



## Alcohol and Entertainment Licensing Sub-Committee

**Thursday 4 April 2024 at 10.00 am**

Conference Hall - 3<sup>rd</sup> Floor, Brent Civic Centre,  
Engineers Way, Wembley, HA9 0FJ

Please note that this meeting will be held in person with members of the Sub-Committee required to attend in person.

**The press and public are also welcome to attend this meeting in person. Please note the meeting is not scheduled for live webcast**

### Membership:

#### Members

Councillors:

Long (Vice-Chair)  
Bajwa  
Mahmood

#### Substitute Members

Councillors:

Ahmed, Chohan, Collymore, Ethapemi, Rubin, Hack,  
Lorber

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

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[Council meetings and decision making | Brent Council](#)

**The press and public are welcome to attend this meeting**

### **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
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<b>1</b>	<b>Apologies for absence and clarification of alternate members</b>	
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<b>2</b>	<b>Declarations of Interests</b>	
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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.

<b>3</b>	<b>Application for an Adult Gaming Centre by Golden Slots (Southern) Ltd for the premises known as Golden Slots, 169-171 Cricklewood Broadway, NW2 3HY, pursuant to the provisions of the Licensing Act 2003</b>	1 - 92
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**Date of the next meeting:            Date Not Specified**



- 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:	Golden Slots (Southern) Ltd
Name & Address of Premises:	Golden Slots, 169-171 Cricklewood Broadway, NW2 3HY
Applicants Agent:	Debbie Bollard

The application is for an Adult Gaming Centre

#### 2. Background

The premises currently benefits from a Bingo premises licence. The Bingo licence will be surrendered and replaced with the Adult Gaming Centre if granted.

#### 3. Relevant Representations

Representations were received and withdrawn from the Police and Licensing Officers. Representations remain outstanding from Ward Councillors and 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 you answer “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 or business – *[delete as appropriate]*):

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: **Golden Slots (Southern) Limited**

7. The applicant's registered or principal address: **Acumen, Connaught House, Luton**

Postcode: **LU1 2RD**

8(a) The number of the applicant's operating licence (as given in the operating licence): **043695-N-323074-010**

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): **Golden Slots**

11. Address of the premises (or, if none, give a description of the premises and their location): **169-171 Cricklewood Broadway, London**

Postcode: **NW2 3HY**

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 floor(s) on which the premises are located.  
**The Premises occupy the ground floor of a three-story terraced property**

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.

	<i>Start</i>	<i>Finish</i>	<i>Details of any seasonal variation</i>
Mon	<i>hh:mm</i>	<i>hh:mm</i>	
Tue			
Wed			
Thurs			
Fri			
Sat			
Sun			

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

### Part 5 – Miscellaneous

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

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? **Yes**

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

**The Premises currently benefit from a Bingo premises licence Number 30158 which the applicant will surrender on the granting of the AGC Premises Licence.**

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

**The Applicant currently operates AGCs in London and Northampton and a full set of the Applicant's policies and procedures are included with the application to demonstrate how the Applicant will operate compliantly.**

**Staff: Four members (Manager x1, security x1, counter staff x2)**

**Opening hours subject to an application to remove existing planning restrictions will be 24/7**

**The Applicant is a participant of the IHL SmartEXCLUSION Multi operator Self Exclusion Scheme.**

## 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.

X

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

X

### Checklist:

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

## Part 7 – Signatures

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

Signature:



Print Name: Debbie Bollard

Date: 14 /02/2024 Capacity: Licensing Consultant

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

Signature:

Print Name:

Date:

Capacity:

## Part 8 – Contact Details

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

23(b) Please give one or more telephone numbers at which the person identified in question 23(a) can be contacted: 01526 341162

24. Postal addresses for correspondence associated with this application: Hough & Bollard Ltd 5 Tarleton Avenue Woodhall Spa

Postcode: LN10 6SE

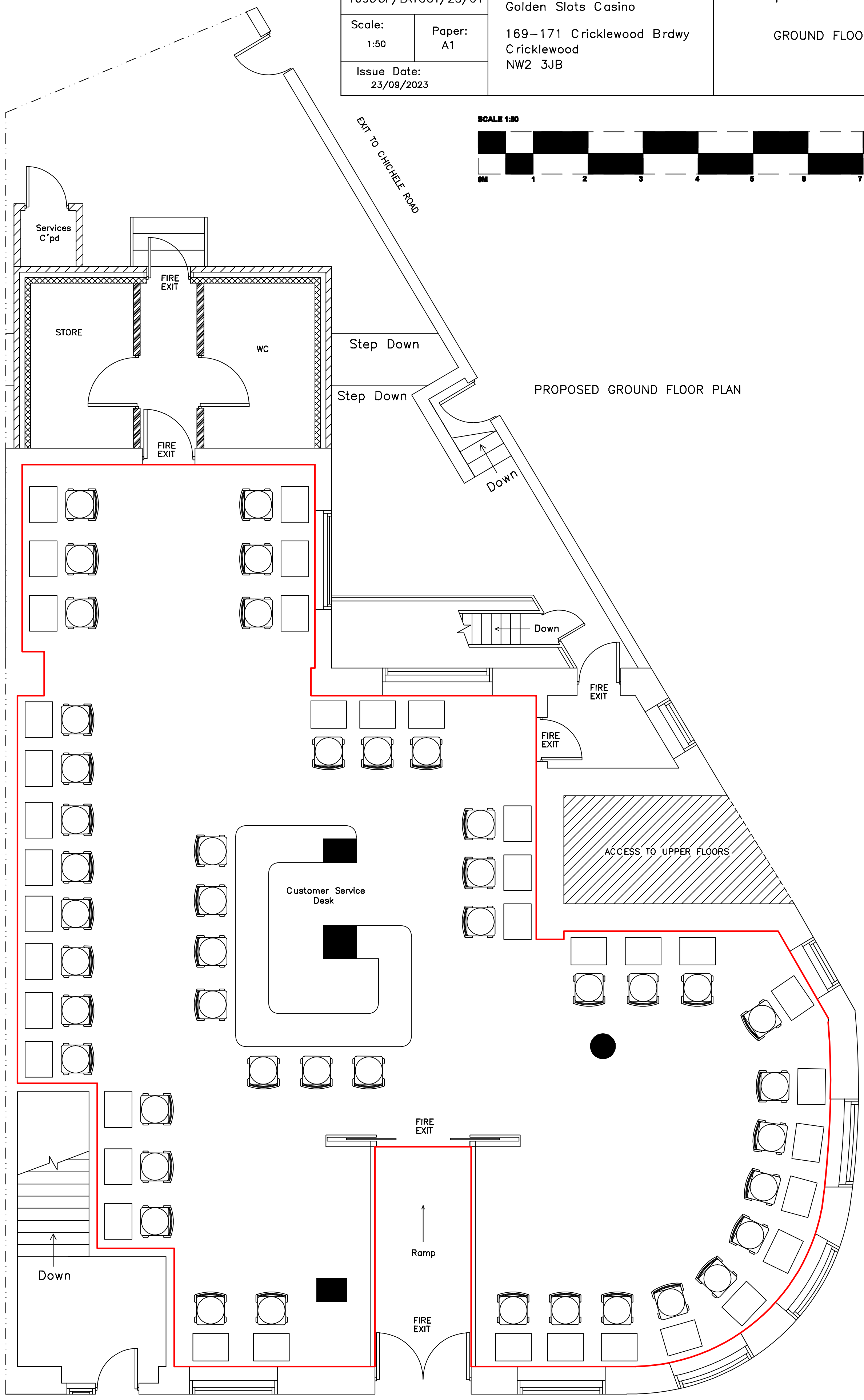
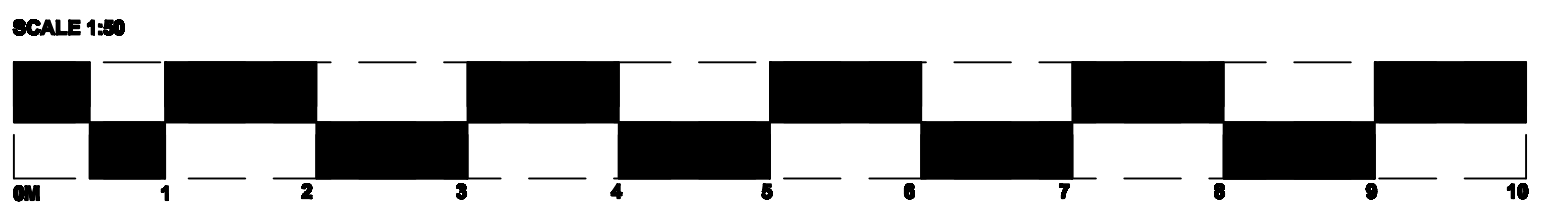
25. If you are happy for correspondence in relation to your application to be sent via e-mail, please give the e-mail address to which you would like correspondence to be sent: [debbie@houghandbollard.co.uk](mailto:debbie@houghandbollard.co.uk)

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Drawing No.  
169CGF/LAYOUT/23/01  
Scale:  
1:50  
Issue Date:  
23/09/2023

Client:  
Golden Slots Casino  
169-171 Cricklewood Brdwy  
Cricklewood  
NW2 3JB

Description:  
GROUND FLOOR PLAN/LAYOUT



ENTRANCE/EXIT CRICKLEWOOD BROADWAY

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## LOCAL GAMBLING RISK ASSESSMENT

**Premises:** Golden Slots 169-171 Cricklewood Broadway, London, NW2 3HY

**Operator:** Golden Slots (Southern) Limited

**Operating Licence:** 043695-N-323074-010

**Prepared by:** Debbie Bollard

**Date:** 8 February 2024

**Local Area Profile:** The premises are located on the ground floor of a 4-storey building previously used as a bank on the corner of the junction of Cricklewood Broadway and Chichele Road. Cricklewood Broadway is a busy commercial area with most properties being occupied by retail on the ground floor and residential accommodation above. The retail includes shops, hospitality, professional services such as accountants and solicitors, dentists opticians etc, financial institutions and other gambling premises. Chichele Road is a quieter residential area.

The area is more ethnically diverse than the UK average with more than 60% of the population made up of large ethnic groups. Cricklewood is generally considered a safe area with crime rates below the national average. The most serious crime is anti-social behaviour followed by violence and sexual offences; theft and shoplifting are less common.

There are 3 betting shops within 100m – William Hill, Paddy Power and Star Sports. There is also a Merkur Bingo at 200 Cricklewood Broadway and Admiral Casino at 160 Cricklewood Broadway.

There are a number of primary schools in the local vicinity, Hampstead Secondary School is half a miles away Whitefield Secondary School is 1.3 miles away and The Crest Boys Academy 1.5 miles away.

There are a number of religious places of worship locally including The Mosque and Islamic Centre of Brent on Chichele Road, the Praise Christian Centre on Columbia Avenue, St Gabriels Church, Sisters of St Joseph, our Lady of Mercy Roman Catholic Chapel on Walm Lane, Cricklewood Baptist Church on Sneyd Road and Our Lady of Mercy Roman Catholic Church on Cricklewood Lane

The nearest bank is Santander less than 100m away and a Tesco's ATM next door to the Merkur Bingo premises. Ashford Place a centre helping the homeless and financially vulnerable is less than half a mile from the Premises, Barnet Foyer which offers accommodation to vulnerable young people is half a mile away. The Kilburn Stret Kitchen is 1.6 miles away. Addaction have a centre on Cobbold Road which is nearly 2 miles away, other addiction rehabilitation centres are further way

**The Premises**

The site will operate as an AGC offering category B3, C and D gaming machines. It has 1 entrance at the front of the premises from Cricklewood Broadway and a fire exit to the rear. The entrance will be monitored by CCTV and staff; signs will be clearly displayed at the entrances advising entry is for persons age 18 and over only. The site is well laid out with a central customer service desk with clear line of sight to all playing positions. A multi-operator self-exclusion scheme is provided through SmartEXCLUSION.

Risks	Level	Impact	Risk Management	Date Reviewed
Children entering the site unnoticed or unchallenged	Low	Severe to business Severe to child	Effective monitoring of entrance by staffs with well positioned customer serviced desk with direct line of sight to the entrances Site frontage designed so as not to be attractive to children CCTV coverage of site linked with offsite monitoring. Think 25 Policy in place and implemented and regularly reviewed; regular staff training; Clear and prominent premises signage and machine labelling Use of 3 <sup>rd</sup> party age verification testing Policy of preventing the wearing of hoods	08/02/2024
Out of control gambling by other vulnerable people	Low	Moderate to business Severe to vulnerable	Customer interaction policy & procedure/log adhered to Staff are trained on awareness and the use of customer interaction policy Site layout designed for effective monitoring of customers IHL SmarHub MOSES in operation	08/02/2024
Failure to deal with customers making complaints about the outcome of gambling	Moderate	Moderate to business Severe to customers	Machines acquired from licensed suppliers only Machines regularly maintained and switched off immediately an outcome of gambling fault is identified Staff trained on dealing with customer disputes, including referrals to ADR scheme	08/02/2024



Failure to provide information on responsible gambling to players	Low	Severe to business Severe to customers	Stay in control posters displayed prominently Stay in control leaflets available in racks & discreet locations Regular audit of poster & leaflets to maintain stock levels	08/02/2024
Failure to recognise signs associated with problem gambling or substantial changes in gambling style	Moderate	Severe to business Severe to customer	Players' positions effectively monitored Players' behaviour monitored Staff trained in customer interaction & policy on recording interaction & level of staff authorised to intervene	08/02/2024
Failure to properly administer the self-exclusion process & maintain its effectiveness, including breaches & reinstatements	Low	Severe to business Severe to customer	IHL SmartHub MOSES in place CCTV at entrance to aid identification of known excluders Site layout permits effective monitoring of customers entering premises Regular review of self-exclusion data	08/02/2024
Failure to identify attempts by third parties to launder money through the business	Low	Severe to business Low to customers	Effective monitoring of customers' behaviour by good line of sight from cash box and CCTV Staff are regularly trained to identify counterfeit money Change machines & note takers regularly inspected	08/02/2024
Poor security increasing vulnerability to crime	Low	Severe to business Severe to customers	Intruder alarm installed and regularly serviced Effective CCTV with data stored for 30 days Staff provided with personal attach alarms Toughened glass windows and doors Mag locks fitted to doors and kept locked from 10pm to 8am Safe on site for cash and keys All incidents recorded in incident log	08/02/2024
Awareness of heightened local crime			Lower than average crime rate area Monitor: <a href="http://www.police.uk">www.police.uk</a> , ukcrimestats.com, <a href="http://www.gov.uk/government/collections/crime-statistics">www.gov.uk/government/collections/crime-statistics</a>	
Awareness of student learning facilities (schools & colleges) in the nearby vicinity in the nearby vicinity			Aware of location of nearby schools Consideration given to internal layout so as to ensure effective monitoring of customers entering the premises and those that might enter that could be underage.	

Awareness of residential facilities for the vulnerable in the nearby vicinity

Gambling care facilities in the nearby vicinity

No residential care homes close by  
Consideration given to internal layout so as to ensure effective monitoring of customers entering the premises and those that might enter that could be vulnerable  
Staff trained to be vigilant to vulnerable people entering the premises

Aware of nearby addiction help facilities  
[www.gamcare.org.uk](http://www.gamcare.org.uk)  
[www.gordonmoody.org.uk](http://www.gordonmoody.org.uk)  
08088020133

**GOLDEN SLOTS (SOUTHERN) LIMITED**  
**POLICIES & PROCEDURES**

**GAMBLING REGULATORY COMPLIANCE**

**Introduction**

The Director & Company acknowledge their obligations to uphold the licensing objectives set out in the Gambling Act 2005 and the requirement to comply with the Licensing Codes and Conditions of Practice (LCCPs) as amended from time to time. The Operator will comply with any relevant social responsibility provision of a code of practice issued by the Gambling Commission.

If it became clear that the Company was unable to fulfil its responsibilities under the Operating Licence the Director would notify the Gambling Commission immediately and comply with any requirements of the Gambling Commission

***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.
- Protecting children and other vulnerable persons from being harmed or exploited by gambling.

***Licensing Conditions and Codes of Practice***

The latest version of the LCCPs can be found online at

<https://www.gamblingcommission.gov.uk/licensees-and-businesses/lccp/online>

Compliance with the *Social Responsibility Codes* is a condition of the Company's Operating Licence, and any breach may lead the Commission to review the with a view to suspension, revocation or the imposition of a financial penalty. This could also expose the Company to the risk of prosecution.

*Ordinary Code Provisions* do not have the status of Operator Licence conditions but set out good practice. The Company can adopt alternative approaches provides it takes into account the ordinary code provision and can demonstrate that an alternative approach is reasonable in the particular circumstances; or that by taking an alternative approach it is acting in a similarly effective manner. Ordinary codes of practice 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 departure from ordinary code provisions by the Company may be taken into account by the Commission on a licence review, but cannot lead to imposition of a financial penalty.

**Information Requirements**

The Director and Company will work with the Gambling Commission in an open and cooperative way and will disclose anything that the Gambling Commission would reasonably need to be aware of in

exercising its regulatory functions. They will disclose to the Commission anything that is likely to have a material impact on the Operator's ability to conduct licensed activities compliantly.

The Company will provide the Gambling Commission with any information that it suspects may relate to the commission of an offence under the Gambling Act 2005, including an offence resulting in a breach of a licence condition or a code of practice provision having the effect of a licence condition.

The Company will report any Key Events as listed in the Licence Condition 15.2.1 to the Gambling Commission within 5 working days of becoming aware of the event.

The Company will report any other matters listed in the Licence Condition 15.2.2 as soon as reasonably practicable.

The Company acknowledges its duty as set out in Licence Code 15.3.1 to, and will, provide the Gambling Commission with any information it requests in Annual Regulatory returns or otherwise relating to its operations including the type of gambling activities provided, the numbers of staff it employs, its policies in relation to, and the experience of, problem gambling.

#### **Access to Premises**

The Company acknowledges its obligations to ensure that staff co-operate with any Gambling Commission Enforcement Officers and that they are made aware of those officers' rights of entry to premises to carry out their compliance function.

The Company will on request permit an enforcement officer to inspect any of its gambling equipment and documents as may be requested.

If a Gambling Commission Enforcement Officer presents themselves at any of the Company's premises a director will be informed immediately and will use all reasonable endeavours, to meet with the Enforcement Officer at the Premises and to provide any necessary assistance.

#### **Anti-Money Laundering**

The Company and its directors are aware of their duties and responsibilities under the Proceeds of Crime Act 2002 and the Terrorism Act 2000 and will consider any advice the Gambling Commission provides on the Proceeds of Crime Act 2002

The Company is aware that there is a risk that the business might be used for money laundering and terrorist financing and will therefore from time to time and at least annually conduct risk assessments. Additional risk assessments may be conducted when there is an introduction of a new product or technology or method of payment. Where a new risk is identified the Company will review its policies and procedures and make any necessary amendments and ensure that they are implemented. The Company will also ensure that there is additional staff training, so the staff understand the changes.

The Company will make a report to NCA in accordance with its Money Laundering Policy if it is suspected that someone is trying to use the business as a way of laundering money.

Staff are trained:-

- to be vigilant at all times for anyone carrying out any suspicious activities on Company Premises including any attempts by third parties to use the business for any illegal activities including for the purpose of money laundering. Staff are required to make a report to their line manager as soon as they suspect anyone of trying to use the business to launder money including attempts to pass any counterfeit or stolen money. The MLRO will then assess the situation and in accordance with the AML Policy where appropriate, make a report to the NCA and Gambling Commission.
- on how to identify counterfeit money using scanners and other detection equipment capable of identifying counterfeit money and to inform the MLRO immediately if a detection is made so a report can be made to the appropriate authorities.
- to report to the Company, anyone they suspect of trying to cheat and a report will be made to the appropriate authorities. If the police are involved, the matter will be recorded in the incident log and included in the Company's annual regulatory return.
- to make a report to the Company, if they suspect another operator or a staff member is operating in an illegal manner and in particular committing an offence under the Gambling Act 2005. The Company will then make a report to the appropriate authority including the Gambling Commission and if necessary, take disciplinary action against any member of staff involved. In the event that the police are involved the matter will be recorded in the incident log and included in the Company's annual regulatory return.

## **ANTI MONEY LAUNDERING POLICY**

### **Introduction**

The Proceeds of Crime Act 2002, the Terrorism Act 2000 and the Money Laundering Regulations 2007 place obligations on the Company and its employees with respect to suspected money laundering, the key points being:

- The reporting and detection of suspected money laundering.
- Employees must be vigilant for the signs of money laundering.
- Any employee who suspects money laundering activity must report this promptly to Harpreet Chattha who is the Money Laundering Reporting Officer (MLRO)
- The Money Laundering Regulations are complex and if there are any doubts about the policy you should seek further guidance from the MLRO.

### **The Policy**

This policy applies to all employees and sets out how to report suspected money laundering activities, to prevent criminal activity and help the Company comply with its legal obligations.

Failure by any employee to comply with the procedures set out in this policy may lead to disciplinary action in accordance with the Company's Disciplinary Policy Procedures.

## **What is Money Laundering?**

Money laundering is a term referring to offences involving the proceeds of crime or terrorism funds. The following are acts of money laundering:

- Concealing, disguising, converting, transferring criminal property, or removing from the UK (section 327 of the Proceeds of Crime Act (POCA) 2002).
- To enter into or become concerned in an arrangement which you know, or suspect will assist the acquisition, retention, use or control of criminal property or on behalf of another person(POCA section 328).
- Acquiring, using or possessing criminal property.

These are also offences which relate to the failure to disclose any of the above acts and tipping off (POCA section 330). Tipping off is where someone informs a person or persons involved in, or suspected to be involved in money laundering acts, in such a way as to reduce the likelihood of their being investigated.

The risk to the Company of breaching legislation is considered to be low, but employees should be aware that they could be potentially exposed to money laundering acts. It is important that all employees are aware of their responsibility to report any suspicions of money laundering activity as set out in this policy and promptly and report any suspicions to Harpreet Chattha to prevent any breach of legislation which can lead to serious criminal penalties.

## **Reporting**

Any employee who has any information that comes to them while working for the Company that they know, suspect, or have reasonable grounds to know or suspect a money laundering activity is occurring should report their suspicions promptly to Harpreet Chattha using the form below.

No further enquiries should be made about the suspected money laundering after reporting to Harpreet Chattha. No further steps in any transaction relating to the suspected money laundering should be made without authorisation from Harpreet Chattha. For example you should not pay out on any bet that was made using moneys suspected of being the proceeds of crime or terrorism funds.

You should not have discussions with anyone else that would indicate suspicions of money laundering.

Harpreet Chattha will consider whether any report made should be reported to NCA and if necessary, promptly report the matter to NCA on the standard electronic report form in the prescribed manner via [www.nationalcrimeagency.gov.uk](http://www.nationalcrimeagency.gov.uk).

Failure to report a disclosure to NCA is considered a criminal offence without reasonable grounds. All disclosures will be retained on file for five years.

## **Further information**

Further information can be obtained from the following sources:

- National Crime Agency (NCA) - Suspicious Activity Reports (SARs):

<http://www.nationalcrimeagency.gov.uk/contact-us/reporting-suspicious-activity-sar>

- National Crime Agency (NCA) – Suspicious Activity Report (SAR) Online System  
[https://www.ukciu.gov.uk/\(ero0v5550ikzu355oj4qvbiz\)/saronline.aspx](https://www.ukciu.gov.uk/(ero0v5550ikzu355oj4qvbiz)/saronline.aspx)
- National Crime Agency (NCA) - Guidance on submitting better quality Suspicious Activity Reports (SARs)

<http://nationalcrimeagency.gov.uk/publications/732-guidance-on-submitting-better-quality-sars/file>

- UKFIU guidance of the revised glossary codes and the reporting routes  
<http://www.nationalcrimeagency.gov.uk/publications/725-sar-glossary-code-and-reporting-routes/file>

- Money Laundering Regulations: report suspicious activities:  
<https://www.gov.uk/guidance/money-laundering-regulations-report-suspicious-activities>

- Gambling Commission - latest anti-money laundering news:  
<http://www.gamblingcommission.gov.uk/Gambling-sectors/AML/Latest-anti-money-laundering-news.aspx>

**For completion by the employee suspicious of activity**

CONFIDENTIAL

From: \_\_\_\_\_

[insert name of employee]

**Details of suspected offence:**

**Names(s) and address(es) of person(s) involved:**

[if a company/public body please include details of nature of business]

**Nature, value and timing of activity involved:**

[Please include full details e.g. what, when, where, how. Continue on a separate sheet if necessary]

**Nature of suspicions regarding such activity:**

[Please continue on a separate sheet if necessary]

**Has any investigation been undertaken (as far as you are aware)?** (Please tick the relevant box)

Yes  No



**If yes, please include details below:**

**Have you discussed your suspicions with anyone else?**

(Please tick the relevant box)       Yes    No

**If yes, please specify below, explaining why such discussion was necessary:**

**Signed:** \_\_\_\_\_ **Dated:** \_\_\_\_\_

**Please do not discuss the content of this report with anyone you believe to be involved in the suspected money laundering activity described. To do so may constitute a tipping off offence, which carries a maximum penalty of five years' imprisonment.**

**For completion by the Money Laundering Reporting Officer (MLRO)**

**THE FOLLOWING PART OF THIS FORM IS FOR COMPLETION BY THE MLRO**

**Date report received:** \_\_\_\_\_

**Date receipt of report acknowledged:** \_\_\_\_\_

**CONSIDERATION OF DISCLOSURE:**

**Action plan:**

**OUTCOME OF CONSIDERATION OF DISCLOSURE:**

**Are there reasonable grounds for suspecting money laundering activity?**

**If there are reasonable grounds for suspicion, will a report be made to NCA?** [Please tick the relevant box]  Yes  No

**If yes, please confirm date of report to NCA:** \_\_\_\_\_ **and complete the box below:**

**Details of liaison with NCA regarding the report:**

**Notice period:** \_\_\_\_\_ to \_\_\_\_\_

**Moratorium Period:** \_\_\_\_\_ to \_\_\_\_\_

**Is consent required from NCA to any ongoing or imminent transactions which would otherwise be prohibited acts? [Please tick the relevant box]**       Yes  No

**If yes, please confirm full details in the box below:**

**Date consent received from NCA:** \_\_\_\_\_

**Date consent given by you to employee:** \_\_\_\_\_

**If there are reasonable grounds to suspect money laundering, but you do not intend to report the matter to NCA, please set out below the reason(s) for non-disclosure:**

[Please set out any reasonable excuse for non-disclosure]

**Date consent given by you to employee for any prohibited act transactions to proceed:**

\_\_\_\_\_

**Other relevant information:**

**Signed:** \_\_\_\_\_

**Dated:** \_\_\_\_\_

**THIS REPORT TO BE RETAINED FOR AT LEAST FIVE YEARS**

## **PROTECTION OF BUSINESS FROM BEING A SOURCE OF CRIME OR DISORDER**

### **Credit & Money lending**

The Company does not provide credit in connection with gambling nor participate in, arrange, permit, or knowingly facilitate the giving of credit in connection with gambling. Staff are trained to be alert to and to prevent collusion between customers. Disciplinary action will be taken against any member of staff involved.

The Company does not permit customers to lend money to one another and staff are trained to be alert to and identify any attempts and to report instances of substantial lending to a director. Customers will be asked to cease the practice and in certain circumstances they may be excluded from the premises if the behaviour continues.

### **Internal crime**

The Company acknowledges that in there is a risk of internal crime in the form of theft or money laundering by employees. Although this is assessed as being low, in order to mitigate the risk the Company has adopted the following policy.

- The Premises are constantly monitored by CCTV which is recorded and available to download and review at any time.
- Only senior management are responsible for emptying and refloating the machines and which is conducted on a weekly basis at which time meter readings are taken and recorded; these are then checked to ensure that the same correspond.
- Any cash is kept stored securely in the safe in the office together with the keys to all the gaming machines with access by senior management only.
- Staff and their family are not permitted to use the gaming machines in the arcade.

The Operator can make the following gaming machines available for use in its Premises:-

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

The Operator will ensure that in its Premises it only operates 1 category B3/4 machine for every 4 category C/D machine unless it has premises with grandfather rights when it can operate a maximum of 4 category B3/4 machines. Where applicable, in order to maintain the 20% rule staff are trained to switch off a category B3/4 machine in the event that a category C/D machine becomes unserviceable.

### **External Crime**

The Company maintains an asset register recording:

- Details of all its gaming machines including serial numbers
- The location of each gaming machine and the relevant authorisation for its operations
- Details of any maintenance
- Details of disposal

The Company ensures that all gaming machines have:

- Independent metering to monitor activity.
- Coin and note acceptors that reduce the risk of counterfeit monies being used in the machines.
- Security locks with access to keys limited to senior management only.
- Alarms and programs designed to shut the machine down in the event of an attempt tamper with them

The Company audits transactions and accounts and makes regular checks for any unusual or suspicious activities.

The Company uses CCTV and has staff monitoring its equipment to prevent crime and criminal misuse.

The Company carries out due diligence checks on companies it deals with to ensure they are trustworthy and reputable and comply with any industry regulations and standards; this includes where appropriate that a supplier holds a valid Operating Licence. If there are any concerns about the conduct of a third party that the Company does business with it will, where appropriate, terminate any contract immediately.

The Company only uses gaming equipment supplied by companies that hold Operating Licences and regularly checks to ensure that the equipment complies with the Gambling Commission's technical standards.

## **ENSURING THAT GAMBLING IS CONDUCTED IN A FAIR AND OPEN WAY**

The Company recognises its responsibility and obligations to ensure that the gambling facilities provided are operated in a fair and open way as is required by the licensing objectives and the LCCPs.

The Company offers gambling on fair and open terms; none of the terms on which gambling is offered are unfair terms within the meaning of the Consumer Rights Act 2015 and, where applicable, meet the reasonableness test under the Unfair Contracts Act 1977. Terms of play are benchmarked against these legal requirements.

Staff are trained on induction that it is essential that the Operator is seen to be operating in a fair and open way and that any queries should be immediately referred to the management. Staff are trained on how to deal with the complaints, and which includes logging all complaints in the log at the Premises. All records and reports, including the outcome of each dispute, are submitted annually to the Gambling Commission.

The Terms and Conditions of use of the facilities in Premises are clearly displayed at the Premises and which include details of how to self-exclude and make a complaint. Paper copies of the terms and conditions and the complaints procedures are made available for customers to take away. Any changes will be notified to customers through additional signage prior to any change taking place.

Where the Company offers customers free or discounted alcoholic drinks for consumption on the premises, such promotions will not be linked to whether, or when, the customer begins, or continues, to gamble. Furthermore the Company will not make unsolicited offers of free alcoholic drinks for immediate consumption by customers at a time when they are participating in gambling activities.

The Company carries sufficient float in its safe on its Premises to cover all gambling transactions and financial obligations.

The Operator acknowledges his responsibility for third parties that it contracts with linked to its licensed activities and will ensure that the terms of any such contracts:-

- require a third party to act in accordance with the LCCPs applicable to AGCs for any activities carried out on behalf of the Operator
- require a third party to provide all information that the Operator may need to comply with their information reporting and other obligations to the Gambling Commission
- permit the Operator to terminate the contract if in his reasonable a third party is in breach of contract particularly relating to terms pertaining to the LCCPs and licensing objectives.

The Company will ensure that there are sufficient facilities for playing Bingo through Electronic Bingo Terminals so that Bingo remains the Primary activity on the Premises. The layout and design of the Premises are such that anyone entering will be able to identify that they are in a Premises licensed to offer Bingo.

## TECHNICAL STANDARDS

### Gaming Machine Technical Standards

LCCP 2.3.1 requires Operators to comply with the Commission's technical standards and with requirements set by the Commission relating to the timing and procedures for testing.

The Gambling Commission's technical standards can be found at:

<https://www.gamblingcommission.gov.uk/licensees-and-businesses/page/gaming-machine-technical-standards>

Gaming machines operated and supplied by the Company are either manufactured or supplied by Operators licensed by the Gambling Commission. The Company will where appropriate seek assurances from its suppliers that the gaming machines and parts supplied comply with the latest technical standards.

Gaming machines operated and supplied by the Company that are manufactured after September 2007 are fully compliant with the Gambling Commission's technical standards.

Gaming machines operated and supplied by the Company that are manufactured after September 2007 contain meters which record information on the games played and this information will be the basis for dispute resolution.

Gaming machines operated and supplied by the Company declare if they are 'random' or 'compensating'.

- If it is a random machine it will state on the machine that 'This machine is random'
- If it is a compensating machine it will state on the machine that 'this game is compensated and may be influenced by previous play'
- If it is a compensating machine which has a feature which may invite a player to make a choice which may offer a low chance of success (e.g. a Hi/Low or gamble button) the machine will state 'this game is compensated and may be influenced by previous play and offer the player a choice where there is little chance of success'.

Gaming machines operated and supplied by the Company display the percentage payout. This is calculated over a very long run, normally 100,000 plays.

- If the game does not depend on player strategy the machine will display the following notice 'this machine has an average percentage payout of at least [insert value]%'.
- If the payout depends on player strategy the machine will state 'the return to player based on best strategy is [insert value]%'.
- If the payout, for example of a feature, does not reflect the true odds the machine will display the following message 'the outcome of any game of feature is not necessarily that shown by the odds displayed'.

Gaming machines operated and supplied by the Company state whether a malfunction will either void a game or voids all pay-outs and games.



Gaming machines operated and supplied by the Company state when a machine has a minimum payout level and will also state if it is not possible to have certain winning combinations available in every game.

### **Bingo Technical Standards**

The Gambling Commission has set out its Bingo Technical Requirements in its document at <https://www.gamblingcommission.gov.uk/standards/bingo-and-casino-technical-requirements/3-part-2-bingo-technical-requirements>

### **Definitions**

- **Main Stage Bingo Game:** A primary game, or games, played in any bingo session, involving physical (paper) and, or as well as, virtual (electronic) tickets which are typically purchased before the bingo session starts.
- **Interval Bingo Game:** any game played outside of sessions of 'main stage bingo'. Entry into interval games is typically purchased prior to each game starting. An example of an interval game would be 'mechanised cash bingo'.

### **Prize Information:**

#### ***Information to be displayed for main stage games:***

The Company will ensure that the prize information board displays the following information at all times during the game session and will ensure that the vast majority of players have a clear and unobstructed view of the board during play:

- The opening and closing numbers of tickets for both paper tickets and virtual (electronic) tickets which will be displayed separately;
- The total number of tickets in the game (whether tickets are paper, virtual or otherwise);
- The total number of tickets not in the game, e.g. spoiled or unsold;
- The total prize fund;
- Details of the allocation of prizes, e.g. one-line, full house, value etc;
- Sufficient information to allow players to identify the ticket in play, e.g. book colour, page;
- All previously called numbers within the game;
- The last number called.

#### ***Information to be displayed for interval bingo games:***

- The game number;
- The game type (e.g. prize, cash);
- The cost per game (unless this is indicated orally to players);
- The number of boards in play for linked games and number of boards or players in play for standards games;
- The prize (cash prizes only; non-cash prizes can be announced by other means);
- The last number called.

When checking a claim, the Company will require a representation of the ticket being checked, including any relevant serial or permutation numbers to be shown, together with its status (valid, not valid, already checked).

### ***Display of information on players' Game devices***

The Company will ensure that, where the information is not readily available otherwise, any Game devices are capable of clearly displaying, either on screen or via labelling attached to the device, the following information:

- All information required as set out above for Main Stage games and Interval Bingo games;
- The players' credit held on the system;
- The price of play information;
- Information on how to gamble responsibly and help for problem gamblers;
- Alarm or fault information when needed.

The Company will ensure that all games are displayed in a recognisable form so that players can follow the play and interact appropriately.

### **Random Number generation**

The Company will seek assurances from its supplier that the Bingo equipment supplied complies with the technical requirements for random number generation. Where the supplier can no longer provide assurances that the equipment does comply, the Company will stop its use until and appropriate updates are made, or it will be removed from the Premises.

### **Electronic device and server-based system requirements**

The Company will ensure that:

- the server used to process the Bingo games is securely housed;
- an audit trail for all financial transactions, errors and significant events is maintained so it can be accessed for compliance audit purposes;
- data is regularly backed-up and the back-up stored in a secure location.

The Company will take all reasonable steps to ensure that:

- its policies for dealing with service interruptions are fair and do not systematically disadvantage customers;
- the system is not adversely affected by the simultaneous or sequential activation of any inputs and outputs, such as 'play buttons', which might, whether intentionally or not, cause malfunctions or invalid results;
- where a note acceptor or printer is in use during a power failure it will on resumption of the power either:-
  - complete or restart the task successfully; or
  - display an error message indicating that such a fault has occurred, and which will remain until the fault has been resolved. Furthermore the metering or audit controls will identify any accounting anomalies for dispute resolution purposes.

The Company will seek assurances from its supplier that where any simultaneous live linked Bingo is played:

- any determinant used in its games is transmitted simultaneously to all player devices designed to receive such information within that game;

- the receiving devices can present the appropriate information such that no player is disadvantaged by the introduction of any delay;
- any gambling devices or systems that incorporate an internal clock use the time to provide an accurate time stamp of all financial transactions, errors, and significant events;
- all clocks or clock systems related to gambling shall be set to the correct time.

### **Cashless play**

The Company shall ensure that where a gaming device has the facility to accept a stake or participation fee from, and make payment of a prize to, the same medium of cashless payment, for example a smartcard ('the medium') (but not TITO), then the following will apply:

- a secure player account database will be held within the system;
- the system will allow a player to retrieve their funds at any reasonable time when the venue is open;
- a facility will be available on the premises which will show a player their current monetary balance without the need to transfer funds or play a game, or receive any offers or inducements to commit money for play or further play;
- the gaming device will be capable of being rendered incapable of accepting funds from the medium at any time when the account holder has entered a self-exclusion agreement at the premises where the device is sited.
- a players will be able to track and, or as well as, limit the amount of money they are able to deposit onto the medium over a given period of time. The limit that the individual chooses to impose may only be set or modified once in any 24-hour period.

### **Printers**

Any printer used to make payments, will be located by opening the main door of the gaming device.

Printed tickets will include the following information:

- details of where and when the ticket originated;
- details of the transaction type;
- the value of the ticket;
- a unique ticket identifier.

### **Ticket validation**

As part of its prevention of fraud strategy, the Company will ensure that any ticket used as a method of credit redemption is independently validated before a credit is given in order to identify duplicate tickets that may be reprinted versions of a ticket that was previously issued. Such data will be kept for audit or ADR purposes.

### **Error Conditions and alert requirements**

The Company will take all reasonable steps to ensure that any Bingo devices made available for play can detect, display and alert the Company to the following types of error conditions and significant events and that if the error or event affects the game-play in any way, then the device will 'lock up' and prevent further game-play until the error or event is cleared:

- events or errors related to payment to play, e.g. coins, notes;

- events or errors related to operation of the device, e.g. battery failure, programme error;
- events or errors related to security, e.g. door open;
- events or errors related to pay-outs, e.g. printer jam, hopper empty.

### **Wireless network systems**

Where a gaming device uses Wi-Fi in order for players to participate the Company will use all reasonable endeavours to ensure that

- there are no areas where the signal is poor or intermittent and likely to interrupt play;
- there is adequate Wi-Fi coverage so that the failure of a single transmitter does not significantly reduce the players' ability to participate in the game.

The Company will ensure that where a network failure occurs all devices alert the player of the failure as soon as it is possible to do so. The device may continue with any game if the network connection is restored provided that the player is not disadvantaged in any way. A manual alternative method of play may be used where there is no disadvantage to the player and where there is adequate time to do so.

The Company will seek assurances from its supplier that all protocols use communication techniques that have proper error detection and, or as well as, recovery mechanisms which are designed to prevent unauthorized access or tampering, employing Data Encryption Standards (DES) or equivalent encryption with secure seeds or algorithms.

### **Power level display requirements**

The Company will ensure that any portable devices give warnings when the battery life of the device reaches a low level.

### **Audit requirements**

The Company will keep and maintain an audit log of sufficient time stamping of significant events for ADR purposes and which is readily available on site.

### **Bingo Tickets**

The Company will ensure that:

- every ticket used in a game of bingo consists of a unique set of letters, numbers or symbols irrespective of whether it is a paper or electronic ticket, or a mix of the two, or any other representations of bingo tickets and irrespective of whether the game takes place in one or at multiple venues;
- each ticket in play has a unique reference number or code associated with it, which can be used for ticket verification purposes.

The Company will ensure that player participation is required to record the numbers or other game determinant called and to claim a win.

## **Marketing**

Where the Company offers any customer or potential customer an incentive or reward it will ensure that the scheme makes clear:

- the circumstances in which, and conditions subject to which, the benefit is available are clearly set out and readily accessible to the customers to whom it is offered;
- that neither the receipt nor the value or amount of the benefit is dependent on the customer gambling for a pre-determined length of time or with a pre-determined frequency; or altered or increased if the qualifying activity or spend is reached within a shorter time than the whole period over which the benefit is offered;
- that if the value of the benefit increases with the amount the customer spends it does so at a rate no greater than that at which the amount spent increases;

The Company will ensure that all marketing is undertaken in a socially responsible manner. He will comply with the advertising codes of practice issued by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP) as applicable.

The Company will also ensure that any marketing communications, advertisements, and invitations to purchase (within the meaning of the Consumer Protection from Unfair Trading Regulations 2008) do not amount to or involve misleading actions or misleading omissions within the meaning of those Regulations; that all significant conditions which apply to any marketing incentives are provided transparently and prominently to consumers and that significant conditions are displayed at the point of sale for any promotion, and on any advertising in any medium for that marketing incentive. Where limitations of space make this impossible information about the significant conditions will be included to the extent that it is possible to do so, and the advertising will clearly indicate that significant conditions apply with a link to a webpage where the significant conditions are displayed in full. Such terms will be made available for the full duration of the promotion.

The Company will not send direct electronic marketing to consumers without their informed and specific consent and will cease sending such marketing if consent is withdrawn.

## **Complaints and disputes**

The Operator's complaints policy and procedures set out in clear and simple terms how a customer can make a formal complaint to the Operator and paper copies are available to take away.

If the complaint cannot be resolved to the satisfaction of the customer, the dispute will be referred to CEDR for ADR. No charge will be made to the customer for the referral.

A record of each dispute and the outcome are retained and recorded on the Operator's annual regulatory return.

A copy of the outcome of any dispute referred to ADR will be sent to the Gambling Commission

The Operator will regularly review and update where necessary its complaints policy and procedure.

## COMPLAINTS AND PLAYER DISPUTE RESOLUTION

Under SR Code provision 6.1.1 licensees must:

- put into effect appropriate policies and procedures for accepting and handling customer complaints and disputes in a timely, fair, open and transparent manner.
- ensure that they have arrangements in place for customers to be able to refer any dispute to an ADR entity in a timely manner if not resolved to the customer's satisfaction by use of their complaints procedure within eight weeks of receiving the complaint, and where the customer cooperates with the complaints process in a timely manner. The services of any such ADR entity must be free of charge to the customer.
- not use or introduce terms which restrict, or purport to restrict, the customer's right to bring proceedings against the licensee in any court of competent jurisdiction. Such terms may, however, provide for a resolution of a dispute agreed by the customer (arrived at with the assistance of the ADR entity) to be binding on both parties.
- Have complaints handling policies and procedures that include procedures to provide customers with clear and accessible information on how to make a complaint, the complaint procedures, timescales for responding, and escalation procedures.
- ensure that complaints policies and procedures are implemented effectively, kept under review and revised appropriately to ensure that they remain effective, and take into account any applicable learning or guidance published by the Gambling Commission from time to time.
- keep records of customer complaints and disputes and make them available to the Commission on request.

## POLICY AND PROCEDURE FOR INVESTIGATING A CUSTOMER COMPLAINT

Where a customer raises a complaint about the use of a gambling product provided by the Company it will invoke its complaints procedure as follows:-

- In the first instance the member of staff receiving the complaint will assess whether it can be resolved immediately without further intervention from the Company and the matter will be recorded in the Company's complaints' log - **Stage 1**
- If a member of staff is unable to resolve the matter immediately the matter will be referred to the Manager who will try to resolve it - **Stage 2**
- Where the Manager is unable to resolve the matter within 48 hours one of the Directors will review the complaint and provide an acknowledgement to the customer within 3 days, by any reasonable communication method requested - **Stage 3**
- If the complaint cannot be resolved to both parties' satisfaction within 8 weeks the customer will be advised to refer the complaint to CEDR ADR Service and provided with contact details
- The Company will provide CEDR ADR Service with any additional information it requires to investigate the complaint within 10 working days of a request,
- A record of the referral and its outcome will be reported to the Gambling Commission.

### The Company will ensure that:

- Its terms and conditions include information about how to make a complaint;
- Information about how to make a complaint is readily accessible to customers and in a paper format that can be taken away;

- The information includes:-
  - details of how to make a complaint and the contact details of the person who will handle the complaint;
  - CEDR ADR Service's contact details for referring any disputes that cannot be resolved within 8 weeks by the Company;
- Customers are provided with a copy of the complaints policy and procedure on request or when making a complaint
- All complaints are handled in accordance with the procedure;
- A record of all complaints is kept in its complaints log and a copy of the outcome and any decision of a referral to CEDR ADR Service
- Its complaints policy and procedure are implemented with effective staff training, kept under review to ensure that they remain effective and comply with the requirements of LCCP 6.1.1 and take into account any applicable learning or guidance published by the Gambling Commission from time to time.
- It notifies the Gambling Commission about any change to its ADR provider.

**GOLDEN SLOTS (SOUTHERN) LIMITED**  
**COMPLAINTS & PLAYER DISPUTE RESOLUTION CUSTOMER INFORMATION**

Golden Slots (Southern) Limited endeavours to provide a high-quality service to its customers and members of staff are trained how to deal with complaints at the initial stage. However, if you believe that things have gone wrong, and your complaint was not resolved to your satisfaction then please inform us as we take such reports seriously. We will review your complaint and will be dealt with by:

Harpreet Chattha who is a director  
Email Address: hgoldenslots19@gmail.com  
Tel: 07957005316

**How to make a complaint**

- Complaints, which we will deal with confidentially, should be submitted in writing, by letter or e-mail.
- The attached form should be used to record and submit complaints.
- Give as much detail as possible and any other relevant information in order to assist us in the investigative process.
- Complaints should be raised within 6 months of the incident.

**What happens next?**

We will acknowledge receipt of your complaint in writing within 3 days. We will investigate and provide a full explanation of what we have done within 8 weeks of receiving a complaint. If this is not possible, for example because of a delay in you providing additional information we have requested, we will give a date by which a full response can be expected, and which will only take into account any such delays. Should your complaint not be resolved between us we will provide you with a 'deadlock' or final outcome letter that you will need to submit if you go to Alternative Dispute Resolution (ADR).

**If you are not satisfied with our response**

If you are still not satisfied with our response to the complaint, you may consider contacting CEDR ADR Service, the ADR entity this company is registered with and request that the matter be reviewed. You should submit all previous correspondence relating to your complaint, including the 'deadlock' letter referred to above.

CEDR ADR Service will acknowledge receipt of your correspondence without undue delay and, after a review, inform you of its findings and recommendation usually within a maximum of 90 days. The review process is thorough and based upon the information that both parties and other independent sources provide.

CEDR ADR Service's contact details are as follows:

- Email Address: [applications@cedr.com](mailto:applications@cedr.com)
- Website: [www.cedr.com/consumer/lotteries-gambling/gambling/](http://www.cedr.com/consumer/lotteries-gambling/gambling/)
- Telephone: 020 7536 6000
- Postal Address: 100 St. Paul's Churchyard, London EC4M 8BU

It is recommended that you visit CEDR ADR Service's website (as above) so that you are fully aware of the procedural rules and other related information [www.cedr.com/wp-content/uploads/2021/11/Gambling-Rules-Nov-21.pdf](http://www.cedr.com/wp-content/uploads/2021/11/Gambling-Rules-Nov-21.pdf)



## Complaint Form - CUSTOMER

Name: .....

Address: .....

.....

Postcode .....

Daytime Telephone No.....

E-mail address: .....

Signature: ..... Date: .....

Is this an initial complaint or a follow up to a previous incident?

.....

.....

.....

Name of staff member that you initially raised your complaint with:

.....

Date of Incident: .....

Time of Incident: .....

A clear and comprehensive account of the complaint and what you are seeking as redress to resolve the matter:

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Please use continuation sheet(s) if required.

Signed .....(Complainant)

Date: .....

For Office Use Only

Director dealing with complaint: .....

Complaint Acknowledged (Y/N): Date: .....

Details of action to resolve taken by Company:

.....  
.....  
.....

If complaint still unresolved by Company

Complainant referred to ADR Entity (Y/N); Date.....

.....

Company Complaint Policy & Procedure Document given to Complainant (Y/N): Date.....

## **PROTECTION OF CHILDREN AND VULNERABLE PEOPLE POLICY**

The Operator recognises its responsibility and obligation to protect children and other vulnerable persons from being harmed or exploited by gambling as is required by the licensing objectives and the LCCPs.

### **Access To Gambling by Children and Young Persons**

#### ***Licence Requirements***

Under s.46 Gambling Act 2005 it is an offence to permit a person under 18 to gamble.

Under SR Code 3.2.3 licensees must:

- Have and put into effect policies and procedures designed to prevent underage gambling. Policies must include verifying the age of a customer.

- Warn customers that underage gambling is an offence.

Under SR Code provision 3.2.3 policies must also include:

- checking the age of apparently underage customers
- refusing entry to an AGC to anyone unable to produce an acceptable form of identification.
- taking action when there are unlawful attempts to enter the adult-only areas .

## **POLICY AND PROCEDURE TO PREVENT UNDERAGE GAMBLING**

All the Company promotional material makes it clear that under 18's are not permitted to enter its Premises.

The Company has a think 25 policy, and anyone entering its Premises that is suspected of being underage or believed to be under 25 is asked to produce valid photographic ID as proof of age which includes their date of birth and has no visible signs of tampering or reproduction. The Company will accept the following as evidence of proof of age:

- A passport; or
- A driving licence; or
- An Armed Forces identity card

Anyone found to be or unable to prove their age will be asked to leave the Premises or refused admission. Forged ID may be retained and handed to the police.

Staff are trained as part of their induction that they are under no circumstances to permit access to Premises by anyone who appears to be under the age of 25 and who cannot prove that they are over the age of 18. Notices are displayed at the entry to the Premises stating that no one under the age of 18 is permitted to enter or gamble.

The Company ensures that it does not offer gambling in a style that is intended to or likely to appeal to anyone under 18.

In the event that a person under 18 repeatedly attempts to gamble at Company premises staff will offer that person information on problem gambling and issue an oral warning that further attempts will be reported to the police. In the event that the said person continues to try to enter the premises for the purpose of gambling the incident will be reported to the police, recorded in the incident log, and recorded in the Company's annual regulatory return.

If the Company identifies an adult who is complicit in encouraging or assisting someone under the age of 18 to enter and gamble in the premises a Director will issue a warning and may consider excluding the adult from Company premises on a temporary or permanent basis.

An entry of any incident will be recorded in the incident log kept at the Premises and reported to the Gambling Commission on an annual basis.

The Company participates in a collective test purchasing scheme as part of its underage gambling prevention strategy with testing undertaken as a minimum of once a year. The results of any test purchase will be recorded in the Company's logs as 'challenge before gambling activity', 'challenge during gambling activity', 'challenge after gambling activity', or 'unchallenged' and reported to the Gambling Commission. Where a premises fails a test purchase a further test purchase will be arranged and the results recorded.

### **Employment of children and young people**

It is an offence for any child (under-16s) and young persons (those aged 16 and 17) employed by the Operator to be engaged, or permitted to be engaged in:

- Providing facilities for gambling.
- Performing a function in connection with a gaming machine at any time.
- Carrying out any other function in a Bingo premises whilst any gambling activity is being carried on in reliance on the premises licence.

The Operator does not employ anyone under the age of 18 to work in its Premises. All staff have been trained about the laws relating to access to gambling by anyone under the age of 18 and which forms part of the induction training for all staff. It is strict Operator policy that no gambling facilities are made available for use at Operator Premises if anyone under the age of 18 is working on the premises outside the hours when the premises are open for business.

## **SOCIAL RESPONSIBILITY POLICY AND PROCEDURES**

### **Licence Requirements**

Under SR Code 3.1.1 licensees must:

- Have and put into effect policies and procedures to promote socially responsible gambling;
- Make an annual financial contribution to organisations to prevent and treat gambling related harms.

Under SR Code 3.3.1 licensees must:

- Make information readily available to customers on how to gamble responsibly and how to access information about problem gambling (e.g. monitoring or controlling gambling by duration or money spent, timers, self-exclusion options or further advice or information)

Under SR Code 3.4.1 licensees must:

- Interact with customers by (a) identifying customers who may be at risk or experiencing gambling harm (b) interacting with those customers and (c) understanding the impact of the interaction;

- Take into account the Commission's guidance on customer interaction  
<https://www.gamblingcommission.gov.uk/licensees-and-businesses/guide/customer-interaction-formal-guidance-for-premises-based-operators?msclkid=8e1bb2c1b4f411ec9bf242e2b502fe58>

Under SR Code 3.5.1 licensees must:

- Have and put into effect procedures for self-exclusion and take all reasonable steps to refuse service or to otherwise prevent an individual who has entered a self-exclusion agreement from participating in gambling.
- Signpost individuals that self-exclude to counselling and support services.

Under SR Code 3.5.6 licensees must:

- Offer customers entering into a self-exclusion agreement at their Premises the ability to self-exclude from other similar local Premises operated by other licensees, by participating in a multi-operator self-exclusion schemes.

### SR Triggers

The Company will use the following trigger points that it can monitor to identify those at risk of problem gambling:-

- An increase in the time spent gambling;
- An increase in the amount of money spent on gambling;
- Chasing losses;
- Complaints made by the customer about not winning or talking about the negative impact of their gambling;
- Signs of distress, agitation or other changes that might indicate that gambling is having a negative impact on the customers wellbeing;
- Threatening self-harm or suicide;
- A customer's known vulnerability.

### SR Procedures

The Company makes an annual financial contribution to an organisation approved by the Gambling Commission to prevent and treat gambling related harms. A decision as to the recipient is made on an annual basis.

As a result of the triggers set out above, where the Company becomes aware that a customer may be at risk of problem gambling, staff will provide the customer with responsible gambling information including the option to have a time-out from gambling or to self-exclude, or other options such as GAMSTOP.

The Company's procedure include staff monitoring customer activity and interacting early and quickly in order to minimise the risk of customers experiencing harms associated with gambling. This takes into account the following 3 key outcomes:

- **Identifying** anyone who appears to be gambling beyond their means or displays behaviour such as agitation distress intimidation or aggression that may indicate problem gambling. Staff are trained to know the

- **Interacting** with anyone displaying signs of problem gambling by first asking them if they are open to a discussion about their behaviour and offering the following:
  - Taking a break from gambling;
  - Setting a limit on the time spent gambling;
  - Setting a limit on the amount that they spend on gambling;
  - Suggesting they play on a lower stake machine;
  - Self-exclusion;
  - Stay in Control Leaflet’;
  - The use of a play diary to monitor their gambling;
  - Use of a Gambling Management App such as Gamblewise and Playright;
  - Information on how to contact to Gamcare for further help;
  - Taking a 'Time Out'.
  
- **Evaluating** the outcome of the interaction by monitoring the customer’s behaviour/gambling activity to see if the advice has been followed and whether there has been a positive change. This should normally be done on a monthly basis and after a self-excluder opts to start gambling again. Where there are any further concerns about irresponsible gambling (even if triggers are not hit) further interaction will take place.

The Company acknowledges that staff have an important role in reducing the risk of customers suffering harm associated with gambling. The Company’s training includes providing staff with the necessary tools, skill, and support to monitor customer activity and behaviour and interact at the earliest opportunity. Staff are trained to know regular customers gambling habits and to recognise any changes that might indicate a problem. Staff are also trained to observe new customers for any signs of problem gambling.

The Company recognises that customers should be protected at all times and monitors footfall to ensure that adequate staffing is available to cover busier periods.

### **Record Keeping**

The Company will maintain records of all customer interactions through its paper/electronic logs, including details of when an interaction was considered and ruled out and if an interaction took place at a later date. Details will include:-

- the behaviour or activity before the interaction;
- the change in behaviour or prompt for the interaction
- what form the interaction took including any advice or suggestions;
- the outcome of the interaction.

Customers will be encouraged to provide their name and any other information considered necessary to provide further help and support and identify previous interactions. Personal data held by the Company will be in accordance with the requirements of the Data Protection Act 2018.

### **Training**

Staff will receive training on the Company’s Social Responsibility Policy and Procedures on induction and then at least annually on how to identify customers at risk, how to interact with customers,

depending on the circumstances and to evaluate whether the interaction has been effective. Training will either be provided in-house by senior management.

Staff will be monitored to ensure that they have understood the training and implemented the procedures. Additional training and remedial training will be provided when considered necessary.

### **Responsible Gambling Information**

The Company provides information to its customers through prominently posters and leaflets, on how to gamble responsibly including how to monitor and control gambling such as:-

- restricting the amount of time spent gambling;
- restricting the amount of money they can spend;
- self-exclusion.

The Company provides information to its customers through prominently posters and leaflets, on how to access further help and advice for problem gambling. The information is:-

- displayed in all places where gambling facilities are provided and adjacent to any ATMs;
- available in a form that can be taken away;
- located where customers can obtain it discreetly;

### **Self-exclusion**

The Company understands that whilst most customers are able to enjoy and control their gambling, it has a duty of care to those who cannot. The Company therefore provides a self-exclusion facility for customers on request.

Self-exclusion is a last resort for customers looking to address their needs around problem gambling. Staff will engage in the customer interaction process where it may be deemed necessary to self-exclude. Sufficient information should be provided so that the consequences of the process are fully understood.

Self-exclusion is for a fixed period of time, that lasts for a minimum of six months; customers can request extensions to their self-exclusion for one or more periods of six months.

The Company will make arrangements for customers to self-exclude without entering its Premises but require a face-to-face meeting with the customer. Customers are given an explanation, where possible in private, about the consequences of the self-exclusion. The Company will take into account any specific requests from customers such as where they live, work and travel to gamble and encourage customers to self-exclude from other local sites.

Customers are given the opportunity to self-exclude immediately and informed that the Company does not permit a cooling off period. If the customer wishes to consider self-exclusion further, they may return to initiate self-exclusion at a later date.

Customers are informed that self-exclusion has an immediate effect once initiated and lasts a minimum of 6 months; customers can extend a period of self-exclusion on request by periods of a minimum of 6 months.

A Self-Exclusion Request form will be completed, and the customer asked to assist by providing an up-to-date photograph showing a good likeness. A copy of the self-exclusion form will be given to the customer together with information on counselling and support services; a copy will be retained on site for the duration of the exclusion and a further 6 months.

The Company is enrolled in and a participant of the IHL SmartExclusion multi-operator self-exclusion scheme and customers self-excluding from the Premises will also be informed of the scheme and encouraged to participate.

An entry of the self-exclusion is made in the self-exclusion log and recorded on the Company's next annual regulatory return. The customer's details will be removed from any marketing data base to ensure that no marketing materials are sent to the customer during the period of self-exclusion.

The Company has taken into account its structure and layout in order to prevent access by self-excluders, monitoring of the entrance by staff and using CCTV. Self-excluders will be removed if found gambling or attempting to gamble at the premises and staff are informed of breach alerts on site and at other locations through MOSES.

Staff are also trained to be alert to a self-excluder asking a third party to gamble on their behalf although it is acknowledged that this is often difficult to identify.

At the end of the self-exclusion period the exclusion will remain in place for a further 6 months unless the customer takes positive action in order to gamble again. This process is known as reinstatement and will normally take place in person. The Company is not required to make an assessment as to whether a reinstatement should take place, but staff are required to check that the person has considered the implication of their return to gambling.

Where a customer chooses to reinstate and return to gambling, they are subject of a 24hr cooling-off period. The self-exclusion will only end at the end of 'cooling off' period and staff are trained not to permit entry to the Premises to anyone during their self-exclusion period and to immediately remove any self-excluded customer.

#### **Assessment of Social Responsibility Policy and Procedure**

The Company assess customer interactions to evaluate the effectiveness of its policy and procedures. Indicators of an effective policy will include:

- Customer retention
- Reduction in complaints
- Increased staff awareness
- An increase in the number of interactions recorded and the quality of the records.

Managers are required to monitor and assess staff interactions and provide additional training where deemed appropriate. Managers are also required to regularly check the Customer Interaction log to ensure that staff are recording all interactions and take appropriate steps to reinforce the need for all interactions to be recorded.



The Company will regularly review this policy and procedures and where it identifies areas for improvement changes will be made and implemented. These will be backed up by additional staff training and monitoring to ensure the changes have been embedded.

### **Staff Gambling Policy**

It is the Company's policy that no member of staff is permitted to gamble on its Premises. This is to protect both the Operator and employees against any issues that can arise from the effect of problem gambling.

Should the Company become aware of any staff member breaching these rules, the staff will be dealt with under the Operator's disciplinary procedure, and which may result in sanctions including dismissal.

The Company is committed to protecting staff in the event of any gambling issues brought to its attention by an employee or a member of their close family. If the Company becomes aware of a member of staff with a gambling problem, it will suggest the staff member seek help through GamCare on 0808 8020 133 and will offer the same support by way of leaflets, and contact numbers that is provided to customers.

### **Local Area Risk Assessment**

The Company understands its obligation under SR Code 10.1.1 to and will carry out a local risk assessment for each premise that it operates. Such local risk assessment will be reviewed from time to time if the Company identifies any changes in circumstances. The Company will also share its local risk assessment with the local authority when applying for a new premises licence or when applying to vary or transfer an existing premises licence.

## **IMPLEMENTING, REVIEWING AND ASSESSING POLICIES AND PROCEDURES**

The Company will keep up to date with the gambling industry and changes to LCCPs via regular visits to the Gambling Commission website and will subscribe to the Gambling Commission's fortnightly E-Bulletin.

The Company will ensure that all policies are implemented and undertake regular checks to ensure that they are still adhered to. Staff are given training by senior member of the team on induction as to the Company's policies and they are asked to sign a log to confirm their understanding. Training includes information on the contents of these policies including:

- The protection of the business from being a source of crime and disorder;
- Anti-money laundering;
- Ensuring fair and open gambling;
- Protection of children and vulnerable people;
- Ensuring the promotion of Social Responsibility in gambling.

Existing staff are required to review and re-familiarise themselves with the current policies and procedures at least once every six months. Staff will be constantly monitored to ensure they have

understood the training. Further individual training is given if there has been a breach of any policy and/or when felt necessary to ensure staff are kept up to date with legislation and regulatory requirements.

Where changes to LCCPs are implemented, the Company will reviewing the existing policies to ensure that they are still compliant and meet with the current LCCPs. Where changes are necessary these will be made as soon as is reasonably practicable and additional staff training will take place where necessary.

The Company will review the policies at any time that there is found to have been a breach of compliance and will put in place any necessary measures to prevent a further breach and will arrange for any further staff training necessary.

Debbie Bollard  
Hough & Bollard Ltd  
5 Tarleton Avenue  
Woodhall Spa  
LN10 6SE

12 March 2024

Our Ref: 30828

Dear Debbie Bollard,

**Re: Licensing Representation to the Application for a premises licence under the Gambling Act 2005 for New Adult Gaming Centre - Golden Slots, 169-171 Cricklewood Broadway, NW2 3H**

**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: Esther Chan – 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 a new AGC Premises Licence, the licensing authority have examined the area of where the AGC will be sited. Cricklewood Broadway is a busy town centre consisting a mixture of different shops and

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surrounded by residential dwellings. The area attracts a level of crime and disorder including street drinking, falling under the cumulative impact zone. Currently the premises occupy a Bingo Premises Licence and seek to change to an AGC.

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

### **CCTV**

1. A comprehensive CCTV system shall be installed and maintained on the premises as required by the Metropolitan Police Licensing Team. CCTV should cover the following:
  - 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 hour a day for 31 days.
3. CCTV shall be made available for the police viewing at any time with minimum delays when requested.
4. The premises shall display notices near the entrance of the venue stating that CCTV is in operation.
5. A monitor shall be placed inside the premises above the front door showing CCTV images of customers entering exiting the premises.
6. A member of staff trained in the use of the CCTV system shall be available at the premise at all times that the premises are open for trading.

### **Children and Young People**

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

## **Entrances and Doors**

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

## **Staffing levels**

12. There shall be no pre-planned single staffing at any time.
13. There will be a minimum of **2** staff present at all times when the premises is open.

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

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

## **Seating**

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

## **Alarms**

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

## **Toilets**

19. The licensee will ensure that customer toilets are checked every hour for evidence of drug taking. Toilet checks are to be documents stating the time and member of staff who made the checks.
20. Toilet doors remain locked and access is permitted by staff members.

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

21. Signs to be displayed alerting customers to the following;
  - a) No alcohol
  - b) No smoking
  - c) No persons under 18 Years
  - d) Persons will be prosecuted for causing criminal damage
  - e) Prominent GamCare documentation will be displayed at the premises.

## **Staff Training**

22. The licensee shall:

- a) 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.
- b) periodically provide refresher training to all of its staff working at these premises on the specific local risks to the licensing objectives.
- c) 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.

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

## **Homeless and Street Drinking**

24. 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.

25. 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**

26. 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.
- f) Details of any person(s) banned from the premises.

In order for the Licensing Authority to withdraw this representation, it will be necessary for you to confirm in writing that your client accept the above conditions.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Esther Chan". The signature is written in a cursive, slightly slanted style.

Esther Chan  
Licensing Inspector  
Regulatory Services

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**From:** Esther, Chan  
**Sent:** Tuesday, March 12, 2024 4:59 PM  
**To:** debbie@houghandbollard  
**Cc:** Legister, Linda Business Licence  
**Subject:** RE: CONSULT: New Adult Gaming Centre - Golden Slots, 169-171 Cricklewood Broadway, NW2 3HY

Dear Debbie,

Thank you for your email.

I now wish to withdraw my representation and have no further comments.

Kind Regards

Esther Chan  
Licensing Inspector  
Regulatory Services

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**TERRITORIAL POLICING**

**Golden Slots Southern Ltd  
Golden Slots  
169-171 Cricklewood Broadway  
Brent  
NW2 3HY**

**Brent Borough Licensing  
South Harrow Police Station  
74 Northolt Road  
South Harrow  
HA2 0DN**

Your ref: 30828

Our ref: 30828/109/23/3122NW

**Email:** Philip.Graves@met.police.uk

**Web:** www.met.police.uk

**Date:** Friday 8<sup>th</sup> of March 2024

**Police Representation to the application for a Premises Licence for 'Golden Slots, 169-171 Cricklewood Broadway, NW2 3HY.'**

I certify that I have considered the application shown above and I wish to make representations that the likely effect of the grant of the application is detrimental to the Gambling Act 2005 licensing objectives for the reasons indicated below.

**Officer: Philip Graves  
Licensing Constable 3122NW**

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 Metropolitan Police are making representations to this application for a premises licence in accordance with Section 1 of the Gambling Act 2005 licensing objectives;

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

Gambling establishments have historically been venues of repeated calls to police due to a variety of issues - criminal damage by frustrated customers, ASB, violence/public order, drug use, congregating street drinkers, local gang activity, underage children etc.

In addition to this, the venue is located in a very high crime area and will require the appropriate conditions to help uphold the licensing objectives. Below are crime maps showing the postcode of NW2 3HY. As you can see a majority of the crime is located along Cricklewood Broadway with the junction of the A407 (where 169-171) is located been the hotspot.

### Top reported crimes

Most commonly reported crimes during Jan 2024

Anti-social behaviour	28
Violence and sexual offences	24
Vehicle crime	23
Other theft	17

[Crime prevention](#)


Crime levels in your area

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### Crimes and priorities

Crime map ▼

Click on a hotspot to see more details. Alternatively, [view as A-Z list](#).



[Explore crime map](#)

**About this crime map**

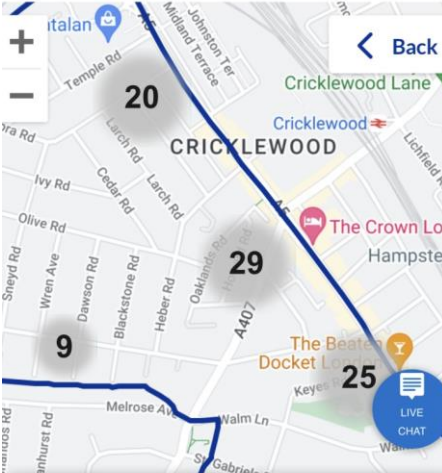
This map uses data from local forces. The hotspots give only a loose idea of where crimes are kept.

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× [www.met.police.uk](http://www.met.police.uk) 🔖 📄 ⋮

All Crimes (136) ▼

January 2024 ▼



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← → ⓘ 🏠 📄

***Police require the following points should be included in the operating schedule, or added as conditions on the premises licence.***

1. A CCTV system shall be installed and maintained on the premises as required by the Metropolitan Police Licensing Team. CCTV should cover the following:

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

2. The CCTV shall continue to record activities 24 hours a day for 31 continuous days.

3. CCTV shall be installed to Home Office Guidance standards and maintained in a good working condition and recordings shall be kept for 31 days and shall be made available to police and authorised Officers from Brent Council upon request.

4. The premises shall display notices near the entrance of the venue stating that CCTV is in operation.

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

6. A member of staff trained in the use of the CCTV system shall be available at the premise at all times that the premises are open for trading.

7. The CCTV system shall display on any recordings the correct date and time of the recording.

8. The Licensee shall maintain a bound and paginated or digital 'Challenge 25 Refusals' register at the premises. The register shall be produced to the police or licensing authority forthwith on request.

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

10. 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

11. 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 license, passport or proof of age card with the PASS Hologram.

12. A maglock shall be installed and maintained on the main entrance/exit to the premises and which will be operable by staff.

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

15. There will be a minimum of two (2) staff present at all times when the premises is open

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

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

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

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

20. The premises shall install and maintain a panic button behind the cashiers counter.
21. The licensee will ensure that customer toilets are checked every hour for evidence of drug taking. Toilet checks are to be documents stating the time and member of staff who made the checks.
22. Toilet doors remain locked, fitted with a magnetic style-locking device and access given by staff only.
23. A fire alarm and smoke detection system shall be installed.
24. Prominent GamCare documentation will be displayed at the premises.
25. The licensee shall on a minimum of once a year:
- (a) 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.
  - (b) Periodically provide refresher training to all of its staff working at these premises on the specific local risks to the licensing objectives.
  - (c) 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
26. New and seasonal staff must attend induction training and receive refresher training every six months.
27. 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.
28. An incident log shall be kept at the premises and made available for inspection on request to an authorised officer of Brent Council of the police, which will record the following:
- a) Any complaints received.
  - b) Any incidents of disorder.
  - c) Any faults in the CCTV system.
  - d) Any visit by a relevant authority or emergency service.
  - e) Any banned customers
29. The following crime prevention measures shall be implemented:
- (a) A time delay safe with deposit slot and anti-fishing mechanisms must be used.
  - (b) Regular robbery awareness and cash handling training shall be given to all staff.

If the above conditions can be met in full police would be in a position to withdraw representations.

Yours sincerely

PC Phil Graves 3122NW

Brent Licensing



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**From:** Phil.S.Graves@met.police  
**Sent:** Thursday, March 14, 2024 8:34 AM  
**To:** Business Licence  
**Cc:** debbie@houghandbollard.  
**Subject:** RE: New Adult Gaming Centre - Golden Slots, 169-171 Cricklewood Broadway, NW2 3HY - 30828 - Police Reps

Good morning Brent,

All parties concerned are now in agreement with the attached reps therefore police withdraw conditions.

Debbie – As discussed, I have removed condition 13 which you highlighted to me. Thank you for your assistance with this.

Thanks,

Phil

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**From:** Grahl, Councillor Gwen

**Sent:** Monday, February 19, 2024 9:56 AM

**To:** Business Licence; Dar, Councillor Tariq towncentreregeneration  
<towncentreregenerat@brent.gov.uk>

**Cc:** Legister, Linda; Prashar, Anu

**Subject:** RE: New Adult Gaming Centre Application - Cricklewood & Mapesbury - 30828

Dear Licensing Team,

Myself and Tariq wish to oppose this application for the following reasons:

1. There is widespread opposition from residents in Cricklewood to further premises for gaming and gambling. They have legitimate concerns about community safety and the effect on children and young people. Every time an application is submitted we are inundated with negative responses. As a council we need to demonstrate that we are keeping the area safe and protecting our young people from harm.
2. There are already multiple gaming premises in this area, and to approve more unnecessary establishments is likely to increase public nuisance and antisocial behaviour in the area. These companies deliberately target areas of social deprivation. There are three betting shops (Admiral Casino, Paddy Power and William Hill) within the immediate vicinity as well as the large MERKUR Bingo just metres away. Reducing the number of non-gambling premises will only increase crime in the area, which is already becoming unsafe for children, especially in the evenings.
3. There are seven schools nearby, pupils from which use this junction as route home especially as it is a major route for buses. They are: Mora Primary School, Anson Primary School, The Mulberry House School, Hampstead School, St Agnes RC Primary School, Child Hill Primary School and Our Lady of Grace Catholic Infant and Nursery School. Gambling is an addictive habit which can be massively detrimental to mental health and wellbeing, particularly for children and young people. We are particularly concerned about gaming establishments, which often have insufficient safeguards in place and are particularly appealing to a younger audience. In line with the licensing objectives, we are gravely concerned about the effect on young people if this plan goes ahead.
4. Cricklewood and Mapesbury ward now has one of the highest incidences of burglaries in London. Promoting gambling, which puts local residents at risk of spiralling debt, may make this problem worse both by making more people likely to commit crime, and by detracting police resources away from household burglaries and towards antisocial behaviour associated with betting shops.

Kind regards,

Gwen and Tariq

**Cllr. Dr. Gwen Grahl**

**Lead Member for Children, Young People and Schools**

**Labour Councillor for Cricklewood and Mapesbury**

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**From:** Clarke, Cllr Anne  
**Sent:** Thursday, February 29, 2024 10:43 AM  
**To:** Business Licence  
**Cc:** Grahl, Councillor Gwen; Dar, Councillor Tariq; Schneiderman, Cllr Alan  
**Subject:** New Adult Gaming Centre Application - Cricklewood & Mapesbury - 30828

Dear Brent Business Licencing,

As a Cricklewood Ward councillor serving the Barnet part of Cricklewood, I am concerned about the large number of gambling establishments in our town centre. These premises are exclusive in that they are not for general community use, a large number of them in one town centre simply means the town centre is no longer inclusive.

Cricklewood is one of the most economically deprived areas of Barnet and Brent. There is no evidence that this type of establishment has ever successfully improved an area, tackled anti-social behaviour or improved outcomes for people in areas of deprivation.

Residents are rightly concerned about this application and do not wish to see more gambling in Cricklewood. We need to see action on ASB, a good mix of shops and restaurants and investment in our town centre. The licensing of this establishment is simply not welcome and I urge rejection.

Kind regards,  
Anne

**Councillor Anne Clarke**  
**Cricklewood Ward**  
**Cabinet member for Community Wealth Building**

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**Cricklewood Town Team Response - Application for gambling premises licence - old  
Barclays Bank**

1. This objection is entered by The Cricklewood Town Team (“CTT”) in response to an application made on the 14th February 2024 by Golden Slots (Southern) Limited (“Golden Slots”) for a gambling premises licence for an adult gaming centre in the old Barclays Bank at 169-171 Cricklewood Broadway (“the Application”).

***Background to CTT***

2. The Cricklewood Town Team (CTT) works to improve the environment and build a stronger community alongside residents’ associations, community creative and faith groups, local businesses, statutory partners including the police and Barnet, Brent and Camden councils as well as the voluntary sector. Straddling the junction of three boroughs and three wards CTT works in response to feedback from and surveys of residents, businesses and traders around Cricklewood to create a thriving local economy, increase visitor enjoyment and make a greener cleaner environment and a safe place for all of us – a community where all voices are heard and valued.
3. Since 2010 CTT has staged a wide range of cultural, health, social and business events. For more details see <https://cricklewood.net/>.

***Grounds for Objection***

4. CTT objects to this application on three grounds (1) that there is a lack of need and that allowing this application would mean the loss of an opportunity for other uses (2) that there is a legitimate and evidence-based concern of crime, disturbances, and

ill effects on the community increasing if this application is allowed (3) that this proposal is inconsistent with Brent's Borough plan 2023-2027.<sup>1</sup>

**Ground 1 - Lack of need and loss of opportunity for other developments**

5. There are significant gambling establishments in Cricklewood already. As Golden Slots note in their risk assessment submitted with their application *"There are 3 betting shops within 100m – William Hill, Paddy Power and Star Sports. There is also a Merkur Bingo at 200 Cricklewood Broadway and Admiral Casino at 160 Cricklewood Broadway."* It does not seem to CTT that there is any benefit to the area having an additional gambling premises in the area. If there is a benefit, this has not been clearly evidenced. CTT takes notice of the over representation of gambling establishments in deprived areas as the author of a 2021 study set out *"The research highlights the clear mismatch between the amenities available in 'left behind' areas, compared with those that are more affluent. Rather than having greater access to the facilities, services and opportunities that help people to improve their lives, those in more deprived communities are disproportionately faced with choices that can often prove harmful."*<sup>2</sup>
  
6. CTT are further concerned that Cricklewood's opportunity to grow as a thriving community is being undermined by the granting of applications such as that made by Golden Slots. Cricklewood had local banks in the community which have now nearly all closed. CTT are concerned that Cricklewood's prime high street locations are being granted to establishments which are unlikely to serve the needs of the community and that this is entrenching the lack of valuable amenities in the locality. Putting the point at its lowest, the bingo premises license granted under number 30158, will be lost if this application is granted. CTT considers that bingo at least

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<sup>1</sup> See <<https://www.brent.gov.uk/the-council-and-democracy/strategies-priorities-and-policies/brent-borough-plan-2023-2027#boroughplan>> accessed 5th March 2024 at 23:37.

<sup>2</sup> See <<https://www.localgov.co.uk/Poorest-areas-have-most-gambling-premises-study-finds/52822>> accessed 6th March 2024 at 09:09 and the associated report Jamie Evans & Katie Cross, The Geography of Gambling Premises In Britain (July 2021), Personal Finance Research Centre (PFRC) University of Bristol.



brings communities together to some degree and considers that this fallback position is a material planning consideration.

7. CTT consider that it would be well placed to partner with Brent Borough Council to revitalise the site in question. CTT takes notice of the success in Mill Hill turning former banks into successful restaurants.<sup>3</sup> CTT further notes Brent Borough's success in local regeneration in other areas.<sup>4</sup> CTT believes that local community engagement would allow a better use for the site to be identified but that this first requires that the application be refused.
8. It is because this establishment is not needed and because it would prevent other community enhancing businesses from operating that the application should be refused.

***Ground 2 – Concern of crime, disturbances, and ill effects on the community***

9. CTT are concerned that the Golden Slots risk assessment understates the issue of crime in the area. In Golden Slots' risk assessment, they maintain that "*Cricklewood is generally considered a safe area with crime rates below the national average. The most serious crime is antisocial behaviour followed by violence and sexual offences; theft and shoplifting are less common.*" Unfortunately, Cricklewood suffers from considerable crime. In January 2024 alone Cricklewood had 188 reported crimes, of which 81 occurred in the immediate vicinity of the proposed location of this establishment (more than two per day) of which 13 were anti-social in nature (more than one every three days) and 21 involved shoplifting crimes (more than one every two days).<sup>5</sup> The immediate vicinity of the proposed establishment appears to the

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<sup>3</sup> This is one of them, before – <<https://millhillbroadway.blogspot.com/2020/04/hsbc-bank-restaurant-bar-mill-hill.html>> - and after <<https://bankfoodanddrink.co.uk/>> both websites accessed 5th March 2024 at 23:56.

<sup>4</sup> See <<https://www.brent.gov.uk/business/regeneration>> accessed 5th March 2024 at 23:58.

<sup>5</sup> See <<https://www.met.police.uk/area/your-area/met/barnet/cricklewood/about-us/crime-map>> accessed 3rd March 2024 at 19.11.

CTT (and contrary to Golden Slots assessment) to be a hotspot for crime, particularly shoplifting and anti-social behaviour.

10. CTT is concerned that an increase in gambling facilities will increase the number of crimes driven by financial need or frustration following vulnerable individuals making significant losses. In connection with this the CTT is concerned that Golden Slots have self-assessed in their application that the risk is medium in relation to (1) "Failure to deal with customers making complaints about the outcome of gambling" and (2) "Failure to recognise signs associated with problem gambling or substantial changes in gambling style". While it is noted that mitigation features are indicated in the risk assessment CTT is concerned that at least some of these risks are almost certain to arise with a corresponding detrimental impact on the community, particularly given the proposed 24-hour opening times.
11. CTT are further concerned that the prevalence of gambling institutions will undermine the community enhancing work in the vicinity. For example, Ashford Place is a centre helping the homeless and financially vulnerable is less than half a mile from the proposed premises, Barnet Foyer which offers accommodation to vulnerable young people is half a mile away. It is notable that Golden Slots is aware of the harms of problem gambling. It states in its policy that *"It is the Company's policy that no member of staff is permitted to gambling on its Premises This is to protect both the Operator and employees against any issues that can arise from the effect of problem gambling."* Unfortunately, it appears to CTT that a level of problem gambling being exacerbated by this establishment being permitted to operate is inevitable.
12. High crime of a nature likely to be exacerbated by this establishment and the deleterious effects on community groups are both good reasons to refuse this application.

### **Ground 3 - inconsistency with Brent's Borough plan 2023-2027**

13. Brent Borough Plan 2023-2027 states that its third strategic priority is Thriving Communities. Two points are made in this connection:

- a. Desired Outcome 1 is *"Enabling Our Communities"* to do this Brent Borough says it will *"Support the Voluntary and Community Sector with clear communication and forums to provide insight, data and case studies of the lived experiences of residents."* There is no evidence to suggest that the local community lived experience supports the grant of the application. This objection alone is evidence that the local community lived experience militates against the grant of this application.
- b. Desired outcome 2 is *"A Safer Borough"* to do this Brent Borough says that it will *"design out crime and anti-social behaviour"*. Without repeating ground 2 here, it suffices to say that CTT does not consider that the Application is consistent with seeking to design out crime and anti-social behavior because it creates a hotspot of similar establishments that will likely increase undesirable associated behavior.

#### **Conclusion**

14. CTT is committed to making Cricklewood a vibrant and pleasant place to live. The application falls short of this goal. It is simply not needed. More concerning, CTT consider that the evidence shows that this development will be harmful to Cricklewood and contrary to Brent Borough's 2023-2027 plan. CTT therefore asks that the application not be granted.

15. CTT hopes that priority is given to proposals that clearly evidence a positive impact upon the community and looks forward to supporting such applications in the future.

**Cricklewood Town Team**

**March 2024**

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**Resident Rep 1**

Sent: Saturday, February 24, 2024 10:55 PM

To: Business Licence <business.licence@brent.gov.uk>

Cc: Dar, Councillor Tariq <Cllr.Tariq.Dar@brent.gov.uk>; Grahl, Councillor Gwen <Cllr.Gwen.Grahl@brent.gov.uk>

Subject: FAO director of Brent Council Regulatory Services

Brent Council Regulatory Services

Brent Civic Centre

Engineers Way

Wembley

HA9 0FJ

I am writing in connection with the application by Golden Slots (southern) limited for a premises licence under the gambling act at 169-171 Cricklewood Broadway. (Photo attached.)

I am copying in my local councillors because I am very shocked by this proposed change of use of premises.

In the first place I am asking you as the licensing authority to supply me with information about the application, including the arrangements for viewing details (as promised on the notice about the application affixed to the premises, of which I attach a photo).

I wish to object against this application in the strongest terms. I live nearby, and Cricklewood Broadway is where I do much of my local shopping, and until recently (when my bank closed) my banking.

The reasons for this objection is that there are already several opportunities for gambling within the immediate area of these premises, so that no further opportunities to gamble are required. Multiple gambling outlets give an undesirable atmosphere in a neighbourhood, encourage an activity which can be damaging to individuals and society, having a bad influence on children and young people using Cricklewood for shopping and other amenities. They also reduce the possibility of other amenities that are much more badly needed. It is likely also to make the area a more threatening environment to walk in after dark.

A local authority has a duty to ensure a balance of commercial activity. Further gambling would reduce the balance further.

I am shocked that the notice gives no information about how to object, or how to contact the licensing authority. I had to search on the internet. I am doubtful that a notice without such information even constitutes a valid notice. If it does not, then any licence obtained would not be valid.

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**Resident Rep 2**

We do not need another gambling site in Cricklewood. There are plenty as it is.

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**Resident Rep 3**

Brent councillor's are employed and in place to to oversee the welfare and care for the residents of this borough. Within this remit is the requirement to listen and act on the voice of the residents. The continued deterioration of our high streets, in particular Cricklewood Broadway shows a wilful neglect of the residents and of the council's legal obligations. Why does Brent council allow the destruction of the environment, allowing cheap hideous constructions without any architectural merit? It's time the councillors reread the requirements of the post's they took and start listening to their public, the wider public. Try creating instead of destroying.

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**Resident Rep 4**

We already have Bingo, Admiral slots amusement arcade, we don't need another gambling and gaming establishment in Cricklewood. This attracts crime and criminal activity. Creates diversion for children.

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**Resident Rep 5**

Strongly against this awful decision

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**Resident Rep 6**

Cricklewood already has several adult gambling venues. Another gambling venue does not support the community or the needs of the people living in Cricklewood. Providing a license for gambling venue is not in the interest of the residents.

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**Resident Rep 7**

Strongly object to this proposal for the following reasons: There is widespread opposition from residents in Cricklewood and Willesden Green to further premises for gaming and gambling. I have legitimate concerns about community safety and the effect on children and young people

- 1) There are already multiple gaming premises in this area, and to approve more unnecessary establishments is likely to increase public nuisance and antisocial behaviour in the area. These companies deliberately target areas of social deprivation. There are three betting shops (Admiral Casino, Paddy Power and William Hill) within the immediate vicinity as well as the large MERKUR Bingo just metres away. Reducing the number of non-gambling premises will only increase crime in the area, which is already becoming unsafe for children, especially in the evenings. The idea that this centre will be open 24 hours a day seven days a week is entirely unacceptable.
- 2) There are seven schools nearby, pupils from which use this junction as route home especially as it is a major route for buses. They are: Mora Primary School, Anson Primary School, The Mulberry House School, Hampstead School, St Agnes RC Primary School, Child Hill Primary School and Our Lady of Grace Catholic Infant and Nursery School. Gambling is an addictive habit which can be massively detrimental to mental health and wellbeing, particularly for children and young people. We are particularly concerned about gaming establishments, which often have insufficient safeguards in place and are particularly appealing to a younger audience. In line with the licensing objectives, we are gravely concerned about the effect on young people if this plan goes ahead.
- 3) Cricklewood and Mapesbury ward now has one of the highest incidences of burglaries in London. Promoting gambling, which puts local residents at risk of spiralling debt, may make this problem worse both by making more people likely to commit crime, and by detracting police resources away from household burglaries and towards antisocial behaviour associated with betting shops. The Risk Assessment fails to take this into account. The Risk assessment does however point out that there is already an issue with Anti Social Behaviour in this area - something which is very unlikely to be reduced by the location of yet another 24hour gambling centre.
- 4) the Risk assessment fails to recognise the location of several residential Care Homes within close proximity: Landsdowne

Care Home on Claremont Road, Lawnfield Houss on Coverdale Road, and Springhill House on Willesden Lane.

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**Resident Rep 8**

With 3 betting shops, another slot machine hall, and a bingo hall within walking distance we do not need another slots venue.

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**Resident Rep 9**

I object to this proposal on several grounds. Firstly there are already too many gambling premises in a short stretch of Cricklewood Broadway. Secondly, the Broadway is already dirty, littered and run down, and will never be improved unless we get more anchor stores such as M&S, Waitrose etc, or even nice coffee shops such as Cafe Nero or Starbucks. We also badly need another pharmacy in the area. Since new flats are being built on the corner site opposite, there will soon be an even greater need for food shops and pharmacies. More gambling opportunities will be of no benefit to the community, and the premises are likely to attract and increase anti-social behaviour.

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**Resident Rep 10**

There are already multiple gambling areas including opposite, that site has an opportunity of significance within the community. Any further gambling halls would not benefit the local community.

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**Resident Rep 11**

I am not happy that you have closed my bank to them turn it into a bingo slot machine . There is already a slot machine shop about two doors down and a massive bingo place in Cricklewood. Why do you insist on placing gambling shops bingo halls in less affluent areas ? You would see these shops in Chelsea or Kingston!

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**Resident Rep 12**

I would like to oppose to more betting and gambling spaces in Cricklewood. It is making the neighbourhood very unsafe and horrible to live in.

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**Resident Rep 13**

Object any gambling in our neighbourhood. There is enough poverty,drugs and incidents related to this.

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**Resident Rep 14**

Object to having another Gambling place in Cricklewood. This type of activity have more negative effects that the fun benefits it brings. Cricklewood has already quite a lot of social problems and this wouldn't be a way to address them. Harm from gambling isn't just about losing money. Gambling can affect self-esteem, relationships, physical and mental health, work performance and social life. It can harm not only the person who gambles but also family, friends, workplaces and communities.

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**Resident Rep 15**

Object to having another Gambling place in Cricklewood. This type of activity have more negative effects that the fun benefits it brings. Cricklewood has already quite a lot of social problems and this wouldn't be a way to address them. Harm from gambling isn't just about losing money. Gambling can affect self-esteem, relationships, physical and mental health,

work performance and social life. It can harm not only the person who gambles but also family, friends, workplaces and communities.

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**Resident Rep 16**

Various gambling locations already

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**Resident Rep 17**

Below you can find some of the negative effects of gambling: Harm from gambling isn't just about losing money. Gambling can affect self-esteem, relationships, physical and mental health, work performance and social life. It can harm not only the person who gambles but also family, friends, workplaces and communities. I don't think this is planning application is beneficial to the Cricklewood community not gives due consideration of the detrimental effects outlined above

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**Resident Rep 18**

I would like to object to another gambling shop in the local area. We already have at least three, and an increasing problem with gambling in the community.

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**Resident Rep 19**

There is already an adult gaming centre on the other side of Cricklewood Broadway as well as a betting shop and a bingo hall within 100m. Cricklewood does not need another gambling establishment, it desperately needs better quality shops and facilities for the vast majority of the community who don't want to spend their time gambling or encourage other people to do so.

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**Resident Rep 20**

I object to this as there are already two 24 hour gaming establishments within 200 meters of the proposed establishment and several other gaming stores in nearby Willesden Green.

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**Resident Rep 21**

I strongly object to granting of this gaming licence to this premises. There are too many gambling places in Cricklewood and this will lead to more anti social behaviour in the area. Please refuse this licence. The old Barclays Bank is in a prominent location at the centre of Cricklewood, so another gambling premises is not what the town centre needs.

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**Resident Rep 22**

Absolute disgrace. Already existing opposite this building is a gambling centre and there is a massive bingo hall just north-west on the same road. This is absolutely not what the area and its vulnerable residents need. I find it disgusting that this is even being considered. A plan to convert the commercial premises into flats would be infinitely more beneficial and also a profitable scheme for the owner. For once, please can Cricklewood be given the treatment it deserves?

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**Resident Rep 23**

Don't you people ever learn that giving license to these types of organisations just attracts the wrong type of pond life increasing the local crime rate leading to a heightened sense off



lack of safety in the local community & probably puts more strain on local services (police etc) . But what do you CARE?

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**Resident Rep 24**

Strongly object to another gambling business as already in the vicinity there is a 2,700 seater bingo hall, an adult gaming centre opposite the application site and numerous betting shops, even one next door. Whilst the application site is in Brent, the adult gaming centre opposite is in Barnet because Cricklewood is a triborough. Barnet and Brent need to recognise we are "one Cricklewood" with one high street and take into account these applications are using the borough boundaries to saturate our town centre. This is a prime site within a primary frontage that could offer better value benefits to the high street. The place has gone from having two banks opposite each other to gambling dens. Gambling is an addictive habit and with several schools using this location as their route, I am concerned for the children and young people. I am also concerned that there is a proposal to open 24/7. This location is the A5 corridor and the police are already stretched with the influx this creates, yet alone to have this problem 24/7.

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**Resident Rep 25**

No need for further gambling venues in the area

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**Resident Rep 26**

We don't need more gambling shops in the area. They do more harm than good.

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**Resident Rep 27**

We need to influence the local community young to spend their time and money productively. Gambling is one of the worst things to introduce into a community. Introducing any activity which is unproductive, mindless, chancey, wasteful, is seen by youths as being approved by the senior members of the community. We must show ourselves to be responsible. I strongly object to any gambling, including slot machines or any other form of gambling into my neighbourhood or any neighbourhood for that matter. Please keep this evil influence away from us. Do not make available the temptations of this possible addiction. Gambling ruins lives. It ruins children's lives. Why this is being even considered is beyond my understanding.

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**Resident Rep 28**

I oppose the application for this adult gaming centre. We do not need this on our high street - it only encourages anti-social behaviour and addiction to gambling. There are far better uses of the premises that will contribute positively to the area. Please reject this application for the good of the vulnerable citizens of Willesden Green and Brent.

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**Resident Rep 29**

This is the worst thing to have in Cricklewood, open a building Society, where we can put our money somewhere after our banks all go.

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**Resident Rep 30**

With 3 betting shops, another slot machine hall, and a bingo hall within walking distance - these places do nothing but rob people of the little money they have and fuel gambling addiction. Impacting the long term growth and generation of the area. Slot machine places are also known to facilitate money laundering.

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**Resident Rep 31**

We do not need another gaming centre the area. There are plenty of them already on the Broadway, in Neasden, Willesden, plus the bingo hall is just across the road. Use the building for something helpful, positive and productive within the community.

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**Resident Rep 32**

We have the largest bingo hall in Europe at Merkur; we don't need more gambling, we need regeneration and positive use of this historic building. Needs are met locally for those who wish to gamble; it isn't benefitting the community but is a detriment to it.

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**Resident Rep 33**

There are plenty of gambling places in Cricklewood, including a huge bingo hall a few feet from the bank, they do not serve the local community in any way other than to extort money from vulnerable people. The bank is a beautiful building which will probably be covered in tacky neon signs just like they have done to the old Nat West Bank opposite. I was under the impression that the Mapesbury conservation area was to be extended to include this building.

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**Resident Rep 34**

There is a gambling arcade directly opposite this site that is open 24hrs 7 days a week. There is also a huge bingo hall just yards up the road from this site. Another bingo hall/ arcade would be 'over kill' and disastrous for this area. Please DO NOT allow this to happen.

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**Resident Rep 35**

Not another one please

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**Resident Rep 36**

I object to this development. We already have an abundance of betting and gaming shops on Cricklewood Broadway. Adding another one is disproportionate and will drag down the area. We do not need another slots or betting shop in the high street.

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**Resident Rep 37**

I would not like another gambling place in Cricklewood, whole street is turning to gambling place, too many in one place !!! Not good for children!

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**Resident Rep 38**

We don't need more gambling services in the area.

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**Resident Rep 39**

I do not think Brent needs an adult gaming centre and do not support applications for a gambling premises licence

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**Resident Rep 40**

Please please no more gambling/gaming premises. Cricklewood Broadway is and the Edgware Road have enough of these already. We don't need any more

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**Resident Rep 41**

I do not support this application. We already have ample gaming in the area and it would only encouraged social discourse and crime

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**Resident Rep 42**

There are far too many gambling / slot machine premises in Cricklewood already. It will add to the already antisocial, drunken and aggressive behaviour in the area. I object in the strongest terms

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**Resident Rep 43**

There are far too many betting shops on that road!

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**Resident Rep 44**

There are already so many betting shops on this street already. It is irresponsible to grant permission for yet another one.

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**Resident Rep 45**

The current area does not need another gambling centre as it has sufficient within this area and the local vicinity. The area suffers from hardships and this will lead to more people attracted to trying to increase their incomes through gambling and it will cause more hardships. Such centres attract people to loiter and ASB and it will not improve the environment for the community. It is in the vicinity of schools and children passing on major transport routes and as a thoroughfare and unacceptable to promote such establishments as appropriate in society. We are facing a cost of living crisis and a community centre or youth hub would be more appropriate. We must look to improve Cricklewood and consider what the community needs. I strongly oppose this to be developed as a gambling centre.

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**Resident Rep 46**

More than 2 Gambling outlets for a population of 9000... there is excessive gambling in Brent & NW London

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**Resident Rep 47**

There are far too many gambling outlets in the Cricklewood Broadway area and no justification for an increase in their number.

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**Resident Rep 48**

we do not need another gambling place in Willesden; there are plenty of opportunities to waste money on this type of thing already plus they are unsightly and will further degrade the high street

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**Resident Rep 49**

Gambling is addictive and addiction destroys lives. Providing an opportunity to gamble shouldn't be encouraged.

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**Resident Rep 50**

I feel that increased gambling facilities like those proposed would be damaging to many local residents who do not have spare money. And it would not help other residents. The space could be much better used in order to help rather than damage the local community and its facilities.

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**Resident Rep 51**

There are sufficient gambling sites already in Cricklewood already. This is a nice building opposite the hotel that could be better used for the community in other ways, especially with the current recession and struggles of many with the high cost of living.

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**Resident Rep 52**

Cricklewood does not need another gambling centre

**Resident Rep 53**

What is the purpose of yet another gambling venue? Could the council consider lowering the business rates to encourage other types of shops: bakers/flower shop. A shop to enhance the Broadway not drag it down further.

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**Resident Rep 54**

The last thing Cricklewood needs is another gambling shop. There is no parking for this site, it would be detrimental to the area, and it would be bad for the community.

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**Resident Rep 55**

There are already far too many gambling establishments in the area. We already have Europes largest bingo hall and a gambling slot venue over the road. Brent need to stand up for its residents and protect them from gambling and protect our high street from so many gambling venues like other boroughs have. Just because the area is at the border with other boroughs does not mean you should neglect it. You must refuse this application and improve and save lives in the process rather than promote addiction.

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**Resident Rep 56**

There exist already a large number of Gambling premises in Cricklewood Broadway and often they tend to bring with them anti-social and other forms of undesirable behaviour. I can easily I think on many other types of facilities that Cricklewood is in need off instead of a another gambling room.

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**Resident Rep 57**

Gambling shops are unhealthy for the community, they prey on financially and educationally disadvantaged and make their lives worse. There is already one gaming center on the corner of that junction and Bingo near by. To improve the quality of the area we should have more shops and facilities that benefit the day to day lives of the community and particularly the children in the area. We need more arts and crafts shops, good quality shopping, a nice cafe, a butcher, a small theatre. The last thing the community needs is more betting and gambling shops.

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**Resident Rep 58**

Unless the council wishes to turn this area into a mini-Las Vegas, is adding more betting shops of benefit to the local community? I think not.

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**Resident Rep 59**

Too many gambling premisses around the same corner which only brings problems.

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**Resident Rep 60**

There are already an excessive number of licensed gambling establishments in close proximity to location of this proposed development.

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**Resident Rep 61**

There are plenty of slots/gambling places already and it is proven they make people poorer and feed gambling addiction. For the sake of Brent residents I think the proposal should be rejected

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**Resident Rep 62**

There are too many of these places in the area already and another can have no material benefit to the area. Enough already.

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**Resident Rep 63**

Do we really need more gambling premises? We are trying to elevate the area and gambling premises are a sign of a deprived area. I am a local resident for over 10 years and I highly object to this application

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**Resident Rep 64**

there are already too many gambling establishments in close proximity

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**Resident Rep 65**

Very much against more encouragement of gambling. We have a flood of gambling adverts on TV. We can't stop people ruining their lives but we can limit it and not give prominent public buildings over to it.

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**Resident Rep 66**

I have two basic objections and concerns: (1) There are several gambling-related businesses in very close proximity already. The proposed business is likely to be associated with crime or disorder and the applicant has not demonstrated how it intends to mitigate this risk; and (2) The location itself, and/or the inadequate mitigating statements as set out in the applicant's specific risk assessment, fails to protect vulnerable people from being harmed / exploited by gambling. The applicant's Local Gambling Risk Assessment mentions "3 [existing] betting shops within 100m" (William Hill, Paddy Power and Star Sports) but does not mention that a fourth, Admiral Casino, is even closer than that (i.e. directly opposite). Merkur Bingo (a fifth gambling related establishment) is mentioned, but not the fact that it is a massive building on the same stretch of road (200 Cricklewood Broadway) - nor that it is open 24 hours a day. These points are relevant and should I think have been more candidly brought to your attention. There is an obvious (and accepted) risk of heightened local crime. This is correctly identified as a risk by the applicant in its Risk Assessment. However, the applicant's suggested risk management in response says this: "lower than average crime rate area". This is inadequate and revealing. The fact that an area may have a lower than average crime rate (if that is true - I don't know) does not justify doing something which risks increasing that rate. To suggest otherwise demonstrates a lack of understanding of the operator's responsibilities under the legislation. Moreover, there is nothing of any substance from the applicant which is said to mitigate the risk. Similarly, the fact of at least 5 other existing gambling businesses are in such close proximity to the proposed site cannot be good for vulnerable persons who already may be addicted to gambling and/or spending more money than they can afford on gambling, but who can easily pass from one such business to another without being identified as vulnerable (but spending a proportion of their income in each). The area also has a higher than average ethnic diversity which is correctly recognised by the applicant, but the applicant does not mention whether the area has a higher than average number of persons with \*mental health\* issues or \*learning disabilities\* (which is relevant because such persons are likely to be particularly vulnerable). The applicant's stated mitigation ("aware of nearby addiction help facilities") is unduly dismissive of the risks to vulnerable people, and inadequate: it fails to engage with how it is going to identify the vulnerability; and suggests that there is no serious intention to do anything significant to mitigate the obvious risks to vulnerable people. The general policy (which is not adequate in any event) is no answer to this because the concern arises from the particular local circumstances - i.e. so many gambling establishments in such close proximity. Finally, whilst the applicant's policies deal with how to deal with complaints from "customers", I have seen nothing to suggest that they would take seriously complaints or concerns raised in good faith by residents who are not customers but who may witness issues of real concern. A genuine commitment to social responsibility would not overlook this.

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**Resident Rep 67**

This application fundamentally goes against the regeneration plans for Cricklewood and would be an extreme oversight from Brent Council should it be allowed. Gambling puts local residents at risk of spiralling debt exasperating the problems this area already suffers from, namely rising poverty, anti social behaviour and crime. Gambling is a proven catalyst for leading more people to commit crime and antisocial behaviour associated with betting shops. The area already has a number of betting shops, slot machine shops (directly opposite) and a large bingo hall 2 minutes away. There is no social, economic or ethical reason for this application be approved. The area supports young families with a number of schools, Brent council's priority should be ensuring the area has services and amenities which benefit them directly rather than promoting gambling which will only be a further drain on Brent's social services in the long run. The previous slot machine application was turned down previously, there is no change to this application, so i hope Brent Council puts its residents first again and rejects the slot machine (and future gambling applications) again.

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**Resident Rep 68**

This application should be rejected because the addition of a further gambling venue to the Cricklewood area would harm public safety and constitute a public nuisance. As the application itself concedes, there are already 4 gambling establishments within 100 metres of the proposed site, and a very large bingo hall within 200m. Concentrating even more here, especially with 24 hour opening, will encourage problem gamblers to go from one to another, and to hang around the area all day. Gambling has been shown to be harmful to mental health. Finally, there is an opportunity cost to this proposal, because the new gambling centre will occupy a prime location which could be used for a shop which actually served the local community.

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**Resident Rep 69**

There are 4 other gambling establishments within 50m. This type of business should be discouraged not encouraged for the people it brings to our area

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**Resident Rep 70**

I object to the planning based on the fact that there are already too many similar gambling premises with in the vicinity. Gambling does not bring anything to the area. In fact, I would suggest that it makes the area less safe for all residents. Behaviour and I suggest that they would make Cricklewood less safe for both adults and children. It could also encourage antisocial behaviour. A premises such as this will bring nothing to the community, and will, in fact make the area less salubrious. Please consider these factors when making your final judgement Cricklewood does not need more gambling premises

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**Resident Rep 71**

This is absurd. Crime is too high and this will make it worse. We already have too many gambling places in the vicinity, and I believe the visibility and availability of these is a great harm to our children.

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**Resident Rep 72**

Crime is increasing in our area. We already have so many such gambling places surrounding us. It's only going to attract more criminals and it's going to put a negative impact on our young adults if they get lots of opportunities for such gaming.

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**Resident Rep 73**

This should not be allowed on the grounds of proximity to other gambling institutions. Permits should be reviewed on a density per area basis, with a number of local

establishments already in place, how can the local authority justify that there is further need in the local area. I strongly object to this, as a local resident.

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**Resident Rep 74**

We absolutely do not need another another gambling outlet in Cricklewood....this site is directly opposite to a casino/ slot machine outlet; beside 2 betting shops and 200 m from the largest bingo Hall in England!!! Maybe Brent and Barnet should liaise on what is best for Cricklewood...

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**Resident Rep 75**

We already have a number of these establishments in Cricklewood I thought you were supposed to be regenerating the area not degenerating it

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**Resident Rep 76**

There are seven schools nearby, pupils from which use this junction as route home especially as it is a major route for buses. They are: Mora Primary School, Anson Primary School, The Mulberry House School, Hampstead School, St Agnes RC Primary School, Claremont primary school , primary school Child Hill Primary School and Our Lady of Grace Catholic Infant and Nursery School. Gambling is an addictive habit which can be massively detrimental to mental health and wellbeing, particularly for children and young people. We are particularly concerned about gaming establishments, which often have insufficient safeguards in place and are particularly appealing to a younger audience. In line with the licensing objectives, we are gravely concerned about the effect on young people if this plan goes ahead.

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**Resident Rep 77**

I strongly object to another gambling business on Cricklewood Broadway. There are already too many gambling establishments and too be fair businesses which do not enhance the area. We have an abundance of chicken shops, £1 shops, barbers and gambling places. Couldn't you bring in more businesses to enhance, like you see on so many high streets, a marks and spencer, a wenzels or a Gail's. Without decent shops the area is less attractive to residents and visitors. There's no banks anymore. It's a shame to see the area going down like this. Therefore please do not allow this proposal!

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**Resident Rep 78**

There are quite enough gambling places in Cricklewood. We do not need another please. This is a pretty poor area, masses of problems with homeless, addicts and beggars. Let's run it down a lot more. Hooray

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**Resident Rep 79**

We do not want yet another low brow gaming venue in cricklewood. We need good food stores, a restaurant or a social venue, pub/bar as all have disappeared. I strenuously oBJECT to Barclays Bank site being transformed into a gaming venue.

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**Resident Rep 80**

The high street is already filled with the gambling venues. Descent residents with small children do not need another which would surely impact negatively to the local community.

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**Resident Rep 81**

Not an ideal environment for children growing up

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**Resident Rep 82**

please object to this we already have a slot machine premises in very close proximity to this proposed one.

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**Resident Rep 83**

Gambling is destructive to society

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**Resident Rep 84**

We have enough gambling establishments in the AREA. this adds nothing.

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**Resident Rep 85**

We don't need or want any more gambling establishments ! A Tesco or Waitrose apr virtually anything else would be better

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**Resident Rep 86**

The number of gambling dens within a short distance in this area is already completely unacceptable. This stretch of the Broadway needs to be cleaned up not turned into Las Vegas. Anyone who thinks what the area needs is yet more gambling must be a sign of corruption. Please approve shops that would improve the area and provide a service to the community- not more gambling- is the 24h one opposite not enough?

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**Resident Rep 87**

I think it is terrible to bring in yet another gambling/casino shop to the area that already has two similar outlets directly across the road, plus the big Bingo Hall close by. Cricklewood deserves something more classy. The area is soon to grow massively with lots more people living there with the development on the B&Q site, for example. How can the Planning Dept have approved this?

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**Resident Rep 88**

This is pathetic, opening yet another gambling join when there are 3 others within 3 minutes walk.

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**Resident Rep 89**

There are enough gambling sites in Cricklewood already. We need more business that will not lead to addiction in the area. Cricklewood already has drink, drugs problem and now gambling. NOT NECESSARY

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**Resident Rep 90**

I am most horrified that Brent Council deem it to be appropriate for yet another Gaming Centre, right in the middle of Cricklewood Town Centre, already lacking in beauty and tasteful architecture, and directly opposite another, and within 100 m of at least two more. This is a prime location in the heart of Cricklewood, and I sincerely hope the Barclays Building is Listed and all facets of its facade and beautiful architecture are protected. What an insult to the building, the local people, school children and all ages who spend their daily lives in this locality, to allow Golden Slots to destroy another corner with their garish and ugly logos trying to entice the locals into the terrible habit of gaming, instead of encouraging them to do something meaningful and helpful with their time and money. Who will set the example of how to behave and what to aspire to. Certainly not Golden Slots. Brent and Barnet Council should be the ones stepping forward in this role. Working together to create something to be proud of. To allow two prominent corners in the heart of the township be taken over by the Gaming Industry is abhorrent, highly irresponsible and sends entirely the wrong message to our young and everybody else as well. Why encourage this ? Who benefits ? Cricklewood Town Centre needs trees and good architecture and shopfronts that



look tasteful and tidy. It should attract and inspire goodness. Shops signs should not overwhelm the original features of an historic building. Leaseholders should be given rules and restrictions in this regard. I cannot imagine who would pass yet another Gaming Centre here. Honestly. This is wrong for so many reasons I sincerely hope all objections will be respected and Gaming Slots are not allowed to destroy another neighbourhood.

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#### **Resident Rep 91**

Cricklewood is a small community enriched with religious backgrounds and strong believers. Already within 200 meters from the site, Cricklewood has two gambling establishments besides regular quiz nights in local pubs and one or two clubs. The proposed site is only 50 meters away from the biggest mosque, which serves as an old people gathering place, holds religious ceremonies, and functions as well as a semi-educational. Many children of various backgrounds come daily afternoon to learn the Quran and basic Islam. There are four schools for minors and teenagers in the area. It seems the applicant does not consider the well-being of the residents which going to increase when the new development for the house matures. Please do not forget this site is on the edge of Barnet, Brent and Camden borders. Therefore, members of the committee may not be aware of the reality on the ground. Certainly creating unhealthy conditions will not be acceptable to local residents on social and moral grounds., Cricklewood already cannot breathe because of heavy middle-range criminal activities present in the area. I failed to understand why planning officers even bother to accept this kind of development which is harmful for everybody and for everyone. Cricklewood be better off without gambling establishments and similar kinds of business establishments... Even the location of the site is unsuitable because of its surroundings. Traffic and pedestrian movements, children catching school busses and attending local schools. So, I am strongly opposing this development. I therefore appeal to officers, members and others to please help us to prevail in sanity and pleasantness in the area.

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#### **Resident Rep 92**

Will inevitably have a detrimental on people using the venue leading to gambling addiction and associated psychological and economic problems. Why is the council even considering this application. How does it enrich the area or local community?

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#### **Resident Rep 93**

This is an appalling decision that this is even being considered. The number of gambling shops and bingo halls in the area has attracted significant problems in the area including drug usage, problem drinking, irresponsible gambling and crime. What are you even thinking Brent council? Massive objection from me

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#### **Resident Rep 94**

Unbelievable with gambling place opposite and bingo nearby already. Please stop dumping this stuff on poor Cricklewood!

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#### **Resident Rep 95**

There are enough gambling facilities in this area already. I do not see we need another one in the old Barclays Bank so I object to this.

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#### **Resident Rep 96**

We do not need yet another gambling location in this family neighbourhood

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#### **Resident Rep 97**

There is already Merkur Bingo Hall, aswell as Admiral gaming centre in Cricklewood there is no need for another of these establishments. If the above can prove that the existing 2

places get overcrowded with people wanting to lose their money, then there is justification for another such premises.

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#### **Resident Rep 98**

What do betting shops bring to the area or the community? I'm yet to see a positive return from such establishments, and all they achieve is siphoning money from the vulnerable. Cricklewood lane already has plenty of betting shops (in fact I would go so far as to say too many). What does golden slots add to the area that is not already there? There have been many studies correlating density of betting shops to crime, I have attached one such example: <https://www.tandfonline.com/doi/full/10.1080/00343404.2022.2159355> With new housing on the horizon, more betting shops won't make the area more appealing. In fact number of betting shops correlates with depravity in the area. Is this the image we want to project of Cricklewood? London's answer to Atlantic City, but much more depressing? We should use such high street units for small businesses, and services that offer something to the community - not big business out to exploit.

<https://www.theguardian.com/society/2021/aug/23/uks-most-deprived-areas-have-highest-number-of-gambling-outlets-report> <https://www.bbc.co.uk/news/business-58300899>

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#### **Resident Rep 99**

I live in front of the place and we already have many gambling places that is making the area feel unsafe with a lot of antisocial behaviour happening around the door of these places. Please, reevaluate how such a premium location can be used for something useful for the community that can help bring more family friendly businesses in the area. Thank you

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#### **Resident Rep 100**

I am a resident of Willesden and I vehemently oppose and object to the opening of a gambling establishment at this address. The area from Willesden to Cricklewood is notoriously becoming more and more dangerous with criminal activity such as robberies and drug offences being committed in daylight. Gambling shops bring additional problems such as alcoholism and antisocial behaviour as people gather around near these places. Research from Nottingham Trent University has recently revealed that the number of betting shops in an area correspond to higher crime rates. Specifically, crime was shown to increase by 4% for each betting shop unit opened in an area, even when controlling for other factors. This alone, is enough reason to oppose the opening of betting shops in our area, particularly because Brent is one of the most deprived and poor borough in London. And it is well known that betting shops prey on the poorest areas because poor, vulnerable people are more likely to use these places. The community doesn't need anymore gambling shops to attract antisocial behaviour and gatherings. It is unethical to open up a gambling shop in one of our poorest boroughs during a cost of living crisis. The council should not be encouraging this.

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#### **Resident Rep 101**

I continue to be opposed to this application to turn this lovely building into another gambling/gaming premises.

Such a business does nothing to enhance our local neighbourhood or the services that a growing community needs. Furthermore with the current cost-of-living crisis, such venues are more likely to contribute to the financial hardship of those desperate to turn to gambling and gaming to improve their financial situation.

With the additional residential properties coming with the renovation of the Barnet-side B&Q site and also the Brent Matalan site, there will surely be more socially-acceptable and important businesses seeking to establish a base in Cricklewood.

I hope you will decline this application.

Kind regards

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### **Resident Rep 102**

There already so many gambling joints on cricklewood high street. This has negative impact and attract anti social elements.

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### **Resident Rep 103**

There is ample research on the association between a clustering of gambling premises and high deprivation, and even evidence for a negative individual and societal impact of introducing an additional gambling premise to a local area (see Pérez et al 2021, Journal of Gambling Studies; Hall et al 2021, Geography). Restrictions on general availability of establishments prevents individual and societal harm more so than the selective measures suggested by the operators that e.g. prevent gamblers from overspending (see Sulkunen et al 2020, Addiction). There is already a high density of gambling premises within 100 metres of the proposed site (e.g. 160, 163, 167 Cricklewood Broadway), as well as within the wider local area. Therefore, my main objection to the planned application is that there are too many gambling premises in close proximity. Second, the introduction of another gambling premise would have negative impacts on current and future residents. More generally, this prominent address should be used for a business or service that provides greater economic and social benefits to the wider community

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### **Resident Rep 104**

Dear Business Licence team

Golden Slots (Southern) have applied for a gambling premises licence for an **adult gaming centre** in the old Barclays Bank at 169-171 Cricklewood Broadway.

I object to the proposed development for the following reasons:

1. it would further degenerate the already vulnerable Cricklewood Broadway with further issues such as littering (the road is already very hard to keep clean and tidy), drinking (we see often people drinking alcohol whilst smoking outside other gaming/gambling centres and begging (people will be approach whilst taking cash in the near ATM offered by Santander).
2. Most of the users will be people who are already financially vulnerable. It is well known that gambling attraction ultimately leads households to financial ruin. The area is also home to vulnerable (often young)adults in accommodation arranged through social services or other care authorities. These people could be attracted by the new gaming centre and further increase the risk or financial ruin. The Gambling Act 2005 demands special protection for such young and other vulnerable people and this should be taken into consideration.
3. The footfall generated by gaming centre patrons would intimidate people who will not use the high street as it should be used. This is already a problem in Cricklewood Broadway where after dark woman and kids do not feel safe. Groups of men often stand by bars, shops in group, often drinking alcohol and/or smoking, vaping, talking loudly or worse fighting.
4. It is an undisputable fact that besides slot machines themselves being addictive, they often act as a gateway towards betting shops and other forms of gambling addiction, which are proven to lead to major mental health & family problems & all manner of untold misery.
5. Evidence from other areas suggests an increased risk of all manner of theft ranging from shoplifting to muggings & burglaries or far worse. Check with the police the data regarding this crimes in Cricklewood Broadway that confirms that the situation on this street is already extremely bad.

6. There are enough gaming / bookmakers / Bingo in Cricklewood and the need for more is complete unnecessary (5/6 within a 200m radius if I am not mistaken). The demographic in this area has already enough options in the area in this category (gaming, betting, bingo and so forth...).
  7. With reduced police presence on our streets, I'm really struggling to see what positives (other than profits for the stakeholder and for those that use these businesses to clean money from crimes) this offers to the local community.
  8. The unit should be used for a retail unit to enhance and extend the shopping experience of the High Street. We need shops that attract families to the High Street. The proposed use would be detrimental to Cricklewood and local people due to the attraction of undesirable people and further crime.
  9. It will deter any other business to look to open in the area as historically these places have dodgy individuals frequenting them. Also the plan to open 24 hours will require an increase of police and late night disturbances for the local residents.
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### **Resident Rep 105**

Dear Sir/Madam,

Please find attached a letter of objection regarding Application 30828 for the gambling license of Golden Slots at 169 - 171 Cricklewood Broadway from NorthWestTWO Residents' Association.

Here it is as well in case there is difficulty in opening the document.

NorthWestTWO Residents' Association objects to the application made by Golden Slots (Southern) Limited for a gambling premises license for an adult gaming centre at the old Barclays Bank location on 169 - 171 Cricklewood Broadway. There is widespread opposition from local residents regarding this application.

The junction of Chichele Road and the Broadway is a major route for buses used by school children from many local schools; Mora Primary School, Our Lady of Grace Catholic infant and nursery school, Anson Primary School just to name but a few. Gambling, which is a very addictive habit, is a real threat to the mental health and wellbeing to our children and young adults.

What concerns many of our local residents is an obvious lack of need for yet another adult gaming centre. There are already a significant number of gambling establishments in Cricklewood. For example, there is William Hill, Paddy Power and Star Sports, all within 100 meters of each other with Ladbrokes and Coral a little further down the road. In addition, we have Merkur Bingo at 200 Cricklewood Broadway and Admiral Casino at 160 Cricklewood Broadway, directly opposite from the old Barclays Bank.

There is no benefit for, yet another adult gambling centre can bring to our community. It neither serves nor improves the lives of our local residents.

Unfortunately, Cricklewood suffers from considerable crime. Adding more gambling centres does nothing to alleviate this problem. In fact, it exacerbates it. In 2024, close to 200 crimes have already been reported. Almost 100 were close to the old Barclays Bank which is located in the A5 corridor. At the recent SNT Ward Panel Meeting in December 2023, the Cricklewood and Mapesbury Safer Neighbourhood Team advised that Cricklewood Broadway and Chichele Road is a hotspot for violence on the streets which filters into the neighbourhood. Granting this license, which the applicant is requesting for 24/7 opening, will

only add to a possible increase of crime and antisocial behaviour potentially driving vulnerable people to live in more difficult circumstances.

Crimes of such nature are having a devastating effect on families in our community. For this reason alone, granting Golden Slots this application has little benefit to our neighbourhood.

We need more valuable amenities. For example, Mill Hill has effectively transformed some their former banks into successful restaurants - whereas we turn ours into gambling houses.

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We at NorthWestTWO and other groups in our community, work hard to try and make Cricklewood a healthy and vibrant place to live.

We appeal to Brent Council to reject this application and in doing so help us at NorthWestTWO, and other local organisations, improve the wellbeing of our young people, our local residents, and everyone connected to our community.

Thank you and kind regards,

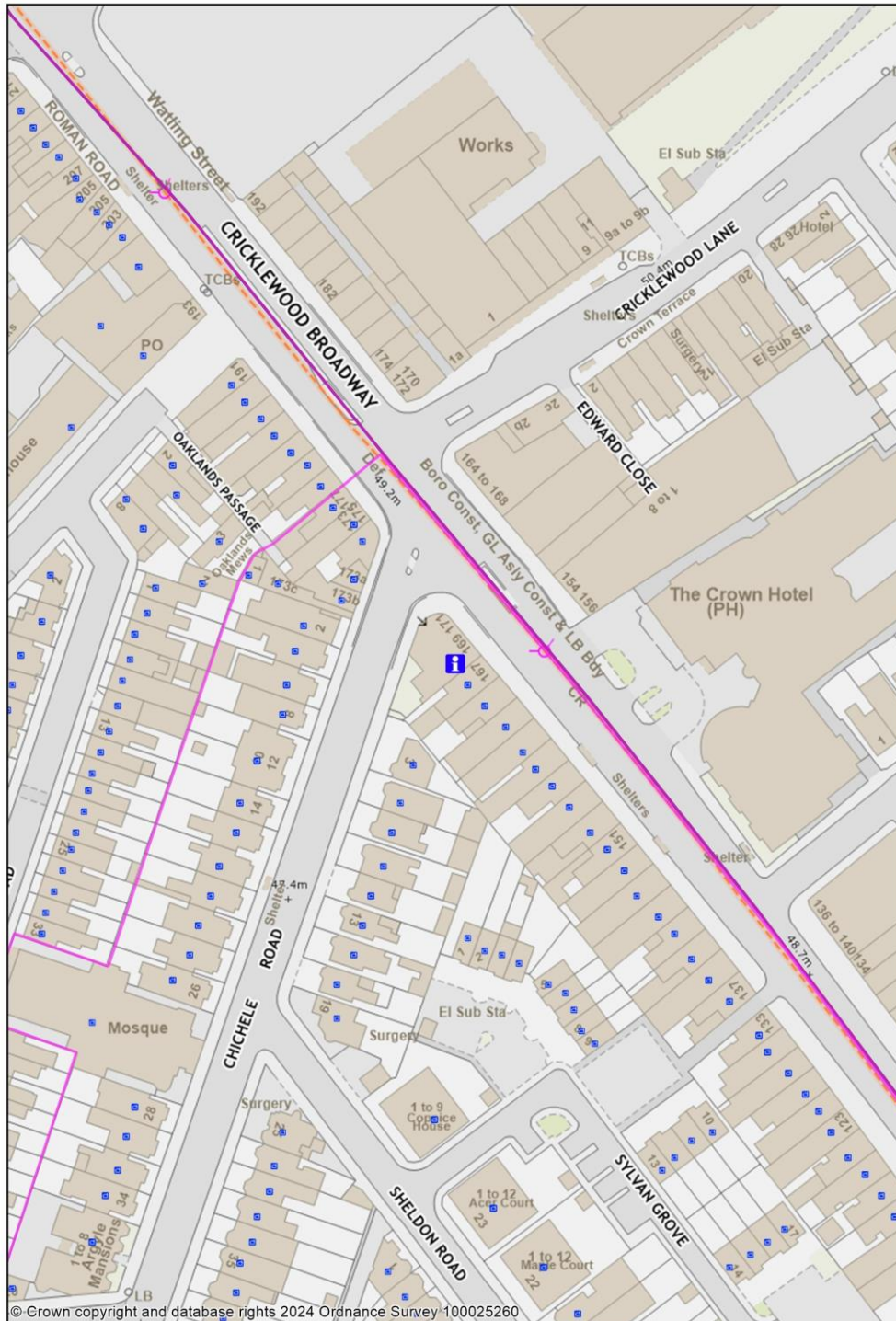
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**Resident Rep 106**

I object to this as there are already two 24 hour gaming establishments within 200 meters of the proposed establishment and several other gaming stores in nearby Willesden Green.

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Basemap Map



1:1250

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