## Local Area Gambling Risk Assessment

| Premises Address: | 141 Kilburn High Road, London, NW6 7HT |
| :--- | :--- |
| Local Authority: | London Borough of Brent |
| Premises Licence No: | Application Stage GRA |
| Operating Licence No: | 000-036646-N-318600-012 |
| Company Details: | Future Leisure Limited, Unit 20 Fleetway West Business Park, 14-16 Wadsworth Road, Greenford, Middlesex, UB6 7LD |
| Name of Assessor: | Anna Zietkiewicz |
| Date Of Assessment: | May 2020 |
| Review Date: | 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 10 p Max. prize $£ 5$

This Local Area Gambling Risk assessment takes into account the London Borough Of Brent 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 |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: |
| Lice | nsing Objective | Risks | Existing Control Measures | Level of Risk of Occurrence I Manageability |
| 1.1 | Protecting children and other vulnerable persons from being harmed or exploited by gambling | LOCALITY <br> - Teddies Nurseries Ltd, 2 West End Ln, North Maida Vale, London NW6 4NT <br> - Villas Nursery. 78a Brondesbury Villas, North Maida Vale, London NW6 6AD <br> - PMC Nursery, 91 Kingsgate Rd, Kilburn, London NW6 4JY <br> - Abacus Ark Nursery Schools, Maida Vale. Regents Plaza Apartments, Units 1-4 The Parade, Kilburn High Rd, London NW6 5TR <br> - Centro Infantil Menchu (Menchu Nursery). 10 Kingsgate PI, Kilburn, London NW6 4TA <br> - Acol Nursery Centre. 16 Acol Rd, London NW6 3AG <br> - Bright Horizons West Hampstead Day Nursery and Preschool. 11 Woodchurch Rd, London NW6 3PL <br> - Treetops Kilburn. Kilburn Ln, North Maida Vale, London NW6 6PT <br> - Chaston Nursery School. 30-31 Palmerston Rd, Kilburn, London NW6 2JL <br> - The Learning Tree Nursery. Quex Rd, North Maida Vale, London NW6 4PS <br> - St Eugene De Mazenod. Mazenod Ave, Kilburn, London NW6 4LS <br> - St Mary's C Of E Primary School. Quex Rd, North Maida Vale, London NW6 4PG <br> - Christ Church C Of E Primary School. Clarence Rd, Kilburn, London NW6 7TE | - Staff to 'patrol' - supervising the whole of the premises. <br> - Implementation of the BACTA Toolkit policies \& procedures including Think/Challenge 25. <br> - Return the stake / retain the prize <br> - Anyone reluctant in providing identification with suspicious behaviour will trigger further investigation. Incident to be logged and customer removed from the area. <br> - Age verification incident report (log) maintained on licensed premises and reviewed on regular basis by team staff members. <br> - Training of staff with 6 monthly refreshers / local area profile / licence conditions. <br> - Training and guidance is provided to staff members regarding customer interaction and the implementation of the ID verification procedure. | Medium Of Occurrence Initially / Low of not managing |



- Review self-excluded data to ensure continued exclusion.
- Regular patrols of the premises including external areas to identify any vulnerable and children.
- Recording \& reporting concerns to the police.
- Regular Test Purchasing.
- "Know Your Customer" in place, developing customer interaction policies \& procedures ( importance of behaviour, time and spend limits).
- Staff monitors customer activity and behaviour to interact early to recognise customer with potential gambling issues.
- Staff to be aware of the importance of social responsibility, the causes and consequences of gambling.
- Adequate staffing levels to be maintained at all times.
- Sharing of information by staff regarding concerns about customers.
- Mystery shopper tests by BACTA.
- Information readily available tom customers on how to gamble responsibly and how to access information about and in respect of gambling problem.


|  |  | Community centres/Libraries <br> - Abbey Community Centre. 222C Belsize Rd, London NW6 4DJ <br> - Kingsgate Community Centre. 107 Kingsgate Rd, West Hampstead, London NW6 2JH <br> - International Gospel Community Centre. 264 Belsize Rd, North Maida Vale, London NW6 4BT <br> - Mazenod Social Club. Mazenod Ave, Kilburn, London NW6 4LS <br> - Casa Do Brasil Em Londres,64-66 Willesden Ln, Kilburn, London NW6 7SX <br> - Kingsgate Resource Centre,208 Webheath, Palmerston Rd, London NW6 2JU <br> - 68 Learn to Fly Center, 68 Priory Rd, London NW6 3HL <br> - Somali Cultural Centre Camden,107 Kingsgate Rd, West Hampstead, London NW6 2JH <br> - Kilburn Library Centre,12-22 Kilburn High Rd, North Maida Vale, London NW6 5UH <br> Youth Club <br> No youth Club within distance <br> Care Home <br> No care homes within distance |  | Staff trained to take all reasonable steps to refuse service or otherwise prevent an individual who has entered a self-exclusion agreement from participating in gambling. <br> Staff trained to take all reasonable steps to prevent any marketing material being sent to a self-excluded customers. <br> Staff to be aware of refusing customers entry due to alcohol or drugs. <br> 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.. <br> Premises laid out to avoid blind spots. <br> Ensure entrance readily visible from throughout the premises. <br> Signage \& window display not to attract under 18s, and advice under 18 's access is prohibited. |  |
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- Divine Healing Church Of Christ,207 Willesden Ln, Kilburn, London NW6 7YR
- Kilburn SDA church,6A Springfield Ln, North Maida Vale, London NW6 5UB
- Islamic Centre of England, 140 Maida Vale, Kilburn, London W9 1QB
- Kilburn Muslim Welfare Association, 217 Belsize Rd, North Maida Vale, London NW6 4AA
- Kilburn \& hamstead centre,237 Kilburn High Rd, Kilburn, London NW6 7JN


## Mental Health:

- NW6 PSYCHOTHERAPY SERVICES. 50 Priory Rd, London NW6 3RE
- Daniela Bailey Therapy. 20 Lonsdale

Rd, Queen's Park, London NW6 6RD

- The Minster Centre. 20 Lonsdale Rd, Queen's Park, London NW6 6RD
- Jonathan Livingstone Therapy \& Training. 28 Brondesbury Villas, North Maida Vale, London NW6 6AA
- 15 Brondesbury Road Medical Centre. 15 Brondesbury Rd, North Maida Vale, London NW6 6BX
- Brigitta Mowat,88 Tennyson Rd, Kilburn, London NW6 7SB
- psychotherapy and counselling,97 Brondesbury Rd, Queen's Park, London NW6 6RY
- The Minster Centre, 20 Lonsdale Rd, Queen's Park, London NW6 6RD





| 1.2 | Preventing <br> Gambling from <br> being a source of <br> crime or disorder, <br> being associated <br> with crime or <br> disorder or being <br> used to support <br> crime |
| :--- | :--- |

## LOCALITY <br> Assess threats <br> PREMISES

Layout to be considered

- Consider 'blind spots'
- Visibility of the entrance


## CUSTOMERS

Customer behaviour

## STAFF

- Personal protection
- Security
- Staff behaviour


## Listed 1 AGC and 5 betting shops

 within distance- MerkurCashino, 130 Kilburn High

Rd, Kilburn, London NW6 4JD

- Betfred. 127 Kilburn High Rd,

North Maida Vale, London NW6 6JH

- William Hill. 40A Kilburn High Rd North Maida Vale, London NW6 5UA
- Paddy Power. 251, 255 Kilburn High Rd, Kilburn, London NW6 7JN
- Ladbrokes. 205 Kilburn High Rd, North Maida Vale, London NW6 7HY
- Ladbrokes. Kilburn Bridge House, Kilburn High Rd, Kilburn, London NW6 6HY
- 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.
- Toughened/laminated glass to front window
- Machine door opening keys only available to management
- Log visits by Police, Local Authority and Gambling Commission officers
- Customer toilet to be kept locked at all times with access given by staff only
- Review unusual patterns of play (as per PoCA), 'non-regular' players and consider exclusion/reporting
- Exclude badly behaved customers
- Maintain contact with local traders and Police
- Limited staff floats
- Staff trained to look out for unusual/dyed notes
- Staff will be trained in signs of alcohol or drugs abuse

Medium of Occurrence Initially / Low of not Managing

## LOCAL AREA PROFILE

## Population

- According to Brent borough council, the population of Brent is estimated to be 359,700 in 2016. The 2011 Census recorded 7,667 people living in the South Kilburn area. The gender split was 50:50
- Brent is the $7^{\text {th }}$ largest borough in London by population and is continuing to grow.
- The borough's population is projected to rise by $25 \%$ by 2041 which would mean an additional 84,800 residents or around 3,900 extra residents per year.
- The Median age in Brent is 32, lower than the England average. The gender split is $49 \%$ female and $51 \%$ male


## Culture

- Brent and South Kilburn is one of the most culturally diverse borough's in the UK ( ethnicity, country of birth, faith and language)


## Unemployment :

- According to ONS annual population survey, from Oct 2018 to September 2019 unemployment in Brent was at $4.0 \%$, which was lower than London (4.6\%) and slightly higher than Great Britain (3.9\%). At the time of 2011 Census just over
- Any customer impaired by alcohol or drugs will be refused entry and prevented from gambling
- Staff \& management to be alert to customers exchanging large volumes of paper notes for alternative denominations
- Staff to be alert to customer redeeming stake with little or no play
- Staff trained about AML basics, strange transaction behaviour
- CCTV coverage over all cash transactions
- TiTo machines (if present) have built in software protection to identify suspicious activity and alert staff.
- Fruit machines played by inserting cash (not credit cards or debit cards)
- Full machine audit on all machines on a weekly basis - ad hoc spot-check in case of any suspicion
- Gaming machines are supplied and maintained by businesses licensed by the Gambling Commission
- No automated ticket redemption machines used in the venue
- Extra Training and guidance is provided to staff members regarding Anti-Social Behaviour
- Staff fully trained how to deal with homeless people seeking refuge.


| 1.3 | Ensuring that gambling is conducted in a fair and open way | PREMISES <br> - Promotions <br> - Advertising <br> EQUIPMENT <br> - Information clearly displayed <br> - Maintenance <br> - Compliance <br> CUSTOMERS <br> - Treatment of customers <br> - Complaints | - Clear terms \& conditions provided within the licensed premises. <br> - Game rules, gambling care providers and other relevant information are provided in both English and other prominent first language. <br> - Information readily available to customers on how to gamble responsibly and how to access information about and in respect of gambling problems. <br> - Machines only obtained from licensed suppliers <br> - Machines to be properly labelled <br> - Implementation of the BACTA Toolkit policies <br> - Training of staff with 6 monthly refreshers <br> - Review advertising material and promotions for compliance with LCCP <br> - Machines to be maintained/serviced regularly <br> - Machines to be turned off should a fault occur <br> - Procedure for making refunds <br> - Details of machine operation and winning combinations to be clearly shown on machines <br> - Staff to have full understanding of stakes and prizes, and odds associated with each machine. | Low-Low |
| :---: | :---: | :---: | :---: | :---: |


|  |  |  | Complaints policy visibly displayed for <br> customer information. All complaints to <br> be fully investigated in accordance with <br> policy and referred to nominated ADR <br> 3rd party as required <br> Suitable public liability Insurance <br> Council conditions openly displayed <br> Regular Compliance Audits |
| :--- | :--- | :--- | :--- | :--- | :--- | :--- |
| $\bullet$ |  |  |  |

Gambling Operation \& Physical Design (Internal and External)

| Lice | sing Objective | Risks | Existing Control Measures | Level of Risk of Occurrence I Manageability |
| :---: | :---: | :---: | :---: | :---: |
| 2.1 | Protecting children and other vulnerable persons from being harmed or exploited by gambling | PREMISES <br> - Consider 'blind spots' <br> - Visibility of the entrance <br> - Signage <br> - Presentation of premises (signage/window display) <br> CUSTOMERS <br> - U18s entering <br> - Problem Gambling <br> - Providing Information <br> - Administering self-exclusion <br> - Signage | - 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 <br> - No cash point or ATM facilities on the premises. <br> - Premises laid out to avoid blind spots <br> - Ensure entrance readily visible from throughout the premises <br> - Signage \& window display not to attract under 18s, and advice under 18's access is prohibited. <br> - Machines to be properly labelled <br> - The entrance layout to enable staff to monitor those entering the premises | Implementation of physical and design control measures will ensure low risk and effective management |


| 2.2 | Preventing Gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime | PREMISES <br> Layout to be considered <br> - Consider 'blind spots' <br> - Visibility of the entrance <br> CUSTOMERS <br> Customer behaviour <br> STAFF <br> - Personal protection <br> - Security <br> - Staff behaviour | - 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 <br> - No cash point or ATM facilities on the premises. <br> - Regular patrols of the premises, including external areas to identify any vulnerable and children <br> - Monitoring customers as they leave the premises <br> - Toughened/laminated glass to front window <br> - Mag Lock on front door <br> - Timer locked safe <br> - Intruder alarm installed and regularly serviced <br> - Panic Button linked to Police |
| :---: | :---: | :---: | :---: |



| Action Plan |  | Action Required | By Whom <br> (name) | By When <br> (date) | Date <br> Completed |  |
| :--- | :--- | :--- | :--- | :--- | :--- | :--- |
| Local Area <br> (insert <br> number) | Gambling <br> Operation and <br> Physical Design <br> (insert number) | Question |  |  |  |  |
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## Brent Crime Statistics April 2019-March 2020



## Employment and unemployment (Jan 2019-Dec 2019)

|  | Hampstead And Kilburn (Numbers) | ead And Kilburn (\%) | London (\%) | Great Britain (\%) |
| :---: | :---: | :---: | :---: | :---: |
| All People |  |  |  |  |
| Economically Active ${ }^{+}$ | 105,600 | 80.3 | 78.1 | 78.9 |
| In Employment ${ }^{+}$ | 103,600 | 78.8 | 74.5 | 75.8 |
| Employees ${ }^{+}$ | 79,600 | 60.8 | 61.0 | 64.6 |
| Self Employed ${ }^{+}$ | 23,800 | 17.7 | 13.2 | 10.9 |
| Unemployed§ | \# | \# | 4.6 | 3.9 |
| Males |  |  |  |  |
| Economically Active ${ }^{+}$ | 64,100 | 87.9 | 84.0 | 83.4 |
| In Employment ${ }^{+}$ | 62,400 | 85.5 | 79.9 | 79.8 |
| Employees ${ }^{+}$ | 52,400 | 72.6 | 62.0 | 65.2 |
| Self Employed ${ }^{+}$ | 10,000 | 12.9 | 17.5 | 14.4 |
| Unemployed§ | $!$ | ! | 4.9 | 4.1 |
| Females |  |  |  |  |
| Economically Active ${ }^{+}$ | 41,500 | 71.1 | 72.1 | 74.5 |
| In Employment ${ }^{+}$ | 41,200 | 70.5 | 69.0 | 71.7 |
| Employees ${ }^{\text {+ }}$ | 27,100 | 46.4 | 59.9 | 64.1 |
| Self Employed $\dagger$ | 13,800 | 23.6 | 8.8 | 7.4 |
| Unemployed§ | $!$ | ! | 4.2 | 3.7 |

Source: ONS annual population survey
= Sample size too small for reliable estimate (see definitions)
Estimate is not available since sample size is disclosive (see definitions)

-     - numbers are for those aged 16 and over, \% are for those aged 16-64
§ - numbers and \% are for those aged 16 and over. $\%$ is a proportion of economically active


## Population by ethnic group, South Kilburn, 2011



Population aged 16-64 (2015)

|  | Hampstead And <br> Kilburn | London <br> (Numbers) | Great Britain <br> (Numbers) |
| :--- | ---: | ---: | ---: |
| Total | 101,500 | $6,014,100$ | $40,465,900$ |
| Male | 51,600 | $3,035,800$ | $20,187,900$ |
| Female | 49,900 | $2,978,300$ | $20,277,900$ |

Source: ONS mid-year population estimates
Note: Percentages are based on total population,

Deprivation-National IMD2019 quintile distribution of LSOAs by London boroughs

The chart shows the distribution of LSOAs within the national quintiles for each London Borough. Barking and Dagenham had the highest proportion of LSOAs in the most deprived quintile in England under the 2019 ID calculations, down marginally from ID2015, but still more than half of its LSOAs were in this group, whereas the ID2015 also showed more than half of LSOAs in Tower Hamlets and Hackney were among the most deprived 20\% of neighbourhoods in England. Five boroughs had no LSOAs in the least deprived quintile in ID2019 - Barking and Dagenham, Brent, Hackney, Islington, Lewisham and Newham. In contrast, almost two thirds of LSOAs in Richmond-upon-Thames ranked in the least deprived quintile.

## Earnings and qualifications -ONS 2019

$\left.\begin{array}{lrl}\text { Qualifications (Jan 2019-Dec 2019) } & & \\ \hline\end{array} \begin{array}{r}\text { Hampstead And Hampstead And } \\ \text { Kilburn } \\ \text { Kilburn } \\ (\%)\end{array}\right)$

Source: ONS annual population survey
Notes: For an explanation of the qualification levels see the definitions section.
Numbers and $\%$ are for those of aged 16-64
$\%$ is a proportion of resident population of area aged 16-64

Earnings by place of residence (2019)

|  | Hampstead And Kilburn (Pounds) | London (Pounds) | Great Britain (Pounds) |
| :---: | :---: | :---: | :---: |
| Gross Weekly Pay |  |  |  |
| Full-Time Workers | 850.7 | 699.2 | 587.0 |
| Male Full-Time Workers | 922.8 | 747.4 | 632.0 |
| Female Full-Time Workers | 803.3 | 655.9 | 528.9 |
| Hourly Pay - Excluding Overtime |  |  |  |
| Full-Time Workers | 22.94 | 18.21 | 14.88 |
| Male Full-Time Workers | 25.50 | 19.03 | 15.44 |
| Female Full-Time Workers | 21.16 | 17.51 | 13.99 |

Source: ONS annual survey of hours and earnings - resident analysis
Notes: Median earnings in pounds for employees living in the area.

## Brent's Mental Wellbeing

Mental distress: How is Brent feeling?
Self-reported well-being - high satisfaction score: $\sim$ of respondents


- England

Self-reported well-being - moh happiness score: $\approx$ or respondents



- England

As indicated in the graphs above, self-reported satisfaction and happiness has improved over the past few years.
5.3\% are diagnosed with depression, which means that Brent has the lowest rate of depression in the UK out of 150 counties and unitary authorities. However, an estimated $16 \%$ of the adult population has a common mental health disorder this is slightly higher than the national comparison of $15.1 \%$

