



Alcohol and Entertainment Licensing Sub-Committee

Tuesday 17 August 2021 at 10.00 am

This will be held as an online virtual Meeting

Details on how to access the link in order to view the meeting will be made available online via the following link: [HERE](#)

Membership:

Members

Councillors:

Long (Vice-Chair)
Kennelly
Hylton

Substitute Members

Councillors:

Ahmed, Chohan, Denslow, Hector, McLeish, Maurice,
Shahzad

For further information contact: Devbai Bhanji, Governance Assistant
Tel: 020 8937 6841; Email: devbai.bhanji@brent.gov.uk

For electronic copies of minutes, reports and agendas, and to be alerted when the minutes of this meeting have been published visit:

www.brent.gov.uk/committees

The press and public are welcome to attend this meeting as an online virtual meeting. The link to view the meeting will be made available via the following link: [HERE](#)

Notes for Members - Declarations of Interest:

If a Member is aware they have a Disclosable Pecuniary Interest* in an item of business, they must declare its existence and nature at the start of the meeting or when it becomes apparent and must leave the room without participating in discussion of the item.

If a Member is aware they have a Personal Interest** in an item of business, they must declare its existence and nature at the start of the meeting or when it becomes apparent.

If the Personal Interest is also significant enough to affect your judgement of a public interest and either it affects a financial position or relates to a regulatory matter then after disclosing the interest to the meeting the Member must leave the room without participating in discussion of the item, except that they may first make representations, answer questions or give evidence relating to the matter, provided that the public are allowed to attend the meeting for those purposes.

***Disclosable Pecuniary Interests:**

- (a) **Employment, etc.** - Any employment, office, trade, profession or vocation carried on for profit gain.
- (b) **Sponsorship** - Any payment or other financial benefit in respect of expenses in carrying out duties as a member, or of election; including from a trade union.
- (c) **Contracts** - Any current contract for goods, services or works, between the Councillors or their partner (or a body in which one has a beneficial interest) and the council.
- (d) **Land** - Any beneficial interest in land which is within the council's area.
- (e) **Licences**- Any licence to occupy land in the council's area for a month or longer.
- (f) **Corporate tenancies** - Any tenancy between the council and a body in which the Councillor or their partner have a beneficial interest.
- (g) **Securities** - Any beneficial interest in securities of a body which has a place of business or land in the council's area, if the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body or of any one class of its issued share capital.

****Personal Interests:**

The business relates to or affects:

- (a) Anybody of which you are a member or in a position of general control or management, and:
 - To which you are appointed by the council;
 - which exercises functions of a public nature;
 - which is directed is to charitable purposes;
 - whose principal purposes include the influence of public opinion or policy (including a political party or trade union).
- (b) The interests a of a person from whom you have received gifts or hospitality of at least £50 as a member in the municipal year;

or

A decision in relation to that business might reasonably be regarded as affecting the well-being or financial position of:

- You yourself;
- a member of your family or your friend or any person with whom you have a close association or any person or body who is the subject of a registrable personal interest.

Agenda

Introductions, if appropriate.

Item	Page
1 Apologies for absence and clarification of alternate members	
2 Declarations of Interests	
Members are invited to declare at this stage of the meeting, the nature and existence of any relevant disclosable pecuniary or personal interests in the items on this agenda and to specify the item(s) to which they relate.	
3 Application for an Adult Gaming Centre by Chongie Entertainment Ltd for the premises known as Little Vegas, 574 High Road, Wembley, HA0 2AA, pursuant to the provisions of the Licensing Act 2003	1 - 94

Date of the next meeting: Tuesday 17 August 2021



- Please remember to **SWITCH OFF** your mobile phone during the meeting.
- The meeting room is accessible by lift and seats will be provided for members of the public.

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Gambling Act 2005

Application for an Adult Gaming Centre

1. The Application

Name of Applicant:	Chongie Entertainment Ltd
Name & Address of Premises:	Little Vegas, 574 High Road, Wembley, HA0 2AA
Applicants Agent:	Woods Whur 2014 Ltd

The application is for an Adult Gaming Centre

2. Background

None

3. Relevant Representations

Representations were received and withdrawn from the Licensing Police and Licensing Officers. Representations remain outstanding from local residents.

4. Interested Parties

None

5. Policy Considerations

None specific

6. Associated Papers

- A. Copy of Application Form
- B. Copies of Representations
- C. Location Map

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**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: **Chongie Entertainment Limited**
7. The applicant's registered or principal address:
- 3-5 Wardour Street, London**
- Postcode: **W1D 6PB**
- 8(a) The number of the applicant's operating licence (as given in the operating licence): **000-057549-N-333196-001**

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): **Little Vegas**

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

Ground Floor, 574 High Road, Wembley

Postcode: **HA0 2AA**

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.

Ground Floor retail premises. Ex William Hill betting shop. 3 floors of residential flats above being developed by the landlord

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	[hh:mm]	[hh:mm]	[*****]
Tues	[hh:mm]	[hh:mm]	[*****]
Wed	[hh:mm]	[hh:mm]	[*****]
Thurs	[hh:mm]	[hh:mm]	[*****]
Fri	[hh:mm]	[hh:mm]	[*****]
Sat	[hh:mm]	[hh:mm]	[*****]
Sun	[hh:mm]	[hh:mm]	[*****]

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:

Woods whur
Signature:

Print Name: Woods Whur 2014 Limited

Date: 15.06.2021 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: Paddy Whur

23(b) Please give one or more telephone numbers at which the person identified in question 23(a) can be contacted: 01132343055

24 Postal address for correspondence associated with this application:

Woods Whur 2014 Limited

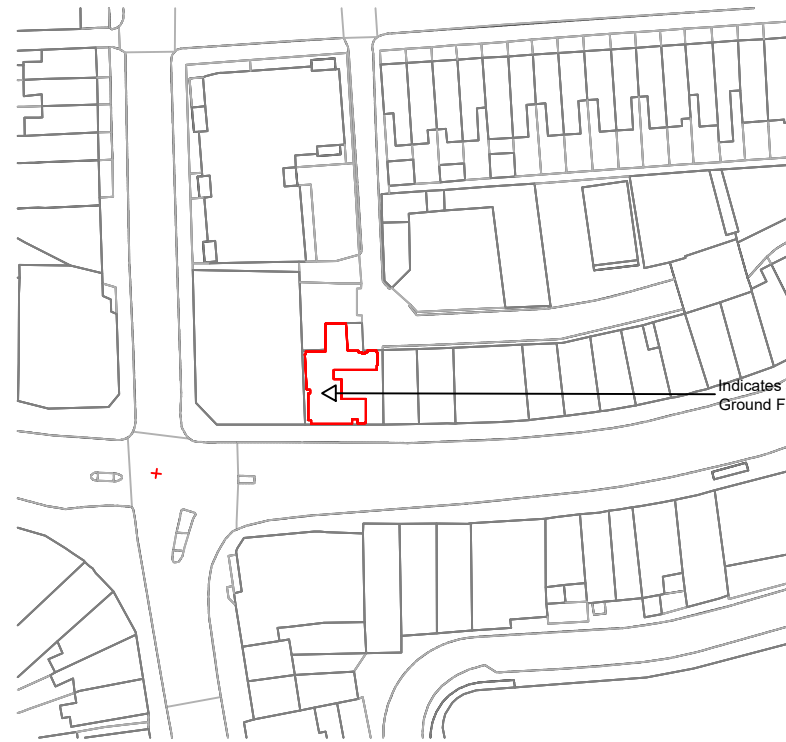
St James House

28 Park Place

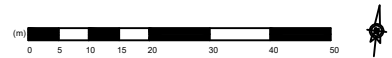
Leeds

Postcode: LS1 2SP

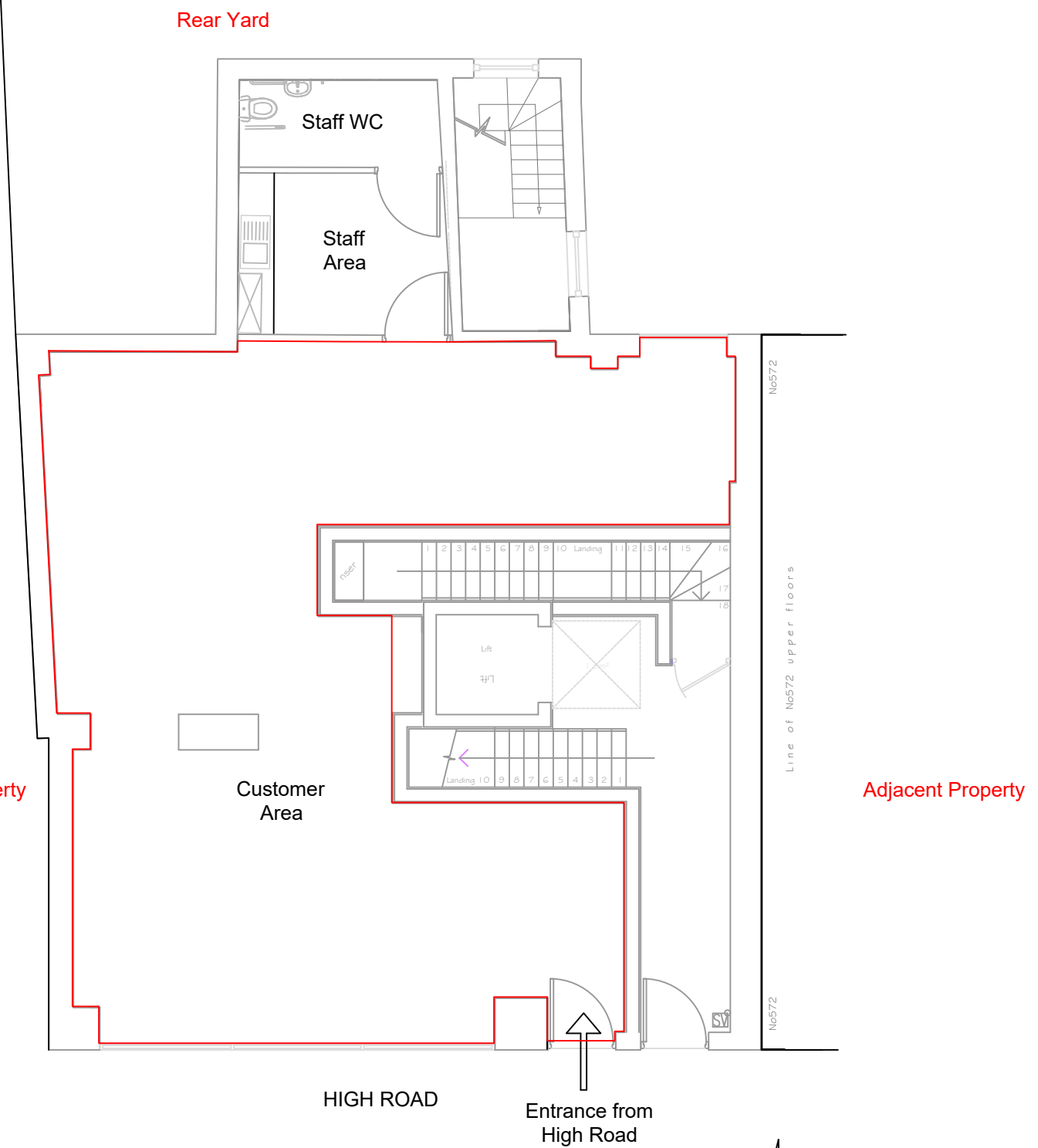
25 If you are happy for correspondence in relation to your application to be sent via e-mail, please give the e-mail address to which you would like correspondence to be sent:
paddy@woodswhur.co.uk



Indicates site in application at:
Ground Floor, 574 High Road, Wembley HA0 2AA



Location Plan 1:1250 @A3



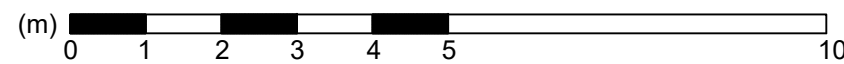
Adjacent Property

Adjacent Property

GAMBLING ACT 2005 LICENSING PLAN

Anything shown on plan that is not required by The Gambling Act 2005 (Premises Licences and Provisional Statements) Regulation 2007 is for illustrative purposes only and does not form part of the premises licence.

— Area in which facilities will be provided for gaming



Rev.	Description	Date:
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10 Borelli Yard
The Borough
Farnham
GU9 7NU

Tel: (0)20 328 7690

www.candpltd.com

Project Address:
Ground Floor, 574 High Road, Wembley, HA0 2AA

Client:
Chongie Entertainments Limited

Drawing Title:
Licence Plan

Project Number: 21.0011
Drawing Number: 01 Revision:

Drawing Status: Issue
First Issue:

Scale: 1:100 @ A3 Date: 12.05.2021

Drawn By: EB Checked By: AB

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Premises: Ground Floor 574 High Road, Wembley HA0 2AA

Premises Licence Number: TBC

Company Details: Chongie Entertainment Limited,
3-5 Wardour St, London

Operating Licence Number: 000-057549-N-333196-001

Date Assessment: June 2021

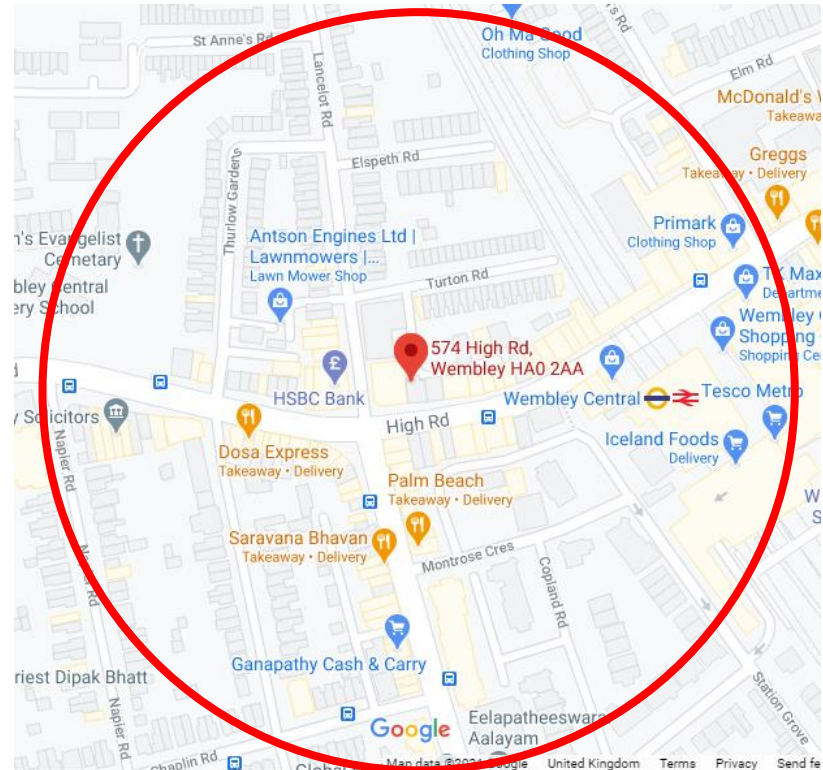
Assessor: [REDACTED]

Sources Utilised: Brent Statement of Gambling Policy, Brent Local Area Profile Maps, Police Crime Mapping, relevant guidance from the Gambling Commission, Open source

Area Profile: Brent is located in North West London, is crossed by two of the main arterial routes into London and is divided by the North Circular Road. Brent adjoins seven other London Boroughs including four of the capital’s Inner Boroughs. It has a population of 319,000 and has a very young population. There are a mixture of affluent areas, predominantly in the north, and areas suffering with higher levels of poverty in the south.

Brent is a multi-ethnic and multicultural borough which has the 2nd largest proportion of black, Asian and minority ethnic people in England and Wales.

The machine mix is to be determined and will be supplied by a company licensed by the Gambling Commission.



Local Area			
Licensing Objective	Risks	Existing Control Measures	Level of Risk of Occurrence / Manageability
1.1 Protecting children and other vulnerable persons from being harmed or exploited by gambling	<p>LOCALITY</p> <ul style="list-style-type: none"> Brent Teaching Primary Care Trust Chaplin Rd, Wembley HA0 4UZ Regal International College 542 High Rd, Wembley HA0 2AA <p>OTHER:</p> <p><u>Student accommodation:</u></p> <p>There is no student accommodation within a 200m radius of the premises</p> <p><u>Family Services</u></p> <p>There are no family services within a 200m radius of the premises</p> <p><u>Job / Recruitment Agencies</u></p> <ul style="list-style-type: none"> James Brooklyn Job Centre 553 High Rd, Wembley HA0 2DW Recruitment Agency Wembley Ealing Rd, Wembley HA0 4TL <p><u>Council Housing Offices</u></p> <p>There are no council housing offices within 200m</p> <p><u>Community centres</u></p> <p>There are no community centres within a 200m</p>	<p>The Premises:</p> <ul style="list-style-type: none"> Signage & window display not to attract under 18s, and advice under 18's access is prohibited. Regular patrols of the premises, to identify any vulnerable and children Posters, 'Stay in Control' leaflets and GamCare leaflets will be on display (near toilets as well as in the main trading area) Staff will ensure a stock of leaflets (stay in control, self-exclusion & Gamcare) through weekly checks of stock GamCare notices with contact number clearly displayed on machines Self-exclusion system in place provided by BACTA Photo equipment available for self-exclusions CCTV coverage of all public areas, 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. Premises laid out to avoid blind spots Entrance readily visible from throughout the premises to allow customer 	<p>High of Occurrence Initially / Low of not Managing</p>

		<p>radius of the premises</p> <p><u>Youth Centres</u></p> <ul style="list-style-type: none"> • Sway Project St Johh the Evangelist, 3 Crawford Ave, Wembley HA0 2HX <p><u>Fast food</u></p> <ul style="list-style-type: none"> • Chickenland Pound City, 556 High Rd, Wembley HA0 2AA • Sams Chicken 538 High Rd, Wembley HA0 2AA • Bombay Vadapar 529 High Rd, Wembley HA0 2DH • Kebabish 40 Ealing Rd, Wembley HA0 4TL <p><u>Cafes</u></p> <ul style="list-style-type: none"> • Ealing Internet Cafe 14A Ealing Rd, Wembley HA0 4TL • Costa Coffee Unit 4 - Wembley Central Station, London HA9 7AJ • Creams Wembley Central Shopping Centre, 455 High Rd, Wembley HA9 7FA <p><u>Banks/Building Society</u></p> <ul style="list-style-type: none"> • HSBC 584 High Rd, Wembley HA0 2DB • Lloyds 564-568 High Rd, Wembley HA0 2AB • Natwest Middlesex, 520 High Rd, Wembley HA9 7BZ • Santander 514 High Rd, Wembley HA9 7BT • Bank of Baroda 2 Ealing Rd, Wembley 	<p>monitoring</p> <ul style="list-style-type: none"> • Monitoring customers as they leave the premises • Machines to be properly labelled <p>The Operation:</p> <ul style="list-style-type: none"> • Staff will patrol and supervise the whole of the premises, with particular care in identifying vulnerable • 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. This includes, for example, gambling trends such as pay day or benefits payments. • 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 • Return the stake/retain the prize • Staff will review self-excluded data to ensure continued exclusion • Sharing of information by staff regarding 	
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		<p>HA0 4TL</p> <p><u>Post Office</u></p> <p>There are no post offices within a 200m radius</p> <p><u>Leisure, Sports Centres, cinemas, bowling alleys</u></p> <p>There are no cinemas or bowling alleys within a 200m radius</p> <p><u>Care Homes:</u></p> <ul style="list-style-type: none"> Beechwood Court Care home Napier Rd, Wembley HA0 4UA <p><u>Hospitals</u></p> <p>There are no hospitals within a 200m radius</p> <p><u>GP/Medical Centres</u></p> <ul style="list-style-type: none"> Lancelot Medical Centre 19 Lancelot Rd, Wembley HA0 2AL Central Dental Care 555 High Rd, Wembley HA0 2DW <p><u>Mental Health:</u></p> <p>There are no mental health centres within a 200m radius</p> <p><u>Addiction/Recovery Centres</u></p>	<p>concerns about customers</p> <ul style="list-style-type: none"> Mystery shopper tests by BACTA <p>Age Verification procedures:</p> <ul style="list-style-type: none"> Implementation of the BACTA Toolkit Policies & Procedures including Think / Challenge 25 Anyone reluctant in providing identification or demonstrating suspicious behaviour will trigger further investigation. Incident to be logged and customer removed from the area. Age verification incident report (log) maintained on licensed premises and reviewed on regular basis by team staff members & Compliance Manager <p>Staff Training:</p> <ul style="list-style-type: none"> Training of staff with 6 monthly refreshers/ local area profile/licence conditions Training and guidance is provided to staff members regarding customer interaction and the implementation of the ID verification procedure. Staff to be trained in Safeguarding Policy 	
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		<p>There are no addiction or recovery centres within a 200m radius</p> <p><u>Hostels/Shelters</u></p> <p>There are no hostels/shelters within a 200m radius</p> <p><u>Food banks</u></p> <p>There are no food banks within a 200m radius</p> <p><u>Loan Shops, Pawn Brokers</u></p> <ul style="list-style-type: none"> • Fast Credit Pawnbrokers 12 Ealing Rd, London HA0 4TL • H&T Pawnbrokers 544 High Rd, Wembley HA0 2AA • Italk Gold 499 High Rd, Wembley HA0 2DH <p><u>Parks/Playgrounds</u></p> <p>There are no parks or playgrounds with a 200m radius</p> <p><u>Religious buildings</u></p> <ul style="list-style-type: none"> • St Johns Church 3 Crawford Ave, Wembley HA0 2HX • Spiritualist Church 1 Elm Rd, Wembley HA9 7JA • Wembley Central Mosque 35-37 Ealing Rd, Wembley HA0 4AE • London Nadarajar Temple 3C Ranelagh Rd, Wembley HA0 4TW • Inner Space 528 High Rd, Wembley HA9 	<ul style="list-style-type: none"> • Staff to be aware of refusing customers entry due to alcohol or drugs • Staff to be trained on Anti Money Laundering, Proceeds of Crime nad Suspicious Behavior • Staff to be trained to look out for signs of aggressive behaviour or problem play 	
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		<p>7BS</p> <p><u>New Development or Shopping centres</u></p> <p>There does not appear to be any new developments in the area.</p> <ul style="list-style-type: none"> Wembley Central Shopping Centre Plaza Control Room, High Rd, London HA9 7AF 		
<p>1.2</p>	<p>Preventing Gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime</p>	<p>LOCALITY</p> <p>There are 4 betting shops within 200m:</p> <ul style="list-style-type: none"> Coral 576, Middlesex, 582 High Rd, Wembley HA0 2AA Paddy Power 554 Wembley High Street, Middlesex HA0 2AA Gr8odds 558 High Rd, Wembley HA0 2AA Paddy Power 10 Ealing Rd, Wembley HA0 4TL <p>There are 2 AGCs within 200 metres:</p> <ul style="list-style-type: none"> Silvertime Amusements 527 High Rd HA0 2DH Bet George 509 High Rd HA0 2DH <p>There are 0 casinos within 200 metres.</p> <p>There are several premises licensed under the Licensing Act 2003 within distance, including:</p> <ul style="list-style-type: none"> Masti 572-582 High Rd, Wembley HA0 2AA Masala 529 High Rd, Wembley HA0 2DH Savannah Lounge Lancelot Parade, 4 Lancelot Rd, Wembley HA0 2AJ 	<p>The Premises</p> <ul style="list-style-type: none"> CCTV coverage of all public areas, 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. Toughened/laminated glass to front window <p>The Operation</p> <ul style="list-style-type: none"> Machine door opening keys only available to management Log visits by Police, Local Authority and Gambling Commission officers Review unusual patterns of play (as per PoCA), 'non-regular' players and consider exclusion/reporting Exclude badly behaved customers and 	<p>Medium of Occurrence Initially / Low of not Managing</p>

		<ul style="list-style-type: none"> • Flannerys Bar 610-612 High Rd, Wembley HA0 2AF • Palm Beach 17 Ealing Rd, Wembley HA0 4AA • Saravana 22, 22A Ealing Rd, Wembley HA0 4TL • Zam Zam Ealing Rd, Wembley HA0 4AA • VIP Lounge 546 High Rd, London HA0 2AA • Gana Restaurant 24 Ealing Rd, Wembley HA0 4TL • Fairprice London 559 High Rd, Wembley HA0 2DW • Costcutter 537A High Rd, Wembley HA0 2DJ • Tesco Unit 14, 15 Central Square, Wembley HA9 7AJ <p>Several premises are not operating at the time of this risk assessment due to Covid-19.</p> <p>LOCAL AREA PROFILE</p> <p>Population</p> <ul style="list-style-type: none"> • 319,000 • Brent’s population is a young one with 40% of residents being under the age of 30 and 25% under 19 years of age <p>Deprivation</p> <ul style="list-style-type: none"> • 11,067 out of 32,844 LSOAs. • Amongst 40% most deprived areas in the country. • Brent ranked 49 out 317 local authorities in 2019 • Ranked 3rd in the Income Decile 	<p>look out for problem behaviour or aggression</p> <ul style="list-style-type: none"> • Maintain contact with local traders and Police, including working with police to combat local issues • Limited staff floats • CCTV coverage over all cash transactions • 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 • Company registered to receive crime bulletins from BACTA. <p>Staff Training</p> <ul style="list-style-type: none"> • Social Responsibility training and incident recording logs available to all staff. • Staff trained to look out for unusual/dyed notes • 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 	
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		<p>(Index of Multiple Deprivation 2015)</p> <ul style="list-style-type: none"> • Ranked 3rd in the Crime Decile (Index of Multiple Deprivation 2015) <p>Unemployment</p> <ul style="list-style-type: none"> • Ranked 5th in the Employment decile (Index of Multiple Deprivation 2015) <p>Crime</p> <ul style="list-style-type: none"> • Most commonly reported crimes during Feb 2021 <ul style="list-style-type: none"> - Violent and Sexual Offences 48 - Anti- Social Behaviour 41 - Other theft 20 - Shoplifting 16 <p>TRANSPORT & CAR PARK FACILITIES</p> <p>The premises are on transport routes. High Road has a number of bus stops along it and the Wembley tube station is nearby.</p>	<ul style="list-style-type: none"> • Extra Training and guidance is provided to staff members regarding Anti-Social Behaviour • Staff fully trained how to deal with homeless people seeking refuge • Staff to be trained on local area risk assessment <p>Customer Interaction and Monitoring</p> <ul style="list-style-type: none"> • Suspicious activity to be written down in the log • Customer interaction may provide knowledge of criminal background and/or association leading to closer security and monitoring of such a customer. • Customers are efficiently monitored throughout the time they are on the premises to ensure prevention of machine related crime (money laundering). • Knowledge activity to be handed over to Nominated Officer who will then report to NCA 	
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<p>1.3</p>	<p>Ensuring that gambling is conducted in a fair and open way</p>	<p>EQUIPMENT</p> <ul style="list-style-type: none"> • Information must be clearly displayed • Maintenance to reduce potential issues • Compliance <p>PREMISES</p> <ul style="list-style-type: none"> • Promotions • Advertising <p>CUSTOMERS</p> <ul style="list-style-type: none"> • Treatment of customers • Complaints 	<p>Equipment</p> <ul style="list-style-type: none"> • Machines only obtained from licensed suppliers • Machines to be properly labelled • Implementation of the BACTA Toolkit policies • Machines to be maintained/serviced regularly / turned off if a fault occurs • Procedure for making refunds • Details of machine operation and winning combinations to be clearly shown on machines <p>Premises</p> <ul style="list-style-type: none"> • Clear terms & conditions provided within the licensed premises. • Any promotions or advertising to be ASA and LCCP compliant <p>Staff Training</p> <ul style="list-style-type: none"> • Training of staff with 6 monthly refreshers • Staff to have full understanding of stakes and prizes, and odds associated with each machine. <p>Customers</p> <ul style="list-style-type: none"> • Review advertising material and promotions for compliance with LCCP • Complaints policy visibly displayed for 	<p>Low / Low</p>
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			<p>customer information. All complaints to be fully investigated in accordance with policy and referred to nominated ADR 3rd party as required</p> <ul style="list-style-type: none"> • Suitable public liability Insurance • Council conditions openly displayed • Regular Compliance Audits 	
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Gambling Operation and Physical Design (Internal and External)				
Licensing Objective		Risks	Existing Control Measures	Level of Risk of Occurrence / Manageability
2.1	Protecting children and other vulnerable persons from being harmed or exploited by gambling	<p>CUSTOMERS</p> <ul style="list-style-type: none"> • U18s entering • Problem Gambling • Providing Information • Administering self-exclusion • Signage <p>PREMISES</p> <ul style="list-style-type: none"> • Consider 'blind spots' • Visibility of the entrance • Signage • Presentation of premises (signage/window display) 	<p>Equipment and Operation</p> <ul style="list-style-type: none"> • Machines to be properly labelled • Staffing levels will be risk assessed to ensure they reflect any risk to staff, customers and promotion of the licensing objectives • There would be no advertising locally. As part of the Licence Conditions and Codes of Practice issued by the Gambling Commission - Any Media displayed on the premises will comply with LCCP: Social responsibility code 5.1.6 (Compliance with advertising codes) The advertising of gambling products and services must be undertaken in a socially responsible manner and we must comply with the UK Advertising Codes issued by the Committees of Advertising Practice (CAP) 	<p>Low/Low considering design features</p>

			<p>and administered by the Advertising Standards Authority (ASA). Advertising on the premises will not differ from that of any other Adult Gaming Centre premises in Wembley.</p> <p>Premises</p> <ul style="list-style-type: none"> • CCTV coverage of all public areas, 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. • Premises laid out to avoid blind spots • Ensure entrance readily visible from throughout the premises • Signage & window display not to attract under 18s, and advise under 18's access is prohibited. • The entrance layout to enable staff to monitor those entering the premises 	
<p>2.2</p>	<p>Preventing Gambling from being a source of crime or disorder, being</p>	<p>CUSTOMERS Customer behaviour</p> <p>PREMISES</p>	<p>Staff Training Full Staff training on Money Laundering and the Proceeds of Crime Act as well as customer behaviour, particularly suspicious or aggressive customers</p>	

	<p>associated with crime or disorder or being used to support crime</p>	<p>Layout to be considered:</p> <ul style="list-style-type: none"> • Consider ‘blind spots’ • Visibility of the entrance • Design out crime <p>STAFF</p> <ul style="list-style-type: none"> • Personal protection • Security • Staff behaviour <p>Money Laundering</p> <ul style="list-style-type: none"> - Customer behaviour - Staff monitoring 	<p>Premises and Operation</p> <ul style="list-style-type: none"> • CCTV coverage of all public areas, 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. • Regular patrols of the premises, including external areas to identify any vulnerable and children • Monitoring of customers as they leave the premises • Design out crime to be implemented • Toughened/laminated glass to front window • Mag Lock on front door • Intruder alarm installed and regularly serviced • Panic Button linked to Police 	<p>Low/Low considering design features</p>
<p>2.3</p>	<p>Ensuring that gambling is conducted in a fair and open way</p>	<p>PREMISES</p> <ul style="list-style-type: none"> • Promotions • Advertising <p>EQUIPMENT</p> <ul style="list-style-type: none"> • Information clearly displayed • Maintenance • Compliance 	<p>Premises</p> <ul style="list-style-type: none"> • CCTV coverage of all public areas, office, frontage and rear door with recording device and ability for management to review remotely online • Clear terms & conditions provided within the licensed premises. 	

			<p>Equipment</p> <ul style="list-style-type: none"> • Machines only obtained from licensed suppliers • Machines to be properly labelled • Implementation of the BACTA Toolkit policies • Machines to be maintained/serviced regularly • Machines to be turned off should a fault occur • Procedure for making refunds • Details of machine operation and winning combinations to be clearly shown on machines <p>Customers</p> <ul style="list-style-type: none"> • 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 • Suitable public liability Insurance • Council conditions openly displayed • Regular Compliance Audits 	<p>Low / Low</p>
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The Licensing Officer
Health Safety and Licensing
London Borough of Brent
Brent Civic Centre
Engineers Way
Wembley
HA9 7FJ

NW CU Police Licensing Team
Brent Borough
74 Northolt Road
South Harrow
Middlesex
HA2 ODN

Date: 12/07/2021
QK Corres. Ref:21/2965NW
LA Ref: 21656

Police Representations to the Application for a premises licence under the Gambling Act 2005 for an Adult Gaming Centre.

**LITTLE VEGAS, GROUND FLOOR, 574 HIGH ROAD,
WEMBLEY, LONDON HA0 2AA**

I certify that I have considered the application shown above and I wish to make representations to prevent undermining the crime and disorder and public nuisance licensing concerns as well as protection of children from harm, for the reasons indicated below.

<i>Officer:</i>	PC Gary Norton
<i>NW BCU</i>	Brent Licensing Team

An officer of the Metropolitan Police, in whose area the premises are situated, who is authorised for the purposes of exercising its statutory function as a 'Responsible Authority' under the Gambling Act 2005.

The application for an Adult Gaming Centre on High Road Wembley does cause Police some concerns over the saturation of gambling venues in the area. More applications are being made for 24/7 gambling establishments in an area that suffers a great deal of issues relating to crime and disorder, public nuisance which resulted in the area being deemed a CIZ (which obviously relates to alcohol supply).

The socio-economic issues of round the clock gambling in areas that suffer from widespread poverty, coupled with issues around addiction to alcohol, drugs and gambling means very sturdy conditions need to be in place to ensure adherence to licensing objectives.

I gave consideration to requesting reduced hours and/or having SIA security to ensure the premises are a safe environment and to help prevent addiction. However, I realise that any applicant would argue what evidence there is to request such steps as the premises isn't yet open and should issues arise, action could be taken.

What Police licensing would like added to the licence conditions are reasonable expectations, some aren't mentioned in the risk assessment control measures. Given Police concerns for the



area blighted by crime and ASB, the need for stringent but fair licensing conditions are a necessity. Some of the conditions are mentioned in the control measures but worded with some ambiguity in terms of expectations, such as CCTV. For this reason, I requested specifically worded conditions to remove the ambiguity.

If the following conditions were included on the Gambling Licence, I would withdraw police representations:

- 1) The venue shall install and maintain a comprehensive CCTV system at the premises as per the minimum requirements of the Metropolitan Police Licensing Team. This system should 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
- 2) The CCTV system shall continually record whilst the venue is open for licensable activities and during all times when customers remain on the premises. All recordings shall be stored for a minimum period of thirty one days with date and time visible. Recordings shall be immediately arranged by a member of staff for handover to Police or authorised officer following their request.
- 3) Notices indicating that CCTV is in use at the premises shall be placed at or near the entrance to the premises and within the premises.
- 4) A "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.
- 5) No alcohol shall be permitted to be consumed on the premises at any time during which facilities for gambling are being provided on the premises.
- 6) The summary of the terms and conditions of the premises licence issued under section 164(1)(c) of the 2005 Act shall be displayed in a prominent place within the premises.
- 7) There will be a minimum of two members of staff after 10pm.
- 8) An incident log shall be kept for the premises and made available on request to an authorised officer of the City Council or the Police which will record the following;
- 9)
 - a) All crimes reported to the venue;
 - b) Any complaints received regarding crime and disorder;
 - c) Any incidents of disorder;
 - d) Any faults in the CCTV system; and
 - e) Any visit by a relevant authority or emergency service.
- 10) The Licensee shall take all reasonable steps to prevent street drinking of alcohol directly outside the premises and to ban from the premises those who do so.
- 11) The Licensee shall place a notice visible from the exterior of the premises stating that customers drinking alcohol outside the premises is not permitted and those who do so will be banned from the premises.
- 12) The Licensee shall implement a policy of banning any customers who engage in crime or disorder within or outside the premises.



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

Yours Sincerely,

Gary Norton 2965NW
MPS Brent Licensing Team

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From: Gary.L.R.Norton@met.police.uk <Gary.L.R.Norton@met.police.uk>
Sent: 14 July 2021 15:21
To: paddy@woodswhur.co.uk
Cc: Business Licence <business.licence@brent.gov.uk>; Legister, Linda <Linda.Legister@brent.gov.uk>
Subject: RE: Wembley - 574 High Road, Wembley, HA0 2AA

Dear All,

As the applicant representative has accepted all the police recommended conditions, I withdraw police representations.

We will monitor the licensable activity going forward, along with other premises in the area, to see what the impact is, positive or otherwise.

Yours Sincerely,

Gary Norton

From: Paddy Whur
Sent: 14 July 2021 11:52
To: Norton Gary L.R - NW-CU
Cc: Susana.Figueiredo@brent.gov.uk; Beth Mortell
Subject: Re: Wembley - 574 High Road, Wembley, HA0 2AA

Sorry yes all 13!

Paddy Whur
Paddy@woodswhur.co.uk
Sent from my iPhone

On 14 Jul 2021, at 11:37, Gary.L.R.Norton@met.police.uk wrote:

Dear Paddy,

Just wanted to clarify, you accepted police conditions but stated there were 12, but there are 13. Can you confirm all 13 are acceptable?

Kind Regards,

Gary Norton

GARY NORTON
Police Constable 2965NW – Brent Licensing Officer

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Little Vegas
Ground Floor
574 High Road
Wembley
HA0 2AA

20th July 2021

Ref: 21656

Dear Sir/Madam

Re: Gambling Act 2005 - Licensing Representation to the Application for an Adult Gaming Centre at Ground Floor, 574 High Road, Wembley, HA0 2AA

I certify that I have considered the above application and I wish to make representations that the likely effect of the grant of the application is detrimental to the Licensing Objectives for the reasons indicated below.

Officer: Susana Figueiredo – Licensing Inspector

An officer of the Licensing Authority, in whose area the premises are situated, who is authorised for the purposes of exercising its statutory function as a 'Responsible Authority' under the Gambling Act 2005

The Licensing Authority representations are primarily concerned with the three licensing objectives;

- **Preventing gambling from being a source of crime and 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.**

As a result of the premises licence application being received by Brent Council for an **Adult Gaming Centre (AGC)**, the licensing authority have examined the area of where the AGC will be sited. High Road, Wembley is a busy town centre consisting of numerous licensed premises such as bars, pubs, betting offices and late night refreshment premises. High Road, Wembley also consists of many residential dwellings all within close proximity.

With the above taken into consideration, Licensing Authority wish to propose the following conditions :

CCTV

1. The venue shall install and maintain a comprehensive CCTV system at the premises as per the minimum requirements of the Metropolitan Police Licensing Team. This system should 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
2. The CCTV shall continue to record activities 24 hours a day for 31 days with date and time visible. Recordings shall be immediately arranged by a member of staff for handover to Police or authorised officer following their request.
3. Notices indicating that CCTV is in use at the premises shall be placed at or near the entrance to the premises and within the premises.
4. A monitor shall be placed inside the premises above the front door showing CCTV images of customers entering exiting the premises.

Children and Young People

5. The licensee shall maintain a bound and paginated or electronic refusals register at the premises. The register shall be produced to the police or licensing authority forthwith upon request.
6. Prominent signage and notices advertising the Challenge 25 will be displayed showing the operation of such policy.
7. 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.
8. 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.

Staffing levels

9. There will be a minimum of two members of staff after 10pm.
10. Staff shall continuously monitor customer activity when they are in the premises.

Identification of Offenders or Problem Persons

11. The Licensee shall implement a policy of banning any customers who engage in crime or disorder within or outside the premises.
12. The licensee will refuse entry to customers who appear to be under the influence of alcohol or drugs.

Seating

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

Alarms

14. The licensee shall install and maintain an intruder alarm on the premises.
15. The premises shall install and maintain a panic button behind the cashiers counter.

Toilets

16. The licensee will ensure that should customer toilets be provided, they are checked every hour for evidence of drug taking. Toilet checks are to be documented stating the time and member of staff who made the checks.

Signage, Promotional Material and Notices

17. Prominent GamCare documentation will be displayed at the premises.

Staff Training

18. The licensee shall provide training on the specific local risks to the licensing objectives that have been identified for these premises as part of the staff induction training programme.
periodically provide refresher training to all of its staff working at these premises on the specific local risks to the licensing objectives.
19. The Licensee shall train staff on specific issues related to the local area and shall conduct periodic refresher training. Participation in this training shall be formally recorded and the records produced to the police or licensing authority upon request.
20. New and seasonal staff must attend induction training and receive refresher training every six months. Participation in this training shall be formally recorded on each member of staffs training records which, if requested will be presented to the Licensing Authority as soon as practicable.

Homeless and Street Drinking

21. The Licensee shall take all reasonable steps to prevent street drinking of alcohol directly outside the premises and to ban from the premises those who do so.
22. The Licensee shall place a notice visible from the exterior of the premises stating that customers drinking alcohol outside the premises is not permitted and those who do so will be banned from the premises.

Recording of Incidents and Visits

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

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

In order for the Licensing Team to withdraw this representation, it will be necessary for you to confirm in writing that you are willing to accept the above conditions.

Yours sincerely,



Susana Figueiredo
Licensing Inspector
Planning, Transportation, Licensing

From: Susana, Figueiredo <Susana.Figueiredo@brent.gov.uk>
Sent: 20 July 2021 12:13
To: Paddy Whur <paddy@woodswhur.co.uk>
Cc: Amy Hayward <amy@woodswhur.co.uk>; Beth Mortell <beth@woodswhur.co.uk>; Gary.L.R.Norton@met.police.uk
Subject: Wembley - Little Vegas, 574 High Road, Wembley, HA0 2AA

Dear Paddy,

Thank you for confirming, I have attached the final version for your records.

The Licensing Authority now withdraw their representation and have no further comments to make.

Please wish your client the best of luck.

Kind regards

Susana Figueiredo
Licensing Enforcement Officer

From: Paddy Whur <paddy@woodswhur.co.uk>
Sent: 20 July 2021 11:18
To: Susana, Figueiredo <Susana.Figueiredo@brent.gov.uk>
Cc: Amy Hayward <amy@woodswhur.co.uk>; Beth Mortell <beth@woodswhur.co.uk>; Gary.L.R.Norton@met.police.uk
Subject: Re: Wembley - Little Vegas, 574 High Road, Wembley, HA0 2AA

Hi Susana,
Just to confirm that those amends are agreed.
Thank you for your help.

Paddy Whur
Paddy@woodswhur.co.uk

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Licensing Department, Brent Council

11 July 2021

I object to the application for an adult gaming centre at 574 High Road Wembley. There are problems along the High Road which this will make worse. People, mostly young men already hang around the area at all times. In the evenings they are close to businesses that are open late along the especially the bookies with their machines.

They are disorderly and put off regular visitors to businesses in the day and in the evening. We don't want any more businesses that cause this kind of problem in Wembley. Please refuse it – it will only cause more anti-social behaviour and disorder.

[REDACTED]

[REDACTED]

[REDACTED]



We authorise Knights solicitors of Two St Peter's Square, Manchester M2 3AA to represent us in objecting to the application for a Gambling Act licence by Chongie Entertainment Ltd at 574 High Road Wembley.

We acknowledge that we will not be responsible for that firms fees or any other costs arising.

Name. [REDACTED]

Address..... [REDACTED]

[REDACTED]
[REDACTED]
11 July 2021



Dear licensing department

I want to object to the application for a adult gaming centre premises at 574 High Rd Wembley.

There are enough problems here with disorderly groups and drinking on the street at all times (day and night). This will add to the disorder because people will gather round this as well.

The police have a lot on there plates already. There few enough of them round here as it is.

Please refuse this so disorder doesnt get worse.

[REDACTED]

To
Regulatory Services (Licensing),
Brent Council,
Brent Civic Centre,
Engineers Way,
Wembley,
HA9 0FJ

We authorise Knights solicitors of Two St Peter's Square, Manchester M2 3AA to represent us in objecting to the application for a Gambling Act licence by Chongie Entertainment Ltd at 574 High Road Wembley.

We acknowledge that we will not be responsible for that firms fees or any other costs arising.

Name..... [Redacted]

Address..... [Redacted] [Redacted] [Redacted]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]



10/07/2021

Dear Sir/madam

Adult Gaming Centre application 574 High Road Wembley

I see from their sign in the window that Chongie Entertainment want to use this building – an old betting office for as an adult gaming centre. I want to object to their licence it will increase the disorder we already have to put up with on the high Road.

You won't find anyone in favour in the street or shops because there is already too much disorder in the High Road with groups causing trouble and this will make more. On top of that people who shop here are against it.

There are not enough police for the problems we already have they are stretched. More disorder will make things worse. please reject this application.

Yours

[REDACTED]

For the attention of licesing
Regulatory services, Brent Council

We authorise Knights solicitors of Two St Peter's Square, Manchester M2 3AA to represent us in objecting to the application for a Gambling Act licence by Chongie Entertainment Ltd at 574 High Road Wembley.

We acknowledge that we will not be responsible for that firms fees or any other costs arising.

Name.....

[Redacted Name]

Address.....

[Redacted Address]

[REDACTED]

9/7/21



Dear Sir

I have seen the sign up for a new application for an adult gaming centre licence at 574 High Road and want to object to it and ask the council not to agree to it.

The shopping area has problems from groups gathering in the day and evening. They drink in groups and cause disorder. It happens all the way down the High Road.

This will only attract more young men and more disorder. It puts off regular shoppers for shopkeepers in Wembley.

This should be turned down because it will cause problems and put off our regular customers.

Please refuse it.

[REDACTED]

To Regulatory Services (Licensing), Brent Civic Centre,
Engineers Way, Wembley, HA9 0FJ



We authorise Knights solicitors of Two St Peter's Square, Manchester M2 3AA to represent us in objecting to the application for a Gambling Act licence by Chongie Entertainment Ltd at 574 High Road Wembley.

We acknowledge that we will not be responsible for that firms fees or any other costs arising.

Name..

[Redacted Name]

Address.....

[Redacted Address]

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Licensing Department, Brent Council

10 July 2021



Dear sir/madam

I object to the proposed bingo centre application at 574 High Road Wembley

Being familiar with this part of Wembley I am worried about the effect it will have on the street.

There is often disorderly behaviour at all different times in the area. The police are busy with other things and don't have the resources to police it as well as it should be.

This project will attract people at a loose end at night and be another place where people will hang around drinking and misbehave putting off people who live in the area and walk along the High Road.

I don't know what times they will be open but am sure this will cause more disorder.

This is the last thing we need please turn it down.

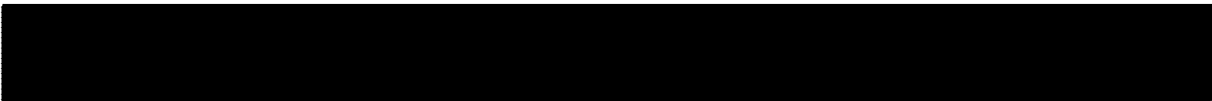
[REDACTED]

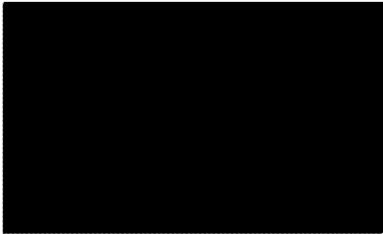
[REDACTED]

We authorise Knights solicitors of Two St Peter's Square, Manchester M2 3AA to represent us in objecting to the application for a Gambling Act licence by Chongie Entertainment Ltd at 574 High Road Wembley.

We acknowledge that we will not be responsible for that firms fees or any other costs arising.

Name.....

Address.....



10 July 2021

Dear Sir

**ADULT GAMING CENTRE APPLICATION, 574 HIGH ROAD
WEMBLEY**

**I have seen the notice for this on the shop window and
want to object. With the problems we already have in
Wembley this should be refused.**

**It will increase the disorder we all already experience and
will put off ordinary shoppers. Please turn down the
licence.**



**Regulatory Services (Licensing),
Brent Civic Centre,
Engineers Way,
Wembley,
HA9 0FJ**

We authorise Knights solicitors of Two St Peter's Square, Manchester M2 3AA to represent us in objecting to the application for a Gambling Act licence by Chongie Entertainment Ltd at 574 High Road Wembley.

We acknowledge that we will not be responsible for that firms fees or any other costs arising.

Name..



Address



.....

[REDACTED]
[REDACTED]
[REDACTED]
9th July 2021



Dear Sirs

Licence Application – Licence for adult gaming centre premises – 574 high Road

We run a business a short distance from the site and object strongly to the application.

I am worried that this project will attract more people into the street who would misbehave and cause crime and create disorder. Traders have plenty of experience of the after effects of overnight disorder on the street.

This is already happening in the street. Disorder occurs and people behave badly putting off regular shoppers. Don't make things worse by allowing this.

Yours

[REDACTED]

Regulatory Services (Licensing),
Brent Council,
Brent Civic Centre,
Engineers Way,
Wembley,
HA9 0FJ

We authorise Knights solicitors of Two St Peter's Square, Manchester M2 3AA to represent us in objecting to the application for a Gambling Act licence by Chongie Entertainment Ltd at 574 High Road Wembley.

We acknowledge that we will not be responsible for that firms fees or any other costs arising.

Name.....



Address.....



.....

[REDACTED]
[REDACTED]
[REDACTED]



8 July 2021

Dear Sirs

Adult Gaming Application at 574 High Road wembley

I see an application has been made for a 'adult gaming centre premises licence' at the former betting office on the High Road and want to object to it. There is a lot of anti-social behaviour already in the area but further gambling premises in the area will cause more disorder than we already get from the bookies with gambling machines nearby.

The groups who gather in the area are often drinking on the street despite the councils ban at all times of the day. If it is opening at night it will be even worse. Don't force this on the ordinary people who use the High Road for shopping.

The police have more than enough on there plates and aren't able to enforce the drinking ban never mind the problems that would be caused by this project.

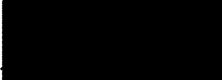
I hope that Chongie will realise this is not a good idea and give up this plan. If not I ask you sincerely to refuse this application.


[REDACTED]

Regulatory Services (Licensing),
Brent Council,
Brent Civic Centre,
Engineers Way,
Wembley,
HA9 0FJ

We authorise Knights solicitors of Two St Peter's Square, Manchester M2 3AA to represent us in objecting to the application for a Gambling Act licence by Chongie Entertainment Ltd at 574 High Road Wembley.

We acknowledge that we will not be responsible for that firms fees or any other costs arising.

Name... 

Address..... 

To Licensing at Brent Council

10 July 2021

I want to put in a formal objection to the licensing department against an application for an adult gaming centre licence premises at 574 High Road Wembley.

We experience problems along the High Road which this will worsen. People already hang around the area at all times. In the evenings they are close to businesses that are open late as I understand this business wants to.

They are disorderly and put off regular visitors to businesses. We don't want any more businesses that cause this kind of problem in Wembley.

We would ask the council to call a halt to businesses including this that will cause more anti-social behaviour and disorder and more problems on the High Road.

Thank you

Signed



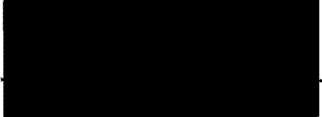
[Redacted signature]

[Redacted address line 1]

[Redacted address line 2]

We authorise Knights solicitors of Two St Peter's Square, Manchester M2 3AA to represent us in objecting to the application for a Gambling Act licence by Chongie Entertainment Ltd at 574 High Road Wembley.

We acknowledge that we will not be responsible for that firms fees or any other costs arising.

Name... 

Address..... 

Regulatory Services (Licensing),
Brent Council,
Brent Civic Centre,
Engineers Way,
Wembley,
HA9 0FJ



10 July 2021

Dear Sirs

Adult Gaming Centre Application – 574 High Road Wembley HA0 2AA

I understand that an application has been made in the old betting shop at this address.

This is a part of wembley where the last thing we need is a business which causes problems, bad behaviour and disorder as this will.

We already have a problem at times of groups gathering, unruly and disorderly behaviour. The last thing we need is more of the same. It will be bad for businesses and put off shoppers from the High Road even more than they are now.

Please make sure that the licence is refused.

Yours faithfully

[Redacted signature]

[Redacted name]

We authorise Knights solicitors of Two St Peter's Square, Manchester M2 3AA to represent us in objecting to the application for a Gambling Act licence by Chongie Entertainment Ltd at 574 High Road Wembley.

We acknowledge that we will not be responsible for that firms fees or any other costs arising.

Name..

Address.....

Regulatory Services
London Borough of Brent
Civic Centre
Engineers Way
Wembley, HA9 0FJ



9 July 2021

Dear Sirs

PROPOSED ADULT GAMING CENTRE PREMISES, 574 HIGH ROAD WEMBLEY

I understand that a licence application has been made to use this property as an adult gaming centre.

I run a business close by and have experience of the area in the day, evening and at night. I am convinced that this scheme will add to the existing problems we have on the High Road of disorder in the evening and overnight.

Groups gather round some of the businesses at night making for an intimidating atmosphere for other people in the area.

It will worsen these problems in this part of wembley and drag further problems from other parts especially in the evening and at night.

I hope the council to refuse the licence.

Yours faithfully

[Redacted signature]

[Redacted name]

[Redacted address line 1]

[Redacted address line 2]

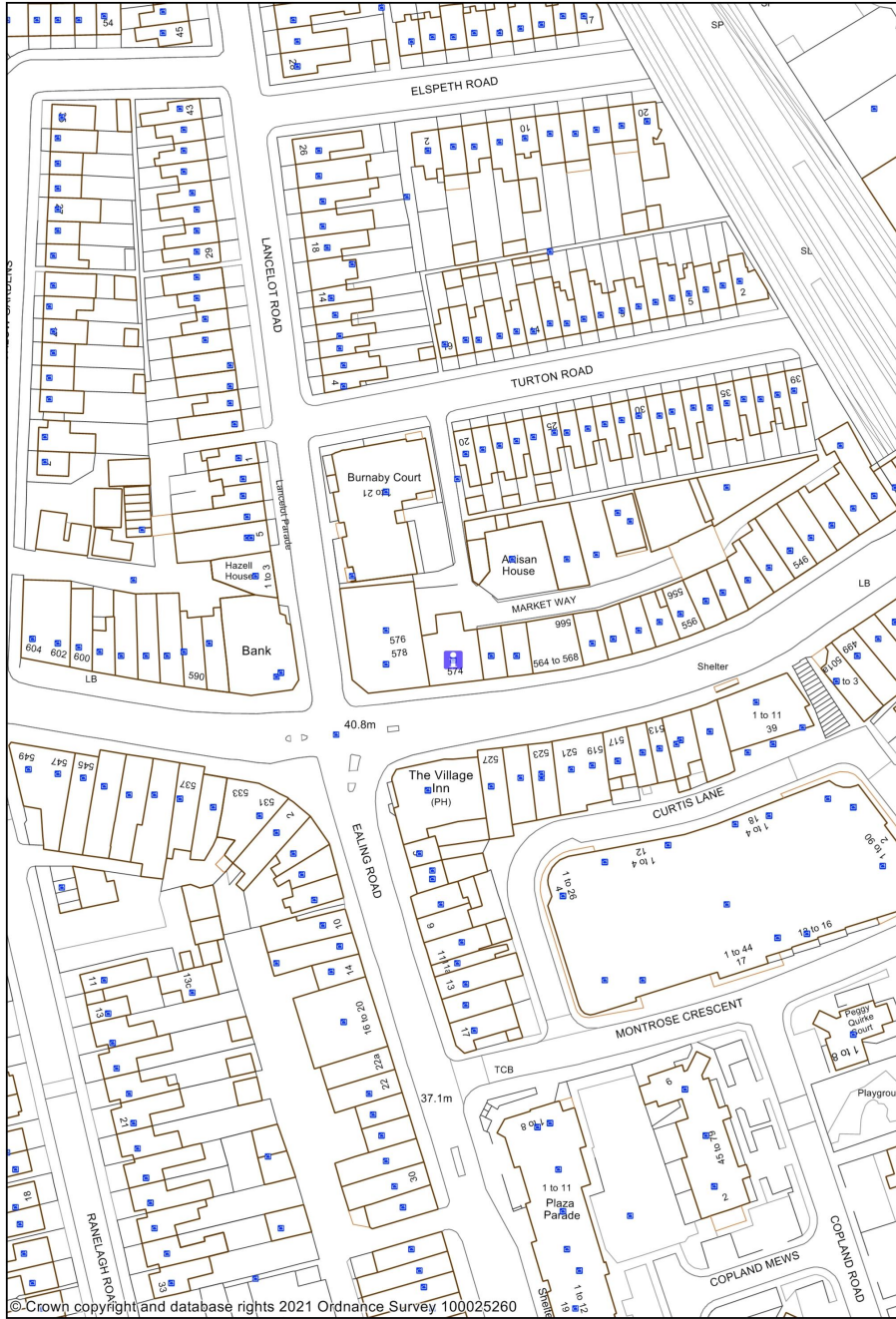
We authorise Knights solicitors of Two St Peter's Square, Manchester M2 3AA to represent us in objecting to the application for a Gambling Act licence by Chongie Entertainment Ltd at 574 High Road Wembley.

We acknowledge that we will not be responsible for that firms fees or any other costs arising.

Name..........

Address..........

Little Vegas, 574 High Road, Wembley



1:1250

0 0.02 0.04 kilometres



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The logo for Little Vegas is displayed within a red rectangular background. The words "LITTLE VEGAS" are written in a bold, yellow, sans-serif font. Below the text is a horizontal line of yellow dots.

LITTLE VEGAS

Chongie Entertainment Limited

Social Responsibility & Compliance Pack

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1 Introduction

Chongie Entertainment Limited (“Chongie”) and all of its employees are committed to a safer gambling experience for all customers of Little Vegas.

These policies and procedures are designed to ensure that the Gambling Act 2005, the LCCP and all relevant guidance is understood and followed by all employees of Chongie.

The Social Responsibility & Compliance Pack is in addition to the following:

- The Money Laundering and Proceeds of Crime Policy
- The Customer Due Diligence and “Know Your Customer” Procedure
- The Advertising and Marketing Policy
- The Staff Guard Policy
- The CCTV Policy
- The Machine Fraud and Ratio Check Policy
- The Gambling Risk Assessment

And any other policy which Chongie may implement in order to uphold the Gambling Act 2005 and all additional guidance and legislation.

1.1 The Gambling Act 2005

Mandatory Licence Conditions implemented by the Gambling Act 2005 (“GA05”):

- 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.
- 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.
- 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.

- 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.

1.2 The Licensing Objectives

- Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime
- Ensuring that gambling is conducted in a fair and open way and
- Protecting children and other vulnerable person from being harmed or exploited by gambling

1.3 The Licensing Conditions and Codes of Practice

The Licence conditions and codes of practice (“LCCP”) set out the requirements Chongie must meet in order to hold its operating licence. All senior employees must subscribe to the Gambling Commission news updates and regularly check the website for updates.

Section 24 of the Gambling Act 2005 sets out two types of provisions:

- Social responsibility provisions

Compliance with these is a condition of licences, therefore any breach of them by an operator may lead the Commission to review the operator’s licence with a view to suspension, revocation or the imposition of a financial penalty and would also expose the operator to the risk of prosecution

- Ordinary code provisions

These do not have the status of licence conditions but are admissible in evidence in criminal or civil proceedings and must be taken into account in any case in which the court or tribunal think them relevant and by the Commission in the exercise of its functions. Any breach of ordinary code provisions by an operator may be taken into account by the Commission on a licence review, but cannot lead to the imposition of a financial penalty

These codes consist of: Financial Requirements (including Anti Money Laundering); Protection of Children & Vulnerable People; Combating Problem Gambling; Access to Gambling by children and young persons; Information on how to gamble responsibly and help for problem gamblers; Customer Interaction; Self Exclusion; Employment of Children & Young Persons; Money lending between customers; Fair & Open provisions; Marketing;

Complaints & Disputes; Gambling Licensees' staff; Information Requirements; Primary Gambling Activity

Adult Gaming Centres must comply with the relevant sections of the LCCP and all members of staff must be familiar with, and are trained on, these sections.

1.4 The Powers of the Gambling Commission and others

Members of staff are to co-operate at all times with the Commission's Compliance officers, Local Authority Licensing officers and the police in the proper performance of their compliance functions.

These individuals rights of entry to premises are contained in Part 15 of the Act which deals with inspection (Sections 303 to 326). A constable, enforcement officer or authorised person under the Act may enter premises for the purpose of assessing compliance or assessing whether an offence is being committed. A constable or enforcement officer can enter a premises if he reasonably suspects that an offence may be being committed or is about to be committed (Section 306). Entry may also be for the purpose of discovering whether facilities for gambling are being provided, to determine whether an operating licence or premises licence is held and to determine whether facilities are being provided in accordance with terms and conditions of an operating licence (Section 307).

Entry may also be made to assess the likely effects of activity when application has been made for a premises licence. A constable or enforcement officer may require the holder of an operating licence to produce, within a specified period, a copy of the authorisation (Section 316). Failure to comply without reasonable excuse to a request to produce a copy of the authorisation may result in an offence and be liable on summary conviction to a fine not exceeding level 2.

Section 317 sets out powers of the constable, enforcement office or authorised person and include inspection of any part of the premises or any machine on anything on the premises, questioning any person, access to written or electronic records, remove or retain evidence of committing an offence or breach of terms and conditions. Section 20 provides that the power of inspection must be exercised only at a reasonable time. The enforcement officer or authorised person must provide evidence of his identify and authority (Section 321). Section 323 provides that a constable, enforcement officer or authorised person may use reasonable force to enter a premises. Section 326 provides that it is an offence to obstruct a constable, enforcement officer or authorised person in carrying out their duties.

2 Social Responsibility

2.1 Promotion of Socially Responsible Gambling

The third objective of the Gambling Act is to protect children and other vulnerable persons from being harmed or exploited by gambling and it is conditional on our Adult Gaming Centre licence that we have appropriate controls in place. The need to prevent young and vulnerable persons from being able to access our products and services is of paramount importance to Chongie.

2.2 Problem Gambling and the Provision of Information

Chongie monitors customer activity and uses a range of indicators to identify potential gambling. These include:

- Time and spend indicators: amount and frequency of time and deposits, time of day, large losses.
- Customer contact: information or hints from customers, frequent complaints, or signs of distress.
- Play indicators: chasing losses, erratic gaming patterns and product choice.
- A 'big win': high staking following a win could hide or even lead to harmful behaviour.

A player may give some signals that they have a gambling problem while communicating with members of staff. A problem gambler may display some of the following signs:

- Finding it hard to manage or stop gambling – customer may make a comment regarding this.
- Signs of agitation, distress or aggression: Customers may target aggression at customer support staff following a loss. Staff will be trained on how to deal with aggressive customers and how to diffuse situations.
- Player informs staff member that their main goal is to win a specific amount of money at which point they will leave.
- Customer contacts Chongie management regularly to express dissatisfaction with gaming outcomes and overall gameplay.

In the event that a suspected problem gambler enters an AGC and wishes to participate in gambling:

- The customer must be tactfully referred to GamCare by the appropriate member of

staff.

- The customer's details must be logged for the purposes of possible exclusion from future participation, should any similar incidents re-occur.
- All written and verbal communication between staff and suspected problem gamblers must be monitored and approved by senior management.

In the event that an existing customer is suspected of becoming a problem gambler:

-
- The customer must be tactfully referred to GamCare, by the appropriate member of staff.
- The customer's details must be logged for the purposes of possible exclusion from future participation, should any similar incidents re-occur.
- All written and verbal communications between staff and the suspected problem gambler should be monitored and approved by senior management.

Chongie clearly displays posters and provides leaflets for customers which detail key organisations which can help, including Gamcare.

The following organisations also provide psychological help, professional advice and assistance in dealing with gambling addiction:

- Counselling Directory
- The National Council on Problem Gambling
- GamCare
- Gamblers Anonymous
- Gam-Anon UK and Ireland
- Y-Gam

2.3 Customer Interaction

Chongie recognises its responsibilities and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice listed under the Social Responsibility Code 3.4.1.

Chongie follows the Identify- Interact- Evaluate framework to ensure compliance and to

protect its customers.

Chongie, where circumstances allow and subject to player confidentiality, shares experience and deliver good practice across the full range of social responsibility requirements for customer interaction with other operators.

Identify

Chongie ensures that staff have access to all relevant sources of information and policies to ensure effective decision making, in order to guide and deliver effective customer interactions, including information to assist in identifying at risk customers whom;

- may not be displaying obvious signs of, or overt behaviour associated with, problem gambling
- are designated as 'high value', 'VIP' or equivalent (although Chongie do not operate a VIP scheme)
- are demonstrating signs of agitation, distress, intimidation, aggression or other behaviours that may inhibit customer interaction

Chongie Entertainment Limited recognises the importance to identify any customers where there may be problems early and pro-actively reach out and offer support.

Interact

Should a staff member feel that a player's behaviour may indicate problem gambling, they should engage with the customer by asking questions such as:

- Do you feel that your gambling spends are controlled?
- Do you acknowledge that your activity may result in losses and can withstand these losses?
- When you lose, do you feel you the need to return as soon as possible to win back your losses?
- Do you ever borrow to finance your gambling?

The member of staff, if they think it necessary, will explain the various management tools in place such as self-exclusion, and will provide information on GamCare.

Evaluate

Chongie understands that evaluation of customer interactions is important to understand the impact they have had and to help ensure customers are getting the right help and support.

The result of a customer interaction may be that the customer is allowed to continue, the customer self-excludes or uses a different tool, or the customer is barred.

A monthly review of customer interactions should be carried out with considerations to the following points:

- Did the customer start using gambling management tools?
- Did the customer read the responsible gambling information?
- Was there a positive change in behaviour? Did the customer's gambling seem to change after the interaction?

Chongie keeps a record of customer interactions, and where an interaction has been ruled out, the reasons for this.

A flow chart of how Customer Interaction works is at section 8.3.

2.4 Self-Exclusion

Self-exclusion is recognised by the gambling industry as a way for players to control their gambling. Chongie offers a self-exclusion facility to help those customers who feel that their gambling is out of control and want assistance to help them stop.

Chongie takes all reasonable steps to ensure that customers on the self-exclusion register are prevented from entering the premises. Whilst on the self-exclusion register, customers also have certain obligations contained in the terms and conditions that they acknowledge when joining the self-exclusion program.

What happens

- When a customer has requested that they be refused entry to our premises, the customer and the appointed manager will formally acknowledge and document the request on a self-exclusion request form, or directly on the web-based AGC national self-exclusion scheme. This will be preceded by a meaningful discussion about the terms and conditions applicable to the scheme and will include other options available to assist a person having a gambling disorder, including being signposted to counselling and support services. A copy of the terms and conditions will be signed by the excluder as acknowledgement of understanding and consent. Customers are given the opportunity of discussing self-exclusion in private where possible.
- Photo identification and signature of the excluder is required for self-exclusion agreements except where an alternative means of identification is at least as effective. Photographs, preferably of the passport style, should be full-faced and a good likeness both initially and throughout the duration of the self-exclusion agreement.

- The Duty Manager will offer the exclusion for a minimum duration of not less than six months, nor more than twelve months; the customer thereafter may request to extend the length of the self-exclusion for one or more further periods of at least six months.
- Chongie will not allow the excluder admittance to the premises during the term of the self-exclusion agreement.
- It is made clear to the customer that they may not revoke the self-exclusion during the agreed period and that if found either in the gambling area or attempting to gamble they will be asked to leave.
- Members of staff must be alert to self-excluded individuals attempting to breach agreements and instances of them getting another person to gamble on their behalf. It is a requirement that staff regularly pay heed to self-exclusion agreement records that are currently active (particularly photographs) in order to stay alert to the identity of those excluded in the locality of the premises.
- Self-excluders have the opportunity of also excluding from other premises owned by Chongie without necessarily having to enter areas licenced for gambling. Where the self-exclusion agreement is extended to other premises we will consider any specific requests made by a customer in setting the bounds of the exclusion area.

Chongie will offer customers with whom they enter into a self-exclusion agreement in respect of facilities for any kind of gambling we offer, the ability to exclude from facilities for the same kind of gambling offered in our locality by any other holder of an operating licence to whom this provision applies, by participating in one or more available multi-operator self-exclusion schemes.

A self-exclusion log is maintained on the premises for recording detail of those currently excluded in addition to records stored digitally.

Those self-excluded are removed from any marketing databases held by Chongie within two days of receiving the completed self-exclusion form, but we will take all reasonable steps to prevent details being knowingly sent as soon as practicable.

At the end of the self-exclusion period, the exclusion will remain in place for a further six months, unless the customer takes positive action in order to gamble again. At the end of the exclusion period, the Manager and customer will, together, review the terms of agreement either by telephone or in person. The review process is recorded on a self-exclusion review form.

Where a customer chooses not to extend the self-exclusion and makes a positive request to begin gambling again, the customer is offered a 24-hour 'cooling off' period before being allowed access to the gambling facilities.

Chongie retains self-exclusion records for the length of the agreement plus a further 6

months.

3 Children and Vulnerable Persons

3.1 Access to Gambling

Chongie implements age verification procedures that use various methods to try and detect and deter children and young people from entering including U18 signage.

The premises themselves have been designed to ensure staff on the floor can see who is accessing the premises and floor staff must be vigilant. Specific risks have been considered in the Local Area Risk Assessment.

3.2 Challenge 25

Chongie operates a challenge 25 policy which requires that all customers who appear to be under 25 are approached by a member of staff and their age verified by the production of the appropriate valid ID document as soon as entering the premises or as soon as possible thereafter but BEFORE gambling.

Acceptable forms of documentation include:

- Any ID carrying the PASS logo (e.g. Citizen Card, Connexions Card) Full Driving Licence with photo card.
- Provisional Driving Licence with photo card or International Passport
- Military Identification Card

The staff must check to see that the ID is acceptable and then record the interaction in the ID Record.

If suitable photographic ID cannot be produced, then the customer should be politely requested to leave the premises with the incident subsequently recorded.

Challenge 25 signage is positioned on or close to the entrance/exit door and displayed in conjunction with existing signage.

The Gambling Commission and Local Licensing Authority may conduct underage test entries to assess whether or not Chongie's Adult Gaming Centre's are allowing under- 18's to enter or gamble on the premises. BACTA also conduct age verification checks.

If at any time staff are informed that they have been the subject of an underage test by the Gambling Commission and/or the Local Licensing Authority, this is immediately reported to the Operations Manager and Compliance Officer.

All age verification test failures are fully investigated by the Operations Manager and/or the Compliance Officer. Performance is constantly monitored and further training may be given

to staff if necessary to react to developing risks in particular areas.

Chongie does not deliberately provide facilities for gambling in such a way as to appeal particularly to children or young people, for example by reflecting or being associated with youth culture.

If a person over the age of 18 knowingly allows a child under the age of 18 in to the Adult Gaming Centre that person and the child will be banned for 6 months (the names and details will be recorded on a written form which will be filed at the unit).

This should be reported to the Premises Manager for that site, who will then complete the "ban log" and report and retain for future use/inspection.

If an employee of Chongie becomes aware that a child or young person is using or has used facilities for gambling provided in reliance on the licence, they shall ensure that:

- Any money paid in respect of the use of those facilities (whether by way of fee, stake or otherwise) by the child or young person is returned as soon as is reasonably practicable; and
- Any prize must not be given to the child or young person.

This should be reported to the Premises Manager for that site, who will then complete the ban log and report to the Operations Manager in writing.

Any member of staff who knowingly allows access to a person under the age of 18 will be subject to disciplinary action.

3.3 Employment of Children and Young Persons

Licencees who employ children and young persons should be aware that it is an offence: -

- a) to employ them to provide gambling facilities in an Adult Gaming Centre
- b) for their contract of employment to require them or permit them to perform functions in respect any gambling machine in an Adult Gaming Centre
- c) to employ a child to perform any function in an Adult Gaming Centre where facilities are being provided to play gaming machines

Chongie will not employ and person under the age of 18 years

4 Crime and Disorder

4.1 Money Laundering and Proceeds of Crime

Chongie maintains a separate ML and POCA policy which is available to all staff.

4.2 Suspicious Activity Reports

All employees are aware of where the SAR forms are located, how to complete them and how to submit them to the Operations Manager.

POCA requires SARs to be raised to the NCA in the event of knowledge or suspicion of the use of the proceeds of crime.

A SAR will be raised with the NCA by the Operations Manager as soon as is reasonably practicable where suspicion is held that the customer is engaged in money laundering.

If the level of concern leading to the SAR is maintained in future transactions or has increased thereafter, then further SARs will be considered.

Wherever knowledge or suspicion exists, the Operations Manager will make an assessment with regards to the continuation of the customer relationship. This decision is made with awareness of the potential offences under POCA if transactions are allowed to continue where knowledge or suspicion exists.

In accordance with Gambling Commission guidance, advice may be sought from the NCA around the most effective approach in respect of terminating a customer relationship.

Where a relationship is terminated, steps will be taken to uphold this as effectively as possible.

Further information is contained in the ML and POCA policy.

4.3 Cash Handling

All members of relevant staff are trained specifically on cash handling and in particular with regard to security, accounting practices and record keeping in respect of:

(i) Monetary stakes introduced to machines (gross takings),

(ii) Money introduced to re-float machines

(iii) Token transactions

(iv) Customer refunds due to machine malfunctions.

(v) Money removed from machines (net takings)

Sign Off Keys

No keys are to be handed to anybody without checking ID. The person who hands over the keys will be held responsible. All visiting engineers need to sign in.

Cash Collection

Cash is collected daily and stored in a safe. The external cash collection will take place every 7-10 days and the Operations Manager will be present.

Empty of Machines

The empty of machines needs to be carried out ideally when there are no customers in the unit.

Once each machine/terminal has been emptied/re-floated the keys need to be locked away again in the safe.

Cash Reconciliation

The Premises Manager is responsible for this and any discrepancies / variances will be recorded as cash losses and investigated as necessary.

All accounting procedures will be recorded by senior management.

4.4 Keeping Alcohol Out

Chongie implements clear rules and guidelines on the consumption and influence of alcohol.

Individuals under the influence of alcohol on entry

- In all our sites individuals who are deemed to be under the influence of excessive alcohol should be prevented from entering any of our premises.
- When such a situation occurs the member of staff should politely refuse entry to the site on the grounds of being under the influence of alcohol and ask the individual to leave the premises.
- Should the individual resist or refrain from leaving the premises in the first instance a Premises Manager should be called. They should also request that the individual leave the premises immediately. If an individual fails to leave the premises or becomes a nuisance that cannot be dealt with by the staff on duty the police should

be called to assist.

- All incidents should be recorded fully on the premises log.

Alcohol consumption on site

- Under no circumstances should customers be served alcoholic drinks on site, nor should they bring alcoholic drinks onto the premises to be consumed.

4.5 Dealing with Aggressive Customers

Violence and aggression are used to show distress and dominance. Whilst there are some individuals for whom such behaviour is normal, members of staff must be extremely cautious of treating such behaviour as normal.

Staff must be aware of any signs of aggression including, but not limited to:

- Tensed muscles or sweating
- Twitching muscles, particularly in the face
- Pacing
- Changes in voice (pitch, volume)
- Language, obscenities, threats
- Facial expression
- Withdrawn or upset
- Carrying a weapon or suspected weapon

In the event a member of staff comes across a customer displaying signs of aggression or violence they should:

- Listen to the customers views or complaints
- Try to understand what their problem is and discuss it with them
- See if they can resolve the situation by taking any actions needed

Staff should be cautious in their approach and ensure they do not adopt a confrontational approach and are aware of how they can contact a another member of staff if necessary.

5 Fair and Open

5.1 General Terms and Conditions

Chongie utilise and comply with BACTAs general Terms and Conditions and all relevant sections of the LCCP

5.2 Complaints Procedure

Chongie Entertainment Limited is committed to providing excellent levels of service and are constantly striving to meet the expectations of customers, and welcome feedback where services can be improved or where expectations have not been met.

Issues of concern can usually be resolved by discussing the matter with a member of the team within one of the Adult Gaming Centres. A database record will be completed at the time of the contact, detailing your contact details, which team member dealt with the issue, the nature of the complaint and how the complaint was resolved. A copy of this complaints procedure will be provided to customers upon request, or whenever they make a complaint.

However, we recognise that sometimes it may not be appropriate to contact us in this way, or you may feel your concerns have not been properly addressed internally after talking to the team. Where this is the case, we actively encourage our customers to use our Complaints Procedure so that issues and concerns can be raised with management and addressed appropriately. This document explains how the Complaints Procedure works, what you need to do and what you can expect.

There are two levels – Complaints Co-ordinator and Lead Contact of the Adult Gaming Centre.

Level 1 – Complaints Co-Ordinator

If Chongie Entertainment Limited haven't reasonably met your expectations or you wish to make a complaint relating to services you should write or e-mail in the first instance to the Complaints Co-ordinator, who will be the General Manager of the premises

Please put in the subject line 'FAO: Complaints Co-ordinator'.

In expressing concerns it is helpful to include all relevant details such as nature of complaint, date, people contacted and the other circumstances relating to your complaint. This helps to quickly and fully understand the nature of the complaint and begin investigations. Once the Complaints Co-ordinator acknowledges receipt of your letter or email in writing within 48 hours, he will also provide a copy of this complaints policy. You can normally expect a full written response within 10 working days of this acknowledgement. His aim is to resolve the

complaint to your complete satisfaction at this level.

Level 2 - Lead contact of the Adult Gaming Centre.

If, after receiving our response at the 1st level you feel that your concerns have not been fully addressed you can ask for your complaint to be referred to the lead contact in relation to the services provided. Please contact Dobromir Baltadzhiev. You can normally expect a full written response to your complaint within 10 working days of acknowledgement of the complaint reaching the 2nd level.

It may be necessary for additional information to be sought from an external source. When this is necessary, it may not be possible to respond to your complaint within 10 working days and the Lead contact of the Adult Gaming Centre will contact you again. He will explain the reasons for asking for a time extension and seek your approval.

Chongie Entertainment Limited understand the need for ADR provisions to be in place and therefore intend to contract with a Gambling Commission approved ADR provider.

5.3 Marketing and Promotional guidelines

Chongie has an Advertising and Media Policy which is available to all staff.

Chongie's marketing team ensures that promotional material is developed in a socially responsible manner, particularly to protect young or vulnerable persons from being harmed or exploited by advertising and in accordance with the following provisions:

- The Gambling Commission's LCCP;
- Committee of Advertising Practice (CAP) code.

6 Recording and Reporting Requirements

6.1 General Reporting Requirements

Chongie acknowledges its obligation to ensure that staff openly co-operate with the Gambling Commission in the proper performance of their compliance functions and that they are made aware of those officers' rights of entry to premises contained under Part 15 of the Gambling Act 2005 and that:

- they must provide the Gambling Commission with any information that the Commission would reasonably need to be aware of in exercising its regulatory functions or suspect may relate to the commission of an offence under the Act, including an offence resulting from a breach of a licence condition or a code of practice provision having the effect of a licence condition. Changes in key circumstances must be reported within five days of their occurrence in accordance with the terms set out in the Operating Licence.
- Chongie must provide the Gambling Commission with such information as the Commission may require from time to time about the use of facilities provided such as:
 - (i) the numbers of people making use of the facilities and the frequency of such use;
 - (ii) the range of gambling activities provided by the licensee and the number of staff employed in connection with them; and
 - (iii) the licensee's policies in relation to, and experience of, problem gambling.
- Chongie must submit a Regulatory Return to the Gambling Commission containing such information as the Commission may require from time to time, and provide evidence that the terms on which gambling is offered are not unfair under the Unfair Terms in Consumer Contracts Regulations 1999 and, where applicable, meet the reasonableness test under the Unfair Contract Terms Act 1977.
- The Appointed Manager will be informed immediately a Gambling Commission Enforcement Officer properly identifies himself on the premises, and will attend to the Officer without undue delay. Staff will co-operate at all times with the Commission's Enforcement Officers.
- Members of staff are trained as part of their induction process in the understanding of, and the strict adherence to this policy, and required to sign to this effect retaining a copy for their future reference. The original is retained on the employee's personnel file.

6.2 Challenge 25 Register

	Name and other details	Date of Challenge	Signed	Print Name	Any other comments
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					

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6.3 Self-Exclusion Register

	Name and other details	Date of exclusion	Expiry of Ban	Signed	Print Name	Breaches of self exclusion by self excluded member	Date of when self excluded has opted and declared to return to gambling
1							
2							
3							
4							
5							
6							
7							
8							
9							
10							

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6.4 Customer Interaction

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	Name and other details	Date	Observation	Action	Outcome	Signed	Print Name
1							
2							
3							
4							
5							
6							
7							
8							
9							
10							



6.5 SARS Register

	Form Name	Date of Form	Submitted	Signed	Print Name	Any other comments
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						

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6.6 Staff Training

	Staff Name	Date of Training	Trainer	Training covered	Signed	Print Name	Any other comments
1							
2							
3							
4							
5							
6							
7							
8							
9							
10							

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6.7 Incidents Requiring Police Attendance

	Date of Incident	Description of Incident	Police attendance?	Signed	Print Name	Any other comments
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						

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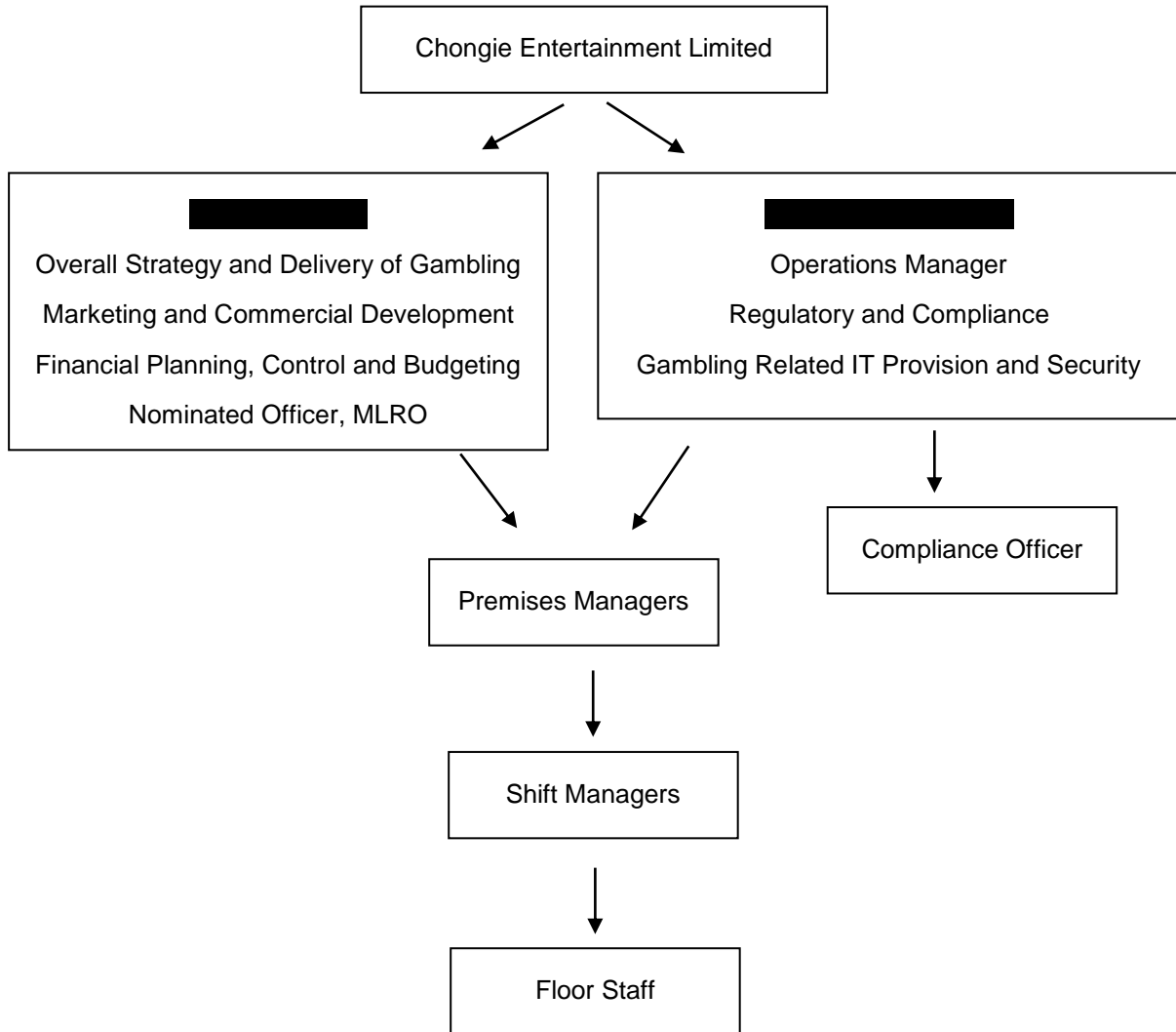


7 Training

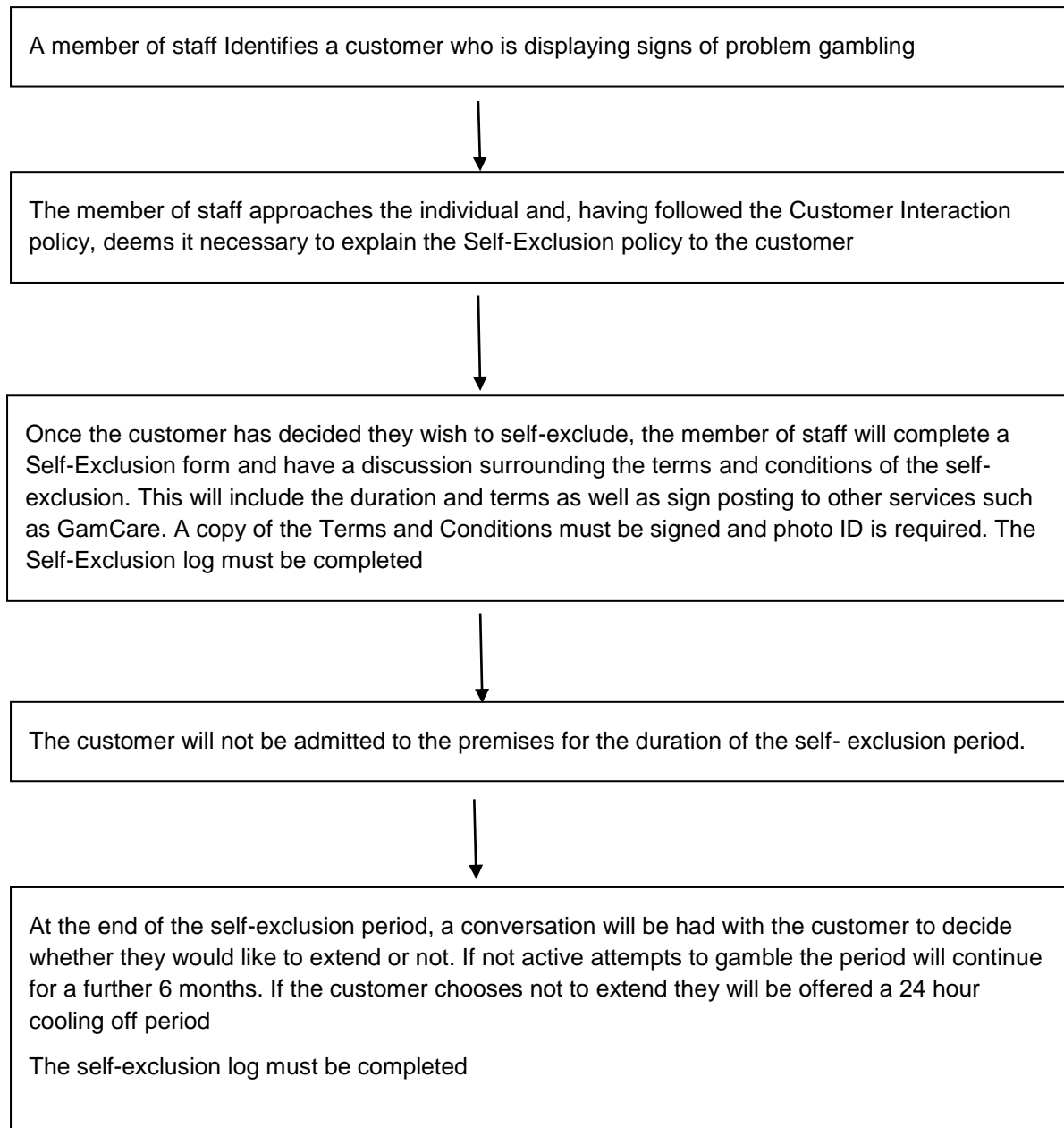
- 7.1 All members of staff receive full training on the Compliance Pack and all other Policies and Procedures of Chongie.
- 7.2 All members of staff will complete training on starting and at annual refreshers.
- 7.3 All training will be recorded in the training Record.
- 7.4 Training is carried out by the [REDACTED], Operations Manager or an external Consultant.

8 Appendices

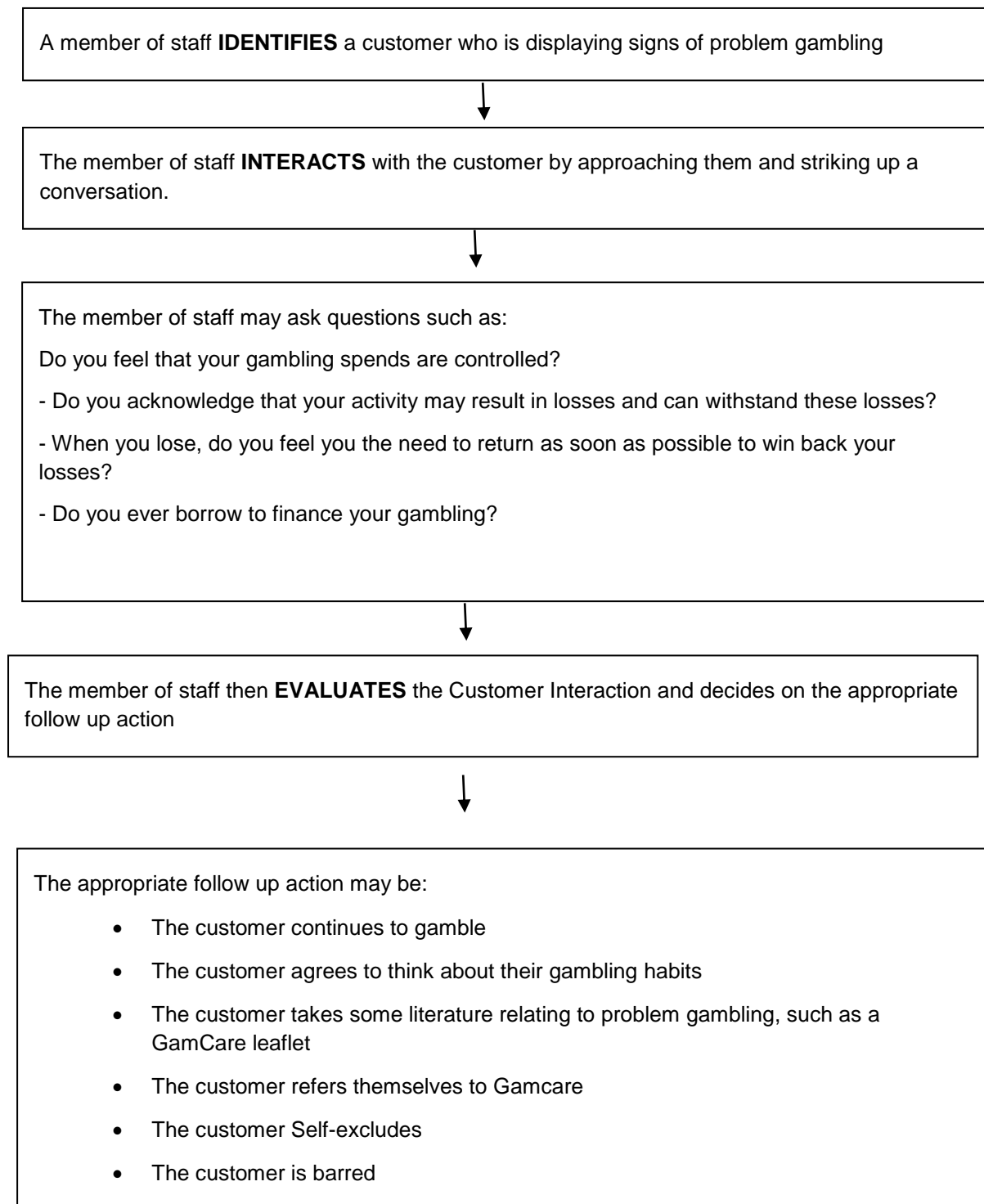
8.1 Management



8.2 Self-Exclusion Flow Chart



8.3 Customer Interaction Flow Chart



9 Monitoring

To ensure that the policies and procedures continues to be fit for purpose:

Chongie are committed to carrying out an ongoing risk assessment of its policies and procedures, tailoring them to and any training around new products and newly identified risks as appropriate.

This policy is subject to review following any new guidance published by the Gambling Commission.

Reviewed By	Reviewed On	Next Review

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