

# Appendix 1

**Application for a premises licence  
under the Gambling Act 2005 (standard form)**

**PLEASE READ THE FOLLOWING INSTRUCTIONS FIRST**

If you are completing this form by hand, please write legibly in block capitals using ink. Use additional sheets if necessary (marked with the number of the relevant question). You may wish to keep a copy of the completed form for your records.

Where the application is -

- In respect of a vessel, or
- To convert an authorisation granted under the Betting, Gaming and Lotteries Act 1963 or the Gaming Act 1968,

the application should be made on the relevant form for that type of premises or application.

**Part 1 - Type of premises licence applied for**

Regional Casino       Large Casino       Small Casino

Bingo       Adult Gaming Centre       Family Entertainment Centre

Betting (Track)       Betting (Other)

Do you hold a provisional statement in respect of the premises? Yes  No

If the answer is "yes", please give the unique reference number for the provisional statement (as set out at the top of the first page of the statement):

## Part 2 – Applicant Details

If you are an individual, please fill in Section A. If the application is being made on behalf of an organisation (such as a company or partnership), please fill in Section B.

### Section A

#### Individual Applicant

1 Title: Mr  Mrs  Miss  Ms  Dr  Other (please specify)

2 Surname: [\*\*\*\*\*] Other name(s): [\*\*\*\*\*]

3 Applicant's address (home/business -):

[\*\*\*\*\*]

[\*\*\*\*\*]

[\*\*\*\*\*]

[\*\*\*\*\*]

Postcode: [\*\*\*\*\*]

4(a) The number of the applicant's operating licence (as set out in the operating licence): [\*\*\*\*\*]

4(b) If the applicant does not hold an operating licence but is in the process of applying for one, give the date on which the application was made: [\*\*\*\*\*]

5 Tick the box if the application is being made by more than one person.

### Section B

#### Application on Behalf of an organisation

6 Name of applicant business or organisation: Future Leisure Limited

7. The applicant's registered or principal address:

Unit 20 Fleetway Business Park

14 - 16 Wadsworth Road

Greenford, Middlesex

Postcode: UB6 7LD

8(a) The number of the applicant's operating licence (as given in the operating licence):

000-036646-N-318600-012

8(b) If the applicant does not hold an operating licence but is in the process of applying for one, give the date on which the application was made: [\*\*\*\*\*]

9 Tick the box if the application is being made by more than one organisation.

### Part 3 – Premises Details

10. Proposed trading name to be used at the premises (if known):

11. Address of the premises (or, if none, give a description of the premises and their location):

10 Brick Lane, London

Postcode: E1 6RF

12 Telephone number at premises (if known): [\*\*\*\*\*]

13 If the premises are in only a part of a building, please describe the nature of the building (for example, a shopping centre or office block). The description should include the number of floors within the building and the floor(s) on which the premises are located.

The premises are a vacant betting shop on the ground floor of a three storey building.

14(a) Are the premises situated in more than one licensing authority area? No

14(b) If the answer to question 14(a) is yes, please give the names of all the licensing authorities within whose area the premises are partly located, other than the licensing authority to which this application is made:

[\*\*\*\*\*]

#### Part 4 – Times of Operation

15(a) Do you want the licensing authority to exclude a default condition so that the premises may be used for longer periods than would otherwise be the case? No

15(b) If the answer to question 15(a) is yes, please complete the table below to indicate the times when you want the premises to be available for use under the premises licence.

	Start	Finish	Details of any seasonal variation
Mon			[*****]
Tues			[*****]
Wed			[*****]
Thurs			[*****]
Fri			[*****]
Sat			[*****]
Sun			[*****]

16 If you wish to apply for a premises licence with a condition restricting gambling to specific periods in a year, please state the periods below using calendar dates:

[\*\*\*\*\*]

#### Part 5 - Miscellaneous

17 Proposed commencement date for licence (leave blank if you want the licence to commence as soon as it is issued): ASAP

18(a) Does the application relate to premises which are part of a track or other sporting venue which already has a premises licence? No

18(b) If the answer to question 18(a) is yes, please confirm by ticking the box that an application to vary the main track premises licence has been submitted with this application.

19(a) Do you hold any other premises licences that have been issued by this licensing authority?

No

19(b) If the answer to question 19(a) is yes, please provide full details:

20 Please set out any other matters which you consider to be relevant to your application:

[\*\*\*\*\*]

### Part 6 – Declarations and Checklist (Please tick)

I/ We confirm that, to the best of my/ our knowledge, the information contained in this application is true. I/ We understand that it is an offence under section 342 of the Gambling Act 2005 to give information which is false or misleading in, or in relation to, this application.

I/ We confirm that the applicant(s) have the right to occupy the premises.

#### Checklist:

- Payment of the appropriate fee has been made/is enclosed
- A plan of the premises is enclosed
- I/ we understand that if the above requirements are not complied with the application may be rejected
- I/ we understand that it is now necessary to advertise the application and give the appropriate notice to the responsible authorities

### Part 7 – Signatures

21 Signature of applicant or applicant's solicitor or other duly authorised agent. If signing on behalf of the applicant, please state in what capacity:



Signature:

Print Name: Woods Whur 2014 Limited

Date: 10 June 2020

Capacity: Solicitors for the Applicant

22 For joint applications, signature of 2nd applicant, or 2nd applicant's solicitor or other authorised agent. If signing on behalf of the applicant, please state in what capacity:

Signature:

Print Name: [\*\*\*\*\*]

Date: (dd/mm/yyyy)

Capacity: [\*\*\*\*\*]

### Part 8 – Contact Details

23(a) Please give the name of a person who can be contacted about the application: Andrew Woods

23(b) Please give one or more telephone numbers at which the person identified in question 23(a) can be contacted: [REDACTED] or [REDACTED]

24 Postal address for correspondence associated with this application:

Woods Whur 2014 Limited

St James House

28 Park Place, Leeds

Postcode: LS1 2SP

25 If you are happy for correspondence in relation to your application to be sent via e-mail, please give the e-mail address to which you would like correspondence to be sent:

[REDACTED]

# Appendix 2

**FUTURE LEISURE LIMITED - 10 Brick Lane**

**APPLICATION FOR GAMBLING ACT 2005 PREMISES LICENCE**

**1. Documents**

- (a) Local Area Risk Assessment ( submitted)
- (b) Example front door and signage
- (c) Example entry sign
- (d) Gamcare Notice
- (e) Self-exclusion Guide
- (f) Social Responsibility Charter
- (g) Policies and Procedures
- (h) Think 25 Arcade Poster
- (i) Staying in Control Leaflet
- (j) Staying in Control Poster
- (k) Think 25 Poster
- (l) Gambling Intervention Guide
- (m) Safeguarding in Gambling

**2. Conditions**

- (a) Mandatory conditions.
  - i. 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.
  - ii. 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.

- iii. 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.
- iv. 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.

(b) Conditions proposed by The Applicant.

CCTV shall be installed to Home Office Guidance standards and maintained in a good working condition and recordings shall be kept for 31 days and shall be made available to police and licensing officers if requested.

A CCTV camera shall be installed to cover

- a) All entry and exit points to and from the premises enabling frontal identification of every person entering under any light conditions
- b) The areas of the premises to which the public have access (excluding toilets)
- c) Gaming machines and the counter area

An overt CCTV monitor to be installed, able to be seen by customers

CCTV shall be made available for the police viewing at any time with minimum delays when requested.

The following crime prevention measures shall be implemented:

- A time delay safe with deposit slot and anti-fishing mechanisms must be used at the counter till area
- Regular robbery awareness and cash handling training shall be given to all staff.

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.

Prominent signage and notices advertising the Challenge 25 will be displayed showing the operation of such policy.

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.

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.

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 from the ground floor cashier counter by staff.

All doors and windows shall remain closed during any licensable activity.

There shall be no pre-planned single staffing/lone working at any time.

There will be a minimum of **two** staff rostered to be on duty at all times when the premises are open.

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

A suitable intruder alarm complete with panic button shall be fitted and maintained.

A fire alarm and smoke detection system shall be installed.

The licensee will ensure that customer toilets are checked every hour for evidence of drug taking and alcohol consumption. Toilet checks are to be documents stating the time and member of staff who made the checks.

Toilet doors remain locked, fitted with a magnetic style-locking device and access given by staff only.

An incident log shall be maintained and made available on request to an authorised Local Authority officer or the Police, which will record the following:

- a) All crimes reported to the venue.
- b) Any complaints or incidents regarding crime and disorder.
- c) Refusals and banned customers.
- d) Any faults in the CCTV system.
- e) Any visit by a relevant authority or emergency service.

Staff will be trained on Policies and Procedures relating to Self Exclusion, Social Responsible Gambling, Gambling Intervention and Safeguarding in Gambling and copies of such policies and procedures will be made available to Police Officers or Licensing Authority officers upon request.

## Local Area Gambling Risk Assessment

<b>Premises Address:</b>	10 Brick Lane, London, England, E1 6RF
<b>Premises Licence No:</b>	Application Stage GRA
<b>Operating Licence No:</b>	000-036646-N-318600-012
<b>Company Details:</b>	Future Leisure Limited, Unit 20 Fleetway West Business Park 14-16 Wadsworth Road, Greenford, Middlesex, UB6 7LD.
<b>Name of Assessor:</b>	Anna Zietkiewicz
<b>Colleagues Present:</b>	Gavin Treslender
<b>Date of Assessment:</b>	June 2020
<b>Review Date:</b>	On opening in conjunction with local staff

## Local Area

Future Leisure Limited offers various types of gaming machines, providing customers an opportunity to gamble, meet and socialise in a safe and controlled environment. We offer various types of gaming machines. Machines played by inserting cash (not credit cards or debit cards)

- Category B3 Max. stake £2 Max. prize £500
- Category B4 Max. stake £2 Max. prize £400
- Category C Max. stake £1 Max. prize £100
- Category D Max. stake 10p Max. prize £5

This Local Area Gambling Risk assessment takes into account the Tower Hamlets Gambling Policy & Local Area Profile effective from 2019.

The applicant takes into account all matters referred to in the Policy and will continue to do so during the application process and thereafter.

Any Local gambling Risk assessment will continue to be assessed and evolve and this will be the case with this assessment.

It is relevant to note that these premises have operated as a Betting office for some time and the proposal is to replace one Gambling Premises Licence with another and not to create a new and additional Gambling Premises Licence.

The applicant is aware of and has taken into account, in this Risk Assessment, the following:-

- *Relevant Guidance from the Gambling Commission.*
- *The Councils Statement of Gambling Policy 2019-2022.*
- *The Councils Gambling Local Area Profile.*
- *The history of this and other gambling premises in this area.*
- *Its own appraisal of local conditions.*

It has considered all relevant information relating to the Licensing Objectives, demographics and crime levels and will continue to do so. This Local Area Risk Assessment takes into account these factors in assessing risk and reflects them in its provisions to inform the proper and safe conduct of the premises without exacerbating the local problems referred to or causing others.

## Local Area

Licensing Objective	Risks	Existing Control Measures	Level of Risk of Occurrence / Manageability
<p><b>1.1</b></p> <p><b>Protecting children and other vulnerable persons from being harmed or exploited by gambling</b></p>	<p><b>LOCALITY</b></p> <ul style="list-style-type: none"> <li>Bright Horizons Spitalfields Day Nursery and Preschool, 21 Lamb St, Spitalfields, London E1 6EA</li> <li>Rainbow Angels Nurseries &amp; Learning Centres, St Anne's Church Hall, 52 Underwood Rd, London E1 5AW</li> <li>Precious Kids Day Nursery, Inside Montefiore Centre, Hanbury St, London E1 5HZ</li> <li>Cass Nursery Centre, St James's Pass, London EC3A 5DE</li> <li>Canon Barnett Primary School, Gunthorpe St, Spitalfields, London E1 7RQ</li> <li>Osmani Primary School, Vallance Rd, Whitechapel, London E1 5AD</li> <li>Christ Church C of E Primary School, 47a Brick Ln, Spitalfields, London E1 6PU</li> <li>Thomas Buxton Primary School, Buxton St, Whitechapel, London E1 5AR</li> <li>Sir John Cass's Foundation Primary School, St James' Passage, Duke's Place, London EC3A 5DE</li> <li>Harry Gosling Primary School, Fairclough St, Shadwell, London E1 1NT</li> </ul>	<ul style="list-style-type: none"> <li>Staff to 'patrol' – supervising the whole of the premises</li> <li>Implementation of the BACTA Toolkit policies &amp; procedures including Think/Challenge 25</li> <li>Return the stake/retain the prize</li> <li>Anyone reluctant in providing identification with suspicious behaviour will trigger further investigation. Incident to be logged and customer removed from the area.</li> <li>Age verification incident report (log) maintained on licensed premises and reviewed on regular basis by team staff members</li> <li>Training of staff with 6 monthly refreshers/ local area profile/licence conditions</li> <li>Training and guidance is provided to staff members regarding customer interaction and the implementation of the ID verification procedure.</li> </ul>	<p>High of Occurrence Initially / Low of not managing</p>

		<ul style="list-style-type: none"> <li>• English Martyrs Roman Catholic Primary School, St Mark St, London E1 8DJ</li> <li>• Kobi Nazrul Primary School, Whitechapel, London E1 1JP</li> <li>• St Anne's Catholic Primary School, Underwood Rd, London E1 5AW</li> <li>• Al-Ashraaf Secondary School, 102-105 Whitechapel High St, Shadwell, London E1 7RA</li> <li>• London Enterprise Academy, Aneurin Beyan House, 81-91 Commercial Rd, Whitechapel, London E1 1RD</li> <li>• London East Academy, 46 Whitechapel Rd, Shadwell, London E1 1JX</li> <li>• Middlesex Academy of Business and Management (MABM), 1st Floor, 12a Brick Ln, Spitalfields, London E1 6RF</li> <li>• London Academy of Dance, 31 Jewry St, London EC3N 2ET</li> <li>• John Academy, 11 th Floor, 15 St Botolph St, London EC3A 7BB</li> <li>• Al-Ihsan Academy, 101 Commercial Rd, Whitechapel, London E1 1RD</li> <li>• Makers, 50 Commercial St, Spitalfields, London E1 6LT</li> <li>• McQueen's Academy, 3 Boyd St, Whitechapel, London E1 1FQ</li> <li>• Kensington Academy of English, Floor 2, 31 Jewry St, London EC3N 2ET</li> </ul>	<ul style="list-style-type: none"> <li>• Review self-excluded data to ensure continued exclusion</li> <li>• Regular patrols of the premises, including external areas to identify any vulnerable and children</li> <li>• Regular Test Purchasing</li> <li>• Monitoring customers as they leave the premises</li> <li>• "Know Your Customer" in place, developing customer interaction policies &amp; procedures (importance of behaviour, time and spend limits)</li> <li>• Staff monitors customer activity and behaviour to interact early to recognise customer with potential gambling issues.</li> <li>• Staff to be aware of the importance of social responsibility, the causes and consequences of gambling</li> <li>• Adequate staffing levels to be maintained at all times</li> <li>• Sharing of information by staff regarding concerns about customers</li> <li>• Mystery shopper tests by BACTA</li> <li>• Supervision of entrances and machines areas.</li> </ul>	
--	--	---	--	--

	<ul style="list-style-type: none"> <li>• Strap and Scraper London Barber Academy, 38 Cheshire St, London E2 6EH</li> <li>• City of London College, 71 Whitechapel High St, Shadwell, London E1 7PL</li> <li>• Wapping High School, 153 Commercial Rd, Whitechapel, London E1 2DA</li> <li>• Madani Girls' School, Myrtle St, Whitechapel, London E1 1HL</li> <li>• St Marylebone School, 119-121 Middlesex St, Spitalfields, London E1 7JF</li> <li>• London Abacus Academy, 58 Underwood Rd Osmani Center, London E1 5AW</li> <li>• McQueen's Academy, 3 Boyd St, Whitechapel, London E1 1FQ</li> <li>• Kevin Fortune Hair Styling Academy, 6 Heneage St, Spitalfields, London E1 5LJ</li> <li>• Eynsford College, 3rd Floor, 2 - 4 Commercial St, Shadwell, London E1 6LP</li> <li>• Birmingham College of Law &amp; Management Ltd, 38 Commercial Rd, Whitechapel, London E1 1LN</li> <li>• College of Linguistics, 6 Greatorex St, Shadwell, London E1 5NF</li> <li>• SCL - Shakespeare College London, Bishopsgate Court, Norton Folgate, Hackney, London E1 6DB</li> <li>• City Banking College, Primrose St, Spitalfields, London EC2A 2HT</li> <li>• Ebrahim College, 100 Greenfield Rd, Whitechapel, London E1 1EJ</li> </ul>	<ul style="list-style-type: none"> <li>• Posters, 'Stay in Control' leaflets and GamCare leaflets (near toilets as well as in the main trading area)</li> <li>• Self-exclusion system in place provided by BACTA</li> <li>• Photo equipment available for self-exclusions</li> <li>• Ensure a stock of leaflets (stay in control and self-exclusion) through weekly checks of stock</li> <li>• GamCare stickers with contact number clearly displayed on machines</li> <li>• Staff to be trained in Safeguarding Policy</li> <li>• Staff Crime Prevention training</li> <li>• Contact/sharing information with AGC operators within ½ mile (co-ordinated through BACTA) Staff to be aware of refusing customers entry due to alcohol or drugs</li> <li>• Staff to be aware of refusing customers entry due to alcohol or drugs</li> </ul>	
--	--	---	--

--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

- College of Advanced Studies, 102-105 Whitechapel High St, Shadwell, London E1 7RA
- University Foundation Programme - UFP, 31 Jewry St, Tower, London EC3N 2ET
- Global City of London College, Ground floor, 36 Alie St, Whitechapel, London E1 8DA
- Ada. National College for Digital Skills (Whitechapel), 61 Vallance Rd, London E1 5AB
- Charles Dickens College, 6 Wheeler St, Spitalfields, London E1 6NR
- Tower Hamlets Recovery College, 86 Old Montague St, Shadwell, London E1 5NN
- David Game College, 31 Jewry St, London EC3N 2ET
- London Corporate College, 38-40 Commercial Rd, Whitechapel, London E1 1LN
- City of London College, 3 Boyd St, Aldgate East, Whitechapel, London E1 1FQ
- ICON College of Technology and Management, Unit 21, 22, 1-13 Adler St, Whitechapel, London E1 1EG
- London School Of Commerce & IT, 59-66 Greenfield Rd, Whitechapel, London E1 1EJ
- East End Computing & Business College, 149 Commercial Rd, Whitechapel, London E1 1PX

		<ul style="list-style-type: none"> <li>• London Vesta College, Montefiore Centre, Hanbury St, London E1 5HZ</li> <li>• St. Peters College Of London, 12-14 Vallance Rd, Shadwell, London E1 5HR</li> <li>• Superior College London, 1-13 Adler St, Whitechapel, London E1 1EG</li> <li>• YMCA George Williams College, Davenant Centre, 179-181 Whitechapel Rd, Shadwell, London E1 1DN</li> <li>• City of London College, 101 Commercial Rd, Whitechapel, London E1 1RD</li> <li>• Northumbria University, 110 Middlesex St, Spitalfields, London E1 7HT</li> <li>• London Metropolitan University, Aldgate Campus, Calcutta House, Old Castle St, London E1 7NT</li> <li>• Hult International Business School - Undergraduate Campus, Hult House East, 35 Commercial Rd, Whitechapel, London E1 1LD</li> <li>• Queen Mary University of London, Whitechapel Campus, Whitechapel, London E1 2AD</li> <li>• Newcastle University London, 102 Middlesex St, Spitalfields, London E1 7EZ</li> <li>• GCU London, 40 Fashion St, Spitalfields, London E1 6PX</li> </ul>	
--	--	---	--

		<ul style="list-style-type: none"> <li>• Coventry University London, 109-117 Middlesex St, Spitalfields, London E1 7JF</li> <li>• INTO City, University of London, 102 Middlesex St, Spitalfields, London E1 7EZ</li> <li>• Don Gratton House (University Of The Arts London), Don Gratton House, 82 Old Montague St, Shadwell, London E1 5NN</li> <li>• Barts and The London School of Medicine and Dentistry, Building, Turner Street Garrod, London E1 2AD</li> <li>• Blizard Institute, 4 Newark St, Whitechapel, London E1 2AT</li> </ul> <p><b>OTHER:</b></p> <p><b><u>Student accommodations</u></b></p> <ul style="list-style-type: none"> <li>• iQ Student Accommodation Aldgate, Proof House, 60 Commercial Rd, Aldgate, Whitechapel, London E1 1LP</li> <li>• iQ Student Accommodation Magenta House, 5 Tyrian Place, Shadwell, London E1 1DQ</li> <li>• Lilian Knowles House - Sanctuary Students, 50 Crispin St, Spitalfields, London E1 6HQ</li> <li>• Student.com, Aldgate Tower, 2 Leman St, London E1 8FA</li> </ul>		
--	--	---	--	--

- Don Gratton House - Sanctuary Students, Don Gratton House, 82 Old Montague St, Shadwell, London E1 5NN
- Liberty Plaza, 65 Leman St, Whitechapel, London E1 8EU
- The Craft Building - Sanctuary Students, 12 Greatorex St, Shadwell, London E1 5NF
- Chapter Spitalfields, 9 Frying Pan Alley, Spitalfields, London E1 7HS
- Chapter Aldgate, 1-2 Education Square, Whitechapel, London E1 1FA

**Youth Hostels**

- Destination 43,43 Commercial St, Spitalfields, London E1 6BD
- Brick Lane Rooms,88A Whitechapel High St, Shadwell, London E1 7QX

**Family Services**

- Women's Health & Family Services, The Brady Centre, 192-196 Hanbury Street, London E1 5HU
- Closer Relationships,225 Shoreditch High St, Hackney, London E1 6PJ

		<p><b><u>Job Centre/ Recruitment Agency</u></b></p> <p>No job centre within distance</p> <p>11 recruitment agency within distance</p> <ul style="list-style-type: none"> <li>• Jubilee Recruitment, 75 Whitechapel Rd, Shadwell, London E1 1DU</li> <li>• Marshall Agency, Aldgate Tower, 2 Leman St, London E1 8FA</li> <li>• Travel Trade Recruitment, 3rd Floor, 1 Aldgate, Tower, London EC3N 1RE</li> <li>• K R C Recruitment Ltd, 101 Commercial Rd, Whitechapel, London E1 1RD</li> <li>• Incisive recruitment, 133 Houndsditch, London EC3A 7AH</li> <li>• Apprenticeship Connect - Training &amp; Apprenticeship Recruitment, WeWork, 8 Devonshire Square, London EC2M 4PL</li> <li>• Blue Arrow London City, 4th Floor, 9 Devonshire Square, Spitalfields, London EC2M 4HP</li> <li>• Creative Personnel, 150 Minorities, Tower, London EC3N 1LS</li> <li>• BAME recruitment, Dawson House, Jewry St, Tower, London EC3N 2EX</li> <li>• Resourcing Group, 80 Coleman St, London E1 7PT</li> </ul>		
--	--	---	--	--

		<ul style="list-style-type: none"> <li>• London City Recruitment, One Five Zero Building, 150 Minorities, Tower, London EC3N 1LS</li> <li>• Teaching Abroad Direct, 36 Alie St, Whitechapel, London E1 8DA</li> <li>• ABN Career, Universal House, 88-94 Wentworth St, Whitechapel, London E1 7SA</li> <li>• Employment First, Community Centre, 1 Wodeham Gardens, London E1 5BN</li> <li>• T &amp; T Recruit Solutions, 18 E Tenter St, Whitechapel, London E1 8DN</li> <li>• MY LOCAL TOOL BOX, 56 Leman St, Whitechapel, London E1 8EU</li> <li>• Simply Recruitment, 150 Minorities, Tower, London EC3N 1LS</li> <li>• Digital Republic Recruitment, 8th floor, 8 Devonshire Square, Spitalfields, London EC2M 4PL</li> <li>• R D A Recruitment Ltd, 9 Devonshire Square, Spitalfields, London EC2M 4YF</li> <li>• Xpertise Recruitment, The Space, 14 New St, London EC2M 4HE</li> <li>• Creative Recruitment, 110 Middlesex St, Spitalfields, London E1 7HY</li> <li>• Rainbow Work Solution, 156 Commercial Rd, Whitechapel, London E1 1NL</li> </ul>	
--	--	---	--

	<ul style="list-style-type: none"> <li>• Austin Andrew Financial Recruitment, Dawson House, 5 Jewry St, Tower, London EC3N 2EX</li> <li>• RWM Recruitment Limited, 91 Brick Ln, Spitalfields, London E1 6QL</li> <li>• Chadwick Nott London, 9 Devonshire Square, London EC2M 4HP</li> <li>• PRS Recruitment Services, Coppergate House, 10 White's Row, Spitalfields, London E1 7NF</li> <li>• Tate Recruitment - London, 9 Devonshire Square, Spitalfields, London EC2M 4HP</li> <li>• Druthers Search, Briannia House, Hanbury St, Spitalfields, London E1 5JL</li> <li>• Adrem Group Ltd, 8 Devonshire Square, Spitalfields, London EC2M 4PL</li> <li>• Synergy Group, 222 Bishopsgate, Spitalfields, London EC2M 4QD</li> <li>• Carrington Knight Associates, 9 Devonshire Square, Spitalfields, London EC2M 4YF</li> <li>• Funds Partnership London, 199 Bishopsgate, Spitalfields, London EC2M 3TY</li> <li>• TRUST RECRUITMENT SERVICES LTD, 1st, 7 Davenant St, Shadwell, London E1 5NB</li> </ul>		

	<ul style="list-style-type: none"> <li>• SMS Recruitment UK, 117 Whitechapel Rd, Shadwell, London E1 1DT</li> <li>• Source, Unit 3 Wool House, 74 Back Church Ln, London E1 1LX</li> <li>• North Gate Executive Search, 110 Cannon St, Spitalfields, London EC4N 6EU</li> <li>• Nexus London Staffing &amp; Recruitment, 2nd floor, 102 Whitechapel Rd, Shadwell, London E1 1JE</li> <li>• Curtis and Mayfair, Aldgate Tower, 2 Leman St, Whitechapel, London E1 8FA</li> <li>• Red Snapper Recruitment, 10 Alie St, London E1 8DE</li> <li>• cer Engineering Ltd, 112 Houndsditch, London EC3A 7BD</li> <li>• Live Recruitment, 1 Primrose St, Spitalfields, London EC2A 2EX</li> <li>• LND Recruitment, 8 Devonshire Square, Spitalfields, London EC2M 4PL</li> <li>• ESG Recruitment, Aldgate Tower, 2 Leman St, Whitechapel, London E1 8FA</li> <li>• Florence, Techspace, 32-38 Leman St, London E1 8EW</li> </ul>	

	<p><b><u>Community Centres/Youth Centres</u></b></p> <ul style="list-style-type: none"> <li>• Greatorex Street Community Centre , 50E Greatorex St, London E1 5NP</li> <li>• Atlee Centre, 5 Thrawl St, Spitalfields, London E1 6RT</li> <li>• London ISTA</li> <li>• Community, Brunswick House, 16, London E1 7PR</li> <li>• Larc, 62 Fieldgate St, Whitechapel, London E1 1ES</li> <li>• Artizan Street Library &amp; Community Centre, 1 Artizan St, Spitalfields, London E1 7AF</li> <li>• KobiNazrul Centre, 30 Hanbury St, Spitalfields, London E1 6Q</li> <li>• Bubble Club Studio, 175 Whitechapel Rd, Shadwell, London E1</li> <li>• Maryam Centre, Maryam Centre, 45 Fieldgate St, Whitechapel, London E1 1JU</li> <li>• BYM, The Whitechapel Centre, Myrtle St, Whitechapel, London E1 1HL</li> <li>• Osmani Trust, 58 Underwood Rd, London E1 5AW</li> <li>• Davenant Centre, 179-181 Whitechapel Rd, Shadwell, London E1 1DN</li> <li>• Newark Youth London, Whitechapel Centre, Myrtle St, Whitechapel, London E1 1HL</li> </ul>
--	---

	<p><b><u>Leisure, Sports Centres</u></b></p> <ul style="list-style-type: none"> <li>• Mulberry Sports Centre, Richard St, Shadwell, London E1 2JP</li> <li>• Whitechapel Sports Centre, 55 Durward St, London E1 5BA</li> <li>• Orangetheory Fitness Aldgate, Entrance on, 1 Alie St, Mansell St, London E1 8DE</li> <li>• DW Fitness First London Spitalfields Tower (Shoreditch), 7 Frying Pan Alley, Spitalfields, London E1 7HS</li> <li>• PureGym London Aldgate, The St. Botolph Building 141, Houndsditch, London EC3A 7DH</li> <li>• PureGym London Whitechapel, 100 Whitechapel Rd, Shadwell, London E1 1JG</li> </ul> <p><b><u>Entertainment/Cinema/Theatre/Arts</u></b></p> <ul style="list-style-type: none"> <li>• The Screening Cinema, 114 Brick Ln, Spitalfields, London E1 6RL</li> <li>• Curzon Aldgate, 2 Canter Way, Whitechapel, London E1 8PS</li> <li>• Close-Up Cinema, 97 Sclater St, Shoreditch, London E1 6HR</li> <li>• Ice &amp; Fire Theatre, 28 Commercial St, Spitalfields, London E1 6LS</li> <li>• People Show, 192-196 Hanbury St, London E1 5HU</li> <li>• Theatre-Rites, Unit 206, E1 Studios, 7 Whitechapel Rd, London E1 1DU</li> <li>• Club Cops, 30 Alie St, Whitechapel, London E1 8DA</li> </ul>	<ul style="list-style-type: none"> <li>• CCTV coverage of all public areas, office, all entry and exit points to and from the premises enabling frontal identification of every person entering under any light conditions with ability for management to review remotely online</li> <li>• Premises laid out to avoid blind spots</li> <li>• Ensure entrance readily visible from throughout the premises</li> <li>• Signage &amp; window display not to attract under 18s, and advice under 18's access is prohibited.</li> <li>• Regular patrols of the premises, including external areas to identify any vulnerable and children</li> <li>• Recording &amp; reporting concerns to the police.</li> <li>• Monitoring customers as they leave the premises</li> <li>• Machines to be properly labelled</li> <li>• The entrance layout enable staff to monitor those entering the premises</li> </ul>	
--	---	---	--

		<ul style="list-style-type: none"> <li>• The Nags Head, 17-19 Whitechapel Rd, Shadwell, London E1 1DU</li> <li>• Whites Gentlemens Club, 32-38 Leman St, Whitechapel, London E1 8EW</li> </ul> <p><b><u>Bank/Building Society</u></b></p> <ul style="list-style-type: none"> <li>• Al Rayan Bank, 97-99 Whitechapel Rd, Shadwell, London E1 1DT</li> <li>• HSBC, 75 Whitechapel Rd, Shadwell, London E1 1DU</li> <li>• NatWest Bank, Black Lion House, 45 Whitechapel Rd, Shadwell, London E1 1DU</li> <li>• Lloyds Bank, 3-5 Whitechapel Rd, Shadwell, London E1 1DU</li> <li>• European Crypto Bank, 1803 Altitude Point 71 Alie Strel, London E1 8NG</li> <li>• Bank Of Baroda, 128 Commercial Rd, Whitechapel, London E1 1NL</li> <li>• Scotiabank, 201 Bishopsgate, Spitalfields, London EC2M 3NS</li> <li>• Deutsche Bank, 6eg, 10 Bishops Square, Spitalfields, London E1 6EG</li> <li>• Royal Bank of Scotland, 280 Bishopsgate, Spitalfields, London EC2M 4RB</li> <li>• NatWest, 250 Bishopsgate, Spitalfields, London EC2M 4AA</li> <li>• The Norinchukin Bank, 155 Bishopsgate, London EC2M 3YX</li> </ul>		
--	--	--	--	--

	<ul style="list-style-type: none"> <li>• Sonali Bank (UK) Ltd, 29-33 Osborn St, Shadwell, London E1 6TD</li> </ul> <p><b>Care Home:</b></p> <ul style="list-style-type: none"> <li>• Discovery Home, 31-33 Spelman St, London E1 5LQ</li> <li>• Buxton Street Care Home, 133 Buxton St, London E1 5AR</li> <li>• Three Sisters Care, Montefiore Centre, Hanbury St, London E1 5HZ</li> </ul> <p><b>GP/Medical Centre</b></p> <ul style="list-style-type: none"> <li>• Spitalfields Practice, 20 Old Montague St, Shadwell, London E1 5PB</li> <li>• Spitalfields Community Health Centre ( Homeless Medical Centre), 9-11 Brick Ln, Spitalfields, London E1 6PU</li> <li>• Med-Pol Medical Centre, 94A Whitechapel High St, Shadwell, London E1 7RA</li> <li>• Ambrose King Sexual Health Centre, The Royal London Hospital, Mount Terrace, Whitechapel, London E1 2BB</li> <li>• Sunnah Circumcision Clinic (London Surgical Centre, 45 Fieldgate St, Whitechapel, London E1 1ES</li> </ul>		
--	--	--	--

--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

- FluCamp, Queen Mary Innovation Centre, 42 New Rd, Whitechapel, London E1 2AX

**Faith Premises/Public Worship**

- Saint Anne's Roman Catholic Church, Underwood Road, Underwood Rd, London E1 5AW
- Christ Church Spitalfields, Commercial St, Spitalfields, London E1 6LY
- Apostolic Shalom Church, Unit 48 Micro Business Park,, 46-50 Greetorex Street, Whitechapel,, London E1 5NP
- Saint Boniface German Roman Catholic Church, 47 Adler St, Whitechapel, London E1 1EE
- St. George's German Lutheran Church, 55 Ailie St, Whitechapel, London E1 8EB
- East London Mosque, 82, 92 Whitechapel Rd, Shadwell, London E1 1JQ
- B. B. C. COMMUNITY CENTRE Mosque, 16 Toynbee St, Spitalfields, London E1 7NR
- Brick Lane Mosque, 59 Brick Ln, Spitalfields, London E1 6QL
- London Iqra Institute, East London Mosque, The Maryam Centre, 45 Fieldgate St, Whitechapel, London E1 1DU

		<ul style="list-style-type: none"> <li>• London Muslim Centre, 46 Whitechapel Rd, Whitechapel, London E1 1JX</li> </ul> <p><b><u>Mental Health:</u></b></p> <ul style="list-style-type: none"> <li>• East London NHS Foundation Trust , 9 Aile St, London E1 8DE</li> <li>• NHS Institute of Psychotrauma, 5NG, 85 Old Montague St, Shadwell, London E1 5NN</li> <li>• Reflect Psychological Services, 46 Aldgate High St, London EC3N 1AL</li> <li>• Tavistock Relationships, Chieftan House, 10 New St, London EC2M 4TP</li> <li>• Psychological Clinical Services , 2 Victoria Ave, Spitalfields, London EC2M 4NS</li> <li>• Turning Point, Standon House, 21 Mansell Street, London E1 8AA</li> <li>• The Pebble Practice, 108 Cornhill Building, 1 Coke Street, London E1 1ER</li> <li>• City &amp; West therapy Ltd, Art of Thought, 147 Commercial St, Spitalfields, London E1 6BJ</li> <li>• Moreways Healthcare@, 12th Floor, Moreways Healthcare Limited, Broadgate Tower, 20 Primrose St, London EC2A 2EW</li> <li>• Dr Sabah Khan, Coppergate House, 16 Brune St, Spitalfields, London E1 7NJ</li> </ul>		
--	--	--	--	--

		<ul style="list-style-type: none"> <li>• Counselling &amp; Psychotherapy East London, 18 Widegate St, Spitalfields, London E1 7HP</li> <li>• Counselling London City Ec,63 St Mary Axe, London EC3A 8AA</li> <li>• East London Psychotherapy, 18 Devonshire Row, London EC2M 4RH</li> <li>• Serene Lifestyles, Aldgate East, 20 White Church Ln, London E1 7QR</li> <li>• The London Practice, 154 Bishopsgate, London EC2M 4LN</li> </ul> <p><b><u>Addiction/Recovery Centres</u></b></p> <ul style="list-style-type: none"> <li>• Bangladeshi Drugs Project, 179-181 Whitechapel Rd, Shadwell, London E1 1DN</li> <li>• Therapy for Addiction - East London, Flat 4, 57 Greatorex St, London E1 5NP</li> <li>• Reset Recovery Centre, 183 Whitechapel Rd, Shadwell, London E1 1DN</li> <li>• Coke Addiction London, Longcroft House, Victoria Ave, Spitalfields, London EC2M 4NS</li> </ul> <p><b><u>Homeless Centres/Shelters</u></b></p> <ul style="list-style-type: none"> <li>• Providence Row (also known as the Dellow Day Centre) 82 Wentworth St, Spitalfields, London E1 7SA</li> </ul>		
--	--	--	--	--

		<ul style="list-style-type: none"> <li>• Booth House, The Salvation Army, 175, 153-175 Whitechapel Rd, London E1 1DN</li> <li>• Crisis UK, 66 Commercial St, Spitalfields, London E1 6LT</li> <li>• Centrepoint, Central House, 25 Camperdown St, Whitechapel, London E1 8DZ</li> <li>• Homeless Link, Minorities House, 2-5 Minorities, Tower, London EC3N 1BJ</li> </ul> <p><b><u>Hospitals</u></b></p> <ul style="list-style-type: none"> <li>• Barts Health, Duru House, 81 Commercial Rd, Whitechapel, London E1 1RD</li> </ul> <p><b><u>Loan Shops, Pawn Brokers, Food Banks</u></b></p> <p>No loan shops, pawn brokers or food banks within distance</p> <p><b><u>Parks/Playgrounds</u></b></p> <ul style="list-style-type: none"> <li>• Altab Ali Park, Adler St, Shadwell, London E1 1FD</li> <li>• Aldgate Square, Aldgate High St, London EC3N 1AF</li> <li>• Four Seasons Garden, 1 Bridle Mews, Whitechapel, London E1 8GE</li> </ul>		
--	--	--	--	--

	<ul style="list-style-type: none"> <li>• Vallance gardens, 67 Wodeham Gardens, London E1 5BN</li> <li>• Allen Garden Playgroup, 55 Buxton St, London E1 5EH</li> <li>• Children's Park, Whitechapel, London E1 7AR</li> <li>• Chicksand Street park, 20 Chicksand St, London E1 5LD</li> <li>• Hanbury Street Play Area, Hanbury St, London E1 5JW</li> </ul> <p><b><u>Bars/ Restaurants fast food</u></b></p> <p>Bars restaurants and fast food within distance</p> <p><b><u>Markets and Shopping Centre</u></b></p> <ul style="list-style-type: none"> <li>• Old Spitalfields Market-Fashion, home, goods&amp; food market</li> </ul>		
--	---	--	--

1.2	<p><b>Preventing from Gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime</b></p>	<p><b>LOCALITY</b> Assess threats</p> <p><b>OTHER</b></p> <p>Listed 5 betting shops within distance and 1 AGC</p> <ul style="list-style-type: none"> <li>• <b>Betfred</b> 101 Whitechapel High St, Shadwell, London E1 7RE</li> <li>• <b>Paddy Power</b>, 1 Commercial St, Shadwell, London E1 6BF</li> <li>• <b>Ladbrokes</b>, 13 Whitechapel Rd, Shadwell, London E1 1DU</li> <li>• <b>Ladbrokes</b>, 76 Aldgate High St, Tower, London EC3N 1BD</li> <li>• <b>Coral</b>, 226 Bishopsgate, Spitalfields, London EC2M 4QD</li> <li>• <b>Merkur Cashino</b>, 87 Whitechapel High St, Shadwell, London E1 7QX</li> </ul> <p><b>LOCAL AREA PROFILE</b></p> <p><b>Population</b></p> <ul style="list-style-type: none"> <li>• At the time of the 2011 Census, the population for Spitalfields and Banglatown was 12,578 which accounted for almost 5 per cent of the total population of Tower Hamlets. The ward had 6,782 males and 5,796 females providing a gender split in the ward of 53.9 per cent male and 46.1 per cent female.</li> </ul>	<ul style="list-style-type: none"> <li>• CCTV coverage of all public areas, office, all entry and exit points to and from the premises enabling frontal identification of every person entering under any light conditions with ability for management to review remotely Online Social Responsibility training and incident recording logs available to all staff.</li> <li>• Toughened/laminated glass to front window</li> <li>• Machine door opening keys only available to management</li> <li>• Log visits by Police, Local Authority and Gambling Commission officers</li> <li>• Customer toilet to be kept locked at all times with access given by staff only</li> <li>• Review unusual patterns of play (as per PoCA), 'non-regular' players and consider exclusion/reporting</li> <li>• Exclude badly behaved customers</li> <li>• Maintain contact with local traders and Police</li> <li>• Limited staff floats</li> <li>• Staff trained to look out for unusual/dyed notes</li> <li>• Staff &amp; management to be alert to customers exchanging large volumes of paper notes for alternative denominations</li> </ul>	<p>Medium of Occurrence Initially Low of not Managing</p>
-----	---	---	--	---

	<p><b>Unemployment</b></p> <ul style="list-style-type: none"> <li>Spitalfields and Banglatown had the 10th highest unemployment rate in the borough with 13.8 per cent, nearly 1.8 percentage points above the Tower Hamlets rate (12 per cent). On Census day, the highest unemployment rate was recorded in Lansbury (18.8 per cent) and the lowest in St Katharine's and Wapping with only 4.9 per cent.</li> </ul> <p><b>Labour market participation</b></p> <ul style="list-style-type: none"> <li>Spitalfields and Banglatown had a rate of 54.1 per cent of residents in employment, slightly below Tower Hamlets (57.6 per cent) and London (62.4 per cent) averages.</li> <li>The proportion of economically inactive residents, including those looking after home &amp; family (6.1 per cent) and the long term sick (4.7 per cent) was above the borough, London and England averages.</li> </ul>	<ul style="list-style-type: none"> <li>Staff to be alert to customer redeeming stake with little or no play</li> <li>Staff trained about AML basics, strange transaction behaviour</li> <li>CCTV coverage over all cash transactions</li> <li>TiO machines (if present) have built in software protection to identify suspicious activity and alert staff.</li> <li>Fruit machines played by inserting cash (not credit cards or debit cards)</li> <li>Full machine audit on all machines on a weekly basis – ad hoc spot-check in case of any suspicion</li> <li>Gaming machines are supplied and maintained by businesses licensed by the Gambling Commission</li> <li>No automated ticket redemption machines used in the venue</li> <li>Extra Training and guidance is provided to staff members regarding Anti-Social Behaviour</li> <li>Staff fully trained how to deal with homeless people seeking refuge.</li> <li>Staff to be trained on local are risk assessment</li> <li>Company registered to receive crime bulletins from BACTA.</li> </ul>	
--	---	--	--

		<ul style="list-style-type: none"> <li>A total of 780 residents were unemployed in Spitalfields and Banglatown. The rate of 7.5 per cent was above the Tower Hamlets (6.7 per cent), London (5.2 per cent) and England (4.4 per cent) averages. Interestingly, the proportion of students, both economically active students (6.1 percent) and inactive students (12.6 per cent) was above the Tower Hamlets, London and England rates too</li> </ul> <p><b>Crime</b></p> <ul style="list-style-type: none"> <li>Number of crimes recorded in February 2020 for Spitalfields and Banglatown are:</li> </ul> <p>Anti Social Behaviour: 82  Burglary: 22  Criminal Damage and Arson: 13  Drugs: 37  Robbery: 11  Violence 48</p> <p><b><u>Transport and car park facilities</u></b></p> <p>2 Train stations within distance</p> <ul style="list-style-type: none"> <li>Aldgate East Station</li> <li>Aldgate Station</li> </ul>	<ul style="list-style-type: none"> <li>Customer interaction may provide knowledge of criminal background and/or association leading to closer security and monitoring of such a customer.</li> <li>Customers are efficiently monitored throughout the time they are on the premises to satisfy age requirements, prevention of machine related crime (money laundering).</li> <li>Suspicious activity to be written down in the log</li> <li>Knowledge activity to be handed over to Nominated Officer who will then report to NCA</li> </ul>	
--	--	---	---	--

		<p>5 car parks within distance</p> <ul style="list-style-type: none"> <li>• NCP Car Park London</li> <li>• Whitechapel High Street</li> <li>• Truman Brewery Parking Ely's Yard</li> <li>• Grey Eagle Street Car Park</li> <li>• Broadgate Car Park</li> <li>• JustPark Whitechapel High Street</li> </ul>		
--	--	--	--	--

1.3	<p><b>Ensuring that gambling is conducted in a fair and open way</b></p>	<p><b>PREMISES</b></p> <ul style="list-style-type: none"> <li>• Promotions</li> <li>• Advertising</li> </ul> <p><b>EQUIPMENT</b></p> <ul style="list-style-type: none"> <li>• Information clearly displayed</li> <li>• Maintenance</li> <li>• Compliance</li> </ul> <p><b>CUSTOMERS</b></p> <ul style="list-style-type: none"> <li>• Treatment of customers</li> <li>• Complaints</li> </ul>		<ul style="list-style-type: none"> <li>• Clear terms &amp; conditions provided within the licensed premises.</li> <li>• Game rules, gambling care providers and other relevant information are provided in both English and other prominent first language.</li> <li>• Machines only obtained from licensed suppliers</li> <li>• Machines to be properly labelled</li> <li>• Implementation of the BACTA Toolkit policies</li> <li>• Training of staff with 6 monthly refreshers</li> <li>• Review advertising material and promotions for compliance with LCCP</li> <li>• Machines to be maintained/serviced regularly</li> <li>• Machines to be turned off should a fault occur</li> <li>• Procedure for making refunds</li> <li>• Details of machine operation and winning combinations to be clearly shown on machines</li> <li>• Staff to have full understanding of stakes and prizes, and odds associated with each machine.</li> <li>• Complaints policy visibly displayed for customer information. All complaints to be fully investigated in accordance with policy and referred to nominated ADR 3rd party as required</li> </ul>	<p>Low-Low</p>
-----	--	--	--	---	----------------

			<ul style="list-style-type: none"><li>• Suitable public liability Insurance</li><li>• Council conditions openly displayed</li><li>• Regular Compliance Audits</li></ul>	
--	--	--	---	--

## Gambling Operation & Physical Design (Internal and External)

Licensing Objective	Risks	Existing Control Measures	Level of Risk of Occurrence / Manageability
<p><b>2.1</b></p> <p><b>Protecting children and other vulnerable persons from being harmed or exploited by gambling</b></p>	<p><b>PREMISES</b></p> <ul style="list-style-type: none"> <li>• Consider 'blind spots'</li> <li>• Visibility of the entrance</li> <li>• Signage</li> <li>• Presentation of premises (signage/window display)</li> </ul> <p><b>CUSTOMERS</b></p> <ul style="list-style-type: none"> <li>• U18s entering</li> <li>• Problem Gambling</li> <li>• Providing Information</li> <li>• Administering self-exclusion</li> <li>• Signage</li> </ul>	<ul style="list-style-type: none"> <li>• CCTV coverage of all public areas, office, all entry and exit points to and from the premises enabling frontal identification of every person entering under any light conditions with ability for management to review remotely online</li> <li>• No cash point or ATM facilities on the premises.</li> <li>• Premises laid out to avoid blind spots</li> <li>• Ensure entrance readily visible from throughout the premises</li> <li>• Signage &amp; window display not to attract under 18s, and advise under 18s access is prohibited.</li> <li>• Machines to be properly labelled</li> <li>• The entrance layout to enable staff to monitor those entering the premises</li> </ul>	

2.2	<p><b>Preventing from being a source of crime or disorder, being associated with crime or disorder or being used to support crime</b></p>	<p><b>PREMISES</b> Layout to be considered</p> <ul style="list-style-type: none"> <li>• Consider 'blind spots'</li> <li>• Visibility of the entrance</li> </ul> <p><b>CUSTOMERS</b> Customer behaviour</p> <p><b>STAFF</b></p> <ul style="list-style-type: none"> <li>• Personal protection</li> <li>• Security</li> <li>• Staff behaviour</li> </ul>	<ul style="list-style-type: none"> <li>• CCTV coverage of all public areas, office, all entry and exit points to and from the premises enabling frontal identification of every person entering under any light conditions with ability for management to review remotely online</li> <li>• No cash point or ATM facilities on the premises.</li> <li>• Regular patrols of the premises, including external areas to identify any vulnerable and children</li> <li>• Monitoring customers as they leave the premises</li> <li>• Toughened/laminated glass to front window</li> <li>• Mag Lock on front door</li> <li>• Timer locked safe</li> <li>• Intruder alarm installed and regularly serviced</li> <li>• Panic Button linked to Police</li> </ul>	
-----	---	---	---	--

<p><b>2.3</b></p> <p><b>Ensuring that gambling is conducted in a fair and open way</b></p>	<p><b>PREMISES</b></p> <ul style="list-style-type: none"> <li>• Promotions</li> <li>• Advertising</li> </ul> <p><b>EQUIPMENT</b></p> <ul style="list-style-type: none"> <li>• Information clearly displayed</li> <li>• Maintenance</li> <li>• Compliance</li> </ul>	<ul style="list-style-type: none"> <li>• CCTV coverage of all public areas, office, all entry and exit points to and from the premises enabling frontal identification of every person entering under any light conditions with ability for management to review remotely online</li> <li>• Clear terms &amp; conditions provided within the licensed premises.</li> <li>• Machines only obtained from licensed suppliers</li> <li>• Machines to be properly labelled</li> <li>• Implementation of the BACTA Toolkit policies</li> <li>• Machines to be maintained/serviced regularly</li> <li>• Machines to be turned off should a fault occur</li> <li>• Procedure for making refunds</li> <li>• Details of machine operation and winning combinations to be clearly shown on machines</li> <li>• Complaints policy visibly displayed for customer information. All complaints to be fully investigated in accordance with policy and referred to nominated ADR 3rd party as required</li> <li>• Suitable public liability Insurance</li> <li>• Council conditions openly displayed</li> </ul>	
--	---	--	--

**Action Plan**

Local Area (insert number)	Gambling Operation and Physical Design (insert number)	Question	Action Required	By Whom (name)	By When (date)	Date Completed

Frequency of Review (enter time period e.g. 12 months)	Date Review Due
---	-----------------

Completed Risk Assessment brought to the attention of:

Name (person responsible for premises and/or implementing control measures)	Position	Signature	Date the this assessment was brought to this persons attention
Jana Zickler-Nice	COFFEE SHOP MANAGER	<i>Jana Zickler-Nice</i>	8/6/2020

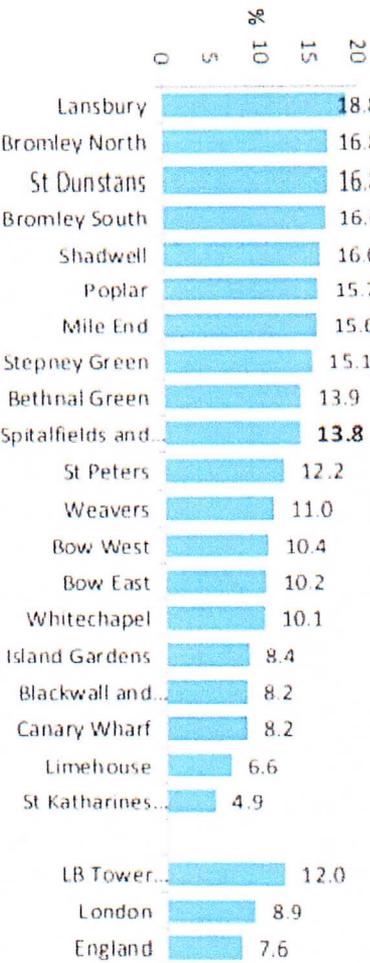
## Labour market participation

Table 6: Labour market participation - Economic active (EA) and Economic Inactive (EI) (Totals and %)

Area	EA: In employment	EA: Unemployed	EA: Full-time student	EI: Retired	EI: Student (incl. full-time)	EI: Looking after home / family	EI: Long-term sick or disabled	EI: Other
Spitalfields & Banglatown	5,660	780	639	446	1,323	642	489	485
Spitalfields & Banglatown (%)	54.1	7.5	6.1	4.3	12.6	6.1	4.7	4.6
Tower Hamlets (%)	57.6	6.7	5.5	4.7	9.9	7.0	4.5	4.0
London (%)	62.4	5.2	4.1	8.4	7.8	5.2	3.7	3.2
England (%)	62.1	4.4	3.4	13.7	5.8	4.4	4.0	2.2

(Source: Census 2011 KS601EW to KS603EW - Economic activity by sex, Population 16 to 74)

Figure 8: Unemployment rate of 16 to 64 – economic active population only

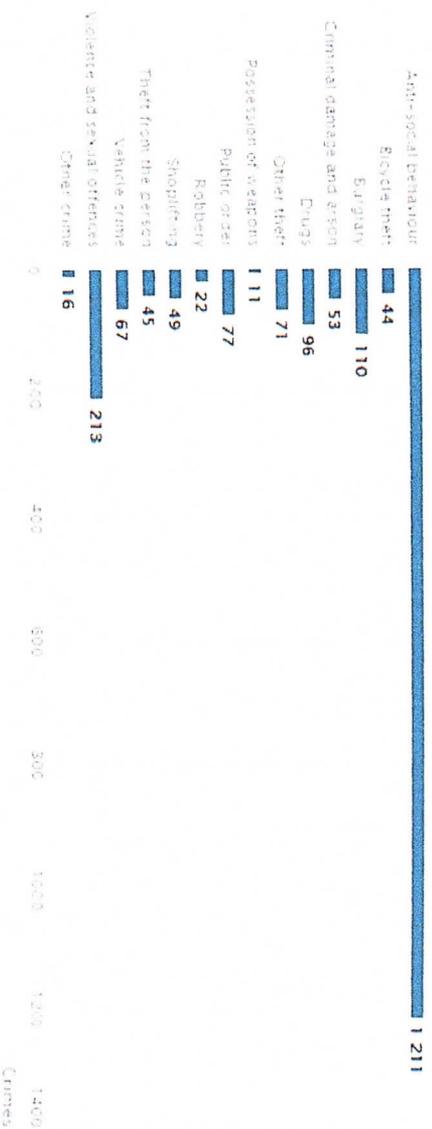


(Source: Census 2011, QS601EW - Economic activity)

❖ Figure 8 on the right shows the unemployment rate based on the economically active population only. This version is the better unemployment measure but it is in general higher compared to the rate based on the proportion of all residents in the 16 to 74 age group as shown above.

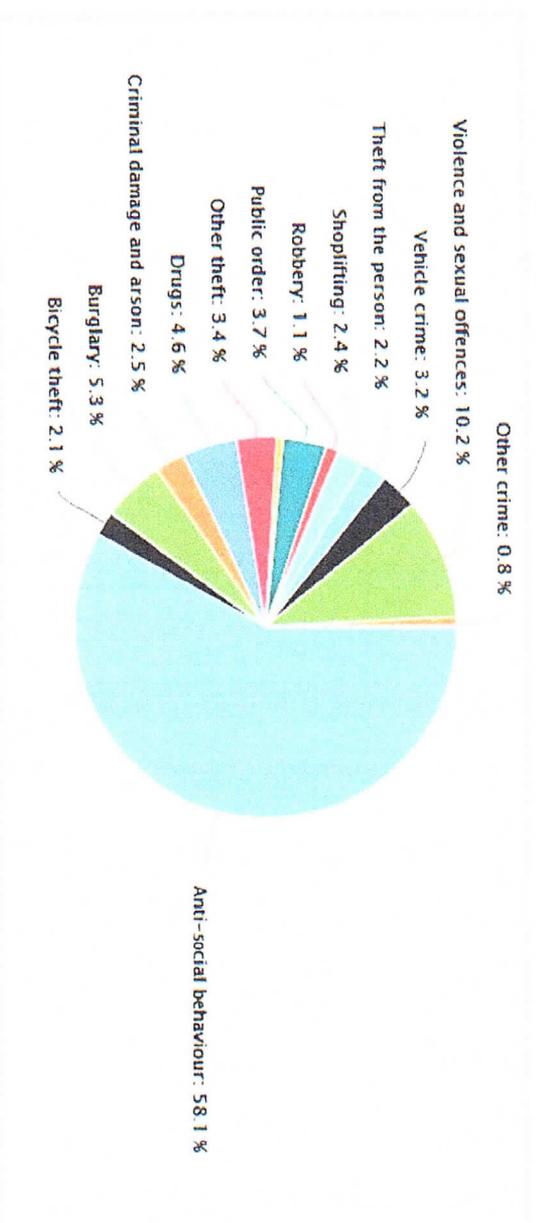
# Tower Hamlet E1 6RF Crime Breakdown April 2020

Number of Crimes in London, Greater London (Tower Hamlets), E1 6RF, England April 2020

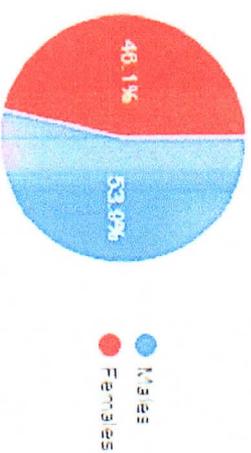


All crimes are displayed within a 1 mile radius of London, Greater London (Tower Hamlets), E1 6RF, England

Percentage of Crime in London, Greater London (Tower Hamlets), E1 6RF, England April 2020

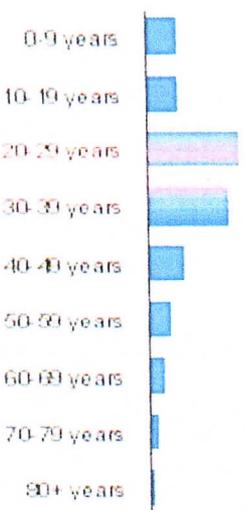


# Population Structure for Spitalfields and Banglatown



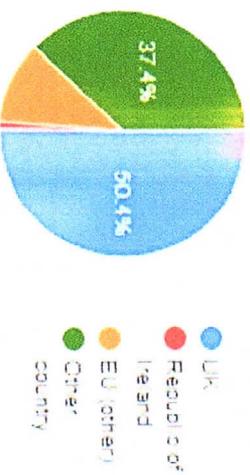
**Gender (E 2018)**

Males	7,779
Females	6,642



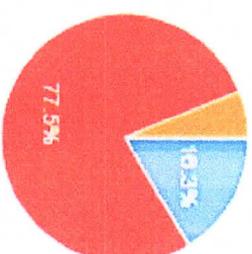
**Age Distribution (E 2018)**

0-9 years	1,399
10-19 years	1,368
20-29 years	4,147
30-39 years	3,570
40-49 years	1,600
50-59 years	1,050
60-69 years	702
70-79 years	365
80+ years	220



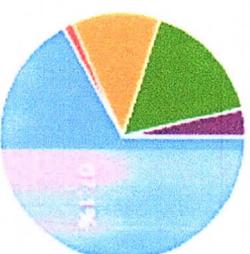
**Country of Birth (C 2011)**

UK	6,334
Republic of Ireland	129
EU (other)	1,409
Other country	4,706



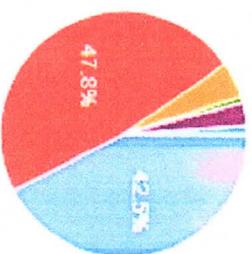
**Age Groups (E 2018)**

0-17 years	2,353
18-64 years	11,178
65+ years	890



**Passport (C 2011)**

UK	8,717
Republic of Ireland	171
EU (other)	1,489
other passport	2,117
no passport	491



**Ethnic Group (C 2011)**

White	5,343
Asian	6,008
Black	584
Arab	107
Mixed/multiple	389
Other ethnic group	147

# Appendix 3



# Appendix 4



Place Directorate  
Public Realm  
Environmental Health & Trading Standards

Licensing Authority  
Licensing Section  
John Onslow House  
1 Ewart Place  
London  
E3 5EQ

Head Of Service David Tolley

Tel 020 7364 5171  
Fax 020 7364 0863  
Enquiries to Kathy Driver  
Email [REDACTED]

[www.towerhamlets.gov.uk](http://www.towerhamlets.gov.uk)

2nd July 2020

My reference P/PR/EHTS/L/128671

Dear Sirs,

**RE: Future Leisure, 10 Brick Lane, London E1**  
**Gambling Act 2005 – Adult Gaming Centre**

I am writing in capacity as Licensing Authority in respect of the above Adult Gaming Centre application and wish to make representation to the application.

The 2005 Act sets out three licensing objectives this licensing authority must have regard to, these licensing objectives are:

- 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;
- Protecting children and other vulnerable people from being harmed or exploited by gambling.

Tower Hamlets has the highest reported Anti Social behaviour, higher than areas such as Soho in Westminster. The location of the premises falls on Brick Lane where this Authority has a Cumulative Impact Zone in respect of Licensed premises due to the high density of licensed premises in the area and high levels of anti social behaviour. This application will accentuate the problems associated in this area.

The applicants risk assessment has identified 65 educational establishments in the area as well as 4 addiction recovery centres, 5 Homeless Centres/Shelters which indicates very high levels of young or vulnerable person living and visiting the vicinity of this premises.



The best of London in one borough

**Tower Hamlets Council**  
John Onslow House  
1 Ewart Place  
London  
E3 5EQ

Consideration should be given to the levels of vulnerable people in the locality. The close proximity to these venues means that those vulnerable to addiction could be drawn to the premises. Old Montague Street has a high record of Drug users and known reports of drug dealing in this area. High levels of homeless reported in this area with begging and street drinkers being common place on Brick Lane.

The Police ASB figures report an increase in Tower Hamlets from 18,115 to 22,181 over the last year.

An adult gaming centre permits the following machines:

- a) a maximum of 20% of the total number of gaming machines which are available for use on the premises may be category B3 or B4 (but not B3A) machines.  
B3 machines being maximum of £2 stake and £500 maximum prize  
B4 machines being maximum of £2 stake and £400 maximum prize
- b) any number of Category C or D machines  
C machines being maximum of £1 stake and £100 maximum prize  
D machines most common money prize being maximum of £10p stake and £5 maximum prize

The plan of the premises given as part of the application does not contain any detail of where the machines will be located, the numbers or if cash machine will be in place. Therefore this Authority is unclear how the line of sight between the customer and staff will be maintained in ensuring the licensing objectives are met. This gives concerns particularly given the large amount of young person's already in the areas due to the number of educational establishments who might try to gain access to the premises.

The consumption of alcohol in AGCs is prohibited at any time during which facilities for gambling are being provided on the premises, however being an area with large numbers of licensed premises already in this area could lead to customers already consuming alcohol before and after being on the premises. This would again be exacerbated by the likelihood of vulnerable persons some of whom may have addition problems living within the vicinity of this premises.

In conclusion, this Authority believes the premises location is unsuitable for an Adult Gaming Centre and ask Members to refuse the application. Should Members decide to grant I would ask that they consider the hours of operation, security staff and lone workers during the evening in regards to any additional conditions.

Yours faithfully,



**Kathy Driver**  
**Principal Licensing Officer**



# Appendix 5



Tom Lewis  
Head of Licensing  
Tower Hamlets Council

**HT - Tower Hamlets Borough**

Licensing Office  
Stoke Newington Police Station  
33 Stoke Newington High Street

Email: [REDACTED]  
[www.met.police.uk](http://www.met.police.uk)

3<sup>rd</sup> July 2020

Dear Sir,

Central East Police Licensing formally object to the application for Adult Gaming License at 10 Brick Lane E1 by Future Leisure Limited. We object on the following grounds:

Preventing gambling from being a source of crime or disorder, and Protecting children and other vulnerable people from being harmed or exploited by gambling.

This objection is not based on the fitness of the applicant to run an adult gaming centre, rather this objection is based on the location of the proposed site. The area has suffered from high levels of crime and disorder due in part to the large number of people with complex needs living in four hostels located close by. The area is part of the Tower Hamlets Saturation Zone, due to the high levels of crime and disorder.

We believe that if this application is granted, then the residents of the hostels will be drawn in to gamble money in the premises. We also believe that they will fund this through aggressive begging and other crime such as theft and robbery. These people often self-medicate on alcohol and are usually drunk by midday, as they invariably lose their money we believe there will be incidents of violence and disorder as they remonstrate with staff, other customers and members of the public. Should this application be granted it will act as a magnet for hostel residents and their associates.

There are also a large number of licensed premises in the area, and the proposed site is on the route for people leaving the area going to Aldgate East Tube Station, we fear that intoxicated people from these bars will be also be drawn to the premises where there is an increased risk of alcohol related of crime and disorder.

There are also several schools in close proximity and Brick Lane is used by children to get to and from school. Brick Lane is also a tourist destination for schools due to its history, heritage and culture. There is also the Chicksand estate close by that has a large youth population, having an adult gaming centre so close by will be an attraction for these young people and risk drawing them into gambling. We do not believe any conditions or plans from any applicant could mitigate the risk of young people from the local area, on their way to school or visiting the area becoming involved in gambling.

I have attached a supporting e-mail from the local Safer Neighbourhood Sargent Rai who gives his teams considered objection to this application.

Given the unique location of the proposed adult gaming centre in an area of deprivation with four hostels, levels of crime and disorder and young people in the area we ask that this application is refused.

Kind Regards

Mark



PC Mark Perry  
Central East Licensing Unit  
Metropolitan Police Service (MPS)  
T: [REDACTED] Email [REDACTED]  
A: Licensing Office, 2nd Floor Stoke Newington Police Station

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 03 July 2020 13:11  
**To:** MARK.J.Perry [REDACTED]  
**Subject:** RE: Adult Gaming center

Dear Mark,

I have digested this short email with more than enough information for me to make an objection.

My objections are as follows:

1. There are currently 4 Hostels nearby the proposed AGC that accommodates a variety of residents who need support for drug,/alcohol dependency, mental health and released from prison. To fund their dependency they commit crime and anti-social behaviour against the local community and businesses. The ASB includes begging and at times aggressively.  
The hostels also draw other people from outside the borough due to the support they offer. They in turn also cause crime and ASB. This has encouraged homeless and rough sleeping, tents being erected in open spaces and all this affect the local community and businesses. The police in partnership with the local council and hostels have made a notably reduction in crime and ASB. However to add a licenced Adult gaming centre into an already fragile community would only encourage and increase crime and ASB. I say this through 25 years of operational policing whether frontline or in partnership working. I have seen the cause and effect of establishments introduced into the community that have been detrimental. The impact will also effect the younger members of the community who are already drawn to substance misuse and resort to crime to fund this.
2. There are 5 schools in the vicinity of the proposed location with parents walking the length of Brick Lane to drop their children to school. Also many schools use Brick Lane as a route in large groups when going on school trips. To have the proposed establishment in the community would be morally wrong as well as unsafe. I say this based on the repeated call Police receive from a nearby betting establishment where the customers resort to violence against each other and staff when they have a dispute. This sometimes spill out into the street. To have the proposed establishment could risk disputes spilling out on the street. Brick Lane is already quite narrow with vehicular traffic restricting pedestrian movement to avoid any conflict or disturbance.
3. Brick Lane is a community based commercial area. Many members of the community work there and are of a Muslim faith. I have discussed this with the Police Faith officer and he has explained the following. Not only is Gambling forbidden in many faiths, there are many cases within the Bengali community where husbands and young men gamble, lose their money and return home causing domestic violent incidents. Tower Hamlets is one of the poorest Boroughs in London and this temptation would only keep the Borough as such. I am aware that this is an adult gaming centre that is proposed, but it is an addiction.

If I can be of any other assistance please do not hesitate to contact me.

Kind regards

Rob RAI - Police Sergeant 173CE



Spitalfields & Banglatown/Weavers Safer Neighbourhood Team  
Central East BCU - Tower Hamlets  
25 Brick Lane, Tower Hamlets, E1 6PU

# Appendix 6

## **Gambling Commission Advice on Moral Objections**

**5.34** Licensing authorities should be aware that other considerations such as moral or ethical objections to gambling are not a valid reason to reject applications for premises licences. In deciding to reject an application, a licensing authority should rely on reasons that demonstrate that the licensing objectives are not being, or are unlikely to be, met, and such objections do not relate to the licensing objectives. An authority's decision cannot be based on dislike of gambling, or a general notion that it is undesirable to allow gambling premises in an area (with the exception of the casino resolution powers).

# Appendix 7

## Principles to be applied by licensing authorities

- 5.1** In exercising their functions under the Act, particularly in relation to premises licences, temporary use notices and some permits, licensing authorities must have regard to the licensing objectives set out in s.1 of the Act, namely:
- 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
  - protecting children and other vulnerable persons from being harmed or exploited by gambling.
- 5.2** It is expected that the licensing authority will have set out their approach to regulation in their statement of policy, having taken into account local circumstances.

### S.153 principles

- 5.19** S.153 of the Act provides that, in exercising its functions under Part 8 of the Act, a licensing authority shall aim to permit the use of premises for gambling in so far as it thinks it is:
- a. in accordance with any relevant code of practice under s.24 (ie the LCCP)
  - b. in accordance with any relevant guidance issued by the Commission under s.25 (ie this Guidance)
  - c. reasonably consistent with the licensing objectives (subject to a and b above), and
  - d. in accordance with the licensing authority's statement of licensing policy (subject to a to c above).
- 5.20** 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.
- 5.21** In the unlikely event that a licensing authority perceives a conflict between a provision of a Commission code of practice or this Guidance, and its own statement of policy or view as to the application of the licensing objectives, the structure of s.153 makes it clear that the Commission's codes and this Guidance take precedence.
- 5.22** In determining applications for premises licences, the Act explicitly sets out two principles that licensing authorities should **not** have regard to:
- s.153 makes it clear that in deciding whether or not to grant a licence, a licensing authority must not have regard to the expected demand for gambling premises that are the subject of the application
  - s.210 (1) of the Act states that 'in making a decision in respect of an application...a licensing authority should not have regard to whether or not a proposal by the applicant is likely to be permitted in accordance with law relating to planning or building'.
- 5.23** A licensing authority is therefore afforded significant scope to exercise its powers under s.153 on the grounds that it does not encroach on the two principles set out above.

**5.24** The requirements in s.153 are subject to the licensing authority's power under s.166 to resolve not to issue casino premises licences. This means that a resolution not to issue a casino premises licence applies regardless of the matters set out in s.153.

# Appendix 8

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

- 5.3** Among other matters, licensing authorities may need to consider the location of premises in the context of this licensing objective. For example, in considering an application for a premises licence or permit that is in an area noted for particular problems with disorder, organised criminal activity etc, the licensing authority should think about what, if any, controls might be appropriate to prevent those premises being associated with or used to support crime. That might include conditions on the premises licence, such as a requirement for door supervisors. The requirement for conditions might be determined by the operator's own risk assessment or the local area profile carried out by the licensing authority, as detailed in Part 6.
- 5.4** A licensing authority will need to consider questions raised by the location of Gambling premises when:
- formulating its statement of licensing policy
  - receiving relevant representations to an application
  - dealing with applications as a responsible authority in its own right
  - considering applications before it.
- 5.5** In the context of gambling premises licences, licensing authorities should generally consider disorder as activity that is more serious and disruptive than mere nuisance. Factors to consider in determining whether a disturbance was serious enough to constitute disorder would include whether police assistance was required and how threatening the behaviour was to those who could see or hear it. There is not a clear line between nuisance and disorder and the licensing authority should take the views of its lawyers before determining what action to take in circumstances in which disorder may be a factor.
- 5.6** Regulatory issues arising from the prevention of disorder are likely to focus almost exclusively on premises licensing, rather than on operating licences. However, if there are persistent or serious disorder problems that an operator could or should do more to prevent, the licensing authority should bring this to the attention of the Commission so that it can consider the continuing suitability of the operator to hold an operating licence.
- 5.7** Of course, licensing authorities are experienced in making judgements in relation to the suitability of premises, particularly those for which they have responsibilities under the Licensing Act 2003 / Licensing (Scotland) Act 2005, in which context they have wider powers to also take into account measures to prevent nuisance.
- 5.8** In relation to preventing disorder, licensing authorities have the ability under s.169 of the Act to attach additional conditions to premises licences, and are entitled to include a requirement for door supervision, as provided for in s.178 of the Act. If a person employed on door supervision would be required to hold a licence issued by the Security Industry Authority (SIA), that requirement will have force as though it were a condition on the premises licence. Further information on conditions on premises licences can be found in Part 9 of this Guidance.
- 5.9** There are a number of voluntary initiatives that the gambling industry participates in to address issues such as underage access, staff safety and security. These change from time to time and licensing authorities are advised to check with local operators, for example when conducting inspections, as to which (if any) scheme the operator is

a part of. Further information can often be found on the website of industry trade associations<sup>5</sup>.

- 5.10** Licensing authorities do not need to investigate the suitability of an applicant for a premises licence, including in relation to crime. The issue of suitability will already have been considered by the Commission, because any applicant (except occupiers of tracks who do not propose to offer gambling themselves) will have to hold an operating licence from the Commission before the premises licence can be issued. However, if the licensing authority receives information during the course of considering a premises licence application or at any other time, that causes it to question the suitability of the applicant to hold an operating licence, these concerns should be brought to the attention of the Commission without delay.

# Appendix 9

## **Gambling Commission Advice on the Licensing Objective of Ensuring that gambling is conducted in a fair and open way**

- 5.11** Generally the Commission would not expect licensing authorities to find themselves dealing with issues of fairness and openness frequently. Fairness and openness is likely to be a matter for either the way specific gambling products are provided and therefore subject to the operating licence, or will be in relation to the suitability and actions of an individual and therefore subject to the personal licence. However, if licensing authorities suspect that Gambling is not being conducted in a fair and open way this should be brought to the attention of the Commission so that it can consider the continuing suitability of the operator to hold an operating licence or of an individual to hold a personal licence.
- 5.12** In relation to the licensing of tracks, the licensing authority's role will be different from other premises in that track owners will not necessarily have an operating licence. In those circumstances the premises licence may need to contain conditions to ensure that the environment in which betting takes place is suitable. Further information can be found in Part 20 of this Guidance.

# Appendix 10

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

- 5.13** In exercising their powers under s.153, licensing authorities should consider whether staff will be able to adequately supervise the gambling premises, as adequate staffing levels is a factor to consider regarding the prevention of underage gambling. The Commission would expect the operator and the licensing authority to work together to consider how any impediments to the supervision of premises might be most appropriately remedied. Supervision also applies to premises that are themselves not age-restricted (eg bingo and family entertainment centre (FEC) premises) but which make gambling products and facilities available.
- 5.14** Where a licensing authority considers the structure or layout of premises to be an inhibition or potential inhibition to satisfying this licensing objective, the licensee should consider what changes are required to ensure the risk is mitigated. Such changes might include the positioning of staff or CCTV, the use of floor-walkers and the relocation of the staff counter to enable direct line of sight. Licensing authorities will need to consider the proportionality of changes to the physical layout in relation to other measures that could be put in place.
- 5.15** If the operator fails to satisfy the licensing authority that the risks are sufficiently mitigated, it may be appropriate to conduct a review of the premises licence.
- 5.16** In relation to casinos, the Commission has issued a code of practice on access to casino premises by children and young persons, as provided for by s.176 of the Act. The code of practice is available as part of the [Licence Conditions and Codes of Practice](#) (LCCP) In accordance with s.176 of the Act, adherence to the code will be a condition of the premises licence. Further information can be found in Parts 9 and 17 of this Guidance.
- 5.17** The Act does not seek to prohibit particular groups of adults from gambling in the same way that it prohibits children. The Commission does not seek to define 'vulnerable persons' but it does, for regulatory purposes, assume that this group includes people who gamble more than they want to, people who gamble beyond their means and people who may not be able to make informed or balanced decisions about gambling due to, for example, mental health, a learning disability or substance misuse relating to alcohol or drugs.
- 5.18** Licensing authorities need to consider, in relation to particular premises, whether any special considerations apply in relation to the protection of vulnerable persons. This could be a local risk that is reflected in the licensing authority's statement of policy. Any such considerations need to be balanced against the authority's objective to aim to permit the use of premises for gambling.

# Appendix 11

## Part 7: Premises licences

- 7.1** Considering applications for premises licences is the main business of the licensing authority in terms of local gambling regulation. Where an individual or company uses premises, or causes or permits premises to be used to offer gambling, a premises licence is required.
- 7.2** Premises licences are issued by the licensing authority with responsibility for the area in which the premises are situated. Guidance on dealing with premises which are situated in more than one licensing authority can be found at paragraph 7.10.

### Premises

- 7.3** In accordance with s.150 of the Act, premises licences can authorise the provision of facilities on:
- a) casino premises
  - b) bingo premises
  - c) betting premises, including tracks and premises used by betting intermediaries
  - d) adult gaming centre (AGC) premises (for category B3, B4, C and D machines)
  - e) family entertainment centre (FEC) premises (for category C and D machines) – the licensing authority may issue a FEC gaming machine permit, which authorises the use of category D machines only.
- 7.4** By distinguishing between premises types, the Act makes it clear that the gambling activity of the premises should be linked to the premises described. Thus, in a bingo premises, the gambling activity should be bingo, with gaming machines as an ancillary offer on the premises. This principle also applies to existing casino licences (but not to licences granted under the Act) and betting premises licences. The [Licence Conditions and Codes of Practice](#) (LCCP) sets out in full the requirements on operators. Subject to the gaming machine entitlements which various types of licence bring with them (and except in the case of tracks), the Act does not permit premises to be licensed for more than one of the above activities.

### Meaning of premises

- 7.5** In the Act, 'premises' is defined as including 'any place'. S.152 therefore prevents more than one premises licence applying to any place. But, 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.
- 7.6** In most cases the expectation is that a single building/plot will be the subject of an application for a licence, for example, 32 High Street. But that does not mean that 32 High Street cannot be the subject of separate premises licences for the basement and ground floor, if they are configured acceptably. Whether different parts of a building can properly be regarded as being separate premises will depend on the circumstances. The location of the premises will clearly be an important consideration and the suitability of the division is likely to be a matter for discussion between the operator and the licensing authority.

- 7.7** The Commission does not consider that areas of a building that are artificially or temporarily separated, for example by ropes or moveable partitions, can properly be regarded as different premises. If a premises is located within a wider venue, a licensing authority should request a plan of the venue on which the premises should be identified as a separate unit.
- 7.8** The Commission recognises that different configurations may be appropriate under different circumstances but the crux of the matter is whether the proposed premises are genuinely separate premises that merit their own licence – with the machine entitlements that brings – and are not an artificially created part of what is readily identifiable as a single premises.
- 7.9** The Act sets out that the type and number of higher stake gaming machines allowable in premises is restricted according to the type of premises licence or permit granted. For example, a converted casino licence allows for 20 gaming machines in categories B, C or D. With the exception of AGCs and FECs, premises are not permitted to be used exclusively for making gaming machines available, but rather to provide the gaming facilities corresponding to the premises licence type. Further detail on gaming machines is set out in Part 16 of this Guidance.
- 7.10** The Act states that an application must be made to a licensing authority in whose area the premises are wholly or partly situated. In circumstances where the premises lie in more than one licensing authority's area, the operator should make their application to just one of those authorities. As both licensing authorities are 'responsible authorities' under s.157 of the Act, the other licensing authority must be notified of the application and is entitled to make representations. As a responsible authority, it has an opportunity to pass relevant information about the premises to the licensing authority determining the application. Further detail on responsible authorities is set out at Part 8 of this Guidance.
- 7.11** Casino premises are subject to separate regulations, involving a two-stage application process. Details of the two stage process can be found in Part 17 of this Guidance.

## **Vessels**

- 7.12** The Act permits premises licences to be granted for passenger vessels. Separate application forms are prescribed for vessels under the Premises Licences and Provisional Statements Regulations.<sup>13</sup> The definition of a vessel in s.353(1) of the Act is:
- anything (other than a seaplane or amphibious vehicle) designed or adapted for use on water
  - a hovercraft
  - anything, or part of any place, situated on or in water.
- 7.13** This last part of the definition should be given a normal and sensible interpretation. Structures which are an extension of the land are not vessels, even if they arch over water. Thus, neither a pier nor a bridge is to be considered a vessel and they remain premises under the Act. This is important because not all forms of permit are available to vessels.

---

<sup>13</sup> SI 2007/459: Gambling Act 2005 (Premises Licences and Provisional Statements) Regulations 2007  
SSI 2007/196: Gambling Act 2005 (Premises and Provisional Statements) Regulations 2007

- 7.14** The Act allows pleasure boats to apply for premises licences. As with multi-purpose buildings, the part of the vessel where gambling takes place will be licensed and the usual restrictions on access for children will apply. The Act applies in relation to a vessel that is not permanently moored or berthed, as if it were premises situated in a place where it is usually moored or berthed. The relevant licensing authority for considering an application for a premises licence in respect of a vessel is the authority for the area in which it is usually moored or berthed.
- 7.15** Where a premises licence is sought in connection with a vessel which will be navigated while licensable activities take place, the licensing authority should be concerned with the promotion of the licensing objectives on board the vessel. It should not focus on matters relating to safe navigation or operation of the vessel, the general safety of passengers or emergency provision, all of which are subject to regulations which must be met before the vessel is issued with its Passenger Certificate and Safety Management Certificate.
- 7.16** Licences are not required for gambling if it takes place aboard a vessel engaged on an international journey. Such gambling is exempted from the offences under the Act if the vessel is on a journey which has taken it, or is intended to take it, into international waters (so this includes cross-channel ferries). In the case of aircraft, no offence takes place if the gambling takes place in international airspace.
- 7.17** This means that licensing authorities will have jurisdiction over gambling conducted on vessels on all inland waterways, at permanent moorings, and on all aircraft on the ground or in domestic airspace. If an ocean-going vessel is involved, authorities will need to establish where the vessel has been, or is intending to go.

## **Vehicles**

- 7.18** Vehicles (trains, road vehicles, aircraft, sea planes and amphibious vehicles, other than a hovercraft) may not be the subject of a premises licence and therefore all forms of commercial betting and gaming will be unlawful in a vehicle in Great Britain. Certain allowances are made for private and non-commercial gaming or betting to take place in a vehicle, but these are subject to a number of stringent requirements. These ensure that, at no point, can the gambling become a commercial activity.

## **Access to premises**

- 7.19** An issue that may arise when division of a premises is being considered is the nature of the unlicensed area from which a customer may access a licensed gambling premises. The precise nature of this public area will depend on the location and nature of the premises. Licensing authorities will need to consider whether the effect of any division is to create an environment with very large banks of machines, which is not the intention of the access conditions, or whether it creates a public environment with gambling facilities being made available.
- 7.20** The Gambling Act 2005 (Mandatory and Default Conditions) Regulations<sup>14</sup> 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.

---

<sup>14</sup> SI 2007/1409: The Gambling Act 2005 (Mandatory and Default Conditions) (England and Wales) Regulations 2007  
SSI2007/266: The Gambling Act 2005 (Mandatory and Default Conditions) (Scotland) Regulations 2007

- 7.21** These 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.
- 7.22** 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.
- 7.23** The relevant access provisions for each premises type is as follows:

Type of premises	Access provisions
Casinos	<ul style="list-style-type: none"> <li>the principal entrance to the premises must be from a ‘street’</li> <li>no entrance to a casino must be from premises that are used wholly or mainly by children and/or young persons</li> <li>no customer must be able to enter a casino directly from any other premises which holds a gambling premises licence.</li> </ul>
AGCs	<ul style="list-style-type: none"> <li>no customer must be able to access the premises directly from any other licensed gambling premises.</li> </ul>
Betting shops	<ul style="list-style-type: none"> <li>access must be from a ‘street’ or from other premises with a betting premises licence</li> <li>no direct access from a betting shop to another premises used for the retail sale of merchandise or services. In effect there cannot be an entrance to a betting shop from a shop of any kind unless that shop is itself a licensed betting premises.</li> </ul>
Tracks	<ul style="list-style-type: none"> <li>no customer must be able to access the premises directly from a casino or AGC</li> </ul>
Bingo premises	<ul style="list-style-type: none"> <li>no customer must be able to access the premises directly from a casino, an AGC or a betting premises, other than a track</li> </ul>
FECs	<ul style="list-style-type: none"> <li>no customer must be able to access the premises directly from a casino, an AGC or a betting premises, other than a track.</li> </ul>

## Access to gambling by children and young people

- 7.24** The Act contains the objective of ‘protecting children and other vulnerable persons from being harmed or exploited by gambling’ and sets out offences at s.46 and s.47 of inviting, causing or permitting a child or young person to gamble, or to enter certain gambling premises. Children are defined in the Act as under-16s and young persons as 16-17 year olds. An adult is defined as 18 and over.
- 7.25** Children and young persons may take part in private and non-commercial betting and gaming, but the Act restricts the circumstances in which they may participate in gambling or be on premises where gambling is taking place as follows:
- casinos are not permitted to admit anyone under 18
  - betting shops are not permitted to admit anyone under 18
  - bingo clubs may admit those under 18 but must have policies to ensure that they do not play bingo, or play category B or C machines that are restricted to those over 18
  - AGCs are not permitted to admit those under 18

- FECs and premises with a liquor licence (for example pubs) can admit under-18s, but they must not play category C machines which are restricted to those over 18
- clubs with a club premises certificate can admit under-18s, but they must have policies to ensure those under 18 do not play machines other than category D machines
- all tracks can admit under-18s, but they may only have access to gambling areas on days where races or other sporting events are taking place, or are expected to take place. This was extended to other sporting venues under the Gambling Act 2005 (Exclusion of Children from Track Areas) Order 2007.<sup>15</sup> Tracks will be required to have policies to ensure that under-18s do not participate in gambling other than on category D machines.

**7.26** Licensing authorities should take particular care in considering applications for multiple licences for a building and those relating to a discrete part of a building used for other (non-gambling) purposes. In particular, they should be aware that entrances and exits from parts of a building covered by one or more licences should be separate and identifiable so that the separation of different premises is not compromised and that people do not 'drift' into a gambling area. The plan of the premises should clearly denote entrances and exits.

**7.27** For bingo and FEC premises, it is a mandatory condition that under-18s should not have access to areas where category B and C gaming machines are located and this is achieved through further mandatory conditions that require the area to be:

- separated from the rest of the premises by a physical barrier which is effective to prevent access other than by an entrance designed for that purpose
- supervised at all times to ensure that under-18s do not enter the area, and supervised by either:
  - one or more persons whose responsibilities include ensuring that under-18s do not enter the areas
  - CCTV monitored by one or more persons whose responsibilities include ensuring that under-18s do not enter the areas
- arranged in a way that ensures that all parts of the area can be observed.

A notice must be displayed in a prominent place at the entrance to the area stating that no person under the age of 18 is permitted to enter the area.

**7.28** Products made available for use in gambling premises will often contain imagery that might be of particular appeal to children or young people. For example, cartoon imagery that is ubiquitous on gaming machine livery. Where any such product is sited on age-restricted premises or in the age-restricted area of premises (and in particular, if sited close to the entrance or threshold and therefore visible to children or young people), licensees should consider whether it might risk inviting under 18s to enter the restricted area.

**7.29** The LCCP requires licensees to ensure that their policies and procedures for preventing underage gambling take account of the structure and layout of their gambling premises. This therefore requires licensees not only to be able to supervise their premises but also that they should mitigate the risks of under 18s being attracted to enter premises by the products available within them. Where a licensing authority has concerns that such products are visible, they could for example require the licensee to re-site the products out of view.

**7.30** There are a range of other conditions which attach to each type of premises which are set out in Part 9 of this Guidance and other Parts relating to each type of premises.

---

<sup>15</sup> SI 2007/1410: Gambling Act 2005 (Exclusion of Children from Track Areas) Order 2007

## Multiple activity premises – layout and access

- 7.31** With the exception of bingo clubs, tracks on race-days and licensed FECs, children will not be permitted to enter licensed gambling premises. Therefore businesses will need to consider carefully how they wish to configure their buildings if they are seeking to develop multi-purpose sites.
- 7.32** Licensing authorities should take particular care in considering applications for multiple premises licences for a building and those relating to a discrete part of a building used for other (non-gambling) purposes. In particular, they should be aware of the following:
- the third licensing objective seeks to protect children from being harmed or exploited by gambling. In practice this means not only preventing them from taking part in gambling, but also prevents them from being in close proximity to gambling. Therefore premises should be configured so that children are not invited to participate in, have accidental access to or closely observe gambling where they are prohibited from participating.
  - 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.
- 7.33** In determining whether two or more proposed premises are truly separate, the licensing authority should consider factors which could assist them in making their decision, including:
- 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?

The Commission has published a quick guide to assist licensing authority officers when considering applications for, and conducting inspections of, [multi-activity premises](#)<sup>16</sup>.

- 7.34** Where a building consists of a number of areas which hold separate premises licences, each individual licence must not exceed its permitted gaming machine entitlement. The position is different for tracks, as detailed in Part 20.
- 7.35** The proper application of s.152 means that different premises licences cannot apply in respect of single premises at different times. There is no temporal element to a premises licence. Therefore, premises could not, for example, be licensed as a bingo club on week days and a betting shop at weekends.

## Single and combined licences

- 7.36** Only one premises licence may be issued for any particular premises at any time although, in some circumstances, the licence may authorise more than one type of gambling. For example, a bingo licence will also authorise the provision of gaming machines. Details of the gambling permissible under each type of licence are set out in the Act and in the premises specific parts of this Guidance.

---

<sup>16</sup> This quick guide does not form part of the Guidance to Licensing Authorities

- 7.37** The exception to this relates to tracks, that is a horse racing course, dog track or other premises where races or sporting events take place, which may be subject to more than one premises licence, provided each licence relates to a specified area of the track.
- 7.38** The Act sets out that there will be a main (betting premises) licence for the track, and, in addition, subsidiary premises licences for other gambling activities may be issued. The normal limitations in respect of access by children and young persons will apply, although in relation to a premises licence for a track, children and young persons will be permitted to enter track areas where facilities for betting are provided on days when dog racing and/or horse racing takes place. This is subject to the rule that children and young persons may not enter any area where gaming machines (other than category D machines) are provided.
- 7.39** In principle there is no reason why multiple types of gambling should not co-exist on a track (with the exception of a casino or AGC<sup>17</sup>), but licensing authorities will want to think about how the third licensing objective is delivered by the co-location of premises. As with the granting of multiple licences in a single building, licensing authorities will need to ensure that entrances to each type of premises are distinct and that under-18s are excluded from gambling areas where they are not permitted to enter.

## Applications

- 7.40** A summary of the application forms and statutory notices is provided at Appendix E and the forms can be downloaded from the Commission's website\_ [www.gamblingcommission.gov.uk](http://www.gamblingcommission.gov.uk).
- 7.41** An application for a premises licence may only be made by persons (which includes companies or partnerships):
- who are aged 18 or over **and**
  - who have the right to occupy the premises and
  - who have an operating licence which allows them to carry out the proposed activity. Details of [operators that hold an operation licence](#) are available on the Commission's website **or**
  - who have applied for an operating licence to allow them to carry out the proposed activity. The premises licence cannot be determined until an operating licence has been issued.
- 7.42** The exception to this is an applicant for a premises licence to allow a track to be used for betting, as these applicants are not required to hold an operating licence if they are merely providing space for other people to provide betting (and those other people hold valid betting operating licences). However, if a track owner is also acting as a betting operator, for example, running pool betting, they will have to have the relevant type of operating licence.
- 7.43** An application must be made to the relevant licensing authority in the form prescribed in regulations laid down by the Secretary of State or Scottish Ministers, and must be accompanied by:
- the prescribed fee
  - the prescribed documents namely a plan of the premises – the plan needs to be to scale, however, a specific scale has not been prescribed.

---

<sup>17</sup> This is because of the access restrictions placed on tracks by Schedule 6, Part 1 of the Gambling Act 2005 (Mandatory and Default Conditions) Regulations

# Appendix 12

## Part 21: Adult gaming centres

- 21.1** Persons operating an adult gaming centre (AGC) must hold a 'gaming machines general operating licence (adult gaming centre)' from the Commission and a premises licence from the relevant licensing authority. They are able to make category B, C and D gaming machines available.

### Protection of children and young persons

- 21.2** No-one under the age of 18 is permitted to enter an AGC. The Act sets out offences at s.46 and s.47 of inviting, causing or permitting a child or young person to gamble, or to enter certain gambling premises. In addition, Social Responsibility (SR) code 3.2.3(3) in the [Licence Conditions and Codes of Practice \(LCCP\)](#) states that 'licensees must ensure that their policies and procedures take account of the structure and layout of their gambling premises in order to prevent underage gambling.
- 21.3** Licensing authorities will wish to have particular regard to the location of and entry to AGCs to minimise the opportunities for under-18s to gain access. This may be of particular importance in areas where young people may be unsupervised for example, where an AGC is in a complex, such as a shopping centre or airport. Licensing authorities should consider whether their statement of policy can be used to reflect such locally based considerations.

### Gaming machines

- 21.4** Gaming machine provisions by premises are set out at Appendix A. S.172(1) of the Act, as amended, provides that the holder of an AGC premises licence 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. For example, a premises with a total of 25 gaming machines available for use can make five or fewer category B3 gaming machines available on those premises.
- 21.5** Premises subject to a licence granted before 13 July 2011 are entitled to make available four category B3/B4 gaming machines, or 20% of the total number of gaming machines, whichever is the greater. AGC premises licences granted on or after 13 July 2011 are entitled to 20% of the total number of gaming machines only. Regulations specify that the category B machines should be restricted to sub-category B3 and B4 machines, but not B3A machines<sup>66</sup>.
- 21.6** Where the operator of an existing AGC premises licence applies to vary the licence and acquire additional AGC premises licences – so that the area that was the subject of a single licence will become divided between a number of separate licensed premises – each separate licensed premises must only contain the permitted machine entitlement. For example, where two separate AGC premises have been created adjacent to each other by splitting a pre-existing premises, it is not permissible to locate eight category B3 gaming machines in one of the resulting premises and none in the other, as the gaming machine entitlement for that premises would be exceeded. Part 7 explains in greater detail what constitutes premises.

### AGC premises licence conditions

- 21.7** Part 9 of this Guidance discusses the mandatory and default conditions that attach to premises licences. Currently there are no default conditions specific to AGCs.

---

<sup>66</sup> S1 2158 The Categories of Gaming Machine Regulations 2007

## **Mandatory conditions**

- 21.8** 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.
- 21.9** 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.
- 21.10** 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.
- 21.11** 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.

# Appendix 13

**Gambling Policy relating to Protecting children and other vulnerable persons from being harmed or exploited by gambling**

- 8.11 In consultation with Public Health within this Council gambling related harms could be defined as “the adverse impacts from gambling on the health and wellbeing of individuals, families, communities and societies”, as suggested by the Responsible Strategy Gambling Board. These harms affect resources, relationships and health. The impact from them may be short-lived but can be durable, having enduring consequences and exacerbating existing inequalities.
- 8.12 This Licensing Authority is will always take the location of the premises into account with regard to the children and vulnerable persons licensing objective when considering applications. We will have particular regard to premises situated in areas of Tower Hamlets that represent a higher risk of potential vulnerability to gambling-related harm where this is indicated in our local area profile.

In order to explain this licensing objective clearly, we have separated it into children and vulnerable people.

**Children**

- 8.13 Protecting children from being harmed or exploited by gambling means:
- a) preventing children from taking part in gambling and,
  - b) restricting activities such as advertising, so that gambling products are not aimed at or appear attractive to children.
- 8.14 To ensure the above we will pay particular attention to licence applications for premises situated near schools or areas where there may be a high concentration of children or families. We will expect applicants to have carefully considered their operation and any potential for exposing children and young people to gambling. Where the Gambling Premises requires a restriction to not admit persons under 18 to the gambling premises or area operators should demonstrate policies and procedures that will prevent children and young people from entering such premises/area or partaking in gambling activities.
- 8.15 When considering the operators risk assessment, we will assess the measures the operator has in place to mitigate the risks to this licensing objective. Following which we will decide whether further specific measures are required at particular premises such as
- a) supervision of entrances to the premises
  - b) supervision of gaming machines and
  - c) the separation of certain areas within the premises
- 8.16 Where category C, B or A machines are on offer in premises to which children are admitted we will ensure:
- a) all such machines are located in an area of the premises which is separated from the remainder of the premises by a physical barrier which is effective in preventing access other than through a designated entrance,

- b) the premises has appropriate signage indicating that access to that area where such machines are located is restricted to persons under the age of 18
- c) only adults are admitted to the area where the machines are located
- d) access to the area where the machines are located is supervised
- e) the area where the machines are located is arranged so that the staff or the licence holder can observe it.

### **Safeguarding against Child Sexual exploitation (CSE)**

- 8.17 The Council acknowledges that CSE awareness does not just apply to children on licensed premises, particularly as children are not permitted to access most gambling premises. However applicants should be equally aware of children in the proximity of the premises that may be waiting for, or seeking, older persons.
- 8.18 Applicants are encouraged to ensure that suitable management controls are in place to safeguard children against the risk of CSE as part of promoting this objective (Objective 3) but also Objective 1 above. Measures may include, but are not limited to:
- awareness training for staff;
  - regular patrols of the premises, including external areas and the immediate proximity, to identify any vulnerable children;
  - close monitoring of patrons as they leave the premises;
  - recording and reporting concerns to the police.
- 8.19 The Council expects applicants to be aware of 'risk indicators' of CSE which include, but are not limited to:
- developing relationships between a child and an older person;
  - children in the company of a group of older persons;
  - children regularly attending premises and meeting with a number of different older persons, particularly where older persons may be facilitating gambling for children;
  - children outside of licensed premises developing relationships with an older person, particularly an older person facilitating gambling for children;
  - children leaving the locality of the premises with older persons, particularly with a group of older persons;
  - children looking uncomfortable in the company of, or leaving with, older persons, particularly groups of older persons.
- 8.20 Whilst the Council does not wish to create the impression that all contact between children and older persons is inappropriate, it believes that licence holders should be aware of the risks of CSE and should proactively manage their premises to minimise the risks.

### **Vulnerable People**

- 8.21 This Licensing Authority does not seek to stop particular groups of adults from gambling or gaming in the same way that we seek to stop children. However, we

are concerned about the potential for vulnerable people to be harmed or exploited by gambling.

- 8.22 The Gambling Commission Guidance does not seek to define 'vulnerable persons' however, for regulatory purposes, it does assume that vulnerable persons includes the following:
- a) people who gamble more than they want to,
  - b) people who gamble beyond their means,
  - c) people who may not be able to make informed or balanced decisions about gambling due to, for example, mental health, a learning disability or substance misuse relating to alcohol or drugs.
- 8.23 This Licensing Authority recognises that there are many serious issues that can be a consequence of problem gambling, and therefore presents a greater risk of harm to vulnerable persons. These can include but are not limited to:
- a) job loss and absenteeism,
  - b) poor work/study performance,
  - c) stress depression and anxiety,
  - d) suicide,
  - e) poor health,
  - f) financial hardship, debts and bankruptcy,
  - g) resorting to crime/theft and imprisonment,
  - h) neglect of family,
  - i) impacts on others,
  - j) relationship breakdown,
  - k) domestic violence.
- 8.24 Problem gambling, particularly with the young, can sometimes be an indication of other issues, such as anti-social behaviour problems. When we become aware of issues associated with problem gambling and vulnerable people, we will seek to work closely with the gambling premises operator, the Gambling Commission and other relevant services within the Council.
- 8.25 This Licensing Authority will have regard to our local area profile and pay particular attention to applications for premises near venues where, for example, Gamblers Anonymous groups (or similar) meet, residential homes, hospitals or other premises where vulnerable as per paragraph 8.22 above reside or visit, when dealing with gambling premises applications. In considering the above, we will base our decision on whether the proximity of the premises to the vulnerable group is likely to present a risk to this licensing objective. Where we have relevant evidence, we may consider the likelihood of vulnerable people using the premises, whether they have other reason to be in the proximity or not. This could be, as an example, through complaints made to us or through representations made about an application.
- 8.26 When determining an application and this issue is raised, we will also take into account the operator's risk assessment and assess the controls that are in place (or

will be in place) to protect vulnerable people and promote the licensing objectives at the premises. Depending on the circumstances, we may have particular regard to:

- a) the size of the premises,
- b) staffing levels at the premises,
- c) procedures in place to identify a vulnerable person and to stop a vulnerable person from gambling,
- d) the location and type of gaming machines on the premises,
- e) arrangements in place to supervise the gaming machines.

8.27 This Licensing Authority encourages operators to consider participation in voluntary best practice or certification schemes, such as GamCare's Safer Gambling Standard to assist in their promotion of the objective of Protecting children and other vulnerable persons from being harmed or exploited by gambling.

# Appendix 14

## **Gambling Policy - Adult Gaming Centres (AGC)**

4.1 This licensing authority 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 ensure that under 18 year olds do not have access to the premises.

Appropriate licence conditions may cover issues such as:

- Proof of age schemes
- CCTV
- Door supervisors
- Supervision of entrances / machine areas
- Physical separation of areas
- Location of entry
- Notices / signage
- Specific opening hours
- Self-barring schemes
- Provision of information leaflets/ helpful numbers for organisations such as GamCare

4.2 This list is neither mandatory nor exhaustive, and is merely indicative.

4.3 An AGC premises is entitled to the following allocation of gaming machines:

**If the licence was granted on or after 13 July 2011:**

- a) a maximum of 20% of the total number of gaming machines which are available for use on the premises may be category B3 or B4 (but not B3A) machines
- b) any number of Category C or D machines

**If the licence was granted before 13 July 2011:**

- a) four category B3 or B4 (but not B3A) machines, or 20% of the total number of gaming machines which are available for use on the premises, whichever is the greater
- b) any number of Category C or D machines