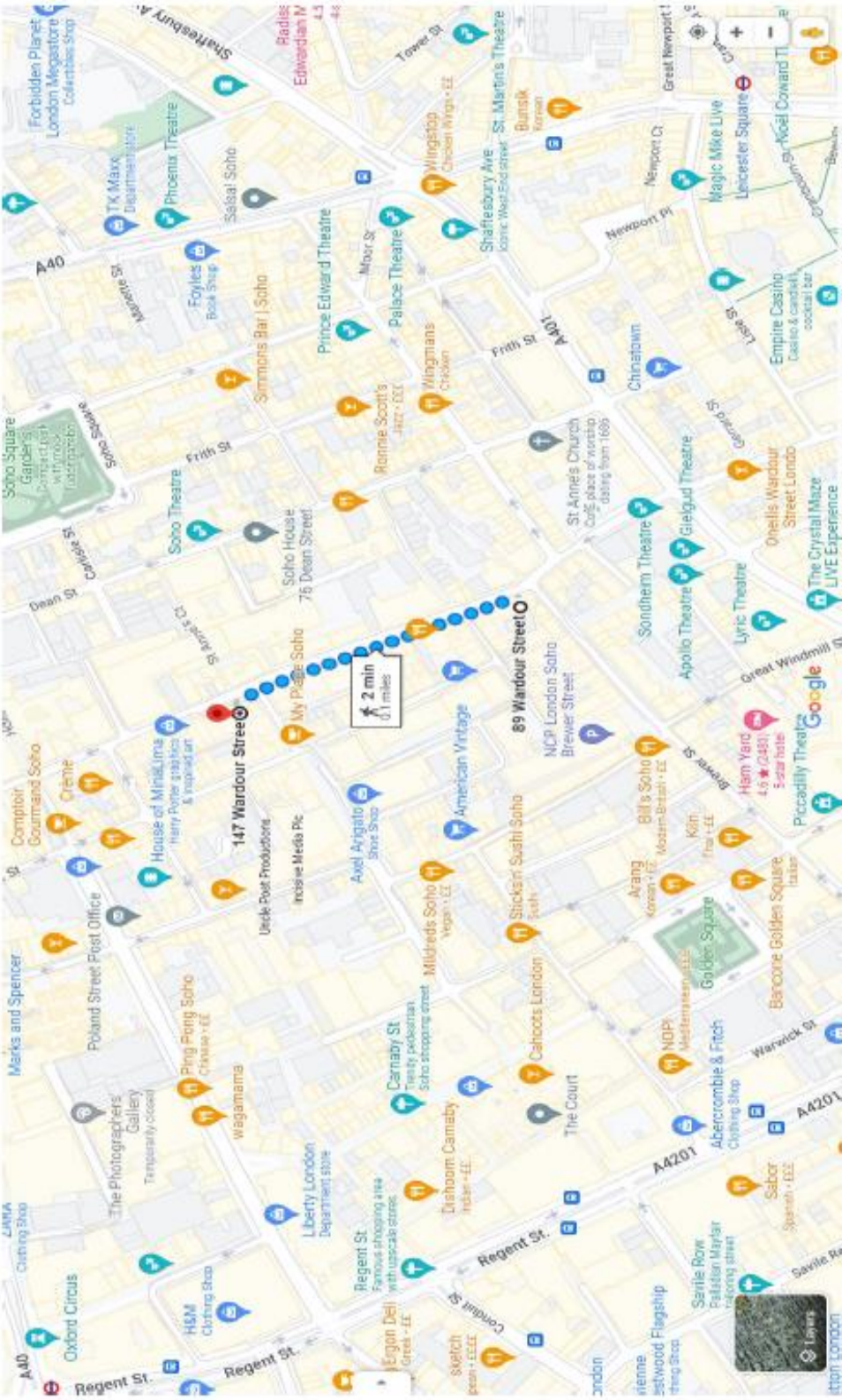
Appendix B



Appendix C



Appendix D



## **Pleasure Fairs (Amusement Premises) Byelaw**

Byelaws for the regulation of hours during which amusement premises may be open to the public; for the securing of safe and adequate means of ingress to and egress from amusement premises; for the prevention and suppression of nuisances and for the preservation of sanitary conditions, cleanliness, order and public safety at amusement premises; for the prevention of outbreaks of fire which might endanger structures used or intended for use in connection with amusement premises, and for reducing the risk of, and the spread of fire from, such outbreaks; made by the Westminster City Council in pursuance of Section 75 of the Public Health Act 1961, as amended by Section 22 of the Local Government (Miscellaneous Provisions) Act 1976.

1. (a) These byelaws shall apply only to pleasure fairs within the meaning of Section 75(2) of the Public Health Act 1961 which are amusement premises:

(b) These byelaws shall not apply to premises licensed or registered under Part II of the Gaming Act 1968 or to members clubs and miners welfare institutes registered under Part III of that Act.

2. In these byelaws, except where the context otherwise requires, the following expressions have the following meanings respectively, that is to say:

(a) "Amusement premises" means any place used wholly or mainly to provide entertainments within the meaning of Section 75(3)(f) of the Public Health Act 1961, and shall include any stationary vehicle, vessel, stall, caravan, trailer or tent where the above applies.

(b) "The Council" means the Westminster City Council.

(c) "Manager" means the person having control of the entertainments provided within the meaning of Section 75(3)(f) at the amusement premises.

### **Regulation of opening hours**

3. (1) The manager shall not keep the amusement premises open between the hours of 12 midnight and 9am.

(2) The Council, may by resolution, fix a later hour in substitution for the hour of 12 midnight in this byelaw for the closing of amusement premises or specified classes of amusement premises on specified dates or during specified periods or generally.

4. (1) The manager shall give to the proper officer of the Council at least 5 days prior notice in writing of the intention to use any amusement premises specifying therein the dates and place at which such amusement premises are to be used.

(2) The notice to be given under this byelaw shall be in addition to and not in substitution for any notice required to be given under any other enactment.

(3) In this byelaw "proper officer" means an officer appointed for the purpose of the Council.

5. (1) The manager shall take such steps as are reasonably practicable to ensure that there are provided such entrances and exits to the amusement premises as will enable persons using the amusement premises (including disabled persons) to be safe and free from risks to health and while such persons are present on the

premises every exit provided for their use shall be unsecured and free from obstruction.

(2) The manager shall cause to be exhibited over each exit from the amusement premises a notice bearing the word 'EXIT' in letters of sufficient size to ensure it is legible at the maximum viewing distance.

6. No person shall place or cause to be placed any obstruction in any exit or gangway provided in accordance with these byelaws while any persons are using the amusement premises.

Nuisances, sanitary conditions, cleanliness, order and public safety

7. The manager shall ensure that at all times when the amusement premises are open for business, there is in operation such lighting as is adequate to enable persons using the premises to be safe.

8. The manager shall ensure that the internal parts of the amusement premises are maintained in good repair and condition in order that persons using the premises shall be safe at all times when the premises are open for business.

9. The manager shall take such steps as are reasonably practicable to ensure that:-  
(a) a sufficient number of unobstructed gangways are provided and maintained in the amusement premises;  
(b) amusement machines, seats and other furnishings and structures are distributed in order that the amusement premises shall, at all times when they are open for business, be safe for persons using the premises (including disabled persons).

10. The manager shall ensure that all parts of the premises (including sanitary accommodation) are kept as clean as is reasonably practicable.

11. The manager shall take such steps as are reasonably practicable to ensure that every machine provided at the amusement premises is properly and safely installed.

12. The manager shall not knowingly permit:-  
(a) the amusement premises to be used for soliciting for the purpose of prostitution nor as a habitual resort or place of meeting of reputed prostitutes but this does not prohibit the manager from permitting such persons to remain on the premises for the purpose of using the amusement machines for such time as is necessary for that purpose.  
(b) any person who is drunk or disorderly to enter or remain on the amusement premises.

13. The manager shall take such steps as are reasonably practicable to ensure that the external doors to the amusement premises suppress noise emanating from those premises where by means of the doors being fitted with a device for automatic closure or by any other similar means.

14. The manager shall ensure that the amusement premises are under the supervision of at least one responsible person at all times when those premises are open for business.

Fire protection

15. (1) The manager shall:

(a) Consult the fire authority regarding a means of fighting fire for use in the amusement premises; and

(b) Provide and maintain reasonable means of fighting fire having regard to all the circumstances including the size, nature and age of the amusement premises; and

(c) Keep the means for fighting fire in a place where it is readily available for use.

(2) In this byelaw 'maintain' means to maintain in an efficient state in efficient working order and in good repair.

#### **Penalty**

16. Any person offending against any of the foregoing byelaws shall be liable on summary conviction to a fine not exceeding £400.

#### **Defence**

17. It shall be a defence for a person to prove that he had taken all reasonable precautions and exercised all due diligence to prevent the commission of an offence under these byelaws.



## Appendix F

These are the mandatory conditions for an AGC:

1. A notice must be displayed at all entrances to AGCs stating that no person under the age of 18 years will be admitted to the premises.
  2. There can be no direct access between an AGC and any other premises licensed under the Act or premises with a family entertainment centre (FEC), club gaming, club machine or alcohol licensed premises gaming machine permit. (England and Wales only). There is no definition of 'direct access' in the Act or regulations, although licensing authorities may consider that there should be an area separating the premises concerned, such as a street or cafe, which the public go to for purposes other than gambling, for there to be no direct access.
  3. Any ATM made available for use on the premises shall be located in a place that requires any customer who wishes to use it to cease gambling at any gaming machine in order to do so.
  4. The consumption of alcohol in AGCs is prohibited at any time during which facilities for gambling are being provided on the premises. Additionally in Scotland the sale of alcohol on the premises is specifically prohibited. A notice stating this should be displayed in a prominent place at every entrance to the premises.
-

**FAMILY LEISURE LIMITED**

**GAME NATION**

**147 - 149 WARDOUR STREET, LONDON, W1F 8WD**

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1. Background
2. Existing Operation
3. Response to Local Authority
4. The Location - GeoFutures
5. Proposed Conditions
6. Local Area Risk Assessment
7. Supporting Documents

## **(1) Background**

1. Family Leisure Limited have operated an Adult Gaming Centre and Family Entertainment Centre at 89 - 91 Wardour Street, London for over 30 years, and are proposing, subject to licensing and planning, to relocate those premises to 147 - 149 Wardour Street, London.
2. The existing premises at 89 - 91 Wardour Street have operated without licence conditions, and without any issues being brought to the attention of the operator, either by the Police, Licensing Authority, or any others. There have been no issues relating to vulnerable persons, no issues relating to crime and disorder, and no general issues connected to the area.
3. As the applicant has operated the existing premises for many years, the applicant fully understands the area in which the premises are situated, and is an experienced operator on Wardour Street.
4. The application for the new Family Entertainment Centre premises licence has been granted. The application for the Adult Gaming Centre premises licence is being considered by Westminster City Council on 21<sup>st</sup> April 2022. If the premises licence for the Adult Gaming Centre at 147 - 149 Wardour Street is

granted, then those premises will operate subject to the following legal requirements:

- Proposed conditions for 147 - 149 Wardour Street, London.
  - Mandatory and default conditions.
  - Gambling Commission's conditions and codes of practice.
5. The agreed conditions go significantly beyond conditions on licences which have operated in the area for some time, but reflect conditions which have been imposed by the Licensing Sub-Committee on recent grants of premises licences in the area. The new conditions also take into account Westminster Gambling Policy and its new policy.
6. A layout plan has been submitted with the application showing the proposed internal layout and access/egress to the Adult Gaming Centre and Family Entertainment Centre.
7. There will be separate entrances to the Adult Gaming Centre and Family Entertainment Centre. The Adult Gaming Centre will be located in the basement of the premises. The Family Entertainment Centre will be located on the ground floor and in the basement. There will be no access internally for

members of the public between the 2 operations.

8. There will be approximately a 25% reduction in the number of gambling terminals at the proposed new site. It is anticipated that there will be approximately 65 terminals in the new site.
  
9. Family Leisure Limited are experienced operators of Adult Gaming Centres in Westminster and Wardour St, having operated the following premises for many years:
  - Las Vegas, 89 - 91 Wardour St, London (AGC)
  - Funland, 89 - 91 Wardour St, London (FEC)
  - Play2Win, 32 Wardour St, London (AGC)
  - Play2Win, 195 - 197 Victoria St, London (AGC)
  
10. Family Leisure Holdings Limited is a subsidiary of City Gaming Limited, which is a leading operator of AGC premises in London and the South East. Many members of the senior management of City Gaming Limited have worked in the gaming industry for over 25 years, in addition to being board members of multiple gambling operating companies. The board of directors is formed of highly experienced operators and management. Adam Hodges CEO has over

30 years leadership experience in LBO, FEC and AGC sectors. Sina Azeri is the Executive Chairman, who was previously a partner in a private equity firm.

11. The City Gaming Group has 15 personal management licence holders throughout their operational structure, and in addition to a training manager, City Gaming utilises an E-learning platform.

12. The protection of the vulnerable, which includes under 18s, and ensuring that the premises is not connected to crime and disorder is of paramount importance, and has been at all times. Amongst other things, this includes having relevant policies and procedures in place, and training staff thoroughly on these policies and procedures to protect people from gambling related harm. This is done in several ways, which include the following:

- Self-exclusion policy
- Clear signage on age restrictions
- A strict challenge 25 policy
- Liaison with centres for vulnerable people
- CCTV systems
- Incident recording
- Door control

- Staff interaction and evaluation
- Understanding local factors
- Promoting the licensing objectives

13. The Local Area Risk Assessment is included in the supporting documentation section as is the list of proposed conditions, and both of those documents go towards the promotion of the licensing objectives and compliance with Westminster gambling policy in this particular site.

14. The operator has a full understanding of the locality having operated in the area for many years, and has carried out an analysis of the Geo-Futures work.

15. The operator has also taken on board the new Westminster Gambling Policy, by not only considering the position relating to terrorism, but also the position relating to general safeguarding of vulnerable people, whether connected to gambling or not.

16. Crime and disorder measures and child protection measures are all dealt with through the E-Learning Platform, training carried out on a 1 to 1 basis, the



Local Area Risk Assessment, and the additional proposed conditions.

17. The applicant is also proposing 5 further conditions, in addition to the conditions proposed with the application.

- One member of staff must be of Assistant Manager grade or above.
- Customers shall not be permitted to leave bags or other belongings at the premises.
- The licensee shall ensure that staff are trained to identify and interact with any customers who are identified as playing more than one gaming machine, including tablet machines at the same time.
- There shall be no cash or ATM on the premises.
- The licensee will invite the following to a meeting at the premises to discuss the operation of the premises at least once every 6 months, and the licensee will directly notify the following of the meeting date at least 2 weeks before the meeting: The Soho Society, local services in the area, local schools in the area and local ward councillors.

## **(2) Existing Operation**

1. Stuart Green is the Chief Commercial Officer for the applicant company and is a very experienced operator in Westminster and in Wardour Street. Stuart has observed many times the 2 existing operations at 89-91 Wardour Street and is responsible with other senior management and site management for ensuring that the existing site promotes the Licensing Objectives. The below paragraphs confirm how the existing premises operate and both Stuart and site management's experience of operating the existing site.

2. The existing Premises in Soho is located on Wardour Street close to the junction of Brewer Street. This is a very high footfall location and daytime traffic is in complete contrast to the night time. There are many bars and restaurants trading in the area with Weekends and evenings being the busier passing footfall traffic. The premises is split into two levels the ground floor operated as an AGC and the basement floor operated as an FEC.

3. The existing AGC currently operates from 9am to 2am, Customers are generally tourists and local restaurant and office workers. They are mainly in the 25-40 year old age bracket and there is a pretty even split between male and Female. Busy trading times are Weekends from 12-00 to 20.00 and week days

from 18.00 to 00.30. Access to the arcade is controlled during the day through our staff who are all fully trained and tested on a Challenge 25 policy and then in the afternoon/evening by SIA registered security personnel. The entrance to the AGC is completely independent to the FEC. This Arcade records our highest number of age checks across our entire business. This arcade differs from most of our arcades for a few reasons.

4. The existing site ( and the proposed site) has high definition CCTV and a spotter camera focused on the front door. This means that customers entering the premises are captured immediately on CCTV and there is a 32 inch or larger big screen in front of them which means that they see themselves on the screen and are aware before they get any further into the shop that they are on CCTV.

5. The customer journey from entering the shop would not only include the customer being aware that they were on CCTV but also include them being aware that they are being observed by staff as there would always be at least one member of staff on the shop floor who would be visible to the customer and who would carry out an assessment of that customer immediately. It would be at this point and before the customer enters the body of the shop that any identification checks and an initial assessment would take place. Staff would

also be able to speak to the customer immediately and assist the customer in using the premises if any such assistance was required. Staff would then continually observe customers during their visit to the Adult Gaming Centre.

6. There are a number of points to make with regard to the existing premises and proposed premises.

- This is our only arcade with an FEC in the same building.
- Due to the location most customers here are not regulars but tourists. We are very much aware of this.
- We are very alert to access control here due to its location and the risks of people under the influence/vulnerable trying to come in and play.
- We are very alert to ensuring that young people don't mistake the AGC entrance for the FEC entrance.
- Our staff are trained specifically to interact accordingly, utilising all the relevant skills built into our LCCP requirements
- All Interactions are recorded via our electronic hand held device, populating our central data base
- All interactions are reviewed weekly via the Snr Management team, thus establishing continual improvement.

- CCTV is also used to cross reference the quality of interactions.

7. We also control these premises by ensuring:-

- That the toilet door remains locked.
- We employ SIA guards at peak trading times. 4pm to 2am
- Staff are all trained on induction, have a 12 week review and regular refresher training in venue and using our online e-learning platform.
- The frontage is designed not to be appealing to children and visibility into the arcade is restricted with Vinyl decors on the windows.
- All staff are trained in Money Laundering and Money Lending
- All staff are trained on Know your Customer to ensure a safe environment can be enjoyed.
- Regular interactions with the customers to ensure they are not vulnerable or playing beyond their means, this is key in a location like this as there are very few regular customers.
- Visitors are asked to remove Head coverings and face coverings to record an image on entry to the venue.

8. The FEC operates from 11am to 1am. Customers are generally in the 15-30 year old age bracket and predominantly of Asian Heritage, due to the mix of machines. There is an even split between males and females. The arcade has a good following on social media and is well known for being a great place to play and enjoy Japanese arcade games and retro classics. The arcade is busy all day Friday, Saturday and Sunday and between 6pm and midnight on weekdays. Lunchtimes can also be busy. There is a spike in footfall during school holidays also. We have a strict no alcohol policy and do not allow people that are under the influence of alcohol entry to the FEC. The FEC is covered by CCTV which can be reviewed by staff in the AGC and also the managers office. Visitors are asked to remove face coverings and head coverings for the purpose of gaining a CCTV image.

9. The FEC is always manned during trading hours and the security guard will also conduct regular patrols of the FEC to support the team and ensure there are no concerns about who is in the FEC. The same due diligence and operational measures apply to the FEC in terms of the customer journey and customer experience.

10. We use an industry leading and recognised system known as SmartHub, approved in conjunction with the Gambling Commission. Each venue utilises a handheld tablet with a user friendly and intuitive interface to record all out interaction, as listed below.

- Self Exclusion

The IHL Smart Exclusion system works in conjunction with the Bacta Multi Operator Self Exclusion System (MOSE) which ensures that details of customers wishing to exclude from operators using either system are automatically recorded on both systems. This is a requirement of the Gambling Commission

- Self Exclusion Breaches

Self Exclusion breaches are closely monitored and customer who persistently attempt to breach their Self Exclusion Agreement are identified and appropriate action taken.

- Age Verification Breaches

The numbers of Age Verification challenges made is monitored closely and where inconsistencies are highlighted, the appropriate management action is taken.

- Customer Interactions

The numbers of Age Verification challenges made is monitored closely and where inconsistencies are highlighted, the appropriate management action is taken.

- Incidents including those requiring police assistance/intervention

Every other type of incident recorded is reviewed weekly and where further action is required, this is reported out to the Operations team.

- AML Log

Each of these interactions is secularly recorded and GDPR compliant

New look dashboard view as below.





11. All venue recorded interaction can be centrally monitored, interactions are reviewed for consistency, quality and highlight any further training requirements. Interactions can be reviewed with the dashboard, adding comments as well as running full reports with multiple filters

### **(3) Response to Local Authority**

**Q1:** For the purpose of this application, it would be useful for the operator to provide their definition of vulnerability, and what it means to their operation.

**A1:** The operator agrees with the Local Authority definition of vulnerable persons, as set out in paragraph 13.4 of its policy. The operator has policies and procedures in place to protect the vulnerable. All staff are fully trained on this matter, including customer interaction and self-exclusion.

A full range of policies is available to ensure that staff are trained to protect vulnerable persons, including social responsibility, self-exclusion and Gamble Aware.

There will be notices and posters, as well as leaflets, within the premises in relation to Gamble Aware / Stay in Control.

In particular, there are Powerpoint training sessions on Access To Gambling By Children And Young Persons, Identifying Customers Who May Be Susceptible To Gambling Harm, and Identifying Customers Who May Be Susceptible To Gambling Harm Part 2. These are all included in the supporting documents.

IHL's smarter technology is used to manage all areas of player protection from gambling related harm, and every venue is equipped with a tablet device which allows easy login of all player interacted related events, which include the following:

- Self-exclusion
- Self-exclusion breaches
- Age verification challenges
- Customer interactions
- Incidents

SmartHub allows the operator to effectively remove paper logs from their premises, and store information centrally.

Test purchasing through check policy is also undertaken and recorded on SmartHub. Please see information in the supporting documents.

All staff training is through e-learning which is supplied through UpSkills, who are a long standing supplier of e-learning modules to the UK gaming industry.

A full explanation of all modules, of which there are 34, is included in the e-learning document in supporting documentation.

This allows the operator to measure the performance of a member of staff on e-learning, and to record all training.

The Safeguarding Adults policy statement also enclosed in the supporting documentation demonstrates the operators commitment to keeping safe vulnerable adults with whom it works alongside. Please refer to the 13 page document in supporting documentation for further details, which are not just limited to protecting the vulnerable as defined in the local authority policy and as agreed by the operator, but include the following:

- a. Preventing abuse
- b. Recognising the signs and symptoms of abuse, grooming and exploitation
- c. Designated name department for safeguarding adults
- d. Responding to people who have experienced or are experiencing abuse
- e. Managing allegations made against members of staff
- f. Recording and managing confidential information
- g. Disseminating/reviewing policy and procedures.

**Q2:** It would be helpful if the operator could advise if there is to be any change to the operating style of the premises, for example:

- Is there an increase in hours from the current hours trading at the current premises?
- Will there be an increase in the number of gaming machines?

**A2:** The current permission, both under planning and licensing regimes, permits the current premises to open 24/7. The operator decided not to operate 24/7 in recent times, and has only been operating until 3am.

**Q3:** Byelaw 3(1) provides that 'the manager shall not keep the amusement premises open between the hours of 12 midnight and 9am.' What is the operators proposal with regard to this?

**A3:** The applicant will comply with Westminster City Council's approach to, and interpretation of, the byelaw.

**Q4:** Can the operator provide further submissions as to the placement of signage in the windows to show its visibility from outside the premises and explain further

what checks would be in place in terms of ID checks? Is it proposed for SIA door staff to be present and conduct these checks?

**A4:** We can show our venue window designs specifically edited to reflect our design, please see these design in our Supporting Documents. SIA door staff will be available between 19:00 & 03:00 (assuming we will close at 03:00 Thursday / Friday / Saturday / Sunday.)

We recognise our responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice, and monitoring of policies and procedures is regularly reviewed and subject to change as part of our ongoing risk assessment. Our policies and procedures with regard to age restriction take into account the structure and layout of our gambling premises so as to prevent access to gambling by children and young persons, and that our facilities do not appeal to children and young persons.

Clear and prominent signage is placed at the entrance to our Adult Gaming Centres stating that it is illegal for persons under the age of 18 years to enter and for City Gaming Limited to permit entry. It is a matter of gross misconduct if a member of

staff knowingly allows entry by any person who is under the age of 18 years to our Adult Gaming Centres.

In addition, any person known to be under 18 years of age is refused entry; and any person who appears to be under 18 years of age, and has not previously provided satisfactory proof to the contrary, is asked to provide appropriate identification when it comes to the attention of staff and before an attempt to gamble. Members of staff are trained to 'Challenge 25' as a minimum. If the person admits to being under the age of 18, they are refused entry. Should they claim to be 18 or over and there is still doubt, satisfactory proof of age is requested and has to be provided before entry is allowed. Incidents involving suspected forged documents will be recorded and reported.

In respect of 'proof of age' documents, these must contain a photograph from which the individual can be identified; state the individual's date of birth; be valid, and legible. It should bear no visible signs of tampering or reproduction.

Acceptable forms of identification include those that carry the PASS logo (e.g. Citizen card); a driving licence (including a provisional licence) with photograph, a passport and military identification cards.

Where there is still doubt and the person cannot produce proof of age, they are advised that they will not be permitted to enter until such time as they provide such proof. They will be shown, have explained to them, and be given a 'proof of age card' application form or offered an explanation on how to apply for a card.

Should the person then refuse to leave, they are advised that the age restriction is a legal requirement. If they still will not leave, the Duty Manager is immediately contacted to take over the situation. Any attempts by under-18s to enter the premises or designated adult area(s) and gamble are brought to the attention of the Duty Manager immediately and recorded as an incident on the IHL tablet for this purpose. Details of entry to include date, time, identity of the individual if known - or detailed description if unknown – member of staff dealing, action taken, the outcome and measures put in place to prevent a re-occurrence. Log to be countersigned by the Duty Manager.

Of note, service is refused in all circumstances where any adult is accompanied by a child or young person.

Members of staff are trained as part of their induction process in the understanding of, and the strict adherence to this policy and accompanying log, and required to sign to this effect retaining a copy for their future reference; the



original being retained on the employee's personnel file. Staff training policy covers all relevant prohibitions against inviting children or young persons to gamble or to enter gambling premises, and refresher training is carried out at appropriate intervals.

It is important to remember that any incidents where the same child or young person repeatedly attempts to gamble must be logged and reported to the Gambling Commission. Should staff be aware of any such circumstance, they should immediately report it to their line manager so they can log the incident and decide on what action to take to prevent any further attempts to gamble by the child or young person.

**Q5:** It would be useful for the operator to provide further information into their operation of other licensed premises under the Gambling Act 2005 to obtain an understanding of their management and operation of such premises.

**A5:** The existing site at 147 - 149 Wardour St, London has been operated by the operator and its predecessor for over 30 years.

The operator also operates other Adult Gaming Centres in Westminster, namely:

- Las Vegas, 89 - 91 Wardour St, London, W1F 0UB
- Funland, 89 - 91 Wardour St, London, W1F 0UB (FEC)
- Play2Win, 32 Wardour St, London, W1D 6QP - AGC, ground floor & basement
- Play2Win, 195 - 197 Victoria St, London, SW1E 5NE

The operator is very experienced in running Adult Gaming Centres and Family Entertainment Centres in Westminster, and also operate in excess of 60 premises around the country.

The operator always works in conjunction with the authorities (including at times agreeing to informally operate at reduced hours), has not had any issues or complaints and has never been the subject of a premises licence review application.

**Q6:** The operator has stated in the Risk Assessment that there will be training for staff, although the operator has advised that there is no actual content of what measures or training staff undertake. It would therefore be useful for the operator to provide details of what staff training will undertake in terms of identifying vulnerable people and providing sufficient and effective support to those people.

**A6:** Please see the following in the supporting documents:

- Access to gambling by children and young persons
- Identifying customers who may be susceptible to gambling harm
- Identifying customers who may be susceptible to gambling harm 2
- Staff guard conflict management
- Player protection systems training
- E-learning explanation
- Safeguarding adults policy statement

**Q7:** Does the operator have a referral scheme in place with regard to self-exclusion?

**A7:** Yes.

**Q8:** Is this onus on the individual to self-exclude from the premises, and if so, how does an individual go about this?

**A8:** The onus is not on the individual to self-exclude. Staff are trained to assess, interact and deal with all situations including self-exclusion if appropriate.

**Q9:** What link does the premises have with local services to provide support?

**A9:** The applicant will liaise with the Soho Society, local schools in the area, local services in the area and ward councillors. The applicant has already had a meeting with the Soho Society and a ward councillor, and has been in contact with a local school.

**Q10:** Will the operator propose to advertise any promotional material associated with the premises that could encourage the use of premises by children or young people?

**A10:** No.

**Q11:** How will the operator control customers from bringing alcohol into the premises to consume whilst gaming or entering the premises in an intoxicated state?

**A11:** All staff will be trained to assess and evaluate customers who are entering the premises. Staff are positioned on the shop floor, rather than behind a counter, and will in practice be assessing all individuals entering the shop. No alcohol will be

permitted onto the premises, and no one will be allowed to enter in an intoxicated state.

**Q12:** The licensing authority require the operator to confirm the number of machines/categories of those machines that will be at the premises. It will also assist if the application can provide an updated plan showing the location of the machines and the location of the CCTV cameras.

**A12:** There will be approximately 65 machines at the premises.

### **13. Additional Points:**

An additional 34 conditions are proposed with the application, none of which are on the existing Adult Gaming Centre licence and which, amongst other things, cover the following:

- Liaison with residents and any other groups
- The provision of a direct contact number
- CCTV
- Children and young people
- Entrances and doors

- Staffing levels
- Identification of offenders or problem persons
- Alarms
- Toilets
- Signage, promotional material and notices
- Staff training
- Homeless and street drinking
- Recording of incidents and visits
- Experienced members of staff
- Front of house staff to receive conflict management training

**14.** The operator acknowledges that the premises on Wardour St falls within a sensitive location, and the uniqueness of Westminster as a location to operate.

The operator is very experienced at operating both within Westminster and within Wardour St, and is fully appreciative of the challenges in the area. The operator is experienced in dealing with the potential risk of vulnerable people trying to use the premises.

The Local Area Risk Assessment identifies establishments which vulnerable persons may attend, and the operator is fully aware of these establishments.

**15.** The operator has traded on Wardour St for many years, and has not had any issues connected with the licensing objectives.

**16.** The operator relies on its experience and senior management knowledge in putting together the Risk Assessment and proposed conditions. The operator is experienced in dealing with the potential risk of under 18s trying to use its premises, and during its time on Wardour St, is not aware that any under 18s have been allowed into the premises.

There are policies in place to deal with protection of young people and the vulnerable, bespoke postage and signage will be clear, staff training will ensure that staff are fully trained to ensure that under 18s do not get into the premises.

It is the operator's experience that children are not attracted to enter its premises in any event, but it will have in place policies and procedures and training to ensure that they do not. There will be no signage in the Adult Gaming Centre window which is attractive to under 18s, and the operator will risk assess the amount of staff required at the premises.

**17.** The operator is aware of Westminster's gambling policy, and in particular, policy AGC1, which states that applications will be determined subject to the relevant criteria in policies OBJ1, OBJ2, and OBJ3.

**18.** The operator demonstrates through its training and conditions, and through its years of operating on Wardour St, that it will not contribute to the levels of crime and disorder on Wardour St. There will be a comprehensive CCTV system on the premises, entry will be refused to anybody who appears to be under the influence of alcohol or drugs, there will be a Maglock in place to be used by staff as well as an intruder alarm and staff panic buttons. Toilets will be checked regularly and an incident log will be maintained at the premises.

**19.** The Local Authority Risk Assessment supported by the additional conditions, staff training and management, will ensure that gambling is conducted in a fair and open way, and the management and operation of the premises will be open and transparent. There will be terms and conditions provided to customers, and there will be no promotional material off-site.

**20.** The operator is fully aware of policy OBJ3, and the importance of protecting children and other vulnerable persons from being harmed or exploited by



gambling. This is dealt with elsewhere in this response summary, but the operator reiterates that it takes the protection of children and other vulnerable persons extremely seriously, and all staff are trained in relation to this. The training is recorded on the E-Learning Platform, and there is specific training for staff to ensure that they are able to identify children and vulnerable persons. This training includes the following:

- Identifying children and age verification
- Identifying safe gambling
- Identifying signs of problem gambling
- Training to evaluate and interact and encourage customers to think about gambling. There will be prominent GamCare documentation throughout the premises, as well as a self-exclusion referral scheme. Whilst customers may directly request help themselves, the onus for self-exclusion is on staff at the premises who are trained to approach and speak to/interact with any customer displaying any signs of problem gambling.

## **(4) The Location - GeoFutures**

1. According to the Geofutures information available from Westminster City Council, the 147-149 Wardour Street scores 45.4 for the composite gambling risk index. It has a 12.8 score for the people gambling at home risk and 32.6 for people gambling away from home risk.
2. The site scores lower than the applicant's site at 89-91 Wardour Street, which has a composite gambling risk index of 51.8. It has a 10.7 score for the people gambling at home risk and 41.1 for people gambling away from home risk.  
Please note that this site has been operating without incident for XX years.
3. For context, the highest composite gambling risk area in Westminster is near the University of Westminster Cavendish Campus with a location score of 74.2.  
The lowest risk score being 0.1 in the centre of Regent's Park.

There are no gambling treatment centres within a 250m radius. There is the Chinese National Healthy Living Centre some 320m away. Within the supporting documents is a further analysis taking into account the new Westminster Gambling Policy.

## **(5) Proposed Conditions**

### Operator's proposed conditions

1. The licensee will liaise with any residents who would like to be contacted quarterly to discuss the operation of the AGC and any issues.
2. The operator will provide a direct contact number to any residents who request the number. A direct telephone number for the manager at the premises shall be publicly available at all times the premises is open. This telephone number is to be made available to residents and businesses in the vicinity.

### **CCTV**

3. The premises shall install and maintain a comprehensive CCTV system as per the minimum requirements of the Westminster Police Licensing Team.
  - (a) All entry and exit points will be covered enabling frontal identification of every person entering in any light condition. The CCTV system will have night colour vision for improved resolution & recording capability.
  - (b) The CCTV system shall continually record whilst the premises is open for licensable activities and during all times when customers remain on the premises and will include the gaming area, office, toilet entrance, any seating and external area immediately outside the premises entrance.
  - (c) All recordings shall be stored for a minimum period of 31 days with date and time stamping.
  - (d) Viewing of recordings shall be made available immediately upon the request of Police or authorised officer throughout the entire 31-day period.
4. 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 is open. This staff

member must be able to provide a Police or authorised council officer copies of recent

CCTV images or data with the absolute minimum of delay when requested.

5. The premises shall display notices near the entrance of the venue stating that CCTV is in operation.
6. A 'spotter monitor' shall be placed inside the premises near the front door showing CCTV images of customers entering ,exiting and whilst on the premises.

#### ***Children and Young People***

7. The Licensee shall maintain a bound and paginated 'Challenge 25 Refusals' register at the premises. The register shall be produced to the police or licensing authority forthwith on request.
8. Prominent signage and notices advertising the Challenge 25 will be displayed showing the operation of such policy.
9. Third party testing on age restricted sales systems purchasing shall take at least twice a year and the results shall be provided to the Licensing Authority upon request.
- 10.A Challenge 25 proof of age scheme shall be operated at the premises where the only acceptable forms of identification are recognised

photographic identification cards, such as a driving licence, passport or proof of age card with the PASS Hologram.

11.A member of the management team will receive training on Child Protection issues and will be the nominated ' Child Protection' manager and any suspicious activity or possible Child Protection issues will be reported to this person who will record the matter and take appropriate action.

### ***Entrances and Doors***

12.A magnetic locking device, commonly referred to as a Maglock will be installed and maintained on the main entrance/exit to the premises which will be operable by staff.

13.Staff will receive a notification when the front door opens.

14.Between 6pm and 3am there will be an SIA registered door person employed at the front door of the premises. The need for an SIA door person at other times will be risk assessed. They shall display their licence at all times in a yellow high visibility arm band.

### ***Staffing levels***

15.There shall be 1 member of staff present at all times and the premises licence holder will risk assess when there is a need for 2 members or more of staff.

### **Identification of Offenders or Problem Persons**

16.The Licensee shall implement a policy of banning any customers who engage in crime or disorder within or outside the premises.

17.The licensee will refuse entry to customers who appear to be under the influence of alcohol or drugs.

### **Alarms**

18.The licensee shall install and maintain an intruder alarm on the premises.

19.The premises shall install and maintain fixed panic buttons and in addition portable panic buttons will be worn by staff.

20.In addition to the panic button the premises will operate Staff Guard. Staff Guard is a 3<sup>rd</sup> party remote monitoring station, who can see venue CCTV & hear Audio. This enables the venue team to press the panic button and have immediate 3<sup>rd</sup> party support for all emergency service – Police, Fire, or Ambulance. The remote monitoring station has voice over control to provide audio instruction – IE Police services have been called and are on route.

### **Toilets**

21.The licensee will ensure that customer toilets are checked every hour for evidence of drug taking. Toilet checks are to be documented stating the time and member of staff who made the checks. Toilets will remain locked at all times with access being provided by staff.

### **Signage, Promotional Material and Notices**

22. Prominent GamCare documentation will be displayed at the premises and other notices promoting responsible gambling.

### **Staff Training**

23. The licensee shall: provide training on the specific local risks to the licensing objectives that have been identified for these premises as part of the staff induction training programme. 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.

24. New and seasonal staff must attend induction training and receive refresher training every six months.

25. All training to be completed in venue by authorised Senior members of the operational team, subsequently supported via E – Learning modules. All Modules are time stamped with refresher training can be automated, and results verified.

26. Staff will also undergo drug and alcohol awareness training to include Homeless and Street Drinking.

### **Homeless and Street Drinking**

27.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.

28.The Licensee shall place a notice visible from the exterior of the premises stating that customers drinking alcohol outside the premises is not permitted and those who do so will be banned from the premises.

### **Recording of Incidents and Visits**

29.An incident log shall be kept for the premises and made available on request to an authorised officer of the City Council or the Police which will record the following;

- a. All crimes reported to the venue;
- b. Any complaints received regarding crime and disorder;
- c. Any incidents of disorder;
- d. Any faults in the CCTV system; and
- e. Any visit by a relevant authority or emergency service.
- f. All ejections of patrons;
- g. All seizures of drugs or offensive weapons;



30.All Responsible Gambling posters and messaging will also be provided in Mandarin Chinese.

31.Any tea/coffee/drinks facilities will be provided for playing customers only.

32.At least one member of staff working at the premises shall have a minimum of 6 months experience working in a licensed Adult Gaming Centre.

33.All front of house staff will receive Conflict Management Training via the e learning module.

34.The licence holder shall ensure that all seating within the premises are either secured to the floor or are weighted to prevent lifting.

#### Additional Proposed Conditions

35.One member of staff must be of Assistant Manager grade or above.

36.Customers shall not be permitted to leave bags or other belongings at the premises.

37.The licensee shall ensure that staff are trained to identify and interact with any customers who are identified as playing more than one gaming machine, including tablet machines at the same time.

38.There shall be no cash or ATM on the premises.

39.The licensee will invite the following to a meeting at the premises to discuss the operation of the premises at least once every 6 months, and the licensee will directly notify the following of the meeting date at least 2 weeks before

the meeting: The Soho Society, local services in the area, local schools in the area and local ward councillors.

### Mandatory Conditions

40. A notice must be displayed at all entrances to AGCs stating that no person under the age of 18 years will be admitted to the premises.

41. There can be no direct access between an AGC and any other premises licensed under the Act or premises with a family entertainment centre (FEC), club gaming, club machine or alcohol licensed premises gaming machine permit. (England and Wales only). There is no definition of 'direct access' in the Act or regulations, although licensing authorities may consider that there should be an area separating the premises concerned, such as a street or café, which the public go to for purposes other than gambling, for there to be no direct access.

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

43. The consumption of alcohol in AGCs is prohibited at any time during which facilities for gambling are being provided on the premises. Additionally in Scotland the sale of alcohol on the premises is specifically prohibited. A

notice stating this should be displayed in a prominent place at every entrance to the premises.

## **(6) Local Area Risk Assessment**

**Premises**

|                                 |  |                                     |  |
|---------------------------------|--|-------------------------------------|--|
| Premises Name:                  | Game Nation                            |                                     |  |
| Premises Address:               | 147 – 149 Wardour Street, London       |                                     |  |
| Premises Post Code:             | W1F 8WD                                |                                     |  |
| Premises Licence/Permit Number: |  |                                     |  |
| Category of Premises:           | Adult Gaming Centre                    | <input checked="" type="checkbox"/> |  |
|                                 | Unlicensed Family Entertainment Centre | <input type="checkbox"/>            |  |
|                                 | (please identify with **)              |                                     |  |

**Company**

|                                       |                                     |
|---------------------------------------|-------------------------------------|
| Operating Company:<br>(the "Company") | Family Leisure Holdings Limited     |
| Operating Licence Reference Number:   | 001875-N-102630-019                 |
| Registered Office Address:            | 4 Cavendish Square, London, W1G 0PG |

**Assessment Completion**

|   |             |  |                   |
|---|-------------|--|-------------------|
| Original Assessment completed by (Signature): |             | Updated Assessment completed by (Signature): |                   |
| Original Assessment completed by (Print):     | G Glanfield | Updated Assessment completed by (Print):     | S Bernardi        |
| Position within the Company:                  | Consultant  | Position within the Company:                 | Regional Director |
| Date of completion of Original Assessment:    | July 2021   | Date of completion of Updated Assessment:    | December 2021     |

**Requirement to Comply**

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

Effective as of 6 April 2016

Social responsibility code provision 10.1.1

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

**Ordinary code provision 10.1.2**

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

**COMPANY OVERVIEW**

1. Family Leisure Holdings Limited is a subsidiary of City Gaming Limited. Both companies hold Operating Licences issued by the Gambling Commission. The main operating brand for the City Gaming group is Game Nation.
2. The City Gaming Group is a leading operator of AGC premises in London and the South-East and has full authority to provide AGC facilities through the grant of Operating Licences by the Gambling Commission. The Gambling Commission has approved the measures which City Gaming Limited has put in place to ensure that it implements effective anti-money laundering procedures, security procedures and trades responsibly in accordance with gambling legislation, the licensing objectives and the licence conditions and codes of practice. These practices are replicated throughout all subsidiary companies including Family Leisure Holdings Limited.
3. Many members of the senior management of City Gaming Limited have worked in the gaming industry for over 25 years. In addition to being Board Members of multiple gambling operating companies, they have also operated large scale Holiday Park FEC's, including AGCs. The Board of Directors is formed of highly experienced operators and management. Adam Hodges, CEO, has over 30 years leadership experience in LBO, FEC, and AGC sectors. Sina Azeri, Executive Chairman was previously a Partner in a private equity firm and has extensive experience in the gambling industry.
4. The City Gaming Group has fifteen Personal Management Licence holders throughout their operational structure: all in key, high profile positions.
5. The entire management team from head office to premises level are fully aware of their roles and responsibilities in regard to the Licence Conditions and Codes of Practice (LCCP).
6. City Gaming Group employs a highly recognised individual within industry as Compliance Officer, reporting directly to the CCO to carry out compliance checks and audits to ensure that the Company's responsibilities and procedures relating to the LCCP are upheld.
7. City Gaming Group employs over 500 people. The Company employs a Training Manager with industry experience to focus on ensuring that staff understand their key role in the Company's social responsibility and customer interactions.
8. In addition to the Training Manager, City Gaming also utilises an E-Learning platform to underpin the emphasis we apply to our learning culture.

9. City Gaming Group engages with reputable security specialists. We work with Incognito to ensure our physical security and guarding policies and procedures are best practice. We work with Link Integrated to ensure the remote monitoring and protection of our customers and staff is placed at the highest priority at all times and they are able to immediately contact any of the emergency services if required without venue intervention.

10. The following sites are operated by the applicant group within Westminster

- Las Vegas, 89-91 Wardour Street, London, W1F 0UB, AGC (Ground floor)
- Funland, 89-91 Wardour Street, London, W1F 0UB – FEC with Permit (Basement). This has a separate entrance from Wardour Street.
- AGC Premises Licence and FEC Permit are both under the name of Family Leisure Holdings Limited.
  
- Play 2 Win, 32 Wardour Street, London, W1D 6QP - AGC (Ground and basement) (located on the corner with Gerrard Street.)
- AGC Premises Licence is in the name of Family Leisure Holdings Limited.
  
- Play 2 Win, 195-197 Victoria Street, London SW1E 5NE - AGC (Ground and basement)
- AGC Premises Licence is in the name of Family Leisure Holdings Limited.

#### EXPLANATORY NOTES

**a/** In compiling this assessment we have looked closely at the Council's 'Statement of Principles for Gambling', effective January 2019, and acknowledge the study together with Manchester City Council and Geofutures in 2015 to help understand key issues concerning gambling related harm so as to protect those that are vulnerable. In particular we have considered 'Case Study 3 - The West End' in the Geofutures document *Exploring area-based vulnerability to gambling-related harm: Developing the gambling-related harm risk index*. We have also utilised information from the Geofutures study including the 'Gambling Risk Index' and other relevant indices.

**b/** This Risk Assessment is designed to ensure that Game Nation staff fully understand the level of risk in the Local Area. Game Nation procedures require Risk Assessments to be reviewed on a regular basis and by including significant detail, staff will become very much more aware of the areas of risk as they review each section of the assessment.



**Local Area Profile**

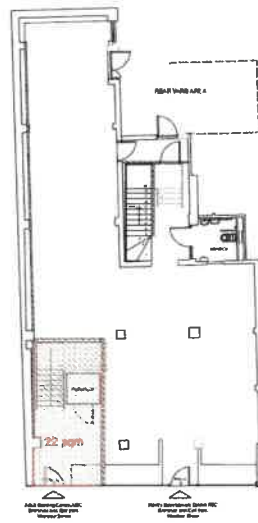
The premises is situated in an area predominately in use by restaurants, bars, cafes and take away food outlets. On one side is a vacant unit and on the other an entrance to the Jungle Recording Studio. The adjacent doorway (shown as no 151 in the photo) provides access to offices above. On the opposite side of Wardour Street are a number of Restaurants and Cafes as shown in the second image below.

The premises is approximately equidistant from the prime shopping areas of Oxford Street at one end of Wardour Street and Shaftsbury Avenue at the other end.

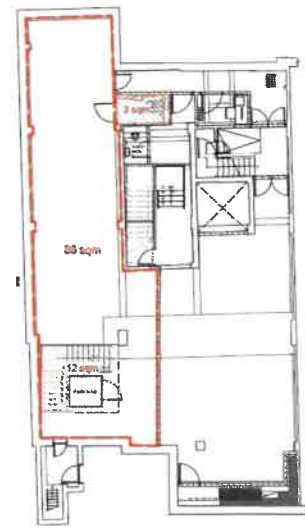


**Plan and location of Property**

Note scale plans are attached to application. The plans here will be updated at the earliest opportunity with details of CCTV and security equipment.



3 Proposed License Plan GF  
Scale 1:150 @ A3



4 Proposed License Plan LGF  
Scale 1:150 @ A3

There are a considerable range of premises in the surrounding area that we are aware of and may heighten the risk to some vulnerable groups of people.

A recognised definition of vulnerability in relation to gambling is as follows – People vulnerable from gambling related harm are people, who gamble more than they want to, gamble beyond their means and may not be able to make informed or balanced decisions about their gambling due to a mental impairment, alcohol, or drugs. Other factors such as bereavement, divorce and other changes in personal circumstances may also affect a person’s ability to make balanced decisions in relation to their gambling.

It is noted, in particular, that the following establishments are nearby:

**Betting Shops**

- Betfred, 39 Wardour Street. 0.2 miles
- Paddy Power, 40 Gerrard Street. 0.3 miles
- William Hill, Lower James Street. 0.3 miles
- Coral, 262 Tottenham Court Road. 0.4 miles
- Coral, Newport Place. 0.4 miles

**Adult Gaming Centres**

- Las Vegas, 89 Wardour Street. 0.1 miles
- ~~Crystal Rooms, 7 Cranbourne Street. 0.4 miles~~ Closed, Updated Dec 2021
- Play 2 Win, 32 Gerrard Street / 23 Gerrard Street. 0.2 miles
- Merkur Slots, Tottenham Court Road. 0.5 miles
- Little Vegas, 5 Wardour Street. Added, Updated Dec 2021

We are also aware of an AGC application by Silvertime Amusements Limited in relation to a premises at 32 Gerrard Street.

**Casinos – Being a West End location, there are a number of Casinos in the vicinity, the closest being:**

- Genting, Chinatown, Shaftsbury Avenue. 0.3 miles
- Empire Casino, Leicester Square. 0.4 miles
- Grosvenor Casino, Coventry Street. 0.3 miles
- Grosvenor Casino, Tottenham Court Road. 0.4 miles
- The Hippodrome, Leicester Square. 0.4 miles
- Grosvenor Casino, Russell Square. 0.5 miles

**Pawn Shops**

- CEX, 32 Rathbone Place. 0.3 miles
- CEX, 70 Tottenham Court Road. 0.5 miles
- ~~Pawnbrokers Today, 29 Frith Street. 0.3 miles~~ **Now closed, Added Dec 21 review**
- Money Exchange, 37 Coventry Street. **Added Dec 21 review**

**Public Houses**

Being a Soho location, there are numerous bars and pubs within a few minutes’ walk with the Ship and the George both being in closest proximity.

**Post Offices**

- St James Post Office, Regent Street. 0.5 miles
- Poland Street Post Office, 14 Poland Street. 0.2 miles

**Banks and ATM Cash Points**

There are numerous Banks and ATM cash machines within a short walk. Examples as below:

- NatWest, Dean Street. 300 feet
- HSBC, 17 Gerrard Street. 0.3 miles
- Barclays, 27 Soho Square. 0.2 miles
- HSBC, 196 Oxford Street. 0.3 miles
- Lloyds, 113 Oxford Street. 0.2 miles
- ~~The Bank of East Asia, 75 Shaftsbury Avenue. 0.3 miles.~~ **Now closed – Dec 21 review**
- Bank of China, Shaftsbury Avenue. 0.3 miles

The above establishments can all have links to people who are “**Vulnerable from gambling related harm, who gamble more than they want to, gamble beyond their means and may not be able to make informed or balanced decisions about their gambling due to a mental impairment, alcohol or drugs.**”

The establishments listed provide gambling services such as AGCs and betting shops and establishments to source funds for gambling such as Banks, ATMs, Post Offices or Pawnbrokers. Public houses do risk that customers may become inebriated and not be in a position to control their gambling.

City Gaming’s training program and procedures ensure that customers displaying any signs of problem related gambling are identified quickly and the appropriate action taken.

#### **SELF EXCLUSION**

Customers are able to Self-Exclude from gambling as a result of a direct request to any member of staff who will be able to arrange for self-exclusion to take place provided the customer has the necessary ID documents and a member of staff authorised to carry out a self-exclusion is present at the time. Should the customer not have the necessary ID documents, an appointment will be made to process the exclusion, and the customer discouraged from gambling in the meantime.

Self-exclusions may also occur through the interaction process whereby a member of staff sees a change in a customer’s behaviour that causes concern, and the staff member interacts accordingly. During these interactions, Self-exclusion would be discussed along with spending limits, time-outs, referral to BeGambleAware etc and on some occasions the customer will decide to self-exclude as a result of the interaction or a series of interactions.

All interactions, including self-exclusion, are recorded via a SmartHub database, and these are reviewed weekly by senior management.

**SIGNAGE**

It's All Under Control posters will be displayed around the venue with leaflets readily available in both prominent and discrete locations for customer to take. These will also be made available in Mandarin Chinese. Over 18s Only messaging will also be prominently displayed in multiple languages at the venue entrance to assist tourists.



Promotional signage is not designed to be attractive to children or young people and is mainly positioned inside the venue.

**Transport Hubs**

Numerous bus stops in the vicinity  
 Leicester Square, Piccadilly, and Tottenham Court Road tube stations within a few minutes' walk  
 Taxis freely available

**Markets**

Berwick Street Market. 0.2 miles  
 Earlham Street Market. 0.4 miles  
 London Market, 48 Warwick Street. 0.4 miles

**Primary Schools, Junior Schools and Children's Centres**

Soho Parish Primary School, Archer Street. 0.2 miles  
 All Souls C of E Primary School, Foley Street. 0.5 miles

**Secondary Schools**

No Secondary Schools in close proximity

**Colleges**

Westminster Kingsway College, 22 Peter Street. 0.2 miles  
 London College of Fashion, 20 John Prince's St, 0.5 miles

**Health Centres**

Great Chapel Street Medical Centre, 13 Great Chapel St, 0.1 miles  
 Ferramed, 81 Oxford Street. 0.2 miles  
 Soho NHS walk in centre, 1 Frith Street. 0.2 miles  
 Everwell Chinese Medical Clinic, 54 Shaftsbury Avenue. 0.2 miles  
 Chinese National Healthy Living Centre, 29-30 Soho Square. 0.2 miles

**Areas of general interest to children and young people** – As a London West End location, there are numerous attractions for children and young people in close proximity.

Family Leisure Holdings operate two AGCs in very close proximity and therefore already employ staff in the area who fully understand the area and customers.

As a tourist area with many tourists and children, Family Leisure Holdings undertake Age Verification Interactions as and when required and are very strict on Age Verification checks to ensure that underage people cannot gain access to gaming machines.

In addition, a member of the venue management team will receive training on Child Protection issues and will be the nominated 'Child Protection' manager and any suspicious activity or possible Child Protection issues will be reported to this person who will record the matter and take appropriate action.

**A strict Challenge 25 policy is in force across all Game nation venues**

**Cinemas** – Many listed in close proximity.

**Bowling**

The Croc Bowling Alley, 1 Ham Yard. 0.3 miles

**Skating** – No Ice or Roller Skating rinks or Skate Parks in close proximity

**Amusement/Video Arcades**

Las Vegas FEC, 89 Wardour Street. 0.1 miles

**Soft Play** – No Soft Play in close proximity

**Playgrounds**

Crabtree Fields Playground, Colville Place. 0.5 miles

St Giles Playground, St Giles Passage. 0.5 miles

**Toy Shops** – As a West End location, there are several large toy shops in the area such as Hamleys in Regent Street and the Lego Shop in Leicester Square. There are, however, no toy shops in very close proximity.

**Leisure Centres**

Marshall Street Spa and Leisure Centre. 0.2 miles

**Fast Food Outlets** – As a West End location, most of the established fast-food chains such as McDonalds, Burger King etc are to be found in the vicinity although predominately on the main shopping thoroughfares rather than Wardour Street itself.



**Centres for vulnerable people – This is not an exhaustive list but shows centres within fairly close proximity**

**Residential Care Homes – No Residential Care Homes in close proximity**

**Drug and Alcohol Treatment Centres**

In fairly close proximity we are aware of the following:

Rehab Guide, Drug and Alcohol Rehab London, Moor Street. 0.3 miles

Turning Point Westminster, 32a Wardour Street. 0.2 miles

Help Me Stop, Percy Street. 0.4 miles

Detox Plus, Shelton Street. 0.6 miles

**Gambling Rehabilitation Centres**

The National Chinese Healthy Living Centre in Soho Square provide a gambling addiction consultation service.

The Responsible Gambling Trust is in the area and is an organisation that City Gaming Limited support through annual donations.

The Young Gamers and Gamblers Education Trust is also in the area.

**Homeless Shelters & Services**

Centrepoint, Dean Street. 0.2 miles

Madness Zone Homeless Shelter, Percy Street. 0.4 miles

The Salvation Army Homelessness Service, Princes Street. 0.5 miles

Westminster Homeless Action Together, Adelaide Street. 0.6 miles

The Connection at St Martins, Adelaide Street. 0.6 miles

**Food Banks/Soup Kitchens – No food banks or soup kitchens in close proximity**

**Places of Worship**

**There are a number of Churches in the vicinity, the closest being:**

The French Protestant Church of London, Soho Square. 0.2 miles

City Gates Church, Greens Court. 0.2 miles

St Patricks Catholic Church, Soho Square. 0.2 miles

St Anns Church, Dean Street. 0.2 miles

All Saints Church, Margaret Street. 0.3 miles

**Mosques**

Soho Islamic Centre, Berwick Street. 0.1 miles  
Muslim World League, Goodge Street. 0.4 miles  
Mosque Islamic, Goodge Street. 0.4 miles

**Mental Health Services**

There are a number of private clinics in the area although the closest NHS trust is the Central and Northwest London NHS Foundation Trust on Euston Road.

**Residents Associations**

We are only currently aware of the Vale Royal House Residents Association in Newport Close.

**Risk from Gambling Related Harm**

The risk posed from gambling related harm in this area is higher than normal because of the high index of deprivation which is normally accompanied by higher than usual rates of alcohol and drug abuse, crime, and mental illness. There is also a known problem of homelessness in some parts of Soho and the subsequent vulnerability in some people that goes with this.

However, this increased risk is mitigated by the company's levels of staff training (Appendix 3), door controls and systems such as StaffGuard (Appendix 1) and SmartHub (Appendix 2). These combined with weekly reviews equip staff to the highest level to recognise and manage those customers displaying any signs of gambling related problems.

Staff are trained to interact with customers who are identified as playing more than one machine at a time, this includes the handheld tablet type of machines. All larger payouts to customers are made as Hand Pays which means staff are interacting with customers on a constant basis.

The company has operated two AGCs in close proximity to 147/149 Wardour Street for many years. Las Vegas in Wardour Street and Play 2 Win in Gerrard Street. Subsequently, our Regional Director, Area Managers and Venue teams are all exceptionally familiar with the risk and vulnerabilities of the customers in the area. The Senior Management team responsible for our venues in this area have a combined experience of over 60 years.

**Liaison with Local Organisations for the Vulnerable and Official Bodies**

We are keen to engage positively with local organisations. For example, at a recently opened venue in Tottenham, City Gaming Limited has engaged with the Local Authority ASB Enforcement Officer and various police contacts as well as joining the Safer Tottenham Business Partnership. In addition, we have written to and supplied contact details to the local organisation that work with the vulnerable such as those with drug or alcohol problems and homelessness and encouraged them to make contact and meet our team so that we can work together in protecting the vulnerable in the area.

As part of the development of our Tottenham venue we openly engaged with the local police Safer by Design team to ensure we built in appropriate security and safety features for the benefit of local community as well as staff and customers. We would seek to engage in a similar manner to ensure this venue operates in a safe and respectful manner.

We would also propose to meet with Soho police based in Wardour Street on a monthly or quarterly basis to ensure that any concerns can be discussed and rectified at a senior level.

**CCTV systems** -CCTV system specification is detailed in Appendix 1. Signage will be in place to make customer aware.

Our CCTV policy/coverage will be regularly reviewed, and additional cameras/equipment will be installed as and when required. A plan of camera positioning will be made available. The CCTV system will be supplied by Link Integrated who also supply the StaffGuard system as described in Appendix 1. In accordance with generally accepted standards, CCTV recordings will be kept for a minimum of 31 days.

City Gaming Group operates high quality CCTV equipment including the latest HiColour HIKVision 4k Cameras which provide a superior image quality for monitoring and evidence purposes. Including “mic live” technology to ensure audio can be provided as well and video.

**4K ColorVu PoC Fixed Mini Bullet Camera**

- High quality imaging with 8 MP, 3840 × 2160 resolution
- 24/7 color imaging
- Clear imaging against strong back light due to 130 dB true WDR technology
- 3D DNR technology delivers clean and sharp images
- 2.8 mm, 3.6 mm fixed focal lens
- Up to 20 m white light distance for bright night imaging
- Water and dust resistant (IP67)

**4K WDR Fixed Dome Network Camera with Build-in Mic**

- High quality imaging with 8 MP resolution
- Efficient H.265+ compression technology
- Clear imaging against strong back light due to 120 dB true WDR technology
- Built-in microphone for real-time audio security
- Water and dust resistant (IP66) and vandal proof (IK10)
- Robust structure design with full metal materials

|                   |   |
|-------------------|---|
| Series            | HS-Angle Star-020                                   |
| Color Protocol    | Star-C20-1-F-6L-AC-2R-10-0-0-0-0                    |
| Video Speed       | 25/15/10/5/3  |
| Star-Drive        | 7/5   |
| Star-Optical Temp | 0/50  |
| Star-4-Input      | Blue/Red  |
| Star-4-Input      | Star-1-4-5-6-7-8-9-10-11-12-13-14-15                |
| IP                | -   |
| WDR               | -   |
| Star-Type         | Fixed, 1.5M   |
| IP                | Star-1-4-5-6-7-8-9-10-11-12-13-14-15-16-17-18-19-20 |

**Door Control**

City Gaming Ltd have extensive experience of operating AGCs in areas such as London that experience high levels of drug dealing and general crime. This experience allows considered decisions to be made in relation to the levels of staff and night security required as detailed below.

- External CCTV coverage
- Door and frontage design will ensure that children will not be able to see gambling taking place whether on the footpath or travelling by bus or other vehicle type.
- SIA door staff will be utilised. Where SIA staff are employed directly, they will be fully trained through the in-house eLearning program supplied by UpSkills (Appendix 3) who are a recognised provider of eLearning to the UK Gaming industry.
- Where SIA door staff need to be sourced from external suppliers, they will be expected to complete and acknowledge completion of the Bacta Toolkit that relates to “Access to Gambling by Children and Young People” – A copy of these training records will be retained on site for inspection. Example below

Company: \_\_\_\_\_ Site Address: \_\_\_\_\_ Site Ref: \_\_\_\_\_ Serial No. / \_\_\_\_\_

**GAMBLING ACT 2005**  
*License Conditions and Codes of Practice*

**SUMMARY OF STAFF TRAINING**

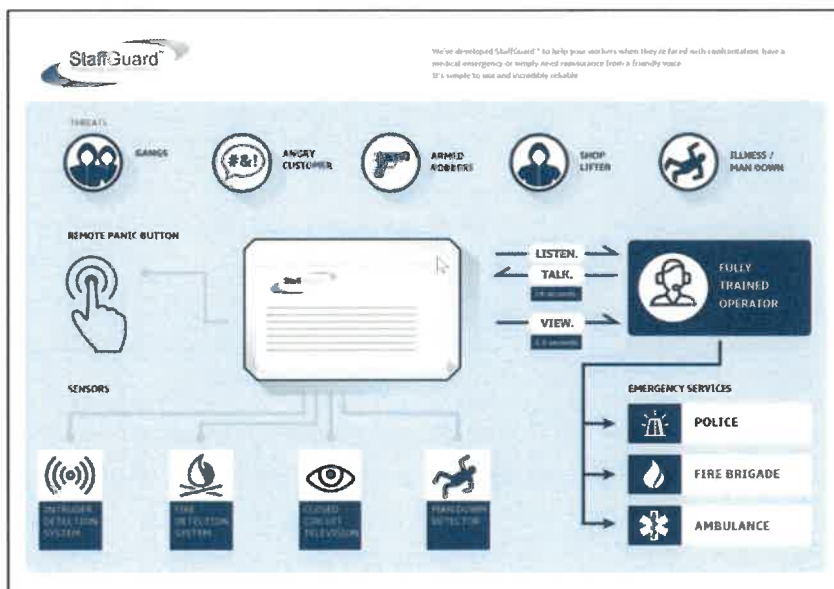
Management and Staff, as appropriate, declare that they have read and understood the following documents, are fully aware of Company policy and procedures and their own respective requirements in relation to them:

|  |   |
|--|---|
| <p>1 Access to Gambling by Children and Young Persons</p> <p>2 Access to Premises by the Gambling Commission's Enforcement Officers</p> <p>3 Advertising Standards and Marketing</p> <p>4 Customer Interaction</p> <p>5 Employment of Children and Young Persons</p> | <p>6 Fair and Open Practice and Dispute Resolution</p> <p>7 Information on how to Gamble Responsibly and Help for Gamblers with problems</p> <p>8 Money Laundering, Cash Handling &amp; Suspicious Transactions</p> <p>9 Self-Exclusion</p> |
|--|---|

| Name | Position | Interval not to exceed 7 days |                  | Signature | Leave Date | Tick against relevant Policies |   |   |   |   |   |   |   |   |  |  |  |  |
|------|----------|-------------------------------|------------------|-----------|------------|--------------------------------|---|---|---|---|---|---|---|---|--|--|--|--|
|      |          | Training Date                 | Re-training Date |           |            | 1                              | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 |  |  |  |  |
|      |          |                               |                  |           |            |                                |   |   |   |   |   |   |   |   |  |  |  |  |

**In addition to CCTV**

We've developed StaffGuard™ to help create a safe environment for our Customers and Staff when they're faced with an incident, have a medical emergency or simply need reassurance from a friendly voice. It's simple to use and incredibly reliable. Staff Guard is a supplementary remote managed service from a command centre that provides 3<sup>rd</sup> party assessment and support. All three of the emergency Service become an extension of the tools our teams can deploy.



**Toilet Facilities**

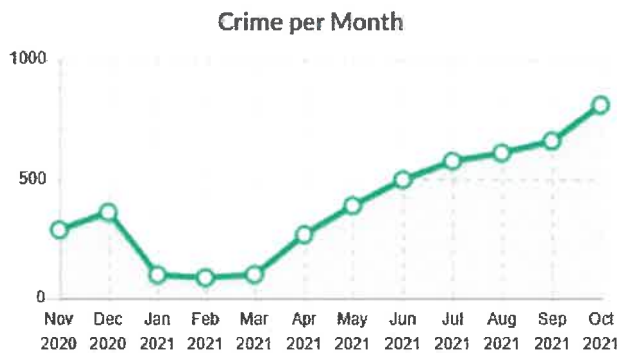
- Access is controlled by staff, so staff become aware of any individuals exhibiting suspicious behaviour.
- These are designed to deter individuals from attempting to inject drugs whilst on the premises.
- Toilets are inspected after every use to identify those individuals potentially involved in drug or alcohol abuse

**Zero tolerance to alcohol abuse with appropriate signage**



**Local Factors**

**Crime Statistics – Source Police.uk. Wardour Street**



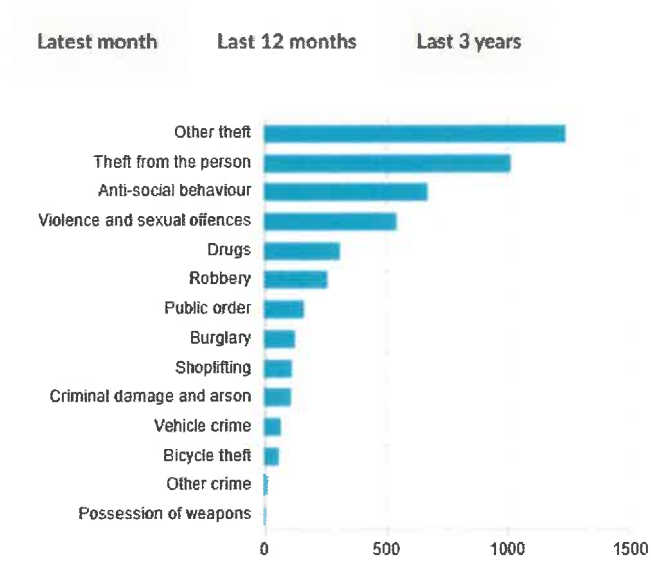
Between Nov 2020 and Oct 2021 an average of 395 crimes were reported each month in the Wardour Street area. There was a significant drop in crime as the country entered its third lockdown period. This reverses as lockdown ends and the economy of the area starts to build back.



The most commonly reported offences across the last 12-month period are as follows:

**Crime types description**

for the last 12 months (from Nov 2020 to Oct 2021)



**Health and Mental Health – Source Public Health England 2019**

The health of people in Westminster is varied compared to the England average. Westminster is one of the 20% most deprived districts/unitary authorities in England and about 27.3% (6680) children live in low-income families.

The rate of alcohol related harm hospital admissions is 487 per 100,000 population which represents 1049 admissions per year. The rate for self-harm hospital admissions is 65 per 100,000 population which represents 170 admissions per year.

The rates of hospital admissions caused by violent crime, under 75 mortality rate from cardiovascular diseases and under 75 mortality rate from cancer are all better than the England average.

**Economic makeup of the community – Source City of Westminster LEA Baseline Study Version II**

Westminster has 692,000 employees, the most of any London borough by some distance, representing 13% of London's workforce. This is nearly twice the amount when compared to the second highest London borough, which is the City of London. The number of employees is expected to rise by a further 13% up to 2036 meaning that by then the number may exceed 780,000. Employee jobs are overwhelmingly located in the two central wards of St James's and West End which account for nearly two thirds of all Westminster jobs.

Westminster has the single largest number of businesses of any London borough, with 49,500 businesses currently located in Westminster. This is 12% of London's total. Camden has the next highest total with around 24,000 businesses. The majority of Westminster's businesses are small with 85% having fewer than 10 employees.

Westminster has a very diverse economy, however the largest sectors by business numbers are the Knowledge Economy and Retail/Entertainment/Leisure

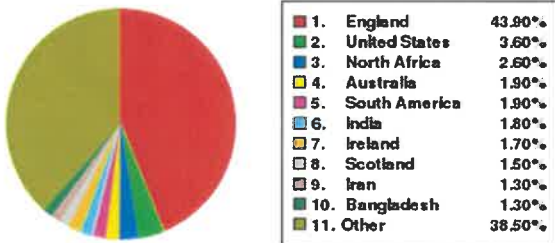
**Deprivation – Source: Department of Communities and Local Government 2019**

| <b>LSOA code (2011)</b> | <b>LSOA name (2011)</b> | <b>Local Authority District code (2019)</b> | <b>Local Authority District name (2019)</b> | <b>Index of Multiple Deprivation (IMD) Rank</b> | <b>Index of Multiple Deprivation (IMD) Decile</b> |
|-------------------------|-------------------------|---|---|---|---|
| E01004763               | Westminster 013B        | E09000033                                   | Westminster                                 | 11,768  | 4   |

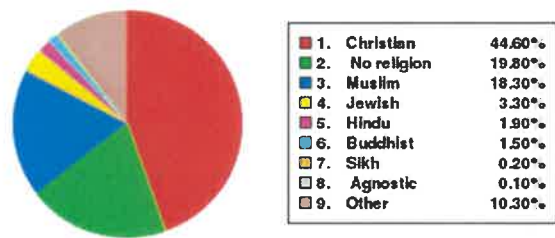
This deprivation index of 11,768 out of 32,844 indicates that this is an area of relatively high deprivation which normally brings the associated higher than normal rates of alcohol and drug abuse, crime, and mental illness.

Ethnic and Religious demographics – Source Qpzm Local Stats. Local Authority Westminster

Country of Birth



Religion



**Gambling Act 2005 – The Licensing Objectives**

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

1. Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.
2. Ensuring that gambling is conducted in a fair and open way; and
3. Protecting children and other vulnerable people from being harmed or exploited by gambling.
4. Safeguarding – (Company Objective, contained at Appendix 4)

As well as formal policies and procedures, the City Gaming Group strives to ensure that all staff are able to recognise and deal with real-world situations through a comprehensive e-learning system, supported by regular in-venue refresher sessions.

**Risk Assessment Summary**

| Risk Assessment  | LO | Level of Risk | Impact  | Control System  | Risk Management   | Reviewed |
|--|----|---------------|---|-----------------|---|----------|
| Children entering site unnoticed/unchallenged                                  | 1  | Low           | Severe to Business<br>Severe to Child                 | Interior Design | <ul style="list-style-type: none"> <li>✓ Constant and effective monitoring of the main entrances by Managers/Staff/Security at all times.</li> <li>✓ Staff have uninterrupted visibility of all gaming machines at all times</li> </ul>   | Dec 2021 |
|  |    |               |   | Exterior Design | <ul style="list-style-type: none"> <li>✓ Front of the Venue is designed not to be attractive to children and challenge 25 posters clearly visible from street.</li> <li>✓ Frontage and doors designed so that children cannot see gambling taking place from the footpath or passing vehicles</li> </ul>  | Dec 2021 |
|  |    |               |   | Physical        | <ul style="list-style-type: none"> <li>✓ Think 25 Policies in place and implemented</li> <li>✓ Regular independent (Check Policy) age verification testing</li> <li>✓ Regular staff training in-house and through e learning with 6 monthly refresher courses</li> <li>✓ The BACTA Toolkit is available and supplements the E Learning program</li> <li>✓ Clear &amp; Prominent premises signage and machine labelling</li> <li>✓ Thank 25 material displayed</li> <li>✓ Regulatory Return data collected through IHL tablet process and reviewed weekly with weekly reporting up to CEO level by Commercial team</li> <li>✓ Policy of preventing the wearing of hoods</li> <li>✓ Health and Safety Policies &amp; procedures in place</li> </ul> | Dec 2021 |
| Failure to deal with Consumers making complaints about the outcome of Gambling | 2  | Moderate      | Moderate to Business<br>Severe to vulnerable customer | Physical        | <ul style="list-style-type: none"> <li>✓ Machine maintenance carried out by qualified engineer</li> <li>✓ Machine turned off immediately should fault be identified</li> <li>✓ Machine only acquired from licensed suppliers.</li> </ul>  | Dec 2021 |
|  |    |               |   | Systems         | <ul style="list-style-type: none"> <li>✓ Complaints Procedure &amp; Forms available on premises</li> <li>✓ Staff training through E Learning with 6 monthly refresher courses</li> <li>✓ Registered with ADR Entity – CEDR. Centre for Effective Dispute Resolution</li> <li>✓ Compliant with Company Procedures</li> </ul>   | Dec 2021 |

|  |   |          |   |                 |   |          |
|--|---|----------|---|-----------------|---|----------|
| Failure to provide information to players on responsible gambling.   | 3 | Low      | Severe to Business<br>Severe to Customers | Physical        | <ul style="list-style-type: none"> <li>✓ Sufficient quantity of posters and leaflets. "It's All Under Control" posters displayed prominently.</li> <li>✓ All machines labelled displaying National Gambling Helpline number and website address.</li> </ul>   | Dec 2021 |
|  |   |          |   | Systems         | <ul style="list-style-type: none"> <li>✓ Stock control system in place for leaflets and is monitored daily.</li> <li>✓ Adhere to Company Procedures and Policies</li> <li>✓ Regular audit to ensure system is in place</li> </ul>   | Dec 2021 |
| Failure to recognise signs associated with problem gambling or substantial changes in gambling style.  | 3 | Moderate | Severe to Business<br>Severe to Customers | Interior design | <ul style="list-style-type: none"> <li>✓ Players behaviour and positions are closely and effectively monitored. Clear lines of sight to all machines and effective CCTV systems</li> </ul>  | Dec 2021 |
|  |   |          |   | Systems         | <ul style="list-style-type: none"> <li>✓ Staffed trained in customer interaction via E Learning with 6 monthly refresher training</li> <li>✓ Clear policy to record the procedure for interaction and logging of interactions through IHL SmartHub tablet system. All interactions reviewed weekly by the Commercial team and a weekly report produced and distributed to all senior management.</li> </ul> | Dec 2021 |
| Staff lacking awareness and unsure how to recognise or respond to a vulnerable person who may be at risk                                     | 4 | Moderate | Severe to Business<br>Severe to Customers | Training        | <ul style="list-style-type: none"> <li>✓ Safeguarding Adults Policy and Training</li> </ul>   | Dec 2021 |
| Failure to properly administer the self-exclusion process and maintain its effectiveness, thereafter, including breaches and reinstatements. | 3 | Low      | Severe to Business<br>Severe to Customers | Physical        | <ul style="list-style-type: none"> <li>✓ CCTV effectively positioned at entrance to benefit identification of knowns excluders.</li> </ul>  | Dec 2021 |
|  |   |          |   | Interior Design | <ul style="list-style-type: none"> <li>✓ Consideration given to internal layout so as to ensure effective monitoring of customers entering the premises and those that might enter in order to gamble on behalf of self-excluder.</li> </ul>  | Dec 2021 |

|   |   |     |   |                 |   |          |
|---|---|-----|---|-----------------|---|----------|
|   |   |     |   | System          | <ul style="list-style-type: none"> <li>✓ IHL Multi Operator Self Exclusion System in place</li> <li>✓ All exclusion and breach data subject to weekly review by Commercial team and reported to senior management.</li> <li>✓ IHL tablet always available to ensure that customers wishing to exclude can do so</li> <li>✓ Details of Self Excluded customers distributed to other sites and operators via IHL/Bacta MOSES systems</li> </ul> | Dec 2021 |
| Failure to identify attempts to launder money on the premises (e.g. dye stained notes) and to follow correct reporting procedure. | 1 | Low | Severe to business<br>Low to customers  | Interior Design | <ul style="list-style-type: none"> <li>✓ Effective monitoring of customers' behaviour by good lines of sight from floor staff and Managers, and well positioned CCTV cameras.</li> </ul>  | Dec 2021 |
|   |   |     |   | Physical        | <ul style="list-style-type: none"> <li>✓ Where machines operate TITO, tickets cannot be transferred or used in any other premises. Suspicious tickets are automatically flagged, and staff interaction is then required</li> <li>✓ The majority of larger wins are paid by hand which forces interaction with staff</li> </ul>  | Dec 2021 |
|   |   |     |   | Training        | <ul style="list-style-type: none"> <li>✓ Red Flag indicators trained.</li> <li>✓ For example – Increased spend inconsistent with the customer's normal profile, unknown customers staking large amounts, customers with no known means of income staking large amounts etc</li> </ul>   | Dec 2021 |
|   |   |     |   | System          | <ul style="list-style-type: none"> <li>✓ The Company has an appointed Money Laundering Officer and has Policies and Procedures in place which are reviewed regularly, are implemented, and monitored in respect of Money Laundering and Suspicious Transactions including a Disclosure Procedure for use by staff and reporting to the National Crime Agency using SARs.</li> </ul>   | Dec 2021 |
| Poor security increasing vulnerability to crime   | 1 | Low | Sever to business<br>Sever to customers | Physical        | <ul style="list-style-type: none"> <li>✓ StaffGuard system incorporating Panic Alarms that connect to an independent Conflict Management Centre</li> <li>✓ Intruder alarm installed and regularly serviced</li> <li>✓ Effective CCTV coverage with data stored for a minimum of 30 days</li> </ul>  | Dec 2021 |
|   |   |     |   | Exterior Design | <ul style="list-style-type: none"> <li>✓ Toughed glass windows and door to limit criminal damage</li> <li>✓ Outdoor CCTV with full coverage of all entrances</li> </ul>   | Dec 2021 |



|  |   |  |  |         |   |          |
|--|---|--|--|---------|---|----------|
|  |   |  |  | Systems | <ul style="list-style-type: none"> <li>✓ Limited cash desk and personal floats</li> <li>✓ Log maintained should Police be called to assist. All incidents reviewed weekly by Commercial Team and reported to senior management</li> <li>✓ Keep abreast of local crime trends</li> </ul> | Dec 2021 |
| Awareness of heightened local crime in the local area.                           | 1 |  |  | Systems | Higher than average crime statistics although an increase in the level is not higher than similar areas or the Metropolitan Police Area in total<br><a href="https://www.police.uk">https://www.police.uk</a>   | Dec 2021 |
| Awareness of students learning facilities (schools & colleges) in the local area | 3 |  |  | Systems | <ul style="list-style-type: none"> <li>✓ Local research identified schools as listed earlier in the assessment</li> <li>✓ Challenge 25 process and systems</li> <li>✓ No gaming visible to children or your persons from outside of the venue</li> </ul>                                | Dec 2021 |
| Awareness of residential facilities for the vulnerable in the local area         | 3 |  |  | Systems | <ul style="list-style-type: none"> <li>✓ Homeless Services as listed earlier in the assessment</li> <li>✓ Door controls, CCTV, and training in place</li> </ul>   | Dec 2021 |
| Awareness of gambling care agencies in the local area                            | 3 |  |  | Systems | No physical facilities for problem gambling in the vicinity<br><a href="http://www.gamcare.org.uk">http://www.gamcare.org.uk</a><br><a href="http://www.gordenmoody.org.uk">http://www.gordenmoody.org.uk</a>   | Dec 2021 |

## **(7) Supporting Documents**

1. Security Systems and Processes / Staff Guard Conflict Management
2. Player Protection Systems
3. E-Learning
4. Safeguarding Adults Policy Statement
5. Access to Gambling by Children and Young Persons
6. Identifying Customers who may be susceptible to gambling harm
7. Identifying Customers who may be at risk of or experiencing harm
8. Smart Hub Age Verification
9. Smart Hub AML User Guide
10. Smart Alert
11. Smart Hub Self Exclusion
12. Smart Hub Incidents
13. Smart Hub Interactions

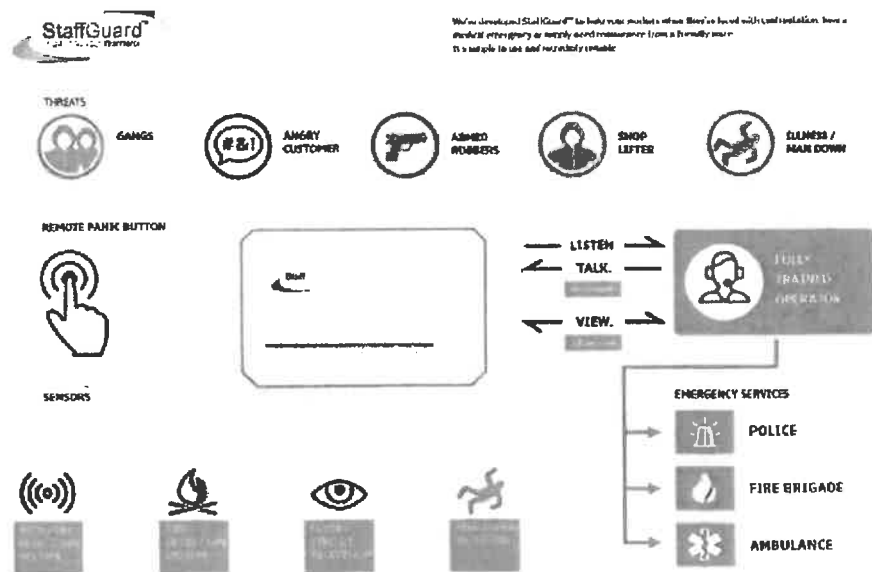
**SECURITY SYSTEMS AND PROCESSES**

**STAFF GUARD CONFLICT MANAGEMENT**

City Gaming Ltd already use a conflict management system known as StaffGuard in a number of it's London venues . This system is supplied by Link Integrated who are specialists in CCTV and conflict management systems and supply many of the UK's leading AGC and Bingo Operators.

In summary, the system works as follows :

- a/ Each site is connected to the Conflict Management Centre which is staffed by SIA licenced Conflict Management Operators. This facility operates 24 hours a day, 7 days a week and 365 days a year.
- b/ Each member of staff carries a remote control key fob or keyring.
- c/ Should a member of staff feel threatened or vulnerable to attack they can press the remote fob or keyring which immediately alerts the Conflict Management Centre. Colour coded lights reassure the member of staff that they are connected to the CMC centre. The system also allows a member of staff to connect to the CMC centre which may require emergency services assistance but hasn't escalated to that point. The CMC operator will confirm a "Standby" situation and continue listening should assistance be required.
- d/ From that point the CMC staff will be able to both see and listen to what is happening on site. The CMC operator will then announce "Security, which service do you require?" – This intervention is normally sufficient to deter further conflict or potential conflict and at that point the person causing concern normally leaves the premises. The system provided 2 way communications which enables the CMC operator to speak to the member of staff and the person causing concern. Should this not be the case the CMC operator will immediately inform the police of the situation.
- e/ The system can be used for any circumstance that requires assistance be it illness, fire etc



**CCTV SYSTEMS – System specification as follows.**

**External 4k Quality CCTV**

**Ease of Access to Cameras and Remote Recording / Monitoring**

The City of London Police Public Space Surveillance Camera System is one of the many tools used to tackle crime and anti-social behaviour (ASB) across the City of London. We are very supportive of this and would to enhance the internal and external security of our venue by providing high quality CCTV equipment inside and out.

All footage would be available for 30 days for Police inspection or recovery if required.

Hikvision's camera installations provides Dynamic Domain Name Service (DDNS) for users to access the IP cameras when their laptops or smart phones are not in the local area network (LAN) of the cameras.



External Camera

**4K Vandal Fixed Dome Camera**

- 4K resolution (3840x2160) pixel
- 1/2" CMOS image sensor with 12MP resolution
- 1080P resolution (1920x1080) pixel
- 1080P resolution (1920x1080) pixel
- 1080P resolution (1920x1080) pixel
- 1080P resolution (1920x1080) pixel
- 1080P resolution (1920x1080) pixel
- 1080P resolution (1920x1080) pixel



**Internal 4 Mega Pixel Camera Solution**

Circa 12 different Cameras positioned effectively positioned to cover all internal and external positions



**4 MP AcuSense 4K 8-Turret Network**

- 4 MP resolution (3840x2160) pixel
- 4 MP resolution (3840x2160) pixel
- 4 MP resolution (3840x2160) pixel
- 4 MP resolution (3840x2160) pixel
- 4 MP resolution (3840x2160) pixel
- 4 MP resolution (3840x2160) pixel
- 4 MP resolution (3840x2160) pixel
- 4 MP resolution (3840x2160) pixel

**4-Direction, 4K Network Camera**

- 4K resolution (3840x2160) pixel
- 4K resolution (3840x2160) pixel
- 4K resolution (3840x2160) pixel
- 4K resolution (3840x2160) pixel
- 4K resolution (3840x2160) pixel
- 4K resolution (3840x2160) pixel
- 4K resolution (3840x2160) pixel
- 4K resolution (3840x2160) pixel



## PLAYER PROTECTION SYSTEMS

City Gaming use IHL's SmartHub technology to manage all areas of protection of players from gambling related harm.

Every venue is equipped with a tablet device which allows easy logging of all player interaction related events. These include the following :

- a/ Self Exclusion
  - o The IHL Smart Exclusion system works in conjunction with the Bacta Multi Operator Self Exclusion System which ensures that details of customers wishing to exclude from operators using either system are automatically recorded on both systems. This is a requirement of the Gambling Commission
- b/ Self Exclusion Breaches
  - o Self Exclusion breaches are closely monitored and customer who persistently attempt to breach their Self Exclusion Agreement are identified and appropriate action taken
- c/ Age Verification Challenges
  - o The numbers of Age Verification challenges made is monitored closely and where inconsistencies are highlighted, the appropriate management action is taken.
- d/ Customer Interactions
  - o Every customer interaction recorded is reviewed on a weekly basis by the Commercial team and interactions/incidents of concern are reported to the senior management team. Where a customer shows clear signs of difficulty with their gambling, this is reported back to the Operations team to follow up as necessary.
- e/ Incidents including those requiring police assistance/intervention
  - o Every other type of incident recorded is reviewed weekly and where further action is required, this is reported out to the Operations team.

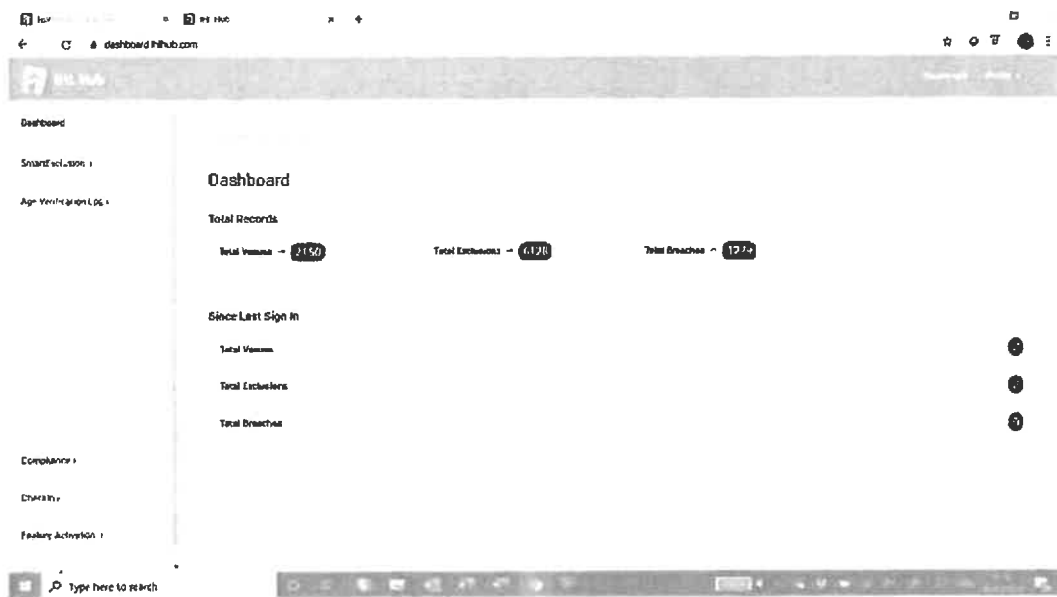
**The following is an extract from IHL literature which offers a further outline into the operation and features of the system**



SmartHUB - The Support Hub for the Gaming Industry

IHL Tech was formed in 2015 and has supplied the High Street gaming sector with self-exclusion and many other functions since April 2016.

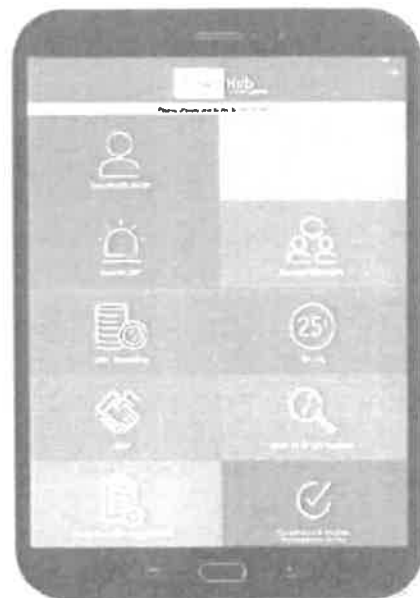
SmartHUB allows the operator to effectively remove paper logs from their premises and store information centrally, securely and importantly compliantly with the General Data Protection Regulation 2016/679. A locked down tablet replaces the traditional pen and paper and a back-end reporting portal gives you access to all the information you require.



A digital log has numerous advantages of a paper log

- Collating accurate and legible logs
- Standardising understanding and approach
- Central and local visibility
- KPI management to ensure all venues are at a single standard

All the logs allow the operators to comply with the current License Conditions and Code of Practise issued by the UK Gambling Commission.



SmartHUB is used by the majority of large AGC and Bingo licensed premises in the UK and is widely accepted as the most accurate and user-friendly solution. AGC operators including Cashino (160+ venues), Playnation (c80% of UK holiday parks), Roadchef use SmartHUB, along with over 100 SMEs. The Bingo Association provide the Silver package of SmartHUB to their entire membership which includes Buzz Bingo (formerly Gala), Mecca Bingo and Beacon Bingo plus 120 High Street Bingo Licenses and 100+ Licensed Holiday Parks.

Whilst SmartHUB provides digital logs, reports and visibility to operators we also provide, through registered 3<sup>rd</sup> parties Alternative Dispute Resolution and Test purchasing, one visit per calendar year. Each of which is a requirement of a premise license.

SmartHUB doesn't take away any responsibility of the operator, it simple makes being compliant easier, gives them greater visibility of their venues activity and allows them to report on and review instantly.

### TEST PURCHASING THROUGH CHECK POLICY

City Gaming employ a third party test purchase provider to carry out regular Age Verification testing across all venues. This is carried out by CheckPolicy who also carry out AV testing on behalf o Bacta.

All tests are monitored and reported on a weekly basis. Test failures are investigated within 48 hours of the test report being received and remedial action/disciplinary action taken.

The following charts show the 2019 and 2020 results from the businesses within the City Gaming group.

| 2019                  |        |                 | Palace of Challenges |       |        |            |       |          |          |        |
|-----------------------|--------|-----------------|----------------------|-------|--------|------------|-------|----------|----------|--------|
| Month                 | Period | Volume of tests | Entry                | Drill | Gamble | Total Fail | Total | No. Pass | No. Fail | Pass % |
| January               | P1     | 1               | 23                   | 12    | 3      | 4          | 30    | 35       | 4        | 89.7   |
| February              | P2     | 1               |                      |       |        |            |       |          |          |        |
| March                 | P3     |                 |                      |       |        |            |       |          |          |        |
| April                 | P4     |                 |                      |       |        |            |       |          |          |        |
| May                   | P5     |                 |                      |       |        |            |       |          |          |        |
| June                  | P6     | 1               |                      |       |        |            |       |          |          |        |
| July                  | P7     | 14              |                      |       |        |            |       |          |          |        |
| August                | P8     | 14              |                      |       |        |            |       |          |          |        |
| September             | P9     | 1               |                      |       |        |            |       |          |          |        |
| October               | P10    | 1               |                      |       |        |            |       |          |          |        |
| November              | P11    |                 |                      |       |        |            |       |          |          |        |
| December              | P12    |                 |                      |       |        |            |       |          |          |        |
| Total Volume of Tests |        | 30              |                      |       |        |            |       |          |          |        |

| Test Purchasing        |        | Palace of Challenges |            |        |            |       |  |
|------------------------|--------|----------------------|------------|--------|------------|-------|--|
| Brand                  | Tests  | Entry                | Drill      | Gamble | Total Fail | Total |  |
| Palace                 | 23     |                      |            |        |            |       |  |
| Family Leisure         | 18     |                      |            |        |            |       |  |
| City Slots             | 0      |                      |            |        |            |       |  |
| Cas                    | 0      |                      |            |        |            |       |  |
| TBC2                   | 0      |                      |            |        |            |       |  |
| Running Total of Tests |        | 30                   |            |        |            |       |  |
| Brand                  | Palace | Family Leisure       | City Slots | Cas    | TBC2       |       |  |
| Tests                  | 23     | 18                   |            |        |            |       |  |
| Passed                 | 18     | 17                   |            |        |            |       |  |
| Failed                 | 3      | 1                    |            |        |            |       |  |
| Pass Rate (%)          | 84%    | 94%                  | 0%         | 0%     | 0%         |       |  |
| Group Pass Rate (%):   |        | 89.7                 |            |        |            |       |  |

| 2020                         |        |                 | Test Purchasing  |       |          |      |       |   |      |      |  |  |       |        |                |            |     |      |  |  |       |    |    |   |   |  |  |  |        |    |    |   |   |  |  |  |        |   |   |  |   |  |  |  |               |     |     |      |     |    |  |  |
|------------------------------|--------|-----------------|--|-------|----------|------|-------|---|------|------|--|--|-------|--------|----------------|------------|-----|------|--|--|-------|----|----|---|---|--|--|--|--------|----|----|---|---|--|--|--|--------|---|---|--|---|--|--|--|---------------|-----|-----|------|-----|----|--|--|
| Month                        | Period | Volume of tests | <u>Disincl/Challege</u>  |       |          |      |       | Size No. No. Pass   |      |      |  |  |       |        |                |            |     |      |  |  |       |    |    |   |   |  |  |  |        |    |    |   |   |  |  |  |        |   |   |  |   |  |  |  |               |     |     |      |     |    |  |  |
|                              |        |                 | Entry  | Dwell | Seizable | Fail | Tests | Pass  | Fail | %    |  |  |       |        |                |            |     |      |  |  |       |    |    |   |   |  |  |  |        |    |    |   |   |  |  |  |        |   |   |  |   |  |  |  |               |     |     |      |     |    |  |  |
|                              |        |                 | 24   | 8     | 4        | 0    | 46    | 42  | 1    | 91.3 |  |  |       |        |                |            |     |      |  |  |       |    |    |   |   |  |  |  |        |    |    |   |   |  |  |  |        |   |   |  |   |  |  |  |               |     |     |      |     |    |  |  |
| January                      | P1     | 8               |  |       |          |      |       |   |      |      |  |  |       |        |                |            |     |      |  |  |       |    |    |   |   |  |  |  |        |    |    |   |   |  |  |  |        |   |   |  |   |  |  |  |               |     |     |      |     |    |  |  |
| February                     | P2     | 2               |  |       |          |      |       |   |      |      |  |  |       |        |                |            |     |      |  |  |       |    |    |   |   |  |  |  |        |    |    |   |   |  |  |  |        |   |   |  |   |  |  |  |               |     |     |      |     |    |  |  |
| March                        | P3     |                 |  |       |          |      |       |   |      |      |  |  |       |        |                |            |     |      |  |  |       |    |    |   |   |  |  |  |        |    |    |   |   |  |  |  |        |   |   |  |   |  |  |  |               |     |     |      |     |    |  |  |
| April                        | P4     |                 |  |       |          |      |       |   |      |      |  |  |       |        |                |            |     |      |  |  |       |    |    |   |   |  |  |  |        |    |    |   |   |  |  |  |        |   |   |  |   |  |  |  |               |     |     |      |     |    |  |  |
| May                          | P5     |                 |  |       |          |      |       |   |      |      |  |  |       |        |                |            |     |      |  |  |       |    |    |   |   |  |  |  |        |    |    |   |   |  |  |  |        |   |   |  |   |  |  |  |               |     |     |      |     |    |  |  |
| June July                    | P6     |                 |  |       |          |      |       |   |      |      |  |  |       |        |                |            |     |      |  |  |       |    |    |   |   |  |  |  |        |    |    |   |   |  |  |  |        |   |   |  |   |  |  |  |               |     |     |      |     |    |  |  |
| August                       | P7     | 10              |  |       |          |      |       |   |      |      |  |  |       |        |                |            |     |      |  |  |       |    |    |   |   |  |  |  |        |    |    |   |   |  |  |  |        |   |   |  |   |  |  |  |               |     |     |      |     |    |  |  |
| September                    | P8     | 11              |  |       |          |      |       |   |      |      |  |  |       |        |                |            |     |      |  |  |       |    |    |   |   |  |  |  |        |    |    |   |   |  |  |  |        |   |   |  |   |  |  |  |               |     |     |      |     |    |  |  |
| October                      | P9     | 2               |  |       |          |      |       |   |      |      |  |  |       |        |                |            |     |      |  |  |       |    |    |   |   |  |  |  |        |    |    |   |   |  |  |  |        |   |   |  |   |  |  |  |               |     |     |      |     |    |  |  |
| November                     | P10    | 6               |  |       |          |      |       |   |      |      |  |  |       |        |                |            |     |      |  |  |       |    |    |   |   |  |  |  |        |    |    |   |   |  |  |  |        |   |   |  |   |  |  |  |               |     |     |      |     |    |  |  |
| December                     | P11    | 6               |  |       |          |      |       |   |      |      |  |  |       |        |                |            |     |      |  |  |       |    |    |   |   |  |  |  |        |    |    |   |   |  |  |  |        |   |   |  |   |  |  |  |               |     |     |      |     |    |  |  |
|                              | P12    | 1               |  |       |          |      |       |   |      |      |  |  |       |        |                |            |     |      |  |  |       |    |    |   |   |  |  |  |        |    |    |   |   |  |  |  |        |   |   |  |   |  |  |  |               |     |     |      |     |    |  |  |
| <b>Total Volume of Tests</b> |        | <b>54</b>       |  |       |          |      |       |   |      |      |  |  |       |        |                |            |     |      |  |  |       |    |    |   |   |  |  |  |        |    |    |   |   |  |  |  |        |   |   |  |   |  |  |  |               |     |     |      |     |    |  |  |
|                              |        |                 |  |       |          |      |       | Tests <sup>m</sup><br>Palara 17<br>Family Leisure 17<br>City Slots 7<br>Oak 5<br>TBC2 0 |      |      |  |  |       |        |                |            |     |      |  |  |       |    |    |   |   |  |  |  |        |    |    |   |   |  |  |  |        |   |   |  |   |  |  |  |               |     |     |      |     |    |  |  |
|                              |        |                 |  |       |          |      |       | Running Total of Tests <b>46</b>  |      |      |  |  |       |        |                |            |     |      |  |  |       |    |    |   |   |  |  |  |        |    |    |   |   |  |  |  |        |   |   |  |   |  |  |  |               |     |     |      |     |    |  |  |
|                              |        |                 | <table border="1"> <thead> <tr> <th>Brand</th> <th>Palara</th> <th>Family Leisure</th> <th>City Slots</th> <th>Oak</th> <th>TBC2</th> <th></th> <th></th> </tr> </thead> <tbody> <tr> <td>Tests</td> <td>17</td> <td>17</td> <td>7</td> <td>5</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Passed</td> <td>16</td> <td>16</td> <td>7</td> <td>3</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Failed</td> <td>1</td> <td>1</td> <td></td> <td>2</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Pass Rate (%)</td> <td>94%</td> <td>94%</td> <td>100%</td> <td>60%</td> <td>0%</td> <td></td> <td></td> </tr> </tbody> </table> |       |          |      |       |   |      |      |  |  | Brand | Palara | Family Leisure | City Slots | Oak | TBC2 |  |  | Tests | 17 | 17 | 7 | 5 |  |  |  | Passed | 16 | 16 | 7 | 3 |  |  |  | Failed | 1 | 1 |  | 2 |  |  |  | Pass Rate (%) | 94% | 94% | 100% | 60% | 0% |  |  |
| Brand                        | Palara | Family Leisure  | City Slots   | Oak   | TBC2     |      |       |   |      |      |  |  |       |        |                |            |     |      |  |  |       |    |    |   |   |  |  |  |        |    |    |   |   |  |  |  |        |   |   |  |   |  |  |  |               |     |     |      |     |    |  |  |
| Tests                        | 17     | 17              | 7  | 5     |          |      |       |   |      |      |  |  |       |        |                |            |     |      |  |  |       |    |    |   |   |  |  |  |        |    |    |   |   |  |  |  |        |   |   |  |   |  |  |  |               |     |     |      |     |    |  |  |
| Passed                       | 16     | 16              | 7  | 3     |          |      |       |   |      |      |  |  |       |        |                |            |     |      |  |  |       |    |    |   |   |  |  |  |        |    |    |   |   |  |  |  |        |   |   |  |   |  |  |  |               |     |     |      |     |    |  |  |
| Failed                       | 1      | 1               |  | 2     |          |      |       |   |      |      |  |  |       |        |                |            |     |      |  |  |       |    |    |   |   |  |  |  |        |    |    |   |   |  |  |  |        |   |   |  |   |  |  |  |               |     |     |      |     |    |  |  |
| Pass Rate (%)                | 94%    | 94%             | 100%   | 60%   | 0%       |      |       |   |      |      |  |  |       |        |                |            |     |      |  |  |       |    |    |   |   |  |  |  |        |    |    |   |   |  |  |  |        |   |   |  |   |  |  |  |               |     |     |      |     |    |  |  |
|                              |        |                 |  |       |          |      |       | Group Pass Rate (%): <b>93.9</b>  |      |      |  |  |       |        |                |            |     |      |  |  |       |    |    |   |   |  |  |  |        |    |    |   |   |  |  |  |        |   |   |  |   |  |  |  |               |     |     |      |     |    |  |  |



## E LEARNING

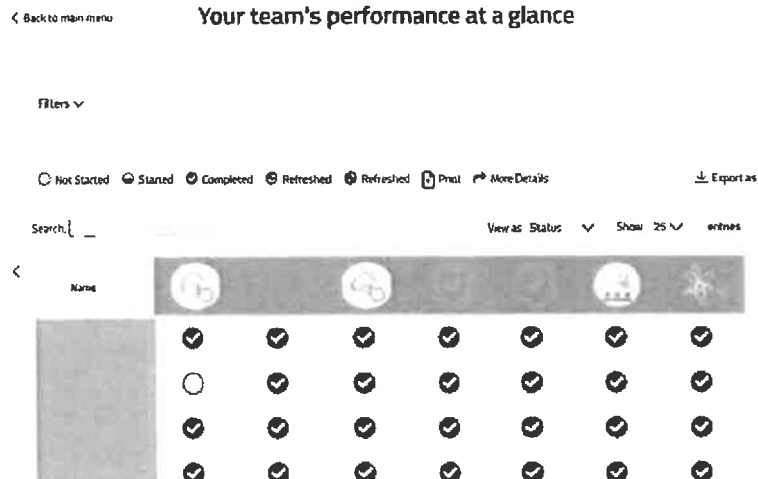
E Learning is supplied through UpSkills who are a longstanding supplier of E Learning modules to the UK Gaming Industry.

Modules available are as listed below – These cover all key aspects of gambling related compliance but also include key areas relating to Ant-Social behaviour and Gangs.

- Adult Gaming Centres
- Anti-Money Laundering
- Compliance - Identify - Interact - Evaluate
- Compliance - Gambling Compliance Training
- LCCP 1 - Access to Gambling by Children & Young Persons
- LCCP 2 - Access to Premises by the Gambling Commission's Enforcement Officers
- LCCP 3 - Advertising Standards and Marketing
- LCCP 4 - Identifying customers who may be susceptible to gambling harm
- LCCP 5 - Employment of Children and Young Persons
- LCCP 6 - Fair and Open Practice - Complaint and Dispute Resolution
- LCCP 7 - Information on how to gamble responsibly and help for gamblers with problems
- LCCP 8 - Money Laundering, Cash Handling and Suspicious Transactions
- LCCP 9 - Self Exclusion
- Compliance - POCA - Proceeds of Crime Act 1
- Compliance - POCA - Proceeds of Crime Act 2
- Compliance - POCA - Proceeds of Crime Act 3
- Health & Safety - Anti-Social Behaviour & Gangs
- People - Equality & Diversity
- Health & Safety - Staff Guard

### MEASUREMENT OF E LEARNING

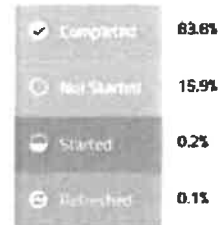
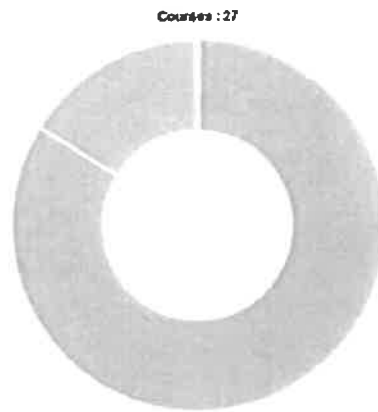
The current learning status of any member of staff can quickly be checked via the web based portal that allows instant access to all learning records



< Back to main menu

## Analyse overall performance

Filters 



### Duration (Mins)

Completed : Average 12 Minutes | Total 32, 215 Minutes  
In Progress : Average 25 Minutes | Total 152 Minutes

All training logs are also available as Excel based export files



## **Safeguarding Adults Policy Statement**

This policy will enable Game-Nation to demonstrate its commitment to keeping safe the vulnerable adults with whom it works alongside. Game Nation acknowledges its duty to act appropriately to any allegations, reports or suspicions of abuse.

It is important to have the policy and procedures in place so that staff, volunteers, service users and carers, and management committee can work to prevent abuse and know what to do in the event of abuse.

The Policy Statement and Procedures have been drawn up in order to enable Game Nation to:

- promote good practice and work in a way that can prevent harm, abuse and coercion occurring.
- to ensure that any allegations of abuse or suspicions are dealt with appropriately and the person experiencing abuse is supported.
- and to stop that abuse occurring.

The Policy and Procedures relate to the safeguarding of vulnerable adults.

Vulnerable adults are defined as:

- People aged 18 or over
- Who are receiving or may need community care services because of learning, physical or mental disability, age, or illness
- Who are or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

The policy applies to all staff, including senior managers, management committee members, trustees, paid staff, agency staff, and anyone working on behalf of Game Nation.

It is acknowledged that significant numbers of vulnerable children and adults are abused, and it is important that Game Nation has a Safeguarding Adults Policy, a set of procedures to follow and puts in place preventative measures to try and reduce those numbers.

In order to implement the policy, Game Nation will work:

- To promote the freedom and dignity of the person who has or is experiencing abuse
- To promote the rights of all people to live free from abuse and coercion
- To ensure the safety and well being of people who do not have the capacity to decide how they want to respond to abuse that they are experiencing
- To manage services in a way which promotes safety and prevents abuse
- Recruit staff and volunteers safely, ensuring all necessary checks are made
- Provide effective management for staff and volunteers through supervision, support and training

#### Game Nation

- Will ensure that all management committee members, staff are familiar with this policy and procedures
- Will work with other agencies within the framework of the National Safeguarding Adults Board Policy and Procedures, issued under The Care Act (Department of Health, 2014)
- Will act within its confidentiality policy and will usually gain permission from service users before sharing information about them with another agency
- Will pass information to Adult and Culture Services when more than one person is at risk. For example: if the concern relates to a worker, volunteer or organisation who provides a service to vulnerable adults or children
- Will inform service users that where a person is in danger, or a crime has been committed then a decision may be taken to pass information to another agency without the service user's consent
- Will make a referral to the Adult Social Care Direct team as appropriate
- Will endeavor to keep up to date with national developments relating to preventing abuse and welfare of adults
- Will ensure that the designated named department understands his/her responsibility to refer incidents of adult abuse to the relevant statutory agencies (Police/Adult and Culture Services Directorate)

The Designated department for Safeguarding Adults in Game Nation is Human Resources working closely with the Operations Team.

They should be contacted for support and advice on implementing this policy and procedures.

This policy should be read in conjunction with other related Game Nation safety policies including the employee welfare scheme.

**These SHOULD BE HELD IN A TRAINING PORTAL**

## **Introduction**

Procedures have been designed to ensure the welfare and protection of any adult who accesses services provided by Game Nation. The procedures recognize that abuse can be a difficult subject for workers to deal with. Game Nation is committed to the belief that the protection of vulnerable adults from harm and abuse is everybody's responsibility and the aim of these procedures is to ensure that all managers, trustees of the organisation, management committee members, staff and volunteers act appropriately in response to any concern around adult abuse.

### **1. Preventing abuse**

Game Nation is committed to putting in place safeguards and measures to reduce the likelihood of abuse taking place within the services it offers and that all those involved within Game Nation will be treated with respect.

Therefore, this policy needs to be read in conjunction with the following policies:

- Equal Rights and Diversity
- Complaints
- Whistle Blowing
- Confidentiality
- Disciplinary and Grievance
- Data Protection
- Recruitment and Selection
- Any other policies which are relevant that the organisation has in place

Game Nation is committed to safer recruitment policies and practices for paid staff. This may include DBS disclosures for staff and volunteers, ensuring references are taken up and adequate training on Safeguarding Adults is provided for staff.

The organisation will work within the current legal framework for reporting staff that are abusers.

Information will be available about abuse and the complaints policy and Safeguarding Adults policy statement will be available to service users.

### **2. Recognising the signs and symptoms of abuse, grooming and exploitation**

Game Nation is committed to ensuring that all staff, the management committee undertake training to gain a basic awareness of signs and symptoms of abuse, grooming and exploitation. Game Nation will ensure that the Designated Named Person and other members of staff have access to training around Safeguarding Adults.

"Abuse is a violation of an individual's human and civil rights by any other person or persons" (The Care Act, 2014)

**Abuse includes:**

- Physical abuse: including hitting, slapping, punching, burning, misuse of medication, inappropriate restraint
- Sexual abuse: including rape, indecent assault, inappropriate touching, exposure to pornographic material
- Psychological or emotional abuse: including belittling, name calling, threats of harm, intimidation, isolation
- Financial or material abuse: including stealing, selling assets, fraud, misuse or misappropriation of property, possessions or benefits
- Neglect and acts of omission: including withholding the necessities of life such as medication, food or warmth, ignoring medical or physical care needs
- Discriminatory abuse: including racist, sexist, that based on a person's disability and other forms of harassment, slurs or similar treatment
- Institutional or organisational: including regimented routines and cultures, unsafe practices, lack of person-centred care or treatment

Abuse may be carried out deliberately or unknowingly. Abuse may be a single act or repeated acts.

People who behave abusively come from all backgrounds and walks of life. They may be doctors, nurses, social workers, advocates, staff members, volunteers or others in a position of trust. They may also be relatives, friends, neighbours or people who use the same services as the person experiencing abuse.

**Grooming**

Grooming happens both online and in person. Groomers will hide their true intentions and may spend a long time gaining trust. Groomers may try to gain the trust of a whole family to allow them to be left alone with the vulnerable and if they work with the vulnerable, they may use similar tactics with their colleagues.

Below are some of the signs of grooming, many of these are common behaviours however increased instances of changes in behaviour may indicate the child is being groomed

- Sudden changes in their appearance and wearing more revealing clothes
- Becoming involved in drugs or alcohol, particularly if you suspect they are being supplied by older or influential men or women
- Becoming emotionally volatile (mood swings are common in all younger people, but more severe changes could indicate that something is wrong)
- Using sexual language that you would not expect them to know
- Appearing controlled by their phone
- Possessing items that they may not be able to afford themselves

### **3. Designated Named Department for safeguarding adults**

Game Nation has appointed a department who is responsible for dealing with any Safeguarding Adults concerns. The Designated department for Safeguarding Adults within Game Nation is Human Resources

Human Resource Department  
City Gaming Limited  
4 Cavendish Square  
London  
W1G 0PG  
+44 203 947 3299

The roles and responsibilities of the named department are:

- To ensure that all staff are aware of what they should do and who they should go to if they have concerns that a vulnerable adult may be experiencing or has experienced abuse, grooming or neglect.
- To ensure that concerns are acted on, clearly recorded and referred to an Adult Social Care Direct team
- To follow up any referrals and ensure the issues have been addressed.
- Consider any recommendations from the Safeguarding Adults process
- To reinforce the utmost need for confidentiality and to ensure that staff are adhering to good practice with regard to confidentiality and security. This is because it is around the time that a person starts to challenge abuse that the risks of increasing intensity of abuse are greatest.
- To ensure that staff working directly with service users who have experienced abuse, or who are experiencing abuse, are well supported and receive appropriate supervision.
- If appropriate staff will be given support and afforded protection if necessary, under the Public Interest Disclosure Act 1998: they will be dealt with in a fair and equitable manner and they will be kept informed of any action that has been taken and it's outcome

#### **4. Responding to people who have experienced or are experiencing abuse**

Game Nation recognises that it has a duty to act on reports, or suspicions of abuse, neglect. It also acknowledges that taking action in cases of adult abuse is never easy.

How to respond if you receive an allegation:

- Reassure the person concerned
- Listen to what they are saying
- Record what you have been told/witnessed as soon as possible
- Remain calm and do not show shock or disbelief
- Tell them that the information will be treated seriously
- Don't start to investigate or ask detailed or probing questions
- Don't promise to keep it a secret

If you witness abuse or abuse has just taken place the priorities will be:

- To call an ambulance if required
- To call the police if a crime has been committed
- To preserve evidence
- To keep yourself, staff and service users safe
- To inform the Designated Named Department in your organisation
- To record what happened in the safeguarding incident log (IHL hub)

All situations of abuse, alleged abuse will be discussed with the Designated Named Department. If a member of the management committee, staff member feels unable to raise this concern with the Designated Named Department then concerns can be raised directly with Adult Social Care Direct. The alleged victim will be told that this will happen. This stage is called the alert.

If it is appropriate and there is consent from the individual, or there is a good reason to override consent, such as risk to others, a referral (alert) will be made to Adult Social Care Direct team

If the individual experiencing abuse does not have capacity to consent a referral will be made without that person's consent, in their best interests.



The Designated Named Department may take advice at the above stage from Adult Social Care Direct and/or the Safeguarding Adults Unit and/or other advice giving organisations such as Police.

### **Adult Social Care Direct**

Contact the local authority where the incident happened

### **Police**

Phone: 101

Emergency: 999

You should ask to make a safeguarding adults alert.

The telephone call should be followed up in writing to the Adult Social Care Direct team outlining concerns using a Safeguarding Adults Incident Alert form (SAIA)



Adult and cultural services will then decide if the safeguarding process should be instigated or if other support/services are appropriate. Feedback will be given to the person who raised the safeguarding adults alert.

The Designated Named Department will have an overview of this process so they can explain it to the person concerned and offer all relevant support to the person and process. This could be practical support e.g. providing a venue, or information and reports and emotional support.

Information should be provided to the individual. This could be about other sources of help or information that could enable them to decide what to do about their experience, enable them to recover from their experience and enable them to seek justice.

## **5. Managing allegation made against member of staff**

Game Nation will ensure that any allegations made against members or member of staff will be dealt with swiftly.

Where a member of staff is thought to have committed a criminal offence the police will be informed. If a crime has been witnessed the police should be contacted immediately.

The safety of the individual(s) concerned is paramount. A risk assessment must be undertaken immediately to assess the level of risk to all service users posed by the alleged perpetrator. This will include whether it is safe for them to continue in their role or any other role within the service whilst the investigation is undertaken.

The Designated Named Department will liaise with Adult Social Care Direct to discuss the best course of action and to ensure that the Game Nation disciplinary procedures are coordinated with any other enquiries taking place as part of the ongoing management of the allegation.

Game Nation has a whistle blowing policy and staff are aware of this policy. Staff will be supported to use this policy.

## **6. Recording and managing confidential information**

Game Nation is committed to maintaining confidentiality wherever possible and information around Safeguarding adults' issues should be shared only with those who need to know. For further information, please see Game Nation confidentiality policy.

All allegations/concerns should be recorded on the IHL Hub incident alert form. The information should be factual and not based on opinions, record what the person tells you, what you have seen and witnesses if appropriate.

The information that is recorded will be kept secure and will comply with data protection.

This information will be secured in a locked filing cabinet/ or computer system. Access to this information will be restricted to the Designated Named Department

## **7. Disseminating/Reviewing policy and procedures**

This Safeguarding Adults Policy and Procedure will be clearly communicated to staff, service users. The Designated Named Department will be responsible for ensuring that this is done.

The Safeguarding adults Policy and Procedures will be reviewed annually by Game Nation. The Designated Named Department for Safeguarding adults will be involved in this process and can recommend any changes. The Designated Named Department will also ensure that any changes are clearly communicated to staff.

## Appendix 1

### Safeguarding Adults Incident Alert Form Reference: SAIA

This form is to be used to notify Adult Social Care Direct Team of any suspected or actual instances of abuse.

#### Person completing the form:

Organisation Name:

Phone contact details:

Date of Notification to Adult Social Care Direct:

#### Details of incident/suspected or actual abuse

To be completed by the manager or lead officer within the organisation responsible for safeguarding adults

Date of alleged incident/harm: Area where incident/harm took place:

Time of alleged incident/harm: Who reported the alert:

Date:

#### Who was involved:

Details of Alleged Victim  
Name:

Name and address of GP:

Address:

Ethnic Origin:

Date of Birth:

Nature of alleged victims' vulnerability:

Phone :

Any other details (e.g. communication needs):

Details of Alleged Perpetrator  
Name :

Ethnic Origin:

Address:

Relationship to victim:

Date of Birth:

Are they a vulnerable adult? Yes/No

Phone Contact:

Alleged perpetrators vulnerability (if applicable):

**If the alleged perpetrator is a staff member please provide staff details**  
(E.g. job role, employer, address of place of work)

**Any other details:**

**Have you made the victim aware that details of the incident are being recorded and will be investigated?**

**Yes/No**

**If not, why not?**

**Type of Abuse (Please tick one or more)**

|  |  |                            |  |
|--|--|----------------------------|--|
| <input checked="" type="checkbox"/>                  |  |                            |  |
| <b>Sexual</b>  |  | <b>Physical</b>            |  |
| <b>Emotional</b>                                     |  | <b>Neglect or omission</b> |  |
| <b>Psychological</b>                                 |  | <b>Financial/Material</b>  |  |
| <b>Discriminatory Abuse</b>                          |  | <b>Institutional</b>       |  |
| <b>Other i.e. suspicious death of a service user</b> |  |                            |  |

**Description of alleged incident / alleged harm, detailing all people involved including witnesses**

On this page please give a detailed description of the incident (please include times) and any other comments you feel are relevant. If necessary, attach further pages.

|   |   |
|---|---|
| <b>What action did you take immediately after the incident/allegation of harm (E.g. administered first aid, asked perpetrator to leave, took victim to secure area)</b>   |   |
| <b>Were the Police called: Yes / No</b>   | <b>Were any other emergency services called: If yes, which service(s)? Yes / No</b>                 |
| <b>Names and badge numbers of Police:</b>   | <b>Outcome: (Response time, taken to hospital etc)</b>  |
| <b>Are there any other Agencies involved? Yes/No</b>  | <b>Please provide details of agencies:</b>  |
| <b>Are there any capacity issues? Yes/ No</b>   | <b>Please provide details:</b>  |
| <b>Has the victim made any previous referrals/alerts? Yes/No</b>  | <b>Please provide details (e.g. dates, type of abuse):</b>  |
| <b>Is the victim in immediate danger of further abuse? Yes/No</b>   | <b>Have any immediate actions been identified to reduce the potential for further abuse? Yes/No</b> |
| <b>Has an initial assessment been made to determine further potential risk to the victim? Yes/No</b>  | <b>What actions have been taken to reduce the potential for further abuse?</b>                      |
| <b>Are there any risks to others? Yes/No (Vulnerable adults, c)</b>   | <b>Please provide details (include who this information has been shared with</b>                    |
| <b>Signed:</b>  | <b>Date:</b>  |
|   | <b>Time:</b>  |
| <b>This form must be sent to the Adult Social Care Direct team within 24 hours of the suspected or actual abuse, or as soon as possible after being made aware. This form can be emailed to the HR department</b> |   |

This is a confidential document and should be stored securely according to your own organisation's procedures. It is your responsibility to ensure that this is done.

**Decision by Safeguarding Manager (Adult and Culture Services Directorate Only)  
Safeguarding Alert Yes / No**

**If No – please give reasons for decision**

# GAME NATION

ACCESS TO GAMBLING BY CHILDREN & YOUNG PERS







## LCCP 1 - Access to Gambling by Children & Young Persons: City Gaming

.....

### Licence Conditions & Codes of Practice

1 of 7



#### Statement

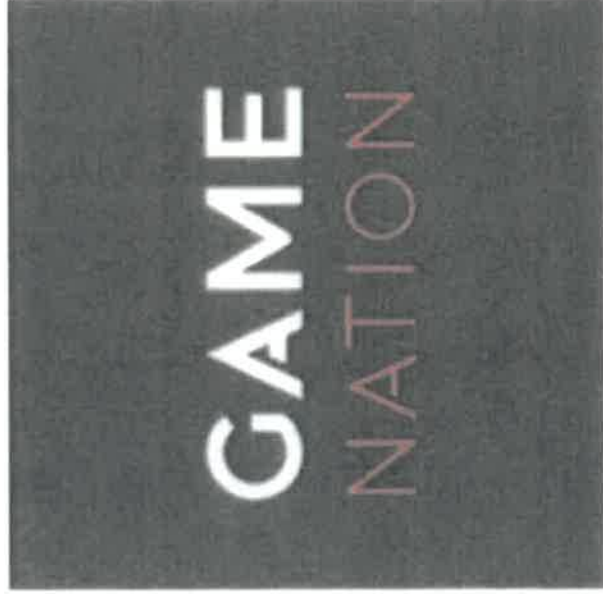
City Gaming Limited recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice, and monitoring of policies and procedures is regularly reviewed and subject to change as part of our ongoing risk assessment.



## LCCP 1 - Access to Gambling by Children & Young Persons: City Gaming

### Licence Conditions & Codes of Practice - Access to Gambling by Children & Young Persons

2 of 7



#### Policy and Procedures

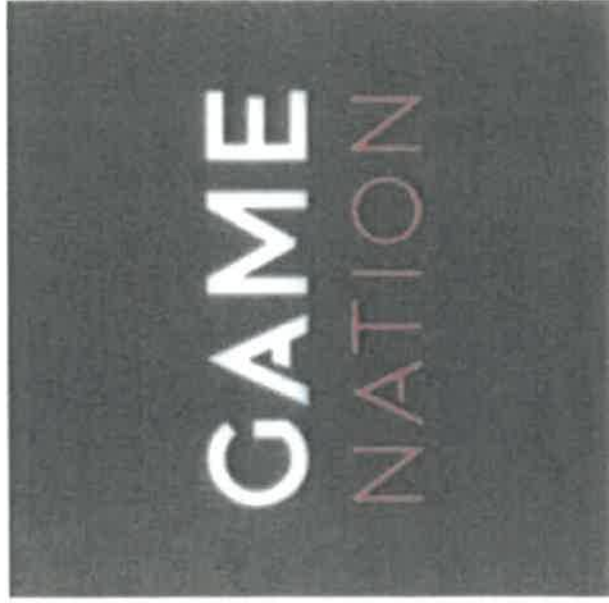
- Our policies and procedures with regard to age restriction take into account the structure and layout of our gambling premises so as to prevent access to gambling by children and young persons, and that our facilities do not appeal to children and young persons.
- Clear and prominent signage is placed at the entrance(s) to our Adult Gaming Centre(s) and adult area(s) stating that it is illegal for persons under the age of 18 years to enter and for City Gaming Limited to permit entry.
- It is a matter of gross misconduct if a member of staff knowingly allows entry by any person who is under the age of 18 years to our Adult Gaming Centre(s) or Adult Gaming Area(s).
- Any person known to be under 18 years of age is refused entry.
- Any person who appears to be under 18 years of age, and has not previously provided satisfactory proof to the contrary, is asked to provide appropriate identification when it comes to the attention of staff and before an attempt to gamble. Members of staff are trained to 'Challenge 25' as a minimum.
- If the person admits to being under the age of 18, they are refused entry.



## LCCP 1 - Access to Gambling by Children & Young Persons: City Gaming

### Licence Conditions & Codes of Practice - Access to Gambling by Children & Young Persons

3 of 7



#### Policy and Procedures



- Should they claim to be 18 or over and there is still doubt, satisfactory proof of age is requested and has to be provided before entry is allowed. Incidents involving suspected forged documents will be recorded and reported.
- Proof of age documents must contain a photograph from which the individual can be identified; state the individual's date of birth; be valid, and legible. It should bear no visible signs of tampering or reproduction. Acceptable forms of identification include those that carry the PASS logo (e.g. Citizen card); a driving licence (including a provisional licence) with photograph, a passport and military identification cards.
- Where there is still doubt and the person cannot produce proof of age, they are advised that they will not be permitted to enter until such time as they provide such proof.
- They will be shown, have explained to them, and be given a 'proof of age card' application form or offered an explanation on how to apply for a card.



## LCCP 1 - Access to Gambling by Children & Young Persons: City Gaming

### Licence Conditions & Codes of Practice - Access to Gambling by Children & Young Persons

4 of 7



#### Policy and Procedures

- Should the person then refuse to leave, they are advised that the age restriction is a legal requirement.
- If they still will not leave, the Duty Manager is immediately contacted to take over the situation.
- Any attempts by under-18s to enter the premises or designated adult area(s) and gamble are brought to the attention of the Duty Manager immediately and recorded as an incident on the IHL tablet for this purpose. Details of entry to include date, time, identity of the individual if known - or detailed description if unknown - member of staff dealing, action taken, the outcome and measures put in place to prevent a re-occurrence. Log to be countersigned by the Duty Manager.
- Service is refused in all circumstances where any adult is accompanied by a child or young person.
- All gaming machines, other than category 'D' machines, are inscribed with a notice prohibiting play by persons under the age of 18 years.
- Stakes are returned to under-18s where they have been identified as gambling in AGCs or adult-only areas, and are not permitted to retain any monetary prize.



### Policy and Procedures

- Members of staff are trained as part of their induction process in the understanding of, and the strict adherence to this policy and accompanying log, and required to sign to this effect retaining a copy for their future reference; the original being retained on the employee's personnel file. Staff training policy covers all relevant prohibitions against inviting children or young persons to gamble or to enter gambling premises, and refresher training is carried out at appropriate intervals.
- It is important to remember that any incidents where the same child or young person repeatedly attempts to gamble must be logged and reported to the Gambling Commission. Should you be aware of any such circumstance, you should immediately report it to your line manager so they can log the incident and decide on what action to take to prevent any further attempts to gamble by the child or young person.



## LCCP 1 - Access to Gambling by Children & Young Persons: City Gaming



### Acknowledgement and Sign Off

6 of 7

#### Instructions

There now follows an acknowledgement and sign off question.

#### Passmark

100%

#### Are You Ready?

Select the continue button when you are ready to start.

I've used the example of a failed quiz

If you take the quiz 3 times and fail

Your results are circulated to the venue Area Manager

AM will subsequently review the failed answers

One to One training will be issued as remedial attention.

Quiz reissued

Training Expiry



One or more of the modules within a course on your Learning Roadmap has recently been expired/refreshed because the allowed number of quiz attempts has been exceeded.

Continue

# GAME NATION

IDENTIFYING CUSTOMERS WHO MAY BE AT RISK OF OR EXPERIENCING HARMS ASSOCIATED WITH GAMBLING.

DOCUMENTS TAKEN FROM IN HOUSE E LEARNING MODULES







## Licence Conditions & Codes of Practice

As a business we are required to interact with customers in a way which minimises the risk of customers experiencing harms associated with gambling, as set out in Social Responsibility Code of the Licence Conditions and Codes of Practice (LCCP). This must include:

- **Identifying customers who may be at risk of or experiencing harms associated with gambling.**
- **Interacting with customers who may be at risk of or experiencing harms associated with gambling.**
- **Understanding the impact of the interaction on the customer, and the effectiveness of our actions and approach.**

A requirement to LCCP requires us to take into account the Commission's guidance on customer interaction. This guidance is structured along the three key outcomes we will be expected to meet:

- **Identify**
- **Interact**
- **Evaluate**

This guidance sets out why customer interaction is a requirement, makes the expectations clear and suggests ways we meet them. It also sets out why customer interaction is important. The gambling commission will expect us to demonstrate how our policies, procedures and practices meet the required outcomes.



### What we need to know

The gambling commission has set out guidance for the purposes of raising compliance standards and preventing harm to consumers. We need to know:

- **The types of behaviours that could indicate gambling harm**
- **How to spot when those indicators should trigger an interaction**

We need to ensure our teams are equipped to identify the relevant indicators of harm, to decide whether you need to interact and have effective processes for monitoring customer behaviour, so we can make quicker and better-informed decisions.

Some indicators of harm, such as high staking behaviour, can look like normal customer activity. Even if we think the customer can afford it, they may still be experiencing gambling harms.

Change compared with previous gambling activity is a general trigger for customer interaction. Building up our knowledge of our regular customers is key to helping us spot changes in their behaviour. We should use a range of indicators. This is not an exhaustive list, but your indicators should include:



Time indicators

Amount of time spent gambling, visit frequency or length of stay on the premises, leaving and then returning to the premises.



Spend

Appearing to spend more than they originally intended



Behaviour or appearance

Signs of distress, agitation or mood swings



Use of gambling management tools

Amount of time spent gambling, visit frequency or length of stay on the premises, leaving and then returning to the premises.



Customer-led contact

Information or hints from the customer, frequent complaints about not winning, or talking about the negative impacts of their gambling.



Play indicators

Chasing losses, erratic playing patterns and gambling on higher risk products



A 'big win' or a windfall

High staking following a win could hide or even lead to harmful behaviour. Suddenly having more money than usual can lead to increasing staking, which can lead to harms not associated with wealth or resources.

## Vulnerability

Life events or changes to an individual customer's circumstances may mean that a person becomes more or less vulnerable to experiencing gambling harms. Those circumstances could include bereavement, loss of income or other factors. It will not always be obvious or clear to an operator when such events have occurred, but knowing our customers, and ensuring staff ask questions when there are potential signs of vulnerability, will help to determine whether those individual circumstances present an increased risk. As part of 'know your customer' we should consider the factors that might make an individual more vulnerable to experiencing gambling related harms. Factors include:



1 Personal and demographic

If the individual is experiencing poor physical or mental health, physical or cognitive impairment, suffering side effects from a brain injury or medication, or has an addiction.



2 Situational

If the individual is experiencing financial difficulties, is homeless, is suffering from domestic or financial abuse, has caring responsibilities, experiences a life change or sudden change in circumstances.



3 Behavioral

If an individual has a higher than standard level of trust or high appetite for risk.



4 Market related

If an individual is engaged in an activity which is highly complex; that they have a lack of knowledge and/or experience of the market.



5 Access

If an individual has difficulty accessing information because of poor literacy or numeracy skills, knowledge, dyslexia or a poor understanding of the English language.



### Affordability

Historically, we have not considered customer affordability, we should therefore consider the comparison to the average amount of money that the majority of people have available to spend on leisure activities, in essence customers spending more than they could afford. We should aim to identify those experiencing or at risk of harm and intervene to try to reduce harm at the earliest opportunity.

You should be aware of the difference between 'disposable income' and 'discretionary income' which refers to the amount left after living costs are taken into account, but it does still include many other unavoidable costs. Most people would consider it harmful if customers were spending a significant amount of their discretionary income on gambling.



### Spotting harmful gambling

We should draw on all available sources of data to give a comprehensive picture of the customer's gambling. Options for spotting harmful gambling include:

- **Sharing of information by staff about concerns.**
- **Customer interaction forms, day diary with flags.**
- **Utilising back office systems and alerts where they exist.**

The right information can mean better and quicker decisions. The customer interaction records we keep should give staff a more complete picture of the customer's previous activity, which will help to inform decisions. Our customers should not be at more risk because our premises are either busier or quieter than usual. You should ensure you have appropriate levels of well-trained staff on duty to meet the licensing objectives.



## The role of teams

It is important that we all receive training so that we are aware of the signs that could indicate that a customer may be experiencing harms associated with gambling. This is not an exhaustive list, but you should ensure that:

- We are trained to identify the signs of harm and refer back to documents that include the types of behaviour that may trigger customer interaction at an appropriate moment. Teams should know how to escalate a situation if they are unsure or require support.
- We understand how indicators of harm could be displayed differently by each customer and know how to spot the signs.
- As a minimum, we receive training at induction as well as refresher training.



## Customer Interaction

When you are concerned that a customer may be experiencing harm, acting early and quickly could help stop or prevent the harm worsening. It is important in a premises environment that you interact with the customer in a timely manner whilst the opportunity presents itself.

For some customers, making them aware of why you are concerned may be enough to prompt them to think and make a change. Some customers will need more support or advice.

Our interactions should have an outcome. Knowing what impact our interaction has had will help you support the customer and help to keep improving our approach. To achieve this, it is vital to keep good records and make them available to teams to inform decisions.





### What we expect

- We expect our teams to be curious, and if we spot behaviour that could indicate harm, act on it.
- ↳ Ensure you and your teams have access to the information and support they need, such as customer interaction records, so that they are able to make decisions about how to interact and can do so discreetly.
- Interact in a way that is appropriate to the severity of the potential harm.
- Think about what information we should give the customer to help them understand why you are interacting with them, such as describing the type of behaviour they display or practical help or support where appropriate.



### Interacting with a customer

Many of our interactions are likely to be face-to-face, so it is important for teams to be prepared in advance of carrying out a customer interaction. You should consider:

- What do you need to know from the customer and what do you already know about them?
- What information do we want to give them?
- How many times have we already interacted with the customer?
- What outcome do we want to achieve?

## Interaction

**A customer interaction has three parts**

GAME

Observation



**Behaviour or activity we have spotted or something the customer tells us**

GAME

Action

**Contact to prompt the customer to think about their gambling, for us to find out more, and an opportunity for us to offer information or support.**

GAME

Outcome

**What we or the customer did next. In some cases, we may need to monitor the customer's gambling to spot any change which may prompt further action.**



## Offering help & support

Encourage customers to think about their gambling. Their responses will help us work out the right kind of help and support to offer.

We will need to direct some customers to information about safer gambling and/or suggest appropriate gambling management tools. We might need to signpost them to sources of help and specialist support from organisations which deal with advice and treatment for problem gambling.

We must also make information about safer gambling readily available to customers, as well as information about problem gambling.

We will need to interact with some customers a number of times. Our records of previous interactions with customers will help us decide how to provide the right help and support.

Customers often respond better to being informed about their behaviour and why, rather than being "told" what to do. But for some customers, and particularly if the behaviour continues to cause concern, you may need to take a more proactive approach. In some cases, you may need to take action for the customer, which could mean refusing service.



## The role of the team

We should ensure that we all:

- **Understand the types of interaction that could take place and how to interact appropriately e.g. they may only need a brief intervention.**
- **Know the type of help or support to offer, such as information, signposting customers to specialist support.**
- **Know the circumstances and process for refusing service to customers, such as requesting a customer to leave or barring a customer.**
- **Understand their respective responsibilities and who is designated to carry out customer interactions, if only certain team members are authorised to interact.**
- **Are advised how to deal with situations where customers demonstrate signs of agitation, distress, intimidation, aggression or other behaviours that may inhibit customer interaction, and what to do if the interaction does not take place at that time.**



## Keeping Records

Good record keeping allows us to demonstrate when and why we have interacted with customers and helps with ongoing monitoring of customers. We should:

- **Keep records of all customer interactions and, where an interaction has been ruled out, the reasons for this. Where an interaction has taken place at a later date, this should also be recorded.**
- **Make use of all relevant sources of information to guide and deliver effective customer interactions, including our records of previous interactions.**

Good records should include:

- **The behaviour or activity before the interaction.**
- **The change in behaviour or prompt for the interaction.**
- **How we interacted and what was said or done, for example advice or suggestions to help the customer manage their gambling, or to take a break from their gambling**
- **What happened next.**

We should also record situations where an interaction was prompted but did not take place, and how you followed that up. In some cases, you will need to monitor the customer's gambling to spot behaviours which could indicate further harm.

**All interactions should be entered on the IHL hub**



Evaluate

1 of 6



What is expected

- **Understand the impact of individual interactions on a consumer's behaviour and whether/ what further action is needed.**
- **Check records to ensure we are aware of any self excluded customers**
- **Share best practice throughout the team**



### Understanding the impact of individual interactions

In this context, by impact we mean a change in the customer's gambling activity which could be attributed to the interaction. An important part of this is whether the customer has understood the information or advice given.

Understanding the impact of the interaction on the customer includes being able to look at and compare:

- The behaviour before the interaction.
- The change in behaviour or prompt for the interaction.
- How you interacted – what was said or done
- What happened next.

Some ways to work out impact include:

- Was there a positive change in behaviour? Did the customer's gambling seem to change after the interaction?
- We could also follow up and ask the customer whether they found the interaction helpful or not.
- Is there a need for further or follow up action?





Evaluate - Effectiveness

3 of 6



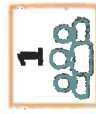
### Evaluating the effectiveness of the approach

Good evaluation helps us to understand which aspects of our approach are the most effective at identifying the right customers, and the types of tools or support that work well to help customers manage their gambling in a way that works for them. The following measures could help to work out whether your approach is working well:

- **Customer retention.**
- **Reduction in complaints.**
- **The appropriate number of customer interactions in relation to the size of your customer base or footfall**

## The role of our teams

We all have an important role to play to understand whether our approach works, and as a minimum, We should:



Records



Ensure that records of all customer interactions are made and used to aid decision making. Such records are used for evaluation purposes e.g. dip sampling for quality assurance purposes or to assess whether a customer changed their behaviour as the result of an interaction.



Training

Be able to recognise when follow-up activity to an interaction is required.



Support

Support each other in carrying out effective interventions.

## Quiz

5 of 6



### Instructions

There now follows a quiz to test your knowledge.

### Passmark

100%

### Are You Ready?

Select the continue button when you are ready to start.

Quiz

5 of 6

# GAME NATION QUIZ

Question 1 of 4

I have read, understood and agree to implement the course guidance in regards to gambling compliance customer interaction.

Yes

No

Quiz

5 of 6

Question 2 of 4

# GAME NATION QUIZ

Where do we check records to ensure we are aware of any self excluded customers



IHL hub



Venue diary



Emails

Quiz

5 of 6

Question 3 of 4

# GAME NATION QUIZ

What of the following is an indicator that a customer is experiencing issues with gambling?  
(Select Two)

Signs of distress, agitation or mood swings

Chatting to other customers about machines they enjoy

Asking your advice on machines to play

Quiz

5 of 6



Question 4 of 4

# GAME NATION QUIZ

If you spot behaviour that could indicate gambling harm, you have a responsibility to act on it.

True

False

Example of a failed test

Test must be reset to obtain 100% completion

If a test is failed three times – fail is escalated to Area Manger for 1 to 1 training.

Your Results

75%

Unfortunately you have not passed the quiz this time, please complete the quiz again. If you have any questions please speak with your line manager.

Score: 75%  
Passmark: 100%  
Attempts: 3

Your Feedback

|   |   |
|---|---|
| 1 | ✓ |
| 2 | ✓ |
| 3 | ✗ |
| 4 | ✓ |



# GAME NATION

IDENTIFYING CUSTOMERS WHO MAY BE SUSCEPTIBLE TO GAMBLING HARM





## LCCP 4 - Identifying customers who may be susceptible to gambling harm: City Gaming

### Licence Conditions and Codes of Practice

1 of 6



#### Statement

City Gaming Limited recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice. Social responsibility awareness is an important aspect of our day-to-day operating practice, and monitoring of policies and procedures is regularly reviewed and subject to change as part of our ongoing risk assessment.



## LCCP 4 - Identifying customers who may be susceptible to gambling harm: City Gaming

Licence Conditions and Codes of Practice - Customer Interaction in Relation to Identifying Customers who may be Susceptible to Gambling Harm

2 of 6



### Policy and Procedures

City Gaming Limited makes use of all relevant sources of information to ensure effective customer interaction and decision making in relation to identifying possible gambling disorders; equally to identify at-risk customers who may not be displaying obvious signs of problem gambling, and in respect of customers designated 'high value'. We work together with other operators to share experience and deliverance of good practice through BACTA.

If members of staff have concerns that a customer's behaviour may be related to having problems with gambling, the Duty Manager is to be informed at the earliest available opportunity. Indicative behaviour may include signs of distress, agitation, aggression, intense mood swings, hysteria, remorse and perhaps even damage to property and violence or the threat of violence to staff or other customers.



## Policy and Procedures

Notwithstanding any initial urgent action taken to deal with the customer's behaviour, you are required thereafter to observe the individual and make a judgement as to whether it is appropriate to suggest to the customer that they might want to be provided with information regarding where they can seek professional advice about the nature of their gambling activity or have the process of self-exclusion explained for consideration. ↗

If the customer refuses such information and continues to behave in a manner which could reasonably be considered to be disruptive or puts the staff or other customers in potential danger, you will implement City Gaming Limited's procedures for dealing with antisocial situations.

You may give consideration to refusing service or barring the customer from the premises and, in extreme situations, contacting police for assistance. Whenever police are called to the premises for assistance in handling any incident, a log entry will be made whether police attend or not.

Notwithstanding any other action that may have to be taken immediately to prevent an incident from worsening, you will log all such reports which may result in future customer interaction or where it has been ruled out where otherwise it would have taken place. The interaction is conducted between a team member and the customer in a confidential and meaningful manner.



## LCCP 4 - Identifying customers who may be susceptible to gambling harm: City Gaming

Licence Conditions and Codes of Practice - Customer Interaction in Relation to Identifying Customers who may be Susceptible to Gambling Harm

4 of 6



### Policy and Procedures

Members of staff are aware of how to deal with requests for self-exclusion, and are aware of where customers can be directed for confidential advice should they be directly approached for assistance. Team members can offer the Self exclusion to be then subsequently completed on the IHL smart hub in venue tablet

This policy and procedure is consistent with, and implemented with due regard to City Gaming Limited's duty in respect of the health and safety of members of staff.

Members of staff are trained as part of their induction process in the understanding of, and the strict adherence to this policy and accompanying log, and required to sign to this effect retaining a copy for their future reference. The original is retained on the employee's personnel file.



## LCCP 4 - Identifying customers who may be susceptible to gambling harm: City Gaming

### Acknowledgement and Sign Off

5 of 6



#### Instructions

There now follows an acknowledgement and sign off question

#### Passmark

100%

#### Are You Ready?

Select the continue button when you are ready to start.



# Age Verification User Guide 1.0

Powered by IHL Tech

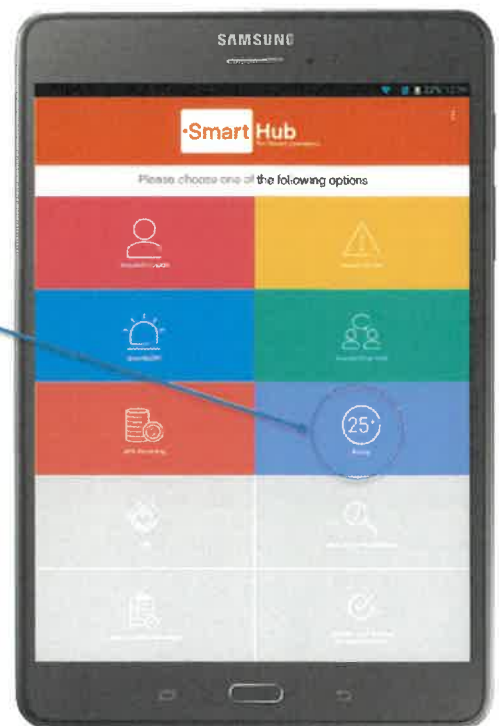
# Age Verification User Guide



## SmartHUB Home Page

### Step 1

- Select Age Verification Icon on the IHL Hub Menu





# Age Verification User Guide



Age Verification-

To create a log select New Incident button



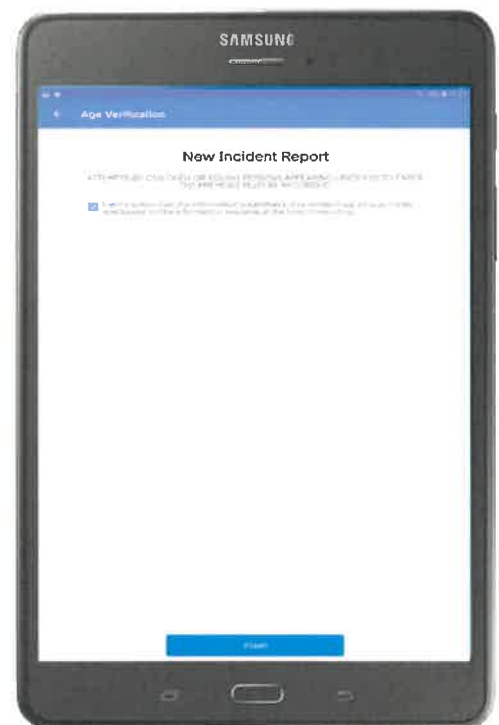
Powered by IHL Tech

# Age Verification User Guide



## New Incident- Disclaimer

1. Read the disclaimer shown on screen
2. Tick to confirm you accept the disclaimer
3. Click START

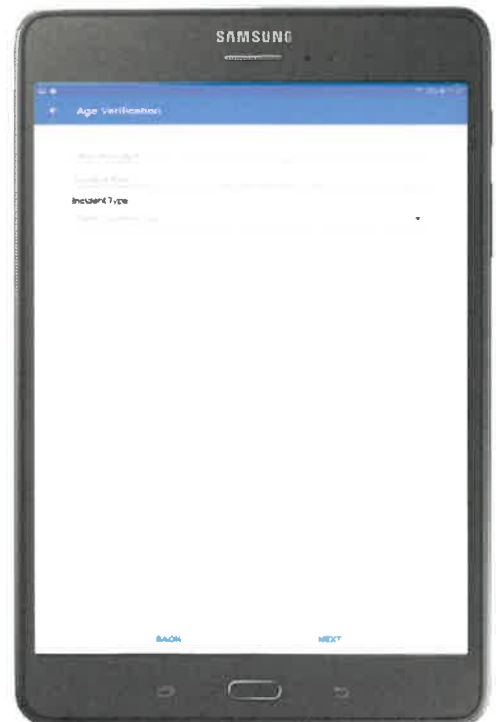


# Age Verification User Guide



## New Incident – Details

- Enter the Incident Date
- Enter the Incident Time
- Select the incident Type
- Click NEXT

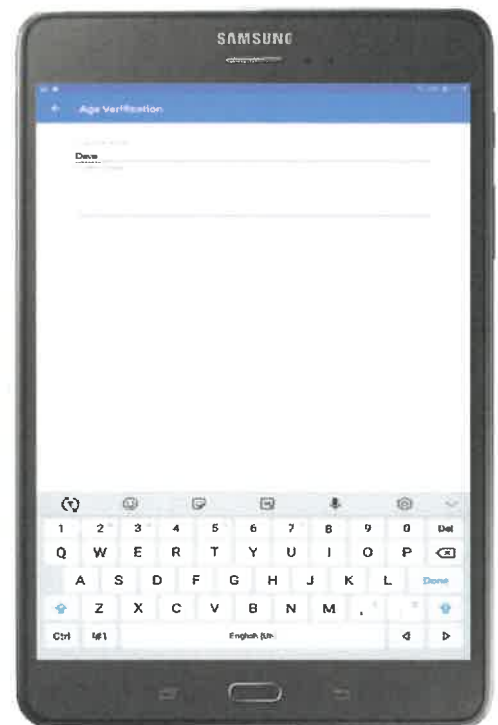


# Age Verification User Guide



## New Incident – Details (cont)

- Enter Customer's Name (if known)
- Enter Incident Details
- Click NEXT



# Age Verification User Guide



## New Incident – Details (cont)

- Select Action taken from drop down list
- Tick box if staff explained age regulations
- Click NEXT

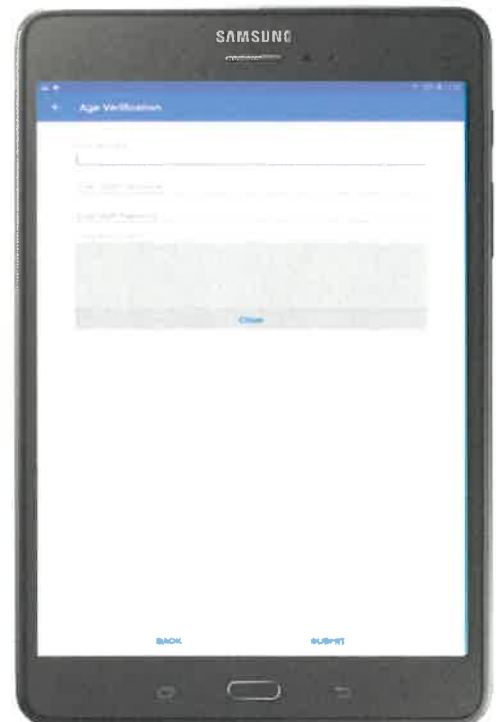


# Age Verification User Guide



## Staff Confirmation-

- Enter your name
- Username for tablet
- Password for tablet
- Sign
  
- Click Next

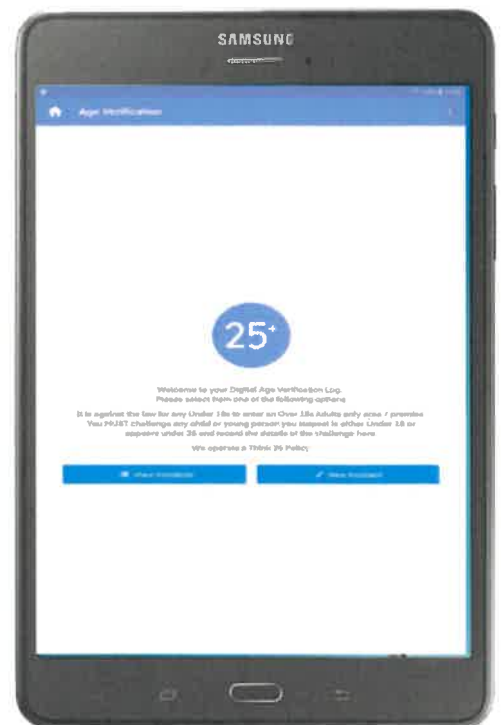


# Age Verification User Guide



View Incidents-

Click the View Incidents button



Powered by IHL Tech

# Age Verification User Guide



## View Incidents (Cont)

Select Incident from the list, this will then let you view all details relating to the incident







# Age Verification User Guide 1.0

Powered by IHL Tech



# SmartALERT User Guide 1.1

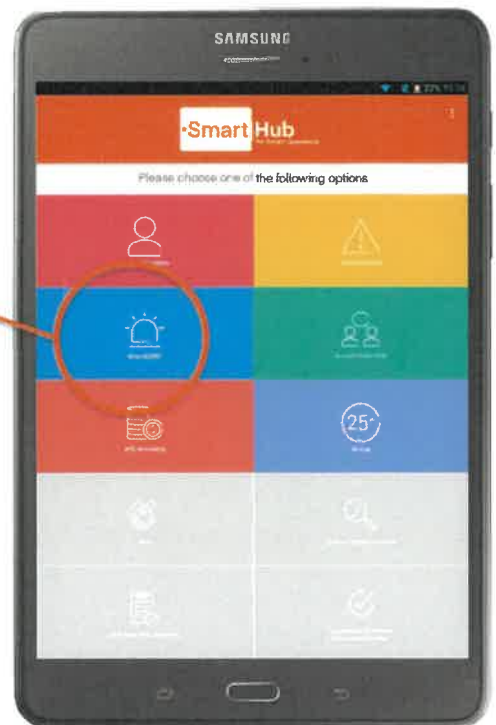
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# SmartALERT User Guide



## IHL Hub Home Page

- Select SmartALERT Icon on the IHL Hub Menu

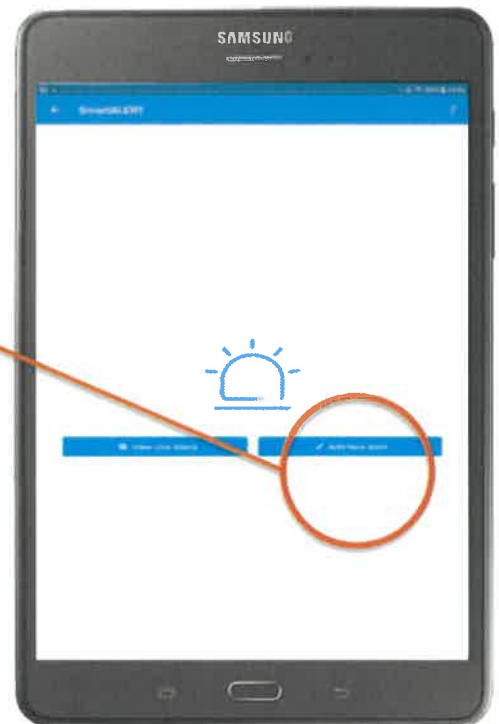


# SmartALERT User Guide



## Add New Incident

- Click the add new Alert to add new incident

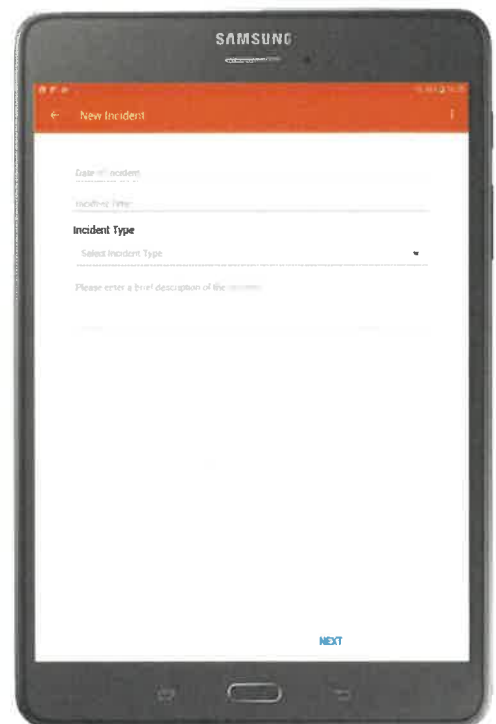


# SmartALERT User Guide



## Incident Details

- Enter the incident details
  - Date
  - Time
  - Incident Type
  - Incident Description
- Click Next



# SmartALERT User Guide



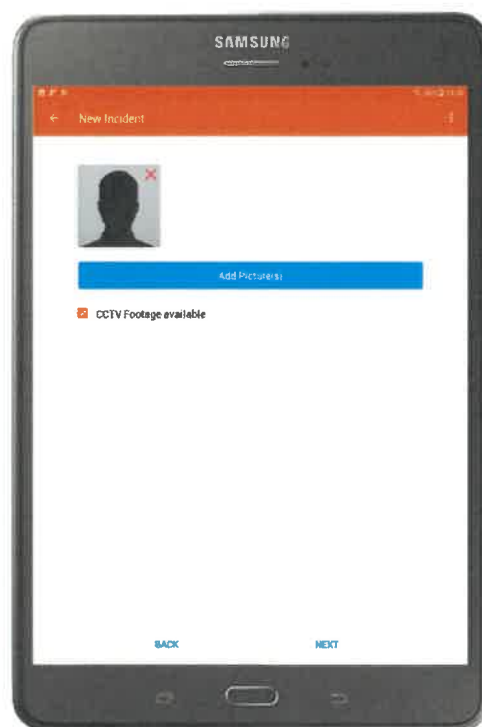
## Add Pictures

If you are able to add a picture either live or from CCTV click 'Add Picture(s)' and take picture

You can add more than one picture, or skip if you only have a detailed description

If CCTV can be made available tick the CCTV footage box. You can add CCTV in the hub later too.

Click Next to continue



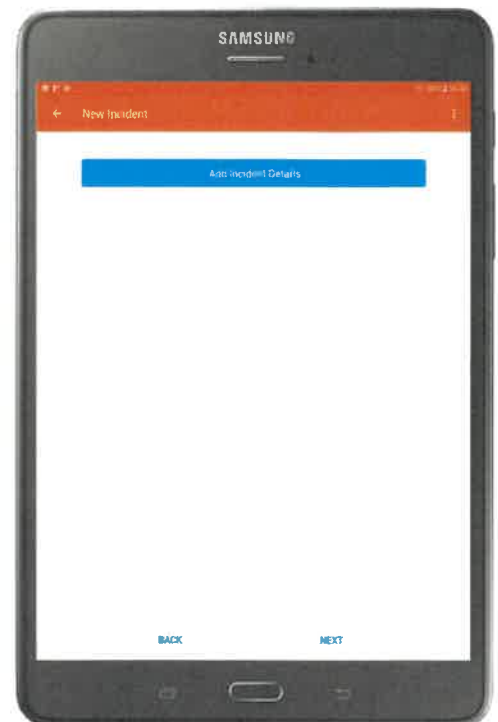
# SmartALERT User Guide



Add Incident Detail

Click 'Add Incident Details'

Please note – if you have added a clear picture of offender(s) then you are able to skip this by clicking next



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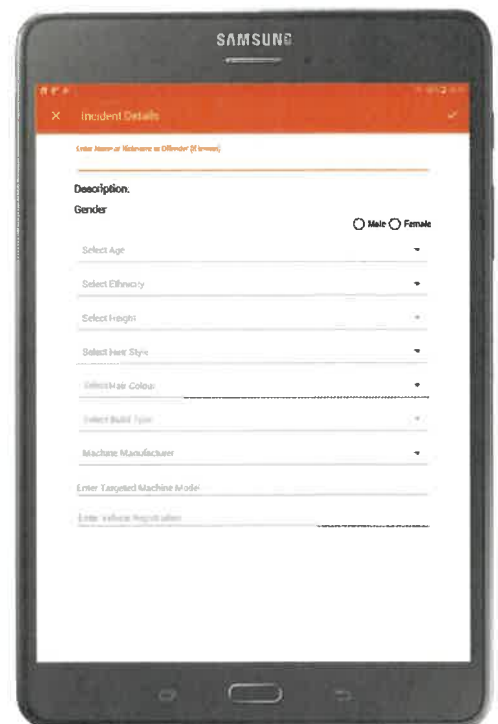
# SmartALERT User Guide



## Enter Incident Detail

Complete as much of the incident details form as possible to support the incident

Once completed, click the tick top right to continue



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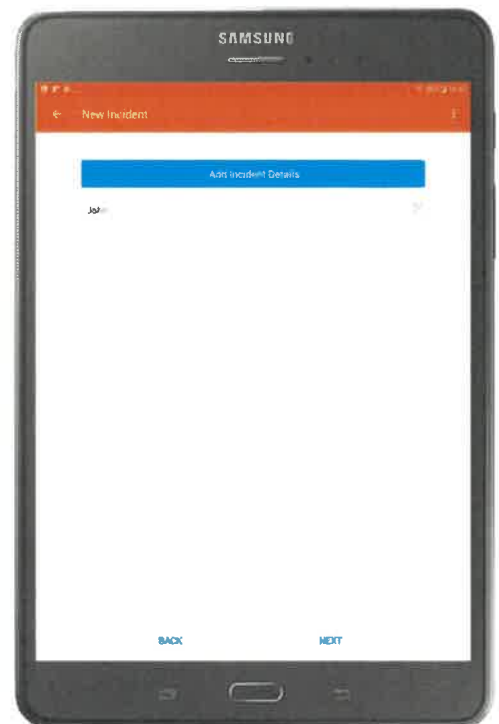


# SmartALERT User Guide



## Save Incident Detail

Once you have added Picture(s) AND /OR Incident Details, click Next to continue



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# SmartALERT User Guide

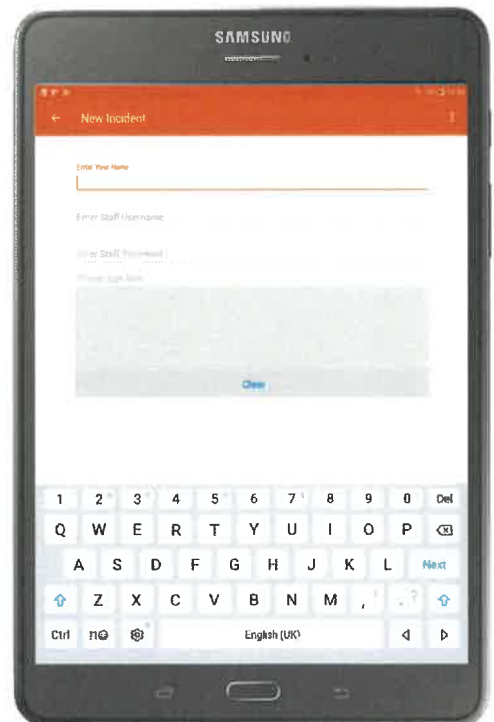


## Submit Incident

Enter the requested details to submit the incident

- Your Name
- Your Tablet User Name
- Your Tablet Password
- Your Signature

Click submit to continue



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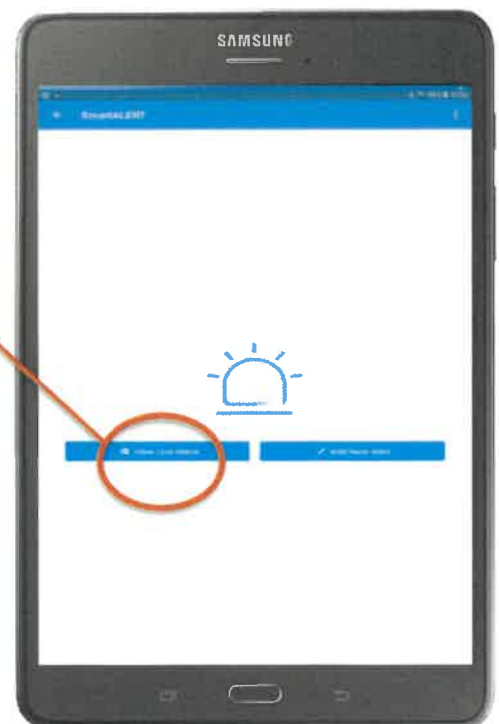
# SmartALERT User Guide



## Incident Carousel

If there are any incidents within a specific locality from you, there will be listed on the SmartALERT Carousel, to view these click View Live Alerts.

It will ask you to enter your username and password for the tablet.



# SmartALERT User Guide



Click the Image to see more details of the incident



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# SmartALERT User Guide

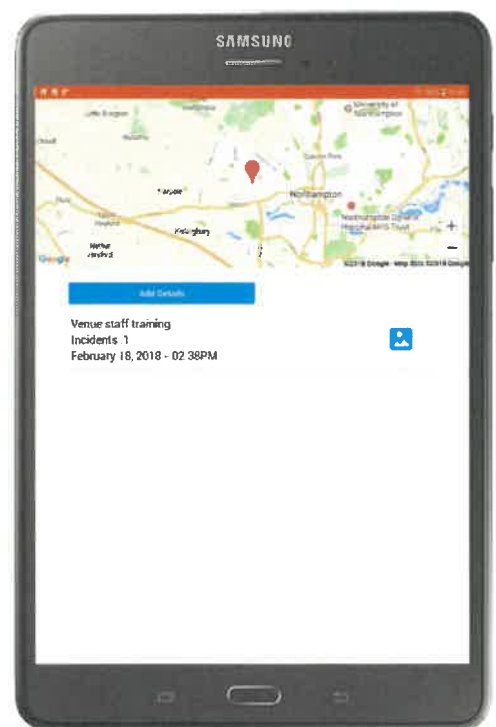


## Incident View

When viewing the incident you will see a location pins for this incident's history

You can click 'Add Details' if you want to add further details to an existing incident – please note this does not have to be an incident you submitted

You can click the Picture Icon to view the incident images





# SmartAlert User guide 1.1

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# SmartEXCLUSION Customer Self-Exclusion

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# SmartEXCLUSION User Guide



## Enrolment

- Enter your Venue Enrolment Key



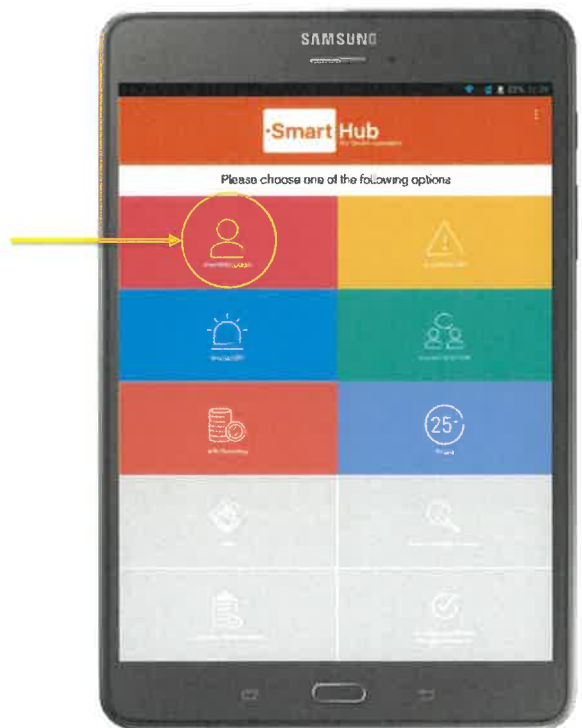


# SmartEXCLUSION User Guide



## SmartHUB Home Page

- Select SmartEXCLUSION Icon on the IHL Hub Menu



# SmartEXCLUSION User Guide



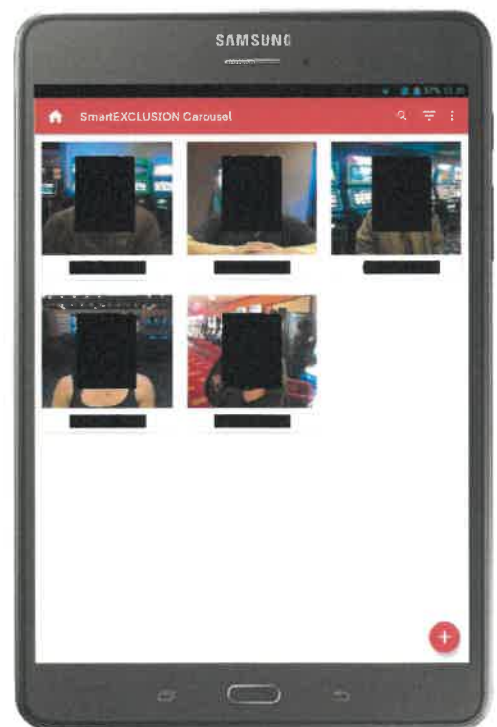
## SmartEXCLUSION Carousel

Here you will see the list of existing customers who have requesting their exclusion to cover your venue

Click an image to view more details of the selected exclusion

You can search and filter the carousel by selecting the icons in the top bar

FYI - The most recent exclusion is positioned top left of the carousel, reading left to right

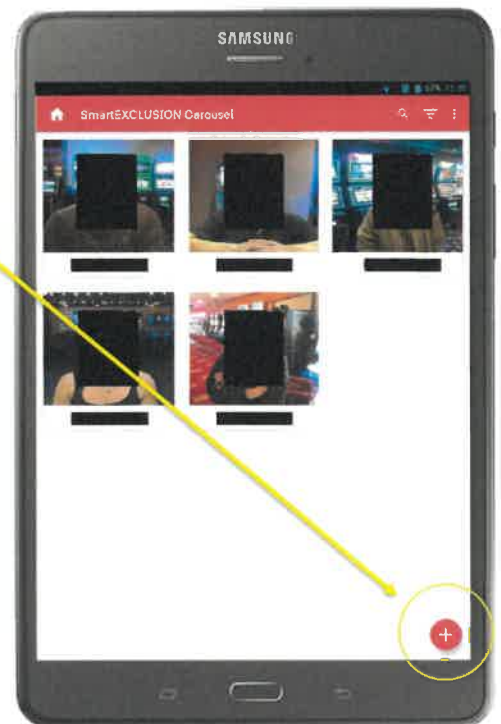


# SmartEXCLUSION User Guide



Start a New Exclusion

Click the + symbol bottom right of the carousel



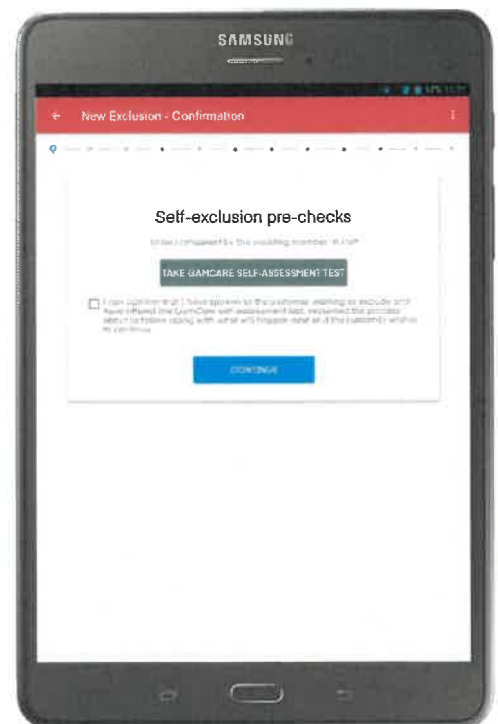
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# SmartEXCLUSION User Guide



## New Exclusion – Disclaimer Page

- If required, you can take the customer through the GAMCARE help pages before you start the new exclusion
- To proceed, confirm you accept the terms for processing the exclusion then click continue

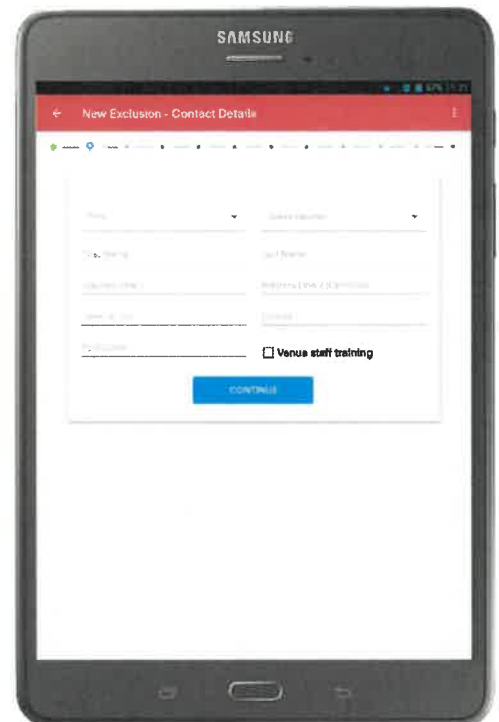


# SmartEXCLUSION User Guide



## New Exclusion – Customer Details

- Enter the details of the customer wishing to excluded and click continue
- If you are completing a 'training / test' exclusion please ensure you tick the 'Venue Staff Training' box BEFORE clicking continue

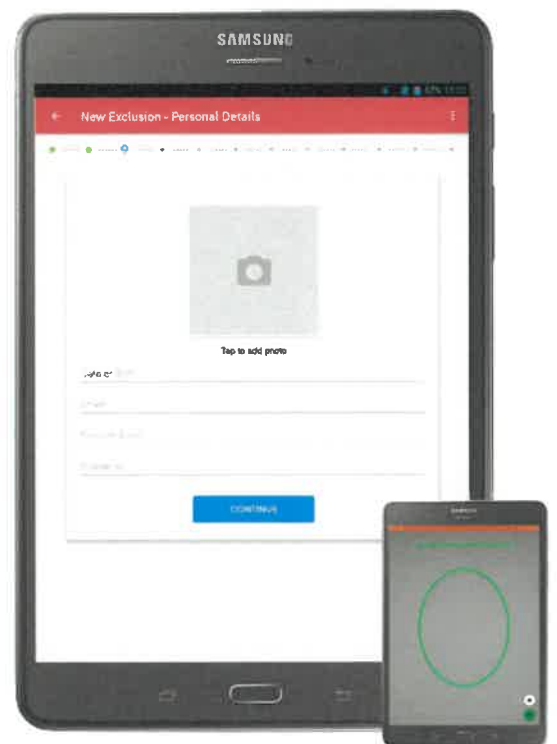


# SmartEXCLUSION User Guide



## New Exclusion – Customer Details

- Click the photo box to take a picture
  - You will be presented with a standard camera view, take photo of the customer with their face clearly positioned within the oval presented, ensuring where possible the photo is taken against a plain backdrop
- Select / Enter Date of Birth for the customer
- Enter either an email address OR mobile numbers for the customer (or both)
- Click continue



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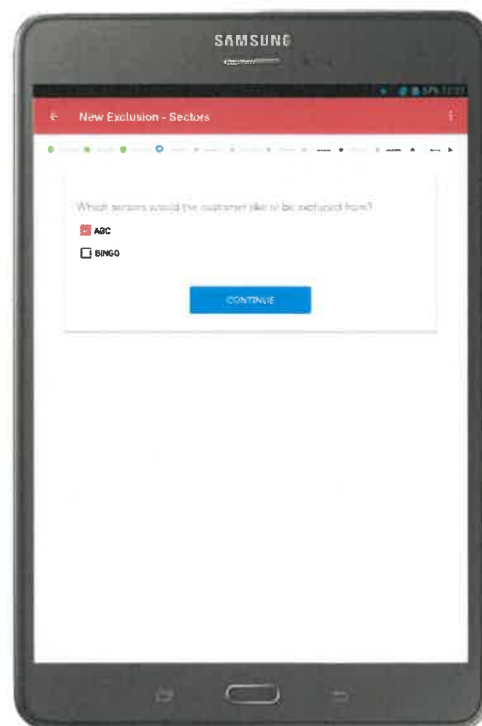
# SmartEXCLUSION User Guide



## New Exclusion – Sector Selection

- Select the sector(s) the customer wishes to exclude
- Click continue

Please note – your sector will be selected as default, and other options available for selection will be subject to your company configuration

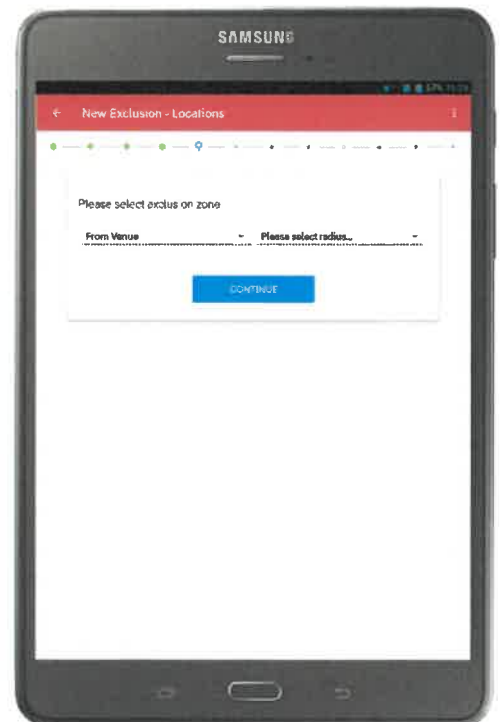


# SmartEXCLUSION User Guide



## New Exclusion - Radius

- Select the centre point for the exclusion
- Select the radius for exclusion
- Click continue



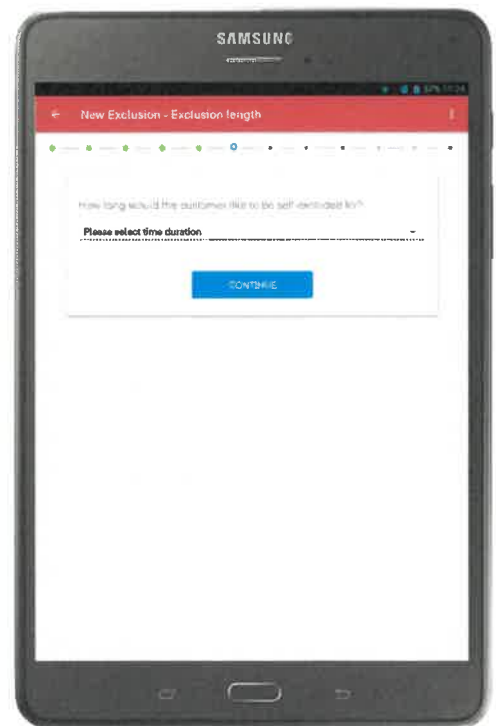


# SmartEXCLUSION User Guide



## New Exclusion - Duration

- Select the duration of the exclusion
- Click continue

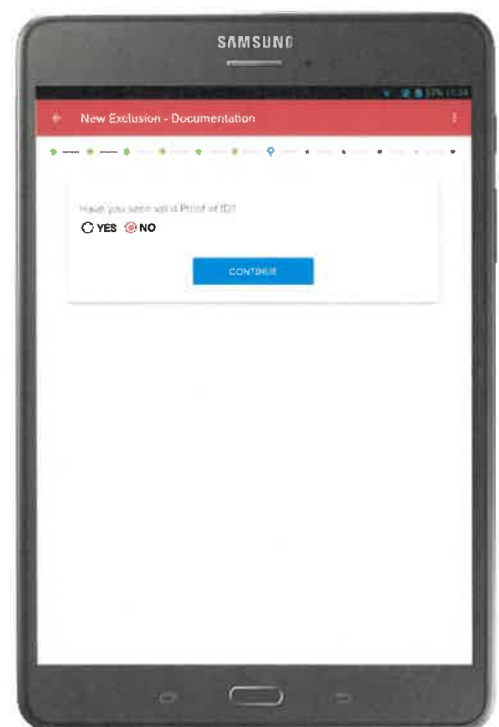


# SmartEXCLUSION User Guide



## New Exclusion – Proof of ID

- Choose if you have seen the customers proof of ID
  - If Yes, enter the ID details
- Click continue

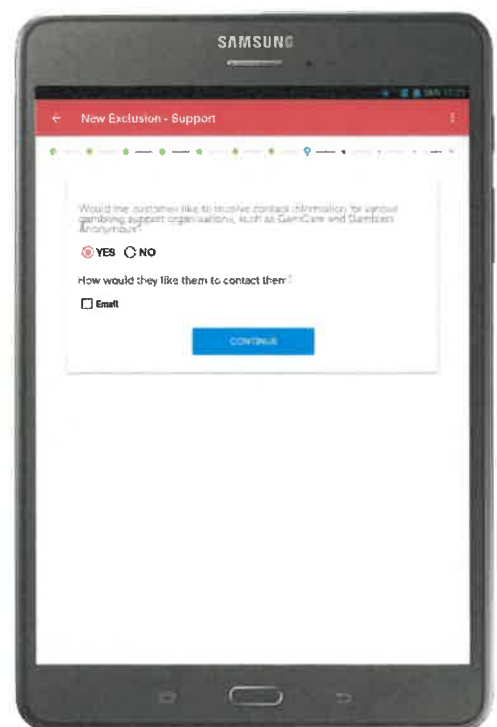


# SmartEXCLUSION User Guide



## New Exclusion – Contact Preferences

- Choose if the customer would like to be contacted by support organisations
- Select the method of communication
- Click continue

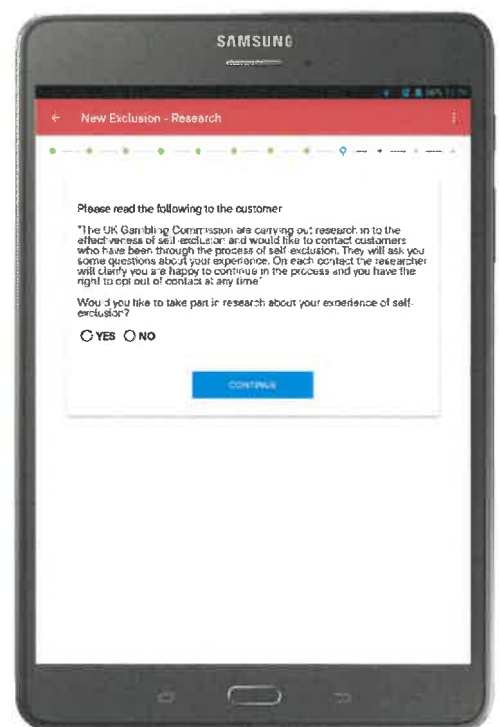


# SmartEXCLUSION User Guide



## New Exclusion – Research Question

- Choose if the customer is happy to participate in research by the Gambling Commission
- Click continue



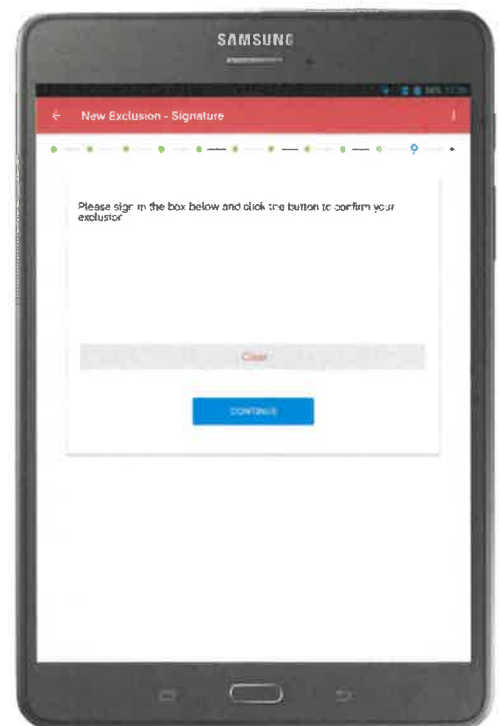
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# SmartEXCLUSION User Guide



## New Exclusion - Signature

- Ask the customer to sign on the screen in the box provided
- Click continue



# SmartEXCLUSION User Guide

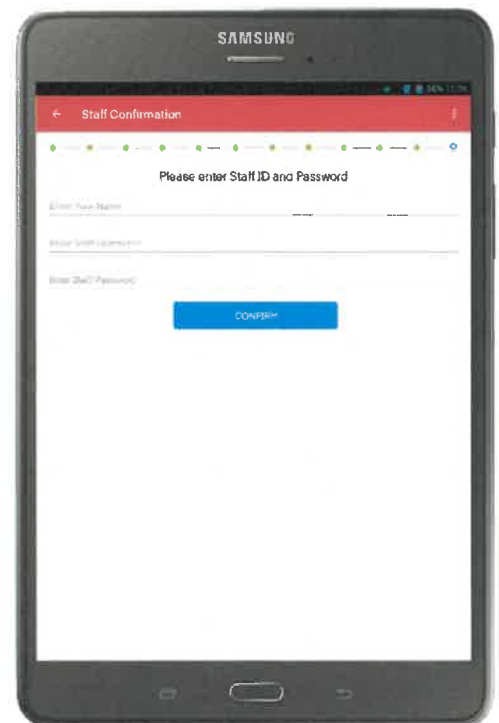


## New Exclusion – Submission Page

- Enter YOUR Name
- Enter your venues Staff User Name
- Enter your venues password
- Click confirm

The exclusion will now be submitted and you will be returned to the carousel

Please note the exclusion may take up to 2 minute to appear in the carousel

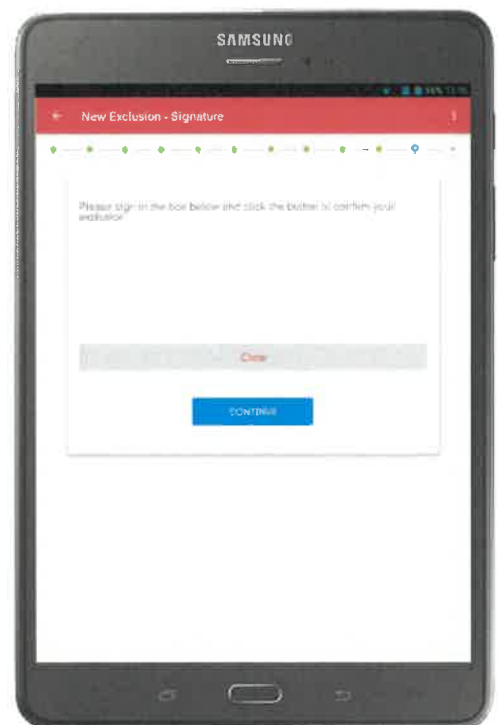


# SmartEXCLUSION User Guide



## New Exclusion - Signature

- Ask the customer to sign on the screen in the box provided
- Click continue



# SmartEXCLUSION User Guide

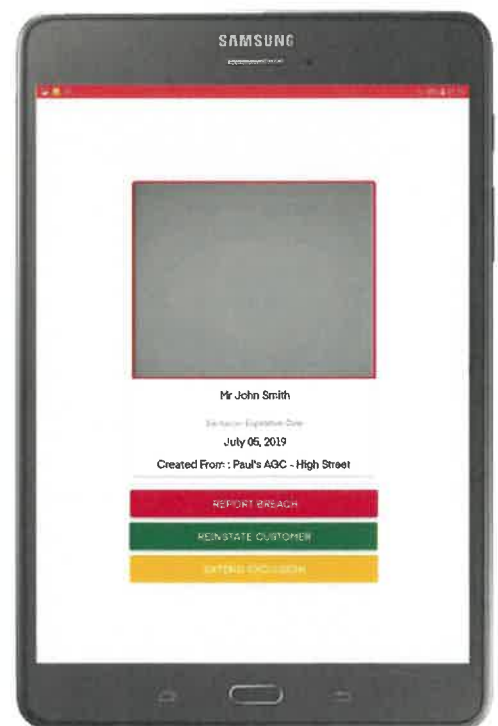


## View Exclusion

Here you can view details of the exclusion, plus

1. Record a breach
2. Reinstate an exclusion
3. Extend an exclusion

Please note Extend or Reinstate is only available when the exclusion has passed initial extension period





# SmartEXCLUSION User Guide



## Recording a Breach

- Click the 'Record Breach' Button
- Select whether Attempted OR Actual Breach
- Enter YOUR Name, Venue Staff Name and Venue Password
- Click confirm



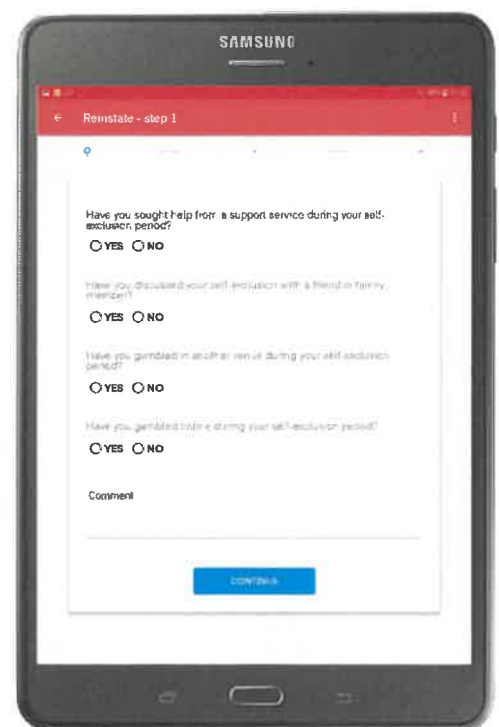
# SmartEXCLUSION User Guide



## Reinstating a customer

- Click the 'Reinstatement' Button
- Complete the 4 questions with the customer
- Add any comments to the reinstatement
- Click confirm

Please note – the exclusion will remain on the carousel for 24 hours – allowing the customer time to reconsider if they wish



# SmartEXCLUSION User Guide



## Extending an Exclusion

- Click 'Extend Exclusion'
- You will now be taken on the same journey as a NEW exclusion, except some fields will not be able to be amended – e.g. name, date of birth etc.
- Complete all the steps to the end and submit the extension
- You will be returned to the carousel

Please note – it will take up to 2 minutes for the new exclusion to appear on the carousel, but the original exclusion will disappear instantly





# SmartEXCLUSION Customer Self-Exclusion

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**RESTRICTED**

**THE OCCUPIER SHOULD KEEP THIS NOTICE IN A SAFE PLACE IN CASE IT IS NEEDED FOR FURTHER REFERENCE. THE STATUTORY POWERS TO SEARCH PREMISES AND THE RIGHTS OF OCCUPIERS ARE SUMMARISED BELOW.**

**Information to the Occupier**

(Notice of the powers to search premises and of the rights of occupiers Police and Criminal Evidence Act 1984 and Codes of Practice.)

Address of premises 35, 3 Waterside Lane, Park Street, Sheffield, S9 2LR  
 Type of premises Business Occupier N/A

**POWER UNDER WHICH SEARCH MADE**

Warrant/order (copy attached) Act section 306 Gamb. & G.  
 Date granted 3/3/22 by Mags NE

or Statutory Power under Police and Criminal Evidence Act 1984 (These powers are summarised on following pages)

Section 17 or  Section 18(5) or  Section 32

or  Section 18(1) This Power requires written authority of an inspector or above, which will normally be recorded by the inspector at (1) below. This Notice will show at (2) below if the Inspector (or above) has recorded the authority elsewhere

Where authority recorded .....

By whom (Name/rank)\* .....

Date/time recorded .....

or  With written consent of person entitled to grant entry (only applicable where above powers not exercised)

I hereby consent to Police searching the above-named premises

Signature\* .....

Name (Capitals)\* ..... Age .....

Status relative to premises .....

**OFFICER IN CHARGE OF SEARCH**

Name Richard Norwood Rank/number X 267

Station/Branch Moss Way

Address Moss Way, Sheffield

|                       |                       |                        |
|-----------------------|-----------------------|------------------------|
| Date<br><u>3/3/22</u> | Time of search        |                        |
|                       | Start<br><u>19.45</u> | Finish<br><u>23.40</u> |

\*In certain circumstances Police Officers names should be replaced by warrant numbers (see Codes of Practice, Code B, Paragraph 2.9)

**Codes of Practice**

A copy of the "Code of Practice for the Searching of Premises by police and the Seizure of Property Found by Police Officers on Persons or Premises" - Code B, is available for you to consult at any police station. This notice is a summary only of the main provisions of the Code, which should be consulted if you require further details (Codes of Practice, Code B, Para 6.7.V).

**Summary of powers of search under the police and criminal evidence act 1984**

**Section 17(1)**

Subject to the following provisions of this section, and without prejudice to any other enactment, a constable may enter and search any premises for the purpose of:

- (a) executing -
  - (i) a warrant of arrest issued in connection with or arising out of criminal proceedings;
  - or
  - (ii) a warrant of commitment issued under section 76 of the Magistrates' Court Act 1980;
- (b) of arresting a person for an arrestable offence;
- (c) of arresting a person for an offence under -
  - (i) section 1 (prohibition of uniforms in connection with political objects), of the Public Order Act 1936;
  - (ii) any enactment contained in sections 6 to 8 or 10 of the Criminal Law Act 1977 (offences relating to entering and remaining on property);
  - (iii) section 4 of the Public Order Act 1986 (fear or provocation of violence)
  - (iia) section 163 of the Road Traffic Act 1988 (c.52) (failure to stop when required to do so by a constable in uniform);
  - (iv) section 76 of the Criminal Justice and Public Order Act 1994 (failure to comply with interim possession order);
- (ca) of arresting, in pursuance of section 21(1A) of the Children and Young persons Act 1969, and child or young person who has been remanded or committed to local authority accommodation under section 21(1) of that Act;
- (cb) of recapturing any person who is, or is deemed for any purpose to be, unlawfully at large while liable to be detained -
  - (i) in a prison, remand centre, young offender institution or secure training centre, or
  - (ii) in pursuance of section 92 of the Powers of Criminal Courts (Sentencing) Act 2000 (dealing with children and young persons guilty of grave crimes), in any other place'
- (d) of recapturing any person whatever who is unlawfully at large and whom he is pursuing; or
- (e) of saving life or limb or preventing serious damage to property

**Section 18(1) (Entry and search after arrest)**

Subject to the following provisions of this section, a constable may enter and search any premises occupied or controlled by a person who is under arrest for an arrestable offence, if he has reasonable grounds for suspecting that there is on the premises evidence, other than items subject to legal privilege, that relates-

- (a) to that offence; or
- (b) to some other arrestable offence which is connected with or similar to that offence

Except as provided by Section 18(5), no search may take place under this section unless an officer of the rank of inspector or above has given written authority. Unless wholly impractical the written authority will be recorded on this notice. Where it is recorded elsewhere information as to where it is recorded will be shown on this notice.

**Section 18(5) (Entry and search after arrest - Inspector's written authority NOT required)**

A constable may conduct a search without obtaining the written authority of an Inspector or above where the arrested person has not been taken to a police station and the arrested person's presence is necessary elsewhere for the effective investigation of the offence.

**Section 32 (Search upon Arrest)**

Where a person has been arrested at a place other than a police station a constable shall have the power to enter and search any premises in which he was when arrested or immediately before he was arrested for evidence relating to that offence for which he has been arrested.

**REASONABLE FORCE**

In the exercise of a power to search, police may use reasonable force to enter the premises and carry out the search.

**WITH CONSENT**

A constable may enter and search any premises with the written consent of a person entitled to grant entry to the premises. Where practicable the written consent will be recorded on this notice (Codes of Practice, Code B, Para 5.1).

- Consent to a search must, if practicable, be given in writing on the front of this notice,
- Consent must not be obtained under duress.
- Where consent is withdrawn before a search is completed, the search must stop.
- If you reside in a lodging house or similar accommodation your landlord can consent to your room or rooms being searched if you are unavailable at the time and the matter is urgent.
- Premises may be searched only to the extent necessary to achieve the object of the search having regards to the size and nature of whatever is sought.

(continued overleaf)

**RESTRICTED**

## RESTRICTED

- A search under warrant may not continue under the authority of that warrant once all things specified in it have been found, or the officer in charge of the search is satisfied that they are not on the premises.
- The search must be conducted with due consideration for the property and privacy of the occupier of the premises and with no more disturbance than necessary.
- Reasonable force may be used to search premises in certain circumstances.
- You may ask a friend, neighbour, or other person to witness the search, but if the officer in charge has reasonable grounds to believe this would seriously hinder the investigation, you will not be allowed this facility.
- The search need not be unreasonably delayed for this purpose.
- If the premises have been entered by force, the officer in charge shall ensure that you or your agent are present to secure the premises, or that they are secured by any other appropriate means.
- Any officer searching premises may seize anything: (a) covered by a warrant and (b) anything which he has reasonable grounds to believe is evidence of an offence or has been obtained in consequence of the commission of an offence, items under (b) may only be seized where this is necessary to prevent their concealment, alteration, loss, damage or destruction.
- Items may not be seized which are subject to legal privilege.
- An officer who for any reason does not seize any items (the reasonably believes have been obtained in consequence of the commission of an offence by some person) will inform you of his suspicions, and if you dispose of the property you may be liable to civil or criminal proceedings.
- An officer may photograph or copy, or have photographed or copied, any document or other article which he has power to seize.
- Where an officer considers that a computer may contain information of evidential value, he may require that information to be produced in a form that can be taken away and in which it is visible and legible.
- Items seized may be retained for as long as is necessary in the circumstances including:
  - (i) For use as evidence at a trial for an offence.
  - (ii) For forensic examination or for other investigations in connection with an offence.
  - (iii) To establish the lawful owner.
- Property shall not be retained as at (i) or (ii) above if a photograph or copy would suffice for the purpose.
- You must be provided with a list or description of retained property if you so request within a reasonable time.
- You or your representative may, at your own expense, be allowed supervised access to seized property to examine it, or have it photographed or copied or be provided with a photograph or copy within a reasonable time following a request.
- You may apply to a Magistrates Court under The Police (Property) Act 1997 for repossession of any seized articles.
- You may be able to seek compensation in certain cases if damage is caused whilst entering or searching your premises, and any application for compensation should be directed to:-

**THE CHIEF CONSTABLE, SOUTH YORKSHIRE POLICE**  
**SNIG HILL, SHEFFIELD S3 8LY**

A copy of the Codes of Practice in relation to The Police and Criminal Evidence Act 1984 is available at any police station and you can consult them free of charge at any reasonable time in relation to any of the above provisions.

### Power to seize property

An officer who is searching any person or premises under any statutory power or with the consent of the occupier may seize anything:-

- (a) covered by a warrant
- (b) the officer has reasonable grounds for believing is evidence of an offence or has been obtained in consequence of the commission of an offence but only if seizure is necessary to prevent the items being concealed, lost, disposed of, altered, damaged, destroyed or tampered with
- (c) covered by the powers in Part 2, Criminal Justice and Police Act 2001 which allows an officer to seize property from persons or premises and, in certain circumstances, retain it for sifting or examination elsewhere (Codes of Practice, Code B, Para 7.1). If property is seized under this power you will be issued with a notice explaining your rights under the Act. Instead of seizing property an officer may require that the holder of the property retains it. If the holder then disposes of it he may be liable to civil or criminal proceedings (taken from Codes of Practice, Code B, Para 7.4).

### ITEMS SUBJECT TO LEGAL PRIVILEGE

No item may be seized which an officer has reasonable grounds for believing to be subject to legal privilege, as defined in PACE, section 10, other than the Criminal Justice and Police Act 2001, Part 2 (Codes of Practice, Code B, Para 7.2).

### PHOTOGRAPHING AND COPYING

An officer may photograph or copy or have photographed or copied any document which he has power to seize (Codes of Practice, Code B, Para 7.5)

### INFORMATION STORED IN ELECTRONIC FORM

If an officer considers that information stored in any electronic form could be used in evidence he may require it to be produced in a legible form so that it can be taken away (Codes of Practice, Code B, Para 7.6)

### Rights of Owner / Occupier of the Property

#### GENERAL

A friend, neighbour or other person must be allowed occupier wishes unless the officer in charge of the investigation or endranger officers or other people, reasonable delayed for this purpose (Code of Practice)

If any of your property is kept by the police you are provided with a list or description of the property with applications may be made either at the police station or to the address shown below (Codes of Practice)

If you wish, you or your representative will be allowed property so that you can examine it or have it photographed for the case. Access will not be allowed if the officer believes that his would:

- (a) prejudice the investigation of any offence lead to the commission of an offence by material such as pornography.
- (b) (Codes of Practice, Code B, Para 7.17)

#### Search with Consent

Consent to a search must, if practicable, be given in notice. Where consent is withdrawn before the search stop (Codes of Practice, Code B, Para's 5.1 & 5.3)

#### SEARCH WITH WARRANT

A copy of the search must, if practicable, be given in notice. Where consent is withdrawn before the search stop (Codes of Practice, Code B, Para's 5.1 & 5.3).

#### SEARCH WITH WARRANT

A copy of the search warrant should, if practicable, be the search begins.

#### COMPENSATION FOR DAMAGE

Compensation may be payable in appropriate cases if and searching premises. An application for compensation should be made to the police station shown on the front of this notice.

### THE CODES OF PRACTICE ISSUED UNDER CRIMINAL EVIDENCE ACT 1984 ARE AVAILABLE AT ANY POLICE STATION.

*Inc - 778-9/4/22*

18(1) above, which will normally be recorded by the Inspector at (1) below. This Notice will show at (2) below if the Inspector (or above) has recorded the authority elsewhere

Where authority recorded .....

By whom (Name/rank)\* .....

Date/time recorded .....

With written consent of person entitled to grant entry (only applicable where above powers not exercised)

I hereby consent to Police searching the above-named premises

Signature\* .....

Name (Capitals)\* .....

Status relative to premises .....

**OFFICER IN CHARGE OF SEARCH**

Name Edward Norwood Rank/number PC 262

Station/Branch Moss Way Sheffield

Address Moss Way Sheffield

|                 |  |
|-----------------|--|
| Date            | Time of search                         |
| <u>01/07/22</u> | <u>19.45</u> Start <u>23.40</u> Finish |

\*In certain circumstances Police Officers names should be replaced by warrant numbers (see Codes of Practice, Code B, Paragraph 2.9)

of:

(a) executing - a warrant of arrest issued in connection with or arising out of criminal proceedings;

(b) a warrant of commitment issued under section 78 of the Magistrates' Court Act 1980;

(c) of arresting a person for an offence under - section 1 (prohibition of uniforms in connection with political objects); of the Public Order Act 1936;

(d) any enactment contained in sections 6 to 8 or 10 of the Criminal Law Act 1977 (offences relating to entering and remaining on property);

(e) section 4 of the Public Order Act 1986 (fear or provocation of violence)

(f) section 163 of the Road Traffic Act 1988 (s.52) (failure to stop when required to do so by a constable in uniform);

(g) section 75 of the Criminal Justice and Public Order Act 1994 (failure to comply with interim possession order);

(h) of arresting, in pursuance of section 21(1A) of the Children and Young Persons Act 1969, and child or young person who has been remanded or committed to local authority accommodation under section 21(1) of that Act;

(i) of recapturing any person who is, or is deemed for any purpose to be, unlawfully at large while liable to be detained -

(j) in a prison, remand centre, young offender institution or secure training centre, or

(k) in pursuance of section 92 of the Powers of Criminal Courts (Sentencing) Act 2000 (dealing with children and young persons guilty of grave crimes). In any other place\* of recapturing any person whatever who is unlawfully at large and whom he is pursuing; or

(l) of saving life or limb or preventing serious damage to property

(m) of saving life or limb or preventing serious damage to property

(n) of saving life or limb or preventing serious damage to property

(o) of saving life or limb or preventing serious damage to property

NOT required)

A constable may conduct a search without obtaining the written authority of an Inspector or above where the arrested person has not been taken to a police station and the arrested person's presence is necessary elsewhere for the effective investigation of the offence.

**Section 32 (Search upon Arrest)**

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- Premises may be searched only to the extent necessary to achieve the object of the search having regard to the size and nature of whatever is sought.

(continued overleaf)

**RESTRICTED**

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### Information to the Occupier

(Notice of the powers to search premises and of the rights of occupiers Police and Criminal Evidence Act 1984 and Codes of Practice.)

|  |  |
|--|--|
| Address of premises: <u>155, 2 Waverley Lane, Waverley, Surrey, GU24 0NR</u>   |  |
| Type of premises: <u>Business</u>  | Occupier: <u>N/A</u>                                   |
| <input checked="" type="checkbox"/> <b>POWER UNDER WHICH SEARCH MADE</b>   |  |
| Warrant/order (copy attached): <u>Ad section 305 search by Pt</u>  |  |
| Date granted: <u>3/3/23</u> by <u>PAV 106</u>  |  |
| or Statutory Power under Police and Criminal Evidence Act 1984<br>(These powers are summarised on following pages)   |  |
| <input type="checkbox"/> Section 17 or <input type="checkbox"/> Section 18(5) or <input type="checkbox"/> Section 32   |  |
| or <input type="checkbox"/> Section 18(1) This Power requires written authority of an Inspector or above, which will normally be recorded by the Inspector at (1) below. This Notice will show at (2) below if the Inspector (or above) has recorded the authority elsewhere |  |
| Where authority recorded: .....  |  |
| By whom (Name/rank)*: .....  |  |
| Date/time recorded: .....  |  |
| or <input type="checkbox"/> With written consent of person entitled to grant entry<br>(only applicable where above powers not exercised)   |  |
| I hereby consent to Police searching the above-named premises  |  |
| Signature* .....   |  |
| Name (Capital)*: ..... Age: .....  |  |
| Status relative to premises: .....   |  |
| <b>OFFICER IN CHARGE OF SEARCH</b>   |  |
| Name: <u>David Norwood</u>   | Rank/number: <u>PC 267</u>                             |
| Station/Branch: <u>Worcester</u>   |  |
| Address: <u>Worcester, Shirefields</u>   |  |
| Date: <u>3/3/23</u>  | Time of search: Start <u>19.45</u> Finish <u>23.40</u> |

\*In certain circumstances Police Officers names should be replaced by warrant numbers (see Codes of Practice, Code B, Paragraph 2.9)

GEN 183 (Nov 2011)

### RESTRICTED

**THE OCCUPIER SHOULD KEEP THIS NOTICE IN A SAFE PLACE IN CASE IT IS NEEDED FOR FURTHER REFERENCE. THE STATUTORY POWERS TO SEARCH PREMISES AND THE RIGHTS OF OCCUPIERS ARE SUMMARISED BELOW.**

#### Codes of Practice

A copy of the Code of Practice for the Searching of Premises by police and the Seizure of Property Found by Police Officers on Persons or Premises - Code B, is available for you to consult at any police station. This notice is a summary only of the main provisions of the Code, which should be consulted if you require further details (Codes of Practice, Code B, Para 6.7.V).

Summary of powers of search under the police and criminal evidence act 1984

#### Section 17(1)

Subject to the following provisions of this section, and without prejudice to any other enactment, a constable may enter and search any premises for the purpose of:

- (a) executing -
  - (i) a warrant of arrest issued in connection with or arising out of criminal proceedings;
  - (ii) a warrant of commitment issued under section 76 of the Magistrates Court Act 1980;
  - (iii) of arresting a person for an arrestable offence;
  - (iv) of arresting a person for an offence under -
    - (i) section 1 (prohibition of uniforms in connection with political objects), of the Public Order Act 1986;
    - (ii) any enactment contained in sections 5 to 8 or 10 of the Criminal Law Act 1977 (offences relating to entering and remaining on property);
    - (iii) section 4 of the Public Order Act 1986 (fear or provocation of violence);
    - (iiiia) section 163 of the Road Traffic Act 1988 (s.52) (failure to stop when required to do so by a constable in uniform);
    - (iv) section 76 of the Criminal Justice and Public Order Act 1994 (failure to comply with interim possession order);
- (ca) of arresting, in pursuance of section 21(1A) of the Children and Young Persons Act 1969, and child or young person who has been remanded or committed to local authority accommodation under section 21(1) of that Act;
- (cb) of recapturing any person who is, or is deemed for any purpose to be, unlawfully at large while liable to be detained -

- (i) in a prison, remand centre, young offender institution or secure training centre, or
- (ii) in pursuance of section 92 of the Powers of Criminal Courts (Sentencing) Act 2000 (dealing with children and young persons guilty of grave crimes), in any other place of recapturing any person whatever who is unlawfully at large and whom he is pursuing, or
- (d) of saving life or limb or preventing serious damage to property
- (e)

#### Section 18(1) (Entry and search after arrest)

Subject to the following provisions of this section, a constable may enter and search any premises occupied or controlled by a person who is under arrest for an arrestable offence, if he has reasonable grounds for suspecting that there is on the premises evidence, other than items subject to legal privilege, that relates-

- (a) to that offence, or
- (b) to some other arrestable offence which is connected with or similar to that offence

Except as provided by Section 18(5), no search may take place under this section unless an officer of the rank of inspector or above has given written authority. Unless wholly impractical the written authority will be recorded on this notice. Where it is recorded elsewhere information as to where it is recorded will be shown on this notice.

#### Section 18(5) (Entry and search after arrest - Inspector's written authority NOT required)

A constable may conduct a search without obtaining the written authority of an Inspector or above where the arrested person has not been taken to a police station and the arrested person's presence is necessary elsewhere for the effective investigation of the offence.

#### Section 32 (Search upon Arrest)

Where a person has been arrested at a place other than a police station a constable shall have the power to enter and search any premises in which he was when arrested or immediately before he was arrested for evidence relating to that offence for which he has been arrested.

#### REASONABLE FORCE

In the exercise of a power to search, police may use reasonable force to enter the premises and carry out the search.

#### WITH CONSENT

A constable may enter and search any premises with the written consent of a person entitled to grant entry to the premises. Where practicable the written consent will be recorded on this notice (Codes of Practice, Code B, Para 5.1).

- Consent to a search must, if practicable, be given in writing on the front of this notice.
- Consent must not be obtained under duress.
- Where consent is withdrawn before a search is completed, the search must stop.
- If you reside in a lodging house or similar accommodation your landlord can consent to your room or rooms being searched if you are unavailable at the time and the matter is urgent.
- Premises may be searched only to the extent necessary to achieve the object of the search having regard to the size and nature of whatever is sought.

(continued overleaf)

### RESTRICTED

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## RESTRICTED

### Power to seize property

A search under warrant may not continue under the authority of that warrant once all things specified in it have been found, or the officer in charge of the search is satisfied that they are not on the premises.

The search must be conducted with due consideration for the property and privacy of the occupier of the premises and with no more disturbance than necessary.

Reasonable force may be used to search premises in certain circumstances. You may ask a friend, neighbour, or other person to witness the search, but if the officer in charge has reasonable grounds to believe this would seriously hinder the investigation, you will not be allowed this facility.

The search need not be unreasonably delayed for this purpose.

If the premises have been entered by force, the officer in charge shall ensure that you or your agent are present to secure the premises, or that they are secured by any other appropriate means.

Any officer searching premises may seize anything: (a) covered by a warrant and (b) anything which he has reasonable grounds to believe is evidence of an offence or has been obtained in consequence of the commission of an offence, items under (b) may only be seized where this is necessary to prevent their concealment, alteration, loss, damage or destruction.

Items may not be seized which are subject to legal privilege.

An officer who for any reason does not seize any items (the reasonably believes have been obtained in consequence of the commission of an offence by some person) will inform you of his suspicions, and if you dispose of the property you may be liable to civil or criminal proceedings.

An officer may photograph or copy, or have photographed or copied, any document or other article which he has power to seize.

Where an officer considers that a computer may contain information of evidential value, he may require that information to be produced in a form that can be taken away and in which it is visible and legible.

Items seized may be retained for as long as is necessary in the circumstances including:

(i) For use as evidence at a trial for an offence.

(ii) For forensic examination or for other investigations in connection with an offence.

(iii) To establish the lawful owner.

Property shall not be retained as at (i) or (ii) above if a photograph or copy would suffice for the purpose.

You must be provided with a list or description of retained property if you so request within a reasonable time.

You or your representative may, at your own expense, be allowed supervised access to seized property to examine it, or have it photographed or copied or be provided with a photograph or copy within a reasonable time following a request.

You may apply to a Magistrates Court under The Police (Property) Act 1897 for possession of any seized articles.

You may be able to seek compensation in certain cases if damage is caused whilst entering or searching your premises, and any application for compensation should be directed to:-

**THE CHIEF CONSTABLE, SOUTH YORKSHIRE POLICE**  
**SNIG HILL, SHEFFIELD S3 8LY**

A copy of the Codes of Practice in relation to The Police and Criminal Evidence Act 1984 is available at any police station and you can consult them free of charge at any reasonable time in relation to any of the above provisions.

### Rights of Owner / Occupier of the Property

#### GENERAL

A friend, neighbour or other person must be allowed occupier wishes unless the officer in charge of the investigation or endanger officers or other people, reasonable grounds to believe this would seriously hinder the investigation, you will not be allowed this facility.

If any of your property is kept by the police you are provided with a list or description of the property with applications may be made either at the police station notice or to the address shown below (Codes of Practice)

If you wish you or your representative will be allowed property so that you can examine it or have it photographed or copied. In you may be provided with a photograph or copy. In for the case. Access will not be allowed if the officer believes that this would:

- (a) prejudice the investigation of any offence lead to the commission of an offence by material such as pornography, (Codes of Practice, Code B, Para 7.17)
- (b)

#### Search with Consent

Consent to a search must, if practicable, be given in notice. Where consent is withdrawn before the search stop (Codes of Practice, Code B, Para's 5.1 & 5.3).

#### SEARCH WITH WARRANT

A copy of the search must, if practicable, be given in notice. Where consent is withdrawn before the search stop (Codes of Practice, Code B, Para's 5.1 & 5.3).

#### SEARCH WITH WARRANT

A copy of the search warrant should, if practicable, be the search begins.

#### COMPENSATION FOR DAMAGE

Compensation may be payable in appropriate cases if and searching premises. An application for compensation should be directed to:-

**THE CHIEF CONSTABLE, SOUTH YORKSHIRE POLICE**  
**CRIMINAL EVIDENCE ACT 1984 ARE AVAILABLE AT ANY POLICE STATION.**

SN - 778.9/4/22



# SmartINTERACTION Customer Interaction App

Powered by IHL Tech

# SmartINTERACTION User Guide



## IHL Hub Home Page

- Select SmartINCIDENT Icon on the IHL Hub Menu



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# SmartINTERACTION User Guide



## Add New Incident

- Click the add New Incident button

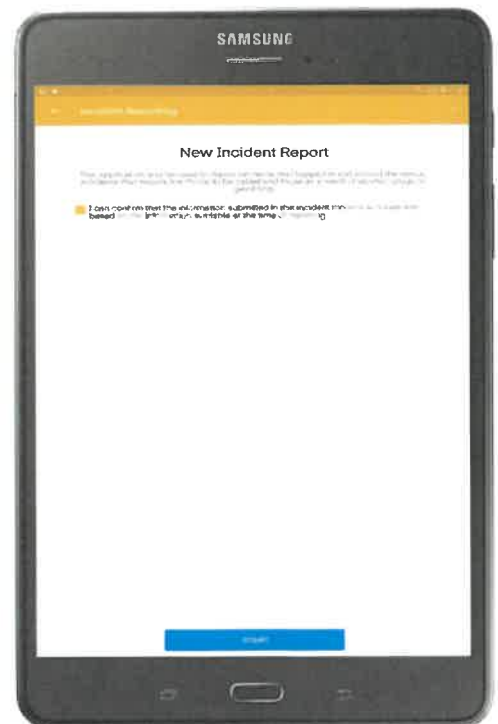


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## New Incident - Disclaimer

1. Read the disclaimer shown on screen
2. Tick to confirm you accept the disclaimer
3. Click START



# SmartINTERACTION User Guide



## New Incident – Details

1. Enter the Incident Date
2. Enter the Incident Time
3. Select the Incident Type
4. Incident Description
5. Click Yes or No to the Customer(s) known to venue question
6. Click NEXT

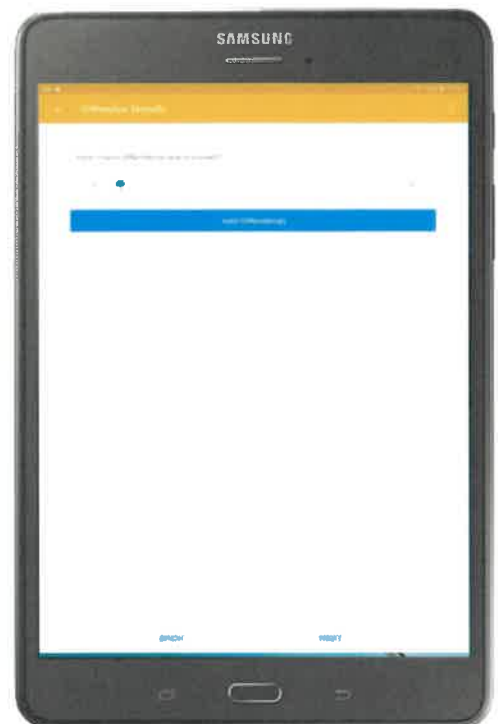


# SmartINTERACTION User Guide



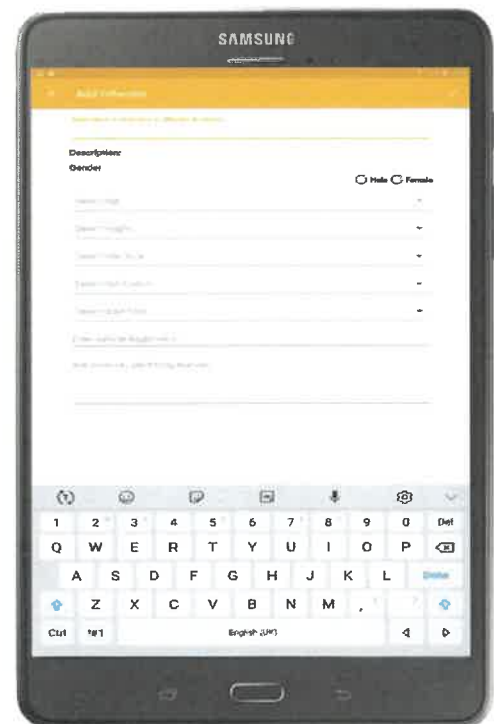
## Offender Details-

- Slide the bar across to the number of offenders that were involved in the Incident,
- Click Add Offender(s) button.



## Offender Details Cont-

- Enter details about the offender(s) including:
- Name or Nickname (if Known)
- Gender
- Age
- Height
- Hair Style
- Hair Colour
- Build Type
- Vehicle Registration if applicable
- Any other key identifying features
- Then select the tick in right hand corner to add



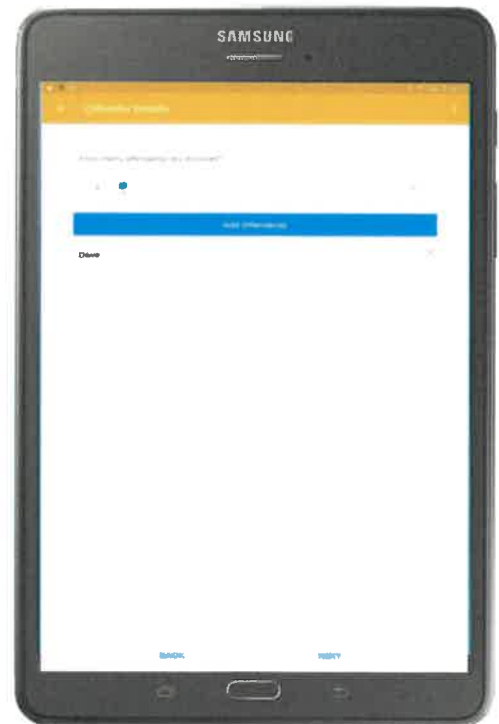


# SmartINTERACTION User Guide



Details of offender(s) added will be displayed on the screen. You can view and edit these by clicking on the name.

Click next



# SmartINTERACTION User Guide



## Incident Details-

This section will ask a series of Yes and No questions regarding the incident, select your answer and then click the next button.

NB-Some questions may ask for more details



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# SmartINTERACTION User Guide



## Incident Details Continued-

Select Yes or No answers – Some answers may require more details,  
Fill in all details to the best of your knowledge  
And click Next



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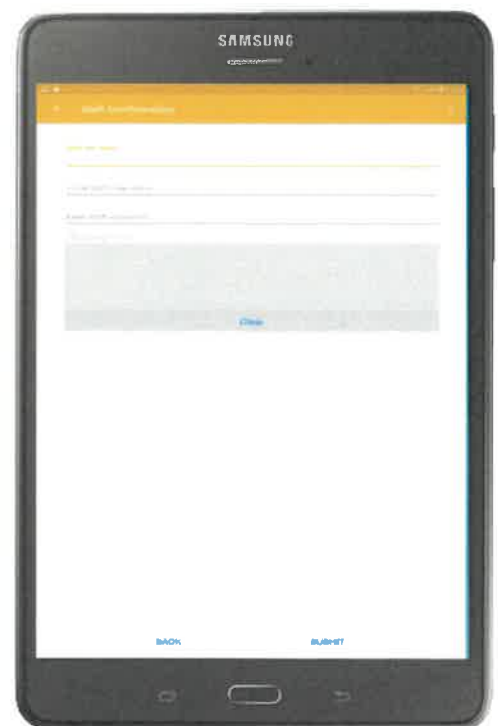
# SmartINTERACTION User Guide



## Staff Confirmation-

- Enter your name
- Username for tablet
- Password for tablet
- Sign

Click Next



# SmartINTERACTION User Guide



To View Incidents-

Click the View Incidents Button



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# SmartINERACTION User Guide

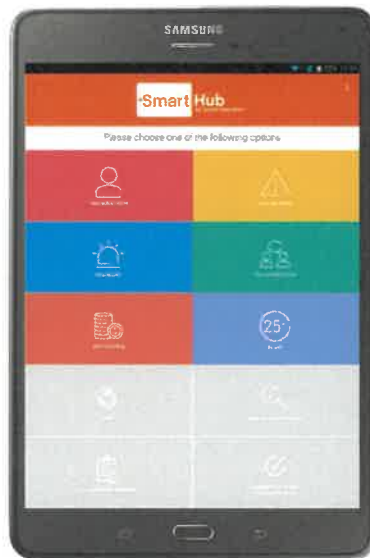


## Viewing Incidents-

Select Incident from the list, this will then let you view all details relating to the incident.

Here you can edit/ add any details to the existing incident buy click on the pencil in the right hand corner





# SmartINERACTION Userguide 1.1

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# SmartINTERACTION Customer Interaction App

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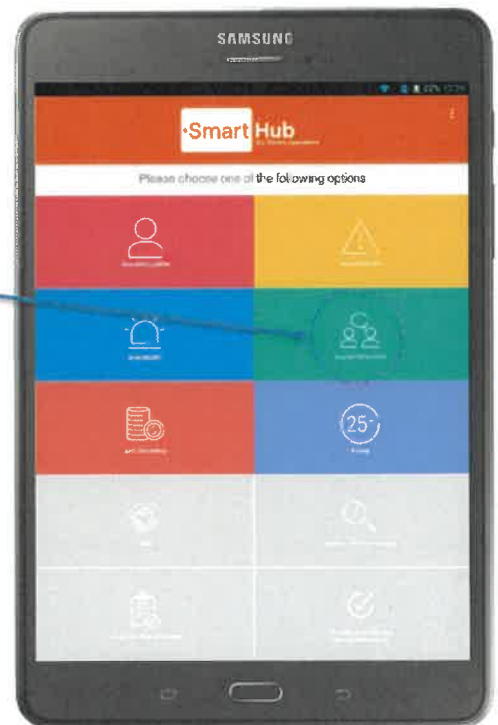
# SmartINTERACTION User Guide



## SmarthUB Home Page

### Step 1

- Select SmartINTERACTION Icon on the IHL Hub Menu




# SmartINTERACTION User Guide



## SmartINTERACTION Menu

Choose one of the following options

- **View Interactions**
  - This allows you to view list of previously submitted interactions
- **New Interactions**
  - This allow you to enter the details of a new interactions
- **Information**
  - Clicking the  symbol will present guidance on interactions, click OK to dismiss



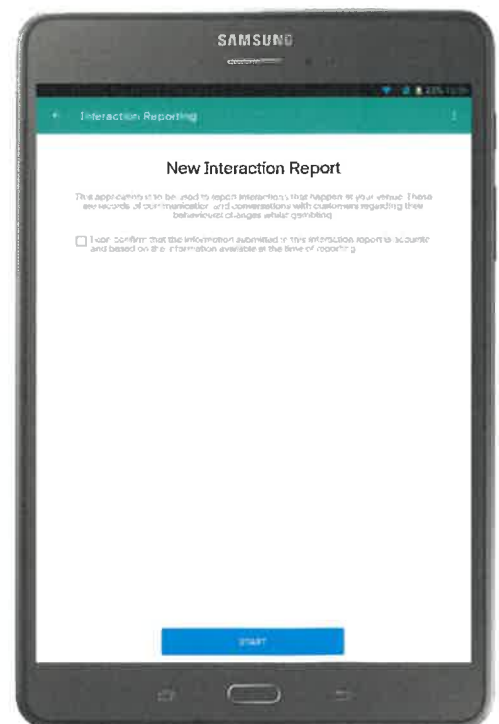
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# SmartINTERACTION User Guide



## New Interaction - Disclaimer

- Read the disclaimer shown on screen
- Tick to confirm you accept the disclaimer
- Click START



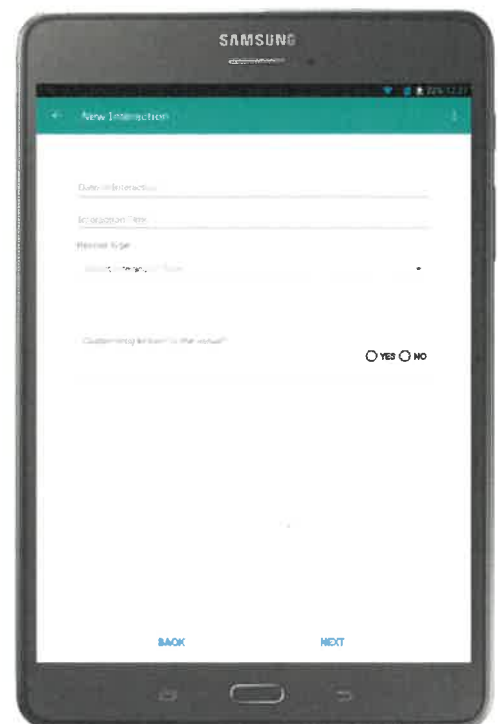
Powered by IHL Tech

# SmartINTERACTION User Guide



## New Interaction – Details

- Enter the Interaction Date
- Enter the Interaction Time
- Select the Interaction Type
- Confirm if customer known to venue
- Click NEXT



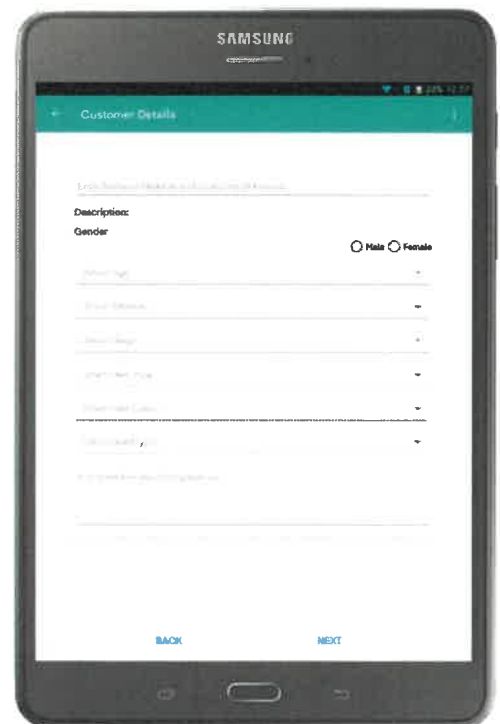
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# SmartINTERACTION User Guide



## New Interaction – Details (Optional)

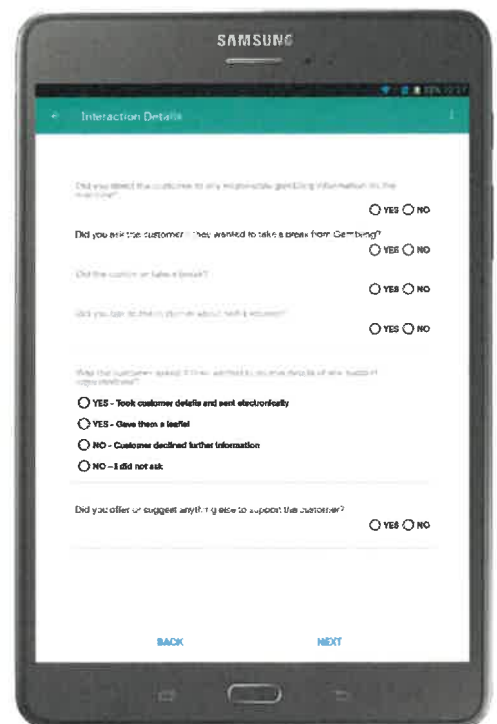
- Enter Customer's Name (if known)
- Enter Customer Details
  - Gender
  - Age
  - Ethnicity
  - Height
  - Hair Style
  - Hair Colour
  - Build Type
  - Any identifying features
- Click NEXT





## New Interaction – Details (cont)

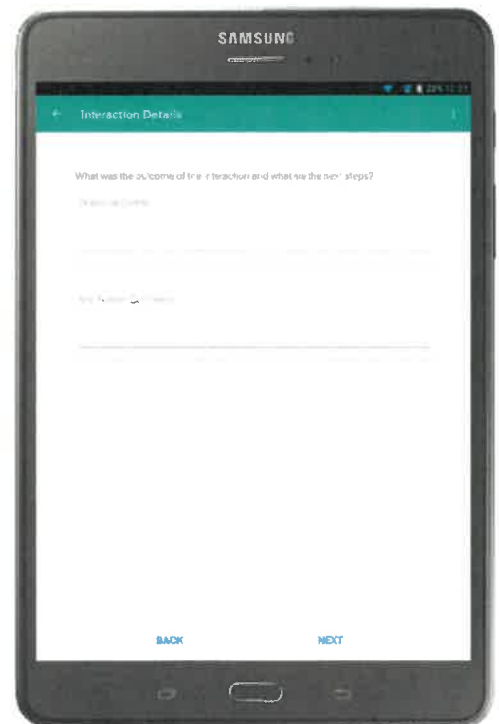
- Complete the interaction questions displayed on the device
  - Did you direct the customer to any responsible gambling information on the machine?
  - Did you ask the customer if they wanted to take a break from gambling?
  - Did the customer take a break?
  - Did you talk to the customer about Self-Exclusion?
  - Was the customer asked if they wanted to receive details of any support organisations?
  - Did you offer or suggest anything else to support the customer?
- Click NEXT





## New Interaction – Details (cont)

- Enter details of the outcome of the interaction and next steps?
- Add any further comments
- Click NEXT



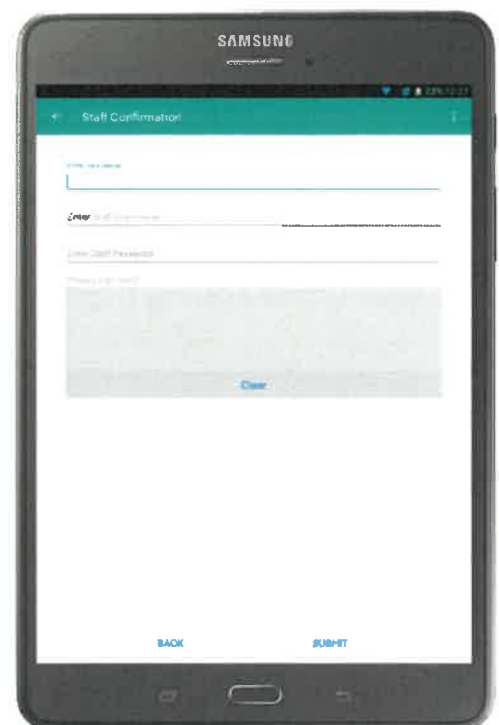
# SmartINTERACTION User Guide



## New Interaction – Submit Interaction

- Enter Your Name
- Enter Staff User Name
- Enter Staff Password
- Click SUBMIT

You will now return to the Interaction Main Menu





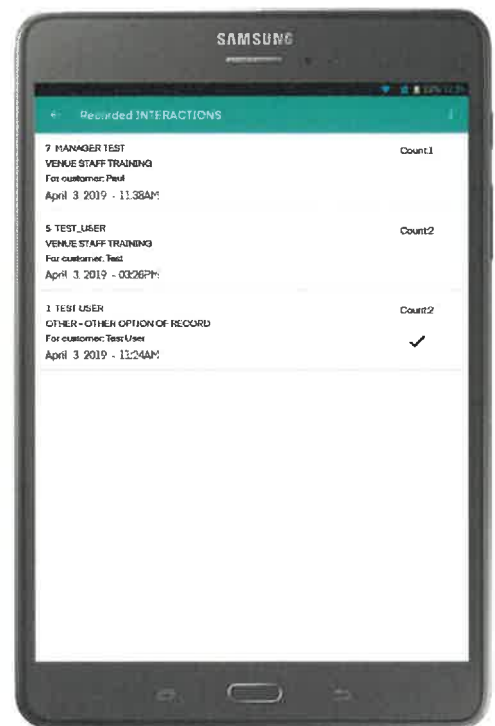
# SmartINTERACTION User Guide



## Recorded Interactions

You will now see a list of recorded interactions

- Clicking on an interaction will open the interaction details
- Clicking Back will return you to the Interaction main menu



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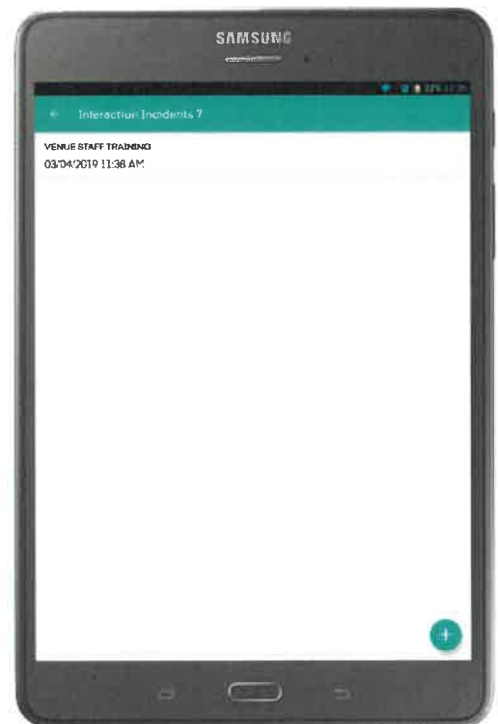
# SmartINTERACTION User Guide



## Interaction Details

You will now see a list of recorded interactions relating to the selected interaction

- You can add further interactions here by clicking the + symbol
- Clicking on an interaction detail will open further interaction details
- Clicking Back x 2 will return you to the Interaction main menu



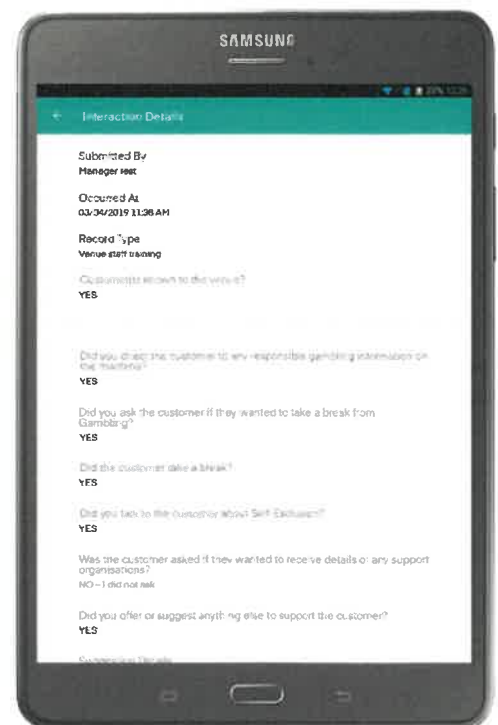
# SmartINTERACTION User Guide



## Interaction Details

You will now see the details relating to the interaction

- Clicking Back x 3 will return you to the Interaction main menu



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# SmartINTERACTION Customer Interaction App

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Re: Family Leisure Holdings Limited

Application for new 'adult gaming centre' premises licence, ref: 22/00920/LIGN

'Game Nation', 147-149, Wardour St, W1D 4JG

Submission on behalf of various objectors

## 1 Introduction

- 1.1 This submission is made on behalf of a number of objectors to this application, namely the [REDACTED]. I have been asked to represent the above at the hearing of this application, due to take place on Thursday 21 April 2022.
- 1.2 [REDACTED] have made time in their schedules to attend the hearing. [REDACTED] will be attending on behalf of the [REDACTED] and in his personal capacity as a local resident.
- 1.3 This submission is intended to assist the Licensing Sub-Committee and the parties by summarising why these objectors believe that the application should be refused and why, in particular, it is not i) 'reasonably consistent' with the licensing objectives set out under s1 Gambling Act 2005 ("GA05"); and ii) that the application is not in accordance with the Statement of Licensing Principles for Gambling ("SoLPG") published by the licensing authority under s349 GA05.

## 2 Background

- 2.1 The [REDACTED] is the recognised amenity group for Soho. It is a charitable company limited by guarantee, established in 1972 to make Soho a better place to live, work or visit by preserving and enhancing the area's existing diversity of character and uses, and by improving its facilities, amenities and environment.
- 2.2 The others named above are either local residents, local business owners, or both, and active in community matters in Soho. [REDACTED] is the Chair of the Safer Neighbourhoods Ward Panel. [REDACTED] is Chair of the [REDACTED].
- 2.3 In addition to the [REDACTED] we understand that there are 'relevant representations' from 7 other interested parties. Although the representations received by the City Council have been redacted and so we are unaware of the precise details of other objectors, it seems clear that the representations taken as a whole constitute a robust objection to an AGC in this location from a cross-section of the local community.
- 2.4 The [REDACTED] is extremely active in licensing matters in Soho, seeking to maintain the often delicate balance between legitimate commercial interests and the interests of the approximately 2600 residents who live in Soho.

- 2.5 The premises is located in the West End 'cumulative impact zone' ("CIZ") for the purposes of LA03. The current 'cumulative impact assessment' ("CIA") published alongside a revised Statement of Licensing Policy. The CIA includes a very detailed assessment over a long period of time of various incidents including crime and disorder and anti-social behaviour in the West End in general and in Soho in particular.
- 2.6 The evidence which underpins the CIA demonstrates the challenges inherent in managing the night-time economy in Soho. There are a large number of premises licensed under LA03 in close proximity to the applicant premises.

### 3 The application

- 3.1 The application is for an 'adult gaming centre' ("AGC") premises licence under s150(1)(c) GA05, i.e. 'making Category B gaming machines available for use (an "adult gaming centre premises licence")'. It is believed that an unlicensed 'Family Entertainment Centre' ("FEC") would also operate within the overall premises footprint.
- 3.2 The location of the premises in Wardour Street is described in the representation from the Metropolitan Police as having 'a significantly higher than average amount of crime and anti-social behaviour, associated with the night-time economy. This is a direct result of premises in the area that are licensed under the LA03 Act as well as premises licensed under the Gambling Act. It is the belief of the MPS that if this application were to be granted, the premises would attract a level of crime and anti-social behaviour to the area.'
- 3.3 The proposed operating hours are 9am to 3am, 7 days a week. The application is accompanied by a Local Area Gambling Risk Assessment (LAGRA). The Soho Society has identified a number of important omissions from the LAGRA (see below).
- 3.4 The premises is currently licensed under LA03 for licensable activities within 'core hours', subject to the full 'restaurant' condition, and so as far as we are aware has no GA05 'footprint'. It is therefore introducing a brand new gambling use into this part of Wardour Street.
- 3.5 We are aware that the applicant has the benefit of an AGC premises licence at 89-91 Wardour Street, and also operates an unlicensed FEC within the overall premises footprint. It is believed that the applicant intends to surrender the AGC licence for 89-91 Wardour Street, and in effect move the operation to 147-149 Wardour Street.

### 4 Summary of reasons for objection

- 4.1 The starting point in GA05 for a licensing authority in exercising their functions in respect of premises licence applications is s153, which provides that:

- (1) 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)).*

- 4.2 s153 GA05 has been the subject of a great deal of debate as to the meaning and implications of the 'aim to permit'. Para 5.20 of the Guidance issued by the Gambling Commission under s25 GA05 states that *'Whilst there is a presumption in favour of permitting the relevant premises to be used for gambling, the licensing authority may not do so unless satisfied that such use would be in accordance with this Guidance, any relevant Commission code of practice, its own statement of policy, and the licensing objectives.'*
- 4.3 Para 1.4 of the SolPG states that: *'The aim to permit principle provides wide scope for the authority to impose conditions on a premises licence, reject, review or revoke premises licences where there is a potential conflict with the relevant codes of practice, relevant Commissions Guidance and this Statement of Licensing Principles.'*
- 4.4 It is expected that the applicant will rely on the existence of the current AGC licence at 89-91 Wardour Street. It is submitted that this not a 'like-for-like' swap and should not be seen as such by the Licensing Sub-Committee. This is largely due to the different nature of Wardour Street as one moves north when compared to the confluence of Wardour Street, Brewer Street and Old Compton Street where the current premises is located.
- 4.5 An AGC premises licence is required in order to permit 'category B' gaming machines to be provided on the premises. Those whom I represent are concerned that the provision of machines will impact on the vulnerable and the young.
- 4.6 An AGC will also attract customers to this part of Wardour Street late at night (after, say, 11pm) and that this will have an adverse impact because of the increased residential and decreased late night entertainment uses in this part of Wardour Street.

#### The LAGRA

- 4.7 A LAGRA is an important document as it sets out the risks that an applicant has identified specific to the area in which the premises is located, and the measures it will put in place to address them. It is therefore vital to assessing whether an application is 'reasonably consistent' with the licensing objectives, and whether it is in accordance with the SolPG.
- 4.8 The interested parties are not persuaded that the LAGRA i) identifies all the risks; and/or ii) assesses the identified risks comprehensively; and/or iii) adequately mitigates the risks. For instance:
- 4.8.1 The Local Area Profile (p5) states that the premises is situated *'in an area predominantly in use by restaurants, bars, cafes and takeaway food outlets'*. It does

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not reference the residential accommodation in the vicinity. This is set out in the Soho Society's representation. There are 22 flats in Clarion House and a further 16 flats in Wardour House at 106-112 Wardour Street, which is situated between the applicant's current and proposed premises. There are residents on Broadwick Street and Duck Lane.

- 4.8.2 The LAGRA acknowledges (p7), as it must, that *'there are a considerable range of premises in the surrounding area that we are aware of and may heighten the risk to some vulnerable groups of people.'* However it fails to identify all of these premises.
- 4.8.3 The LAGRA fails to identify (p14) a number of residents' associations in the vicinity, including Meard and Dean Street Residents Association and indeed the Soho Society itself, despite the latter being the recognised amenity society for Soho.
- 4.8.4 The LAGRA acknowledges (p14), as it must, *'the risk posed from gambling related harm in this area is higher than normal because of the high index of deprivation which is normally accompanied by higher than usual rates of alcohol and drug abuse, crime, and mental illness. There is also a known risk of homelessness in some parts of Soho and the subsequent vulnerability in some people that goes with this.'*
- 4.8.5 The LAGRA does identify a number of premises and services which cater for these sections of the community. However this list is unfortunately not comprehensive. The existence of a dedicated medical centre for homeless people on Frith Street is evidence of the scale of the homelessness problem in the area. Although the Centrepoin premises on Dean Street is identified, the Centrepoin service on Berwick Street which provides short stay direct access accommodation to homeless young adults is not.
- 4.8.6 The number of gaming machines is not stated. The premises will provide category B3 gaming machines. These have the same stakes and prizes as the much-criticised B2 gaming machines (also known as FOBT's). The provision, location and numbers of these machines are important factors in judging risk to vulnerable persons and assessing whether this risk has been mitigated.
- 4.8.7 The site is within the City Council's proposed Gambling Vulnerability Zone ("GVZ").
- 4.9 In particular, the location of this site near to many late night licensed premises combined with the proposed opening hours means that customers will inevitably be attracted north up Wardour Street past residents. Not only will this result in noise, but a proportion of these individuals will inevitably be intoxicated.
- 4.10 The Soho Society identifies 3 distinct 'phases' of activity throughout a 24 hour period. Each phase involves persons who are considered to be vulnerable under the definition of vulnerability accepted by the applicant in the LAGRA. This highlights the unique circumstances of Soho. Those who are vulnerable due to homelessness, mental health
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issues, intoxication through alcohol or drugs etc are present *throughout the day and night, every day and night*.

- 4.11 Added into this mix is the many thousands of people enjoying the largest concentration of licensed premises – and particularly late-night licensed premises – anywhere in the UK. According to Soho Society research, there are 109 premises licences in Soho which permit a terminal hour up to 3.30am.
- 4.12 This concentration is why Soho was the UK's first 'special policy area' for the purposes of alcohol licensing. A key part of these policies – and therefore of the City Council's holistic approach to managing the late-night economy - is that people are not retained in the area late at night (particularly after 'core hours').
- 4.13 Is the application 'reasonably consistent with the licensing objectives (subject to paragraphs (a) and (b))'?
- 4.13.1 The interested parties believe that the application raises issues under the following licensing objectives, for the reasons set out: *'preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime' and 'protecting children and other vulnerable persons from being harmed or exploited by gambling.'*
- 4.13.2 It is a concern that category B3 gaming machines will be made available for use as these are believed to carry increased risk factors for vulnerable persons.
- 4.13.3 We append the most recent crime statistics provided to the Ward Panel. This shows the challenging environment in which the premises would operate.
- 4.14 Is the application 'in accordance with the statement published by the authority under section 349 (subject to paragraphs (a) to (c))'?
- 4.15 Policy LOC1 of the SolPG states that *'a sensitive location is defined as any premises which is within close proximity or on a main route to a school, educational institution, hostel or other sensitive locations where there is the potential for exposing children, young people or other vulnerable persons to gambling'*. (our emphasis).
- 4.16 Para 15.1 states that *'The council will pay particular attention to the suitability of a location for gambling activity in terms of the objective of the protection of children and vulnerable persons from being harmed or exploited by gambling, and the effect of crime and /or disorder on residents and on those working in and visiting the area.'* (our emphasis).
- 4.17 Para 11.1.1 states *'Where an area is known for high levels of crime the council will consider carefully whether gambling premises are suitable to be located there, and whether additional conditions may be necessary, such as the provision of CCTV, minimum levels of staffing and licensed door supervisors, etc.'* (our emphasis).

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4.17.1 We note that conditions have been proposed regarding staffing (that there is no requirement for more than 1 member of staff to be working at any one time, and that member of staff may have only have 6 months experience) but these are not considered sufficient to manage the risks.

4.18 Under OBJ3 (related to the 'protection of children and other vulnerable persons' licensing objective), para 13.1 states '*Whether there are appropriate measures in place to protect children and other vulnerable persons from being harmed or exploited by gambling.*'

4.19 Para 13.2 states that (our emphasis) '*The location of the premises may be a significant factor if for example the premises are located near a school, hostel or other sensitive premises.*'

## 5 Conclusion

5.1 In all the circumstances, my clients ask that the application is refused.

5.2 If Members do not feel that the application should be refused entirely, they ask that the opening hours are curtailed to no later than midnight.

5.2.1 The City Council has recently consulted on revisions to its SoLPG. The proposed new policies include a bespoke policy for AGCs, and the introduction of 'Gambling Vulnerability Zones'. The proposed policy for AGCs proposes opening hours with a terminal hour of midnight.

5.2.2 Appendix 4 of the SoLPG sets out the 'Pleasure Fairs (Amusement Premises) Byelaw'. s3(1) of the byelaw states that '*The manager shall not keep the amusement premises open between the hours of 12 midnight and 9am.*'

5.3 Thank you for taking the time to consider the content of this submission.

Richard Brown, Citizens Advice Westminster

11 April 2022

## Top Reported Crimes

| Nov – Feb 22                                      |     | Previous Nov – Feb (Without Covid)                |     |
|---|-----|---|-----|
| Theft and Handling - Other Theft                  | 721 | Theft and Handling - Other Theft                  | 807 |
| Theft and Handling - Other Theft Person           | 550 | Theft and Handling - Other Theft Person           | 565 |
| Robbery - Personal Property                       | 129 | Robbery - Personal Property                       | 171 |
| Drugs - Possession Of Drugs                       | 115 | Burglary - Burglary In Other Buildings            | 83  |
| Violence Against the Person - Common Assault      | 70  | Theft and Handling - Theft From Shops             | 75  |
| Violence Against the Person - Assault with Injury | 59  | Drugs - Possession Of Drugs                       | 64  |
| Theft and Handling - Theft From Shops             | 51  | Violence Against the Person - Common Assault      | 59  |
| Violence Against the Person - Harassment          | 42  | Violence Against the Person - Harassment          | 54  |
| Sexual Offences - Other Sexual                    | 34  | Violence Against the Person - Assault with Injury | 45  |
| Violence Against the Person - Serious Wounding    | 32  | Theft and Handling - Theft From M/V               | 27  |
| Burglary - Burglary in Other Buildings            | 30  | Theft and Handling - Theft/Taking of Pedal Cycles | 25  |
| Violence Against the Person - Other Violence      | 27  | Criminal Damage - Other Criminal Damage           | 22  |
| Theft and Handling - Theft/Taking of Pedal Cycles | 19  | Sexual Offences - Other Sexual                    | 20  |
| Theft and Handling - Theft From M/V               | 17  | Violence Against the Person - Serious Wounding    | 18  |
| Criminal Damage - Other Criminal Damage           | 15  | Criminal Damage - Criminal Damage To Other Bldg   | 12  |
| Other Notifiable Offences - Other Notifiable      | 11  | Other Notifiable Offences - Other Notifiable      | 11  |
| Criminal Damage - Criminal Damage To M/V          | 11  | Burglary - Burglary - Residential                 | 10  |

## Top Streets all crime – 1<sup>st</sup> Nov 21 – 28<sup>th</sup> Feb 22

|                           |     |                       |    |
|---------------------------|-----|-----------------------|----|
| GREEK STREET              | 239 | GOLDEN SQUARE         | 14 |
| OLD COMPTON STREET        | 231 | ARCHER STREET         | 14 |
| WARDOUR STREET            | 138 | GREAT FULTENEY STREET | 14 |
| SHAFTESBURY AVENUE        | 117 | GLASSHOUSE STREET     | 13 |
| DEAN STREET               | 105 | SOHO STREET           | 13 |
| CARNABY STREET            | 99  | LEXINGTON STREET      | 13 |
| GREAT MARLBOROUGH STREET  | 75  | GOSLETT YARD          | 12 |
| FRITH STREET              | 70  | SOHO PLACE            | 12 |
| SOHO SQUARE               | 60  | NEWBURGH STREET       | 11 |
| BREWSTER STREET           | 58  | PETER STREET          | 11 |
| BATEMAN STREET            | 44  | GARJISLE STREET       | 10 |
| GREAT WINDMILL STREET     | 45  | ROMILLY STREET        | 9  |
| KINGLY STREET             | 41  | KINGLY COURT          | 9  |
| BROADWICK STREET          | 37  | CAMBRIDGE CIRCUS      | 9  |
| CHARING CROSS ROAD        | 36  | D'ARBLAY STREET       | 8  |
| BORWICK STREET            | 35  | MARSHALL STREET       | 8  |
| GANTON STREET             | 32  | HAM YARD              | 7  |
| BEAK STREET               | 29  | RAMILLES STREET       | 7  |
| POLAND STREET             | 24  | DUPOURS PLACE         | 6  |
| MANETTE STREET            | 24  | WALKER'S COURT        | 6  |
| MOOR STREET               | 23  | MEARD STREET          | 6  |
| RUPERT STREET             | 18  | WARWICK STREET        | 5  |
| LITTLE MARLBOROUGH STREET | 17  | FOURBERT'S PLACE      | 5  |
| INGESTRE PLACE            | 15  | NDEL STREET           | 5  |

**Premises History****Appendix 5****Gambling Act 2005 History**

| <b>Licence Number</b> | <b>Application Type</b>                                 | <b>Date Determined</b> | <b>Decision</b>                      |
|-----------------------|---|------------------------|--------------------------------------|
| 22/02337/LIGPUN       | Gambling Permit –<br>New Family<br>Entertainment Centre | 1 March 2022           | Granted under<br>Delegated Authority |

**Licensing Act 2003 History**

| <b>Licence Number</b> | <b>Application Type</b>   | <b>Date Determined</b> | <b>Decision</b>                       |
|-----------------------|---|------------------------|---------------------------------------|
| 18/10597/LIPN         | Application for a New<br>Premises Licence   | 8 November 2018        | Granted by Licensing<br>Sub-Committee |
| 19/07324/LIPT         | Premises Licence –<br>Transfer of Licence<br>Holder from Thor 147-<br>155 Wardour St Sarl<br>to A.m.a. Hospitality<br>Limited | 10 July 2019           | Granted under<br>Delegated Authority  |

There is no appeal history for the premises.

**CONDITIONS CONSISTENT WITH THE OPERATING SCHEDULE AND CONDITIONS PROPOSED BY A PARTY TO THE HEARING**

When determining an application for a new premises licence under the provisions of the Gambling Act 2005, the licensing authority must, unless it decides to reject the application, grant the licence subject to the conditions which are indicated as mandatory in this schedule.

At a hearing the licensing authority may, in addition, and having regard to any representations received, grant the licence subject to such conditions which are consistent with the operating schedule submitted by the applicant as part of their application, or alter or omit these conditions, or add any new condition to such extent as the licensing authority considers necessary for the promotion of the licensing objectives.

This schedule lists those conditions which are consistent with the operating schedule, or proposed as necessary for the promotion of the licensing objectives by a responsible authority or an interested party as indicated. These conditions have not been submitted by the licensing service but reflect the positions of the applicant, responsible authority or interested party and have not necessarily been agreed

**Mandatory Conditions**

1. A notice must be displayed at all entrances to AGCs stating that no person under the age of 18 years will be admitted to the premises.
2. There can be no direct access between an AGC and any other premises licensed under the Act or premises with a family entertainment centre (FEC), club gaming, club machine or alcohol licensed premises gaming machine permit. (England and Wales only). There is no definition of 'direct access' in the Act or regulations, although licensing authorities may consider that there should be an area separating the premises concerned, such as a street or cafe, which the public go to for purposes other than gambling, for there to be no direct access.
3. Any ATM made available for use on the premises shall be located in a place that requires any customer who wishes to use it to cease gambling at any gaming machine in order to do so.
4. The consumption of alcohol in AGCs is prohibited at any time during which facilities for gambling are being provided on the premises. Additionally in Scotland the sale of alcohol on the premises is specifically prohibited. A notice stating this should be displayed in a prominent place at every entrance to the premises.

**Conditions consistent with the operating schedule**

5. The licensee will liaise with any residents who would like to be contacted quarterly to discuss the operation of the AGC and any issues.
6. The applicant will provide a direct contact number to any residents who request the number. A direct telephone number for the manager at the premises shall be publicly available at all times the premises is open. This telephone number is to be made available to residents and businesses in the vicinity.

7. The premises shall install and maintain a comprehensive CCTV system as per the minimum requirements of the Westminster Police Licensing Team.
  - (a) All entry and exit points will be covered enabling frontal identification of every person entering in any light condition. The CCTV system will have night colour vision for improved resolution & recording capability.
  - (b) The CCTV system shall continually record whilst the premises is open for licensable activities and during all times when customers remain on the premises and will include the gaming area, office, toilet entrance, any seating and external area immediately outside the premises entrance.
  - (c) All recordings shall be stored for a minimum period of 31 days with date and time stamping.
  - (d) Viewing of recordings shall be made available immediately upon the request of Police or authorised officer throughout the entire 31-day period.
8. 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 is open. This staff member must be able to provide a Police or authorised council officer copies of recent CCTV images or data with the absolute minimum of delay when requested.
9. The premises shall display notices near the entrance of the venue stating that CCTV is in operation.
10. A 'spotter monitor' shall be placed inside the premises near the front door showing CCTV images of customers entering ,exiting and whilst on the premises.
11. The Licensee shall maintain a bound and paginated 'Challenge 25 Refusals' register at the premises. The register shall be produced to the police or licensing authority forthwith on request.
12. Prominent signage and notices advertising the Challenge 25 will be displayed showing the operation of such policy.
13. Third party testing on age restricted sales systems purchasing shall take at least twice a year and the results shall be provided to the Licensing Authority upon request.
14. A Challenge 25 proof of age scheme shall be operated at the premises where the only acceptable forms of identification are recognised photographic identification cards, such as a driving licence, passport or proof of age card with the PASS Hologram.
15. A member of the management team will receive training on Child Protection issues and will be the nominated ' Child Protection' manager and any suspicious activity or possible Child Protection issues will be reported to this person who will record the matter and take appropriate action.
16. A magnetic locking device, commonly referred to as a Maglock will be installed and maintained on the main entrance/exit to the premises which will be operable by staff.
17. Staff will receive a notification when the front door opens.
18. Between 6pm and 3am there will be an SIA registered door person employed at the front door of the premises. The need for an SIA door person at other times will be risk assessed. They shall display their licence at all times in a yellow high visibility arm band.
19. There shall be 1 member of staff present at all times and the premises licence holder will risk assess when there is a need for 2 members or more of staff.

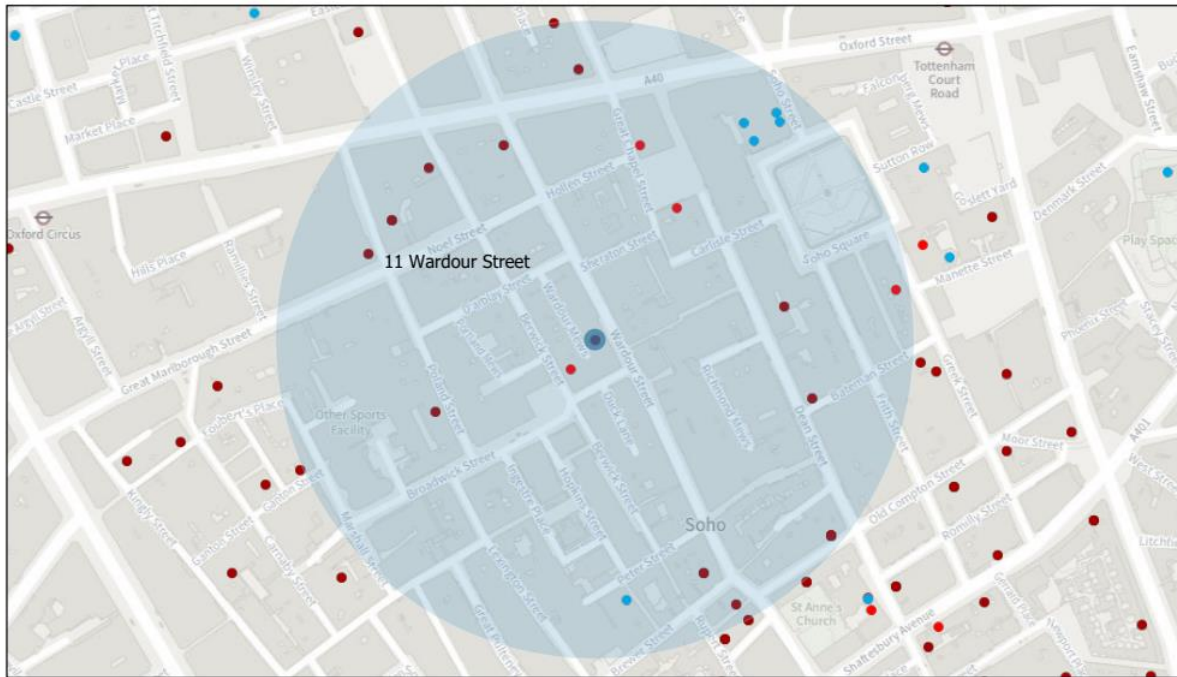
20. The Licensee shall implement a policy of banning any customers who engage in crime or disorder within or outside the premises.
21. The licensee will refuse entry to customers who appear to be under the influence of alcohol or drugs.
22. The licensee shall install and maintain an intruder alarm on the premises.
23. The premises shall install and maintain fixed panic buttons and in addition portable panic buttons will be worn by staff.
24. In addition to the panic button the premises will operate Staff Guard. Staff Guard is a 3rd party remote monitoring station, who can see venue CCTV & hear Audio. This enables the venue team to press the panic button and have immediate 3rd party support for all emergency service – Police, Fire, or Ambulance. The remote monitoring station has voice over control to provide audio instruction – IE Police services have been called and are on route.
25. The licensee will ensure that customer toilets are checked every hour for evidence of drug taking. Toilet checks are to be documented stating the time and member of staff who made the checks. Toilets will remain locked at all times with access being provided by staff.
26. Prominent GamCare documentation will be displayed at the premises and other notices promoting responsible gambling.
27. The licensee shall: provide training on the specific local risks to the licensing objectives that have been identified for these premises as part of the staff induction training programme. 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.
28. New and seasonal staff must attend induction training and receive refresher training every six months.
29. All training to be completed in venue by authorised Senior members of the operational team, subsequently supported via E – Learning modules. All Modules are time stamped with refresher training can be automated, and results verified.
30. Staff will also undergo drug and alcohol awareness training to include Homeless and Street Drinking.
31. 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.
32. The Licensee shall place a notice visible from the exterior of the premises stating that customers drinking alcohol outside the premises is not permitted and those who do so will be banned from the premises.
33. An incident log shall be kept for the premises and made available on request to an authorised officer of the City Council or the Police which will record the following;
  - a. All crimes reported to the venue;

- b. Any complaints received regarding crime and disorder;
- c. Any incidents of disorder;
- d. Any faults in the CCTV system; and
- e. Any visit by a relevant authority or emergency service.
- f. All ejections of patrons;
- g. All seizures of drugs or offensive weapons;

- 34. All Responsible Gambling posters and messaging will also be provided in Mandarin Chinese.
- 35. Any tea/coffee/drinks facilities will be provided for playing customers only.
- 36. At least one member of staff working at the premises shall have a minimum of 6 months experience working in a licensed Adult Gaming Centre.
- 37. All front of house staff will receive Conflict Management Training via the e learning module.
- 38. The licence holder shall ensure that all seating within the premises are either secured to the floor or are weighted to prevent lifting.

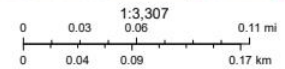


**147-149 Wardour Street**



03/04/2022, 00:05:44

- Live Gambling Act
- Primary
- Independent
- Schools
- Free School
- Nursery
- Others
- Special
- Secondary
- Academy



**Resident Count within a 75 metre radius of 147-149 Wardour Street = 70**

| <b>Licensed Gambling Premises within 250 metres of 147-149 Wardour Street</b> |                             |   |   |
|---|-----------------------------|---|---|
| <b>Licence Number</b>   | <b>Trading Name</b>         | <b>Address</b>  | <b>Application Type</b>                 |
| 22/02337/LIGPUN   | Not Recorded                | 147 - 149 Wardour Street London W1F 8WD                   | Gambling Permit - FEC New               |
| 09/08092/LIGPN  | Polka                       | 58 Poland Street London W1F 7NR                           | Gambling Permit - LPGM Notification     |
| 11/03876/LILN   | Soho Theatre Company        | First Floor To Second Floor 21 Dean Street London W1D 3NE | New Lotteries Registration              |
| 08/00100/LIGPN  | The Wardour                 | 201 - 203 Wardour Street London W1F 8ZH                   | Gambling Permit - LPGM Notification     |
| 09/04810/LIGPN  | The Crown & Two Chairmen    | 31-32 Dean Street London W1D 3SB                          | Gambling Permit - LPGM Notification     |
| 09/03962/LIGPN  | The Kings Arms Public House | 23 Poland Street London W1F 8QJ                           | Gambling Permit - LPGM Notification     |
| 15/11530/LIGPPV   | Not Recorded                | 23 Poland Street London W1F 8QJ                           | Licensed Premises Gaming Machine Permit |

|                 |                                |   |  |
|-----------------|--------------------------------|---|--|
| 11/00284/LIGPPC | Green Man                      | The Green Man 57<br>Berwick Street<br>London W1F 8SR                                    | Gambling Permit -<br>LPGMP Conversion      |
| 09/03959/LIGPN  | Coach & Horses<br>Public House | 1 Great Marlborough<br>Street London W1F<br>7HG   | Gambling Permit - LPGM<br>Notification     |
| 21/13102/LIGCH  | Las Vegas                      | 89 - 91 Wardour<br>Street London W1F<br>0UB   | Gambling Act - Change<br>Licensee Dets     |
| 21/10187/LIGPUR | Funland                        | 89 - 91 Wardour<br>Street London W1F<br>0UB   | Gambling Permit - FEC<br>Renewal           |
| 12/06391/LILN   | The Teenage<br>Trust Ltd       | 93 Newman Street<br>London W1T 3EZ  | New Lotteries<br>Registration              |
| 18/12908/LIGPPN | Village Bar                    | Basement Ground<br>Floor And Part First<br>Floor 81 Wardour<br>Street London W1D<br>6QD | Gambling Permit -<br>LPGMP New             |
| 09/03620/LIGPN  | Admiral Duncan<br>Public House | 54 Old Compton<br>Street London W1D<br>4UD  | Gambling Permit - LPGM<br>Notification     |
| 17/07818/LIGPPV | Not Recorded                   | 54 Old Compton<br>Street London W1D<br>4UD  | Licensed Premises<br>Gaming Machine Permit |
| 15/08621/LIGPN  | Admiral Duncan                 | 54 Old Compton<br>Street London W1D<br>4UD  | Gambling Permit - LPGM<br>Notification     |
| 09/10260/LILN   | Not Recorded                   | 87 - 91 Newman<br>Street London W1T<br>3EY  | New Lotteries<br>Registration              |
| 22/02337/LIGPUN | Not Recorded                   | 147 - 149 Wardour<br>Street London W1F<br>8WD   | Gambling Permit - FEC<br>New               |