

SHIPLEY'S LOCAL GAMBLING RISK ASSESSMENT

PREMISES

Premises Name:	Shipleys Bingo Centre
Premises Address:	46/47 South Mall, Edmonton Green, Shopping Centre, London. Enfield
Premises Post Code:	N9 0TT
Premises Licence Number	
Category of Premises	Bingo

COMPANY

Operating Company:	Amuse 2016 Ltd
Operating Licence Number	Gambling Commission Reference 46781

ASSESSMENT WRITER

Name of Person Writing this Assessment:	Byron Evans
Position within the Company:	Compliance Consultant
Date that Original Assessment was written:	29th September 2020

REQUIREMENT TO COMPLY

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

Effective as at April 6th 2016

Social Responsibility Code Provision 10.1.1

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

Ordinary Code Provision 10.1.2

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

Local Area

The purpose of this document is to assist staff in understanding and carrying out their responsibilities in running the premises including alerting them to any special problems of which they need to be aware in carrying out their duties.

The operator and its related companies run by the Shipley family have longstanding experience of operating bingo and adult gaming centre premises in London and the Midlands. It is familiar with the guidance in Enfield Borough Councils Statement of Principles for Gambling 2019 and their Gambling Area Local Profile (January 2019). The company has an independent regime for testing the robustness of its policies & procedures and since the introduction of the Gambling Act 2005 (in 2007) has not been sanctioned by the Gambling Commission nor been subject to any Licence Review by a local authority.

The Luxury Bingo Centre proposed is located within a primary shopping area. Opposite is Totally Wicked and slightly to the right is the Edmonton Green library. Other traders in the area include Milan Shoes, EE mobile phone shop, Onur Jeweller's, Greggs, Paddy Power and Savers. There is a wide range of approximately 120 retail outlets in the Edmonton Green Shopping Centre including:

An Asda Superstore, approximately 200 metres from the proposed premises;

Betting Shops – Ladbrokes, Paddy Power, William & Bet Fred are all within the centre with a Corals nearby on Fore Street.

Bingo – Cashino

Pawn Shop – H & T Pawnbrokers;

Public House – The Railway Tavern on Market Square;

Post Office – 150 metres from the proposed premises on South Mall;

Banks & ATM cashpoints – there are at least 3 ATM's within close proximity.

These premises all possibly have links to people who are potentially vulnerable to gambling related harm as either providing a source of funds to gamble or which provide gambling services. The applicant is mindful of this and staff training programmes and procedures ensure that customers that might display signs of gambling related problems are identified quickly and the appropriate action taken.

The proposed premises have a frontage of 37 feet . The premises are square in shape internally and have an emergency exit to the rear (a service area). As a Bingo centre it will provide Bingo along with gaming machines from category B3, C and D.

Schools

There are 4 schools within easy travelling distance of the Edmonton Green Shopping Centre:

St Edmunds Catholic Primary School, Hertfield Road:

Latymer All Saints Church of England School, Hydethorpe Road;

Fleecefield Primary School, Brettenham Road;

Edmonton County School, Great Cambridge Road.

The Explore Learning Centre (English & Maths tuition) is located opposite Asda.

The LadyBug Day Nursery is located on the first floor adjacent to the Market Square.

It is not unusual to see school children in the shopping centre at lunchtimes and after school hours using the Library or the Leisure Centre on Fore Street. The risk of these children gambling is mitigated by the processes noted on page 6 of this Risk Assessment. It should also be noted that there will be no visibility of gambling through the entrance or windows of the proposed premises.

Centres/meeting places for vulnerable people

Enfield Community Drug and Alcohol Service, Centre Way, Enfield

HELP Centre, Wellbeing and Financial Advice for the vulnerable, Fore Street/North Circular, Edmonton

MIND Wellbeing Centre, Fore Street, Edmonton

Connect Services (for the vulnerable with mental health issues), Fore Street, Edmonton Green
Edmonton Methodist Church (Food Bank), Fore Street, Edmonton Green.
Salvation Army Community Centre, Fore Street, Edmonton Green
Edmonton Community Mental Health Centre, Lucas House, Fore Street, Edmonton Green.
Citizens Advice, Vincent House, Ponders End
Homeless Resource Centre, 300 Fore Street, Edmonton.

Risk from gambling related harm

Enfield Borough Council's Local Area Profile produced in January 2019 highlights Edmonton Green as being an area of high risk from gambling related harm. Amuse 2016 propose the following specific procedures and physical approaches to identify those people at potential risk and to prevent access to gambling:

The risk posed from gambling related harm in this area is higher than normal due to higher percentages of deprivation, poor mental health, crime and unemployment. However, this risk will be mitigated by the company's superior levels of staff training, door control systems, cctv and operational procedures. These, combined with weekly reviews, will equip staff to the highest level to recognise and manage those customers displaying any potential signs of gambling related problems.

CCTV

A 16 camera high definition system will be installed to include 2 cameras on the exterior of the premises (subject to Shopping Centre Management approval) which will monitor those entering/exiting the premises and any nearby activity in the South Mall.

All CCTV images will be stored in the appropriate GDPR fashion and images will be made available to the Police, licensing authority and Centre Management to recover any required images.

Door control

Amuse 2016 and their other associated companies have extensive experience in operating Bingo and adult gaming centres in areas where the management of door control is a significant consideration. This experience allows decisions to be made in relation to the levels of staff and night security required as detailed below:

- External CCTV coverage
- Night time Mag lock controls
- Minimum of two members of staff on duty at all times
- SIA registered Night Security staff on duty from Thursday to Sunday (a procedure that will be reviewed as necessary)
- Door and frontage design will ensure that children or the vulnerable will not be able to see gambling taking place through the windows or doors.

Local factors

Through crime statistics and local observations we are aware that street drinking and drug dealing is an issue in this part of Edmonton Green. Amuse 2016 propose to minimise the risk of these issues being associated with their proposed premises through systems and procedures already mentioned above along with further measures relating to Toilets:

Toilets

- Access controlled by staff
- UV lighting to deter drug abuse by injection.
- Toilets inspected after every use to identify those individuals involved in drug or alcohol abuse.
- Zero tolerance to drug or alcohol abuse with appropriate signage
- Toilet facilities designed so that no areas are accessible to hide drugs syringes or alcohol

Amuse 2016 will also meet with the Shopping Centre Management on a regular basis in order to discuss any prevailing issues relating to the management or operation of the bingo premises.

Gambling Act 2005 – The Licensing Objectives

The Gambling Act 2005 sets out the three licensing Objections (LO), which are.

- A.** Preventing Gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.
- B.** Ensuring that Gambling is Conducted in a fair and open way; and

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

Risk Assessment	LO	Level of Risk	Impact	Control System	Risk Management	Reviewed
Children entering site unnoticed or unchallenged	(C)	Low	Severe to business Severe to child Breach of conditions	Interior Design	*Constant and effective monitoring of entrance by staff with well positioned cash desk having direct line of visibility to gaming machine and bingo area. Clear signage +18	Sept 2020
				Exterior Design	*Frontage of Venue designed so as not to be attractive to children or the vulnerable. Think 25 posters	Sept 2020
				Physical	CCTV coverage of entrance linked to office, position of cash desk and staff to monitor main entrance. Staff constantly walking around the venue.	Sept 2020
				Systems	*Think 25 policies in place and implemented *Use of Bingo Associations resources for age verification testing. *Regular staff training (6 monthly) in house. *Adherence to company policies. *clear & prominent premises signage and machine labelling. *Think 25 material displayed. *Policy of preventing the wear of hoods. *Regular monthly review of incident report logs. *Policies & Procedures in place and regularly reviewed.	Sept 2020
Out of control gambling by other vulnerable persons	(C)	Low	Non-compliant to social responsibility code provisions.	Systems	*Customer interaction policy & procedure/log adhered to. *Liaison with head office *regular staff training.	Sept 2020
Failure to deal with Customers making complaints about the outcome of Gambling	(B)	Low	Moderate to business. Severe to vulnerable customer.	Physical	*Machine maintenance carried out by our engineers *Machine turned off immediately should fault be identified. *Machines only acquired from licensed suppliers	Sept 2020

Risk Assessment	LO	Level of Risk	Impact	Control System	Risk Management	Reviewed
Failure to deal with consumers making complaints about the outcome of Gambling(continued)	(B)	Low	Moderate to business Severe to customer	Systems	*Complaints procedure & forms available on premises. *Half yearly staff training on company policy. *Compliant with Company practices and policies.	Sept 2020
Failure to provide information to players on responsible gambling.	(C)	Low	Severe to business Severe to customer	Physical	*Stay in Control posters displayed prominently. *Sufficient quantity of stay in control leaflets, discretely located. *machine labelling displaying national gambling helpline.	Sept 2020
				Systems	*Stock control system in place for leaflets. *Ensure adherence with company policies and practices *Regular checks to ensure systems in place.	Sept 2020
Failure to recognise signs associated with problem gambling or substantial changes in gambling style	(c)	Moderate	Moderate to business Severe to customer	Interior Design	*Players positions effectively monitored *Play's behaviour closely monitored	Sept 2020
				Systems	*Staffed trained in customer interaction in line with company policies and practices *Clear policy to record the procedure for interaction and level of staff that are authorised to intervene (manager)	Sept 2020
Failure to properly administer the self-exclusion process and maintain its effectiveness thereafter, including breaches and reinstatements.	(C)	Low	Severe to business Severe to customer	Physical	*CCTV effectively positioned on entrance to benefit identification. Of known excluders and images on Smart Hub tablet. Liaison with shopping centre management and security.	
				Interior Design	*consideration given to internal layout so as to ensure effective monitoring of customers entering the premises and those that might enter in order to gamble on behalf of a self-excluder	
				Systems	*All data subject to regular review IHL Multi operator self exclusion system in place IHL Smart Hub tablet always available to ensure that customers wishing to exclude can do so. Details of self excluded customers distributed to other sites and operators via IHL/Bingo Association MOSES systems. Customer Complaints to be fully investigated in accordance with policy and referred to nominated ADR 3 rd party as required by LCCP	

Risk Assessment	LO	Level of Risk	Impact	Control System	Risk Management	Reviewed
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Failure to identify attempts to launder money on premises. (e.g. dye stained notes) and to follow correct reporting procedure	(A)	Low	Severe to business Low to customers	Interior Design	*Effective monitoring of customer's behaviour by good lines of sight from staff members and well positioned CCTV	Sept 2020
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	(A)			Systems	*Fully compliant with LCCP requirements *Comply with companies' policies and practices in particular the reporting procedure to company appointment Money Laundering Officer *Where machines operate TiTo tickets cannot be transferred or used in any other premises. Suspicious tickets are automatically flagged and staff interaction is then required. Review unusual patterns of play (as per PoCA), non-regular players and consider exclusion/reporting	Sept 2020
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Poor security increasing vulnerability to crime	(A)	Low	Severe to business Severe to customers	Physical	*Static panic Alarm *Staff Guard Personal Panic alarm fob *Intruder alarm installed and regularly serviced. *Effective CCTV coverage with data stored for 30 days *Safes kept locked at all times not in use	Sept 2020
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	(A)			Exterior Design	*Roller shutters fitted to frontage of premises and during "out of Business" hours *Local authority/police in close proximity to premises * External CCTV with full coverage of entrance and rear exit.	Sept 2020
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	(A)			Systems	*Limited cash desk and personal floats *Key storage and authorisation of use policy in place *Regular liaison with local police *incident log maintained for police called for assistance *Staff Guard system *Subscribe to BACTA's crime bulletins *Subscribe to Bingo Association information	Sept 2020
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Risk Assessment	LO	Level of Risk	Impact	Control System	Risk Management	Reviewed
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Awareness of heightened local crime in the local area	(A)			Systems	In line with national urban levels. NO heightened risk https://www.police.uk https://ukcrimestats.com https://www.gov.uk/government/collections/crim-statistics	Sept 2020
Awareness of student learning facilities (schools & colleges) in the local area	(C)			Systems	*There are colleges and schools in immediate vicinity *Partner of local anti-truancy scheme *entrance monitoring given extra resources between 3pm and 4pm on school/college days, think 25+ policy	Sept 2020
Awareness of residential facilities for the vulnerable in local area	(C)			Systems	*No care homes or other residential facilities for the vulnerable in the vicinity http://www.carehome.co.uk	Sept 2020
Awareness of gambling care agencies in local area	(C)			Systems	*No specific facilities for problem gambling in the vicinity. www.gamcare.org.uk www.gordonmoody.org.uk	Sept 2020

Assessment Review			
Frequency of Review	e.g. Every 12 months or after any incidents or changes	Date Review Due:	23rd August 2021
Signature of Lead Assessor			