



Alcohol and Entertainment Licensing Sub-Committee

Wednesday 17 June 2026 at 10.30 am

Boardrooms 1 & 2, 3rd Floor, Brent Civic Centre

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:

P Ahmed (Chair)

Substitute Members:

Councillors:

Aden, Burn, Mahmood, Clinton, Do Rosario,
Chowdhury, Mulaisho, Alexandre, Vakani

Councillors:

Councillors:

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

For electronic copies of minutes and agendas please visit:
[Council meetings and decision making | Brent Council](#)

Notes for Members - Declarations of Interest:

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

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

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

***Disclosable Pecuniary Interests:**

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

****Personal Interests:**

The business relates to or affects:

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

or

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

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

Agenda

Introductions, if appropriate.

Item	Page
1 Apologies for absence and clarification of alternate members	
2 Declarations of Interests	
Members are invited to declare at this stage of the meeting, the nature and existence of any relevant disclosable pecuniary or personal interests in the items on this agenda and to specify the item(s) to which they relate.	
3 Application for an Adult Gaming Centre by 312 Investments Ltd for the premises known as Vault Casino, 574 High Road, Wembley, HA0 2AA, pursuant to the provisions of the Licensing Act 2003	1 - 326

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. Alternatively, it will be possible to follow proceedings via the live webcast [HERE](#)

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Gambling Act 2005

Application for an Adult Gaming Centre

1. The Application

Name of Applicant:	312 Investments Ltd
Name & Address of Premises:	Vault Casino, 574 High Road, Wembley, HA0 2AA
Applicants Agent:	Hough & Bollard Ltd – Debbie Bollard

The application is for an Adult Gaming Centre.

2. Background

None

3. Relevant Representations

Representations were received and withdrawn from the Police and Licensing Officers.

Representations remain outstanding from Councillors, Members of Parliament, Public Health 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: **312 Investments Limited**

7. The applicant's registered or principal address: **Grovedell House, 15 Knightswick Road, Canvey Island, Essex,**

Postcode: **SS8 9PA**

8(a) The number of the applicant's operating licence (as given in the operating licence):
067529-N-341548-001

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

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

Part 3 – Premises Details

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

11. Address of the premises (or, if none, give a description of the premises and their location): **574 High Road, Wembley**

Postcode: **HA0 2AA**

12. Telephone number at premises (if known):

13. If the premises are in only a part of a building, please describe the nature of the building (for example, a shopping centre or office block). The description should include the number of floors within the building and floor(s) on which the premises are located.
The premises will occupy the ground floor of a 4 story building.

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

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

Part 4 – Times of Operation

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

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

	<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? **No**

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

20. Please set out any other matters which you consider to be relevant to your application: **The Applicant has included a copy of its Policies and Procedures with the application**

The Applicant considers the following conditions appropriate to be attached to the Premises Licence

CCTV

1. The venue shall install and maintain a comprehensive CCTV system at the premises as per the minimum requirements of the Metropolitan Police Licensing Team. This system should cover:

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

2) The CCTV system shall continually record whilst the venue is open for licensable activities and during all times when customers remain on the premises. All recordings shall be stored for a minimum period of thirty one days with date and time visible.

Recordings shall be immediately arranged by a member of staff for handover to Police or authorised officer following their request.

3. Notices indicating that CCTV is in use at the premises shall be placed at or near the entrance to the premises and within the premises.

4. A monitor shall be placed inside the premises above the front door showing CCTV images of customers entering exiting the premises.

Children and Young People

5. 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.

6. The licensee shall maintain a bound and paginated or electronic refusals register at the premises. The register shall be produced to the police or licensing authority forthwith upon request.

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

8. 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.

Staffing levels

9. There will be a minimum of two members of staff at all times, with one member of staff a licensed SIA operator at night time.

10. Staff shall continuously monitor customer activity when they are in the premises.

Identification of Offenders or Problem Persons

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

12. No alcohol shall be permitted to be consumed on the premises at any time during which facilities for gambling are being provided on the premises.

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

Seating

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

Alarms

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

16. The premises shall install and maintain a panic button behind the cashiers counter.

Toilets

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

Signage, Promotional Material and Notices

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

Staff Training

19. The licensee shall provide training on the specific local risks to the licensing objectives that have been identified for these premises as part of the staff induction

training programme. periodically provide refresher training to all of its staff working at these premises on the specific local risks to the licensing objectives.

20. The Licensee shall train staff on specific issues related to the local area and shall conduct periodic refresher training. Participation in this training shall be formally recorded and the records produced to the police or licensing authority upon request.

21. New and seasonal staff must attend induction training and receive refresher training every six months. Participation in this training shall be formally recorded on each member of staffs training records which, if requested will be presented to the Licensing Authority as soon as practicable.

Homeless and Street Drinking

22. 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.

23. 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

24. 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

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: **08/04/2026** Capacity: Licensing Consultant

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

Signature:

Print Name:

Date: 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**

LOCAL GAMBLING RISK ASSESSMENT

Premises: 574 High Road Wembley HA0 2AA

Operator: 312 Investments Ltd

Operating Licence: 067529-N-341548-001

Prepared by: 7th April 2026

Date: M Davitt

Introduction

This Local Area Risk Assessment (LARA) has been prepared in accordance with:

- Gambling Act 2005
- Gambling Commission Guidance to Licensing Authorities
- Licence Conditions and Codes of Practice (LCCP)
- London Borough of Brent Statement of Gambling Policy (latest version)

This assessment identifies local risks associated with the operation of an Adult Gaming Centre and demonstrates how those risks are mitigated through robust operational controls.

The assessment will be reviewed:

- Annually
- Following any significant local or operational changes
- Prior to any variation or new premises licence application

Licensing Objectives

The Gambling Act 2005 sets out three licensing objectives:

1. Preventing gambling from being a source of crime or disorder
2. Ensuring gambling is conducted in a fair and open way
3. Protecting children and vulnerable persons from harm or exploitation

This risk assessment has been prepared with these objectives at its core.

Requirement to Comply

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

Social responsibility code provision 10.1.1

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

Ordinary code provision 10.1.2

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

Premises

The Premises is located on the ground floor of a 4-storey building previously occupied by a William Hill Betting shop and is sited on a busy high street in Wembley with a mixture of retail, hospitality, takeaways, and financial institutions, many of which have residential premises above. It sits between a licensed bar and Corals betting shop to one side and a money transfer shop and bank to the other; almost immediately opposite is another AGC, Silvertime Casino Slots that operates multiple sites across London, including 3 in close proximity.

Behind the High Street on both sides are residential areas with a mixture of terrace and detached/semi detached housing and green spaces including Barham Park, King Edward Park, and One Tree Hill Recreation Ground. Close by is also Wembley Stadium.

The site sits in the Ward of Wembley Central in the London Borough of Brent, an ethnically diverse with over 86% of the population from BAME backgrounds (Census 2021).

The site has previously been occupied as a betting shop (William Hill) and The premises is located in close proximity to both a train station and a number of bus stops that. The area around the site experiences significantly more footfall during football stadium as a result of its proximity to Wembley Stadium. Its also located in relatively close proximity to Trader Wembley which increase the number of individuals who will be in the area.

Suitability of the Premises

The premises was previously operated as a betting shop and is located within an established commercial area.

The proposed operation as an Adult Gaming Centre:

- Is restricted to persons aged 18 and over
- Does not permit access to alcohol
- Is continuously staffed
- Does not encourage external congregation

As such, the use is considered appropriate for the location and represents a controlled and supervised environment.

Local Authority Policy Context

The premises is located within the London Borough of Brent. The Council's Statement of Gambling Policy requires operators to assess local risks, particularly

in relation to deprivation, crime, and proximity to vulnerable groups.

While Brent does not designate formal Gambling Vulnerability Zones in the same way as some boroughs, the area of Wembley Central is recognised as a high footfall urban environment with indicators of deprivation and crime that require enhanced safeguarding measures.

This assessment has been prepared in line with the London Borough of Brent's Statement of Gambling Policy, with particular regard to the protection of vulnerable persons, local deprivation indicators and cumulative impact considerations

Demographics

Demographic data is primarily based on the 2021 Census published by the Office for National Statistics (ONS), supplemented where appropriate by more recent population estimates.

Central Wembley has a population of around 18,558 (according to the 2024 ONS) with an estimated number of 4,930 households. 44.1% of which have 4 or more people living in them (compared to England's average of 19.9%), 17.6% having 3 people (compared to England's average of 16%), 19.9% having 2 people and 18.4% having 1 person (Compared to England's average of 34% and 30.1%). Of these 4,930 households only 31.8% of them are not deprived in any dimension (which is much lower than the average of 48.4%) whereas 40.1% (average 33.5%) are deprived in 1 dimension, 21.9% (average 14.2%) are deprived in 2 dimensions, 5.7% (average 3.7%) are deprived in 3 dimensions and 0.6% (average 0.2%) are deprived in 4 dimensions.

According to the 2021 ONS data, 58.7% of the population are economically active and in employment, 4.9% are economically active but unemployed while 36.5% are economically inactive. Data shows that of those who are currently employed, 9.5% work 15 hours or less (part-time), 18.6% work 16-30 hours (part-time), 64.9% work 31-48 hours (full-time) and 7% work 49 hours or more (full-time).

The area is predominantly Asian (69.7%) with Hinduism being the most practiced religion (46.2%) with Christianity being behind that (27.3%). Despite that, the majority of the residents (51.6%) have English as their main language while a combined total of over 30% know English well or very well.

Vulnerability Considerations

The relatively high levels of deprivation and economic inactivity in the area are recognised risk factors for gambling-related harm.

The operator has taken this into account by implementing:

- Safer gambling policies
- Staff training to identify vulnerable customers
- Access to support services and self-exclusion schemes

Cultural Considerations

The area has a highly diverse population with a range of languages and cultural backgrounds.

To ensure accessibility and protection:

- Staff are trained in inclusive communication
- Customers are signposted to support services
- Multilingual support resources are made available where appropriate

Wembley Central

Population

2024

18,558

people

58,620,101 people in England

Source: ONS - Mid-year estimates

Small area: Output area

Number of households

2021

4,930

households

23,436,085 households in England

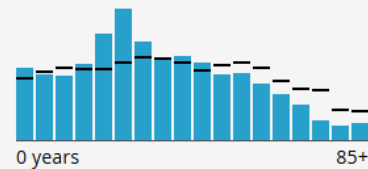
Source: ONS - Census 2021

Small area: Output area

Age profile

2024

■ Wembley Central — (England)



Source: ONS - Mid-year estimates

Small area: Output area

Household composition

2021

■ Wembley Central | (England)

One person household **18.3%** (30.1%)

Single family household **53.0%** (63.0%)

Other household types **28.7%** (6.9%)

% of all households

Source: ONS - Census 2021

Small area: Output area

Household deprivation

2021

■ Wembley Central | (England)

Household is not deprived in any dimension **31.8%** (48.4%)

Household is deprived in one dimension **40.1%** (33.5%)

Household is deprived in two dimensions **21.9%** (14.2%)

Household is deprived in three dimensions **5.7%** (3.7%)

Household is deprived in four dimensions **0.6%** (0.2%)

% of all households

Source: ONS - Census 2021

Ethnic group

2021

■ Wembley Central | (England)

Asian, Asian British or Asian Welsh **69.7%** (9.6%)

Black, Black British, Black Welsh, Caribbean or African **10.2%** (4.2%)

Mixed or Multiple ethnic groups **2.3%** (3.0%)

White **12.0%** (81.0%)

Other ethnic group **5.8%** (2.2%)

% of all people

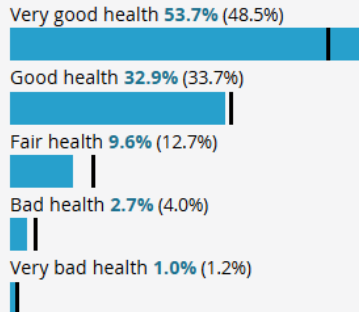
Source: ONS - Census 2021

Small area: Output area

General health

2021

Wembley Central (England)



% of all people

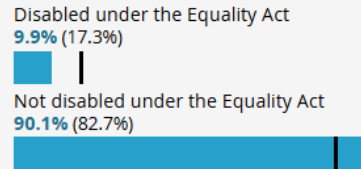
Source: ONS - Census 2021

Small area: Output area

Disability

2021

Wembley Central (England)



% of all people

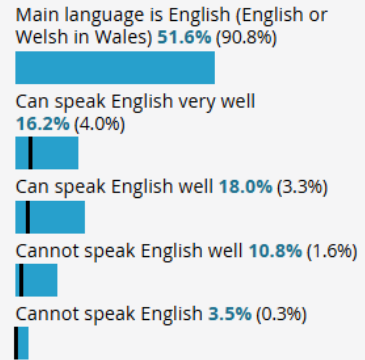
Source: ONS - Census 2021

Small area: Output area

Proficiency in English

2021

Wembley Central (England)



% of people aged three years and over

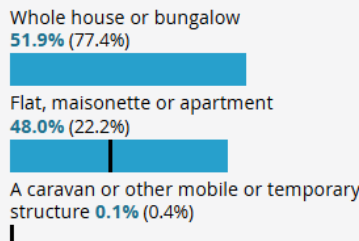
Source: ONS - Census 2021

Small area: Output area

Accommodation type

2021

Wembley Central (England)



% of all households

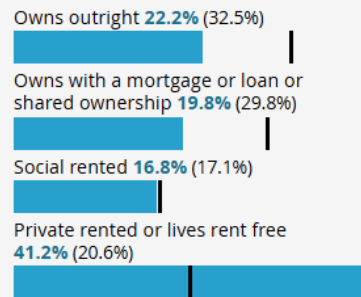
Source: ONS - Census 2021

Small area: Output area

Tenure of household

2021

Wembley Central (England)



% of all households

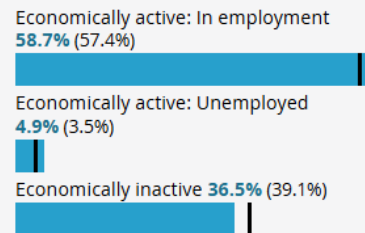
Source: ONS - Census 2021

Small area: Output area

Economic activity status

2021

Wembley Central (England)



% of people aged 16 years and over

Source: ONS - Census 2021

Small area: Output area

Employment history

2021

Wembley Central (England)

Not in employment: Worked in the last 12 months **16.1%** (13.2%)



Not in employment: Not worked in the last 12 months **36.1%** (61.1%)



Not in employment: Never worked **47.8%** (25.6%)



% of people aged 16 years and over not in employment

Source: ONS - Census 2021

Small area: Output area

Socio-economic Classification (NS-SeC)

2021

Wembley Central (England)

L1, L2 and L3: Higher managerial, administrative and professional occupations **6.9%** (13.2%)



L4, L5 and L6: Lower managerial, administrative and professional occupations **12.1%** (19.9%)



L7: Intermediate occupations **8.0%** (11.4%)



L8 and L9: Small employers and own account workers **10.3%** (10.6%)



L10 and L11: Lower supervisory and technical occupations **5.3%** (5.3%)



L12: Semi-routine occupations **12.5%** (11.3%)



L13: Routine occupations **19.9%** (12.0%)



L14.1 and L14.2: Never worked and long-term unemployed **15.1%** (8.5%)



L15: Full-time students **9.9%** (7.7%)



% of people aged 16 years and over

Source: ONS - Census 2021

Small area: Output area

Highest level of qualification

2021

Wembley Central (England)

No qualifications **30.0%** (18.1%)



Level 1, 2 or 3 qualifications **31.1%** (39.9%)



Apprenticeship **3.3%** (5.3%)



Level 4 qualifications and above **30.3%** (33.9%)



Other qualifications **5.3%** (2.8%)



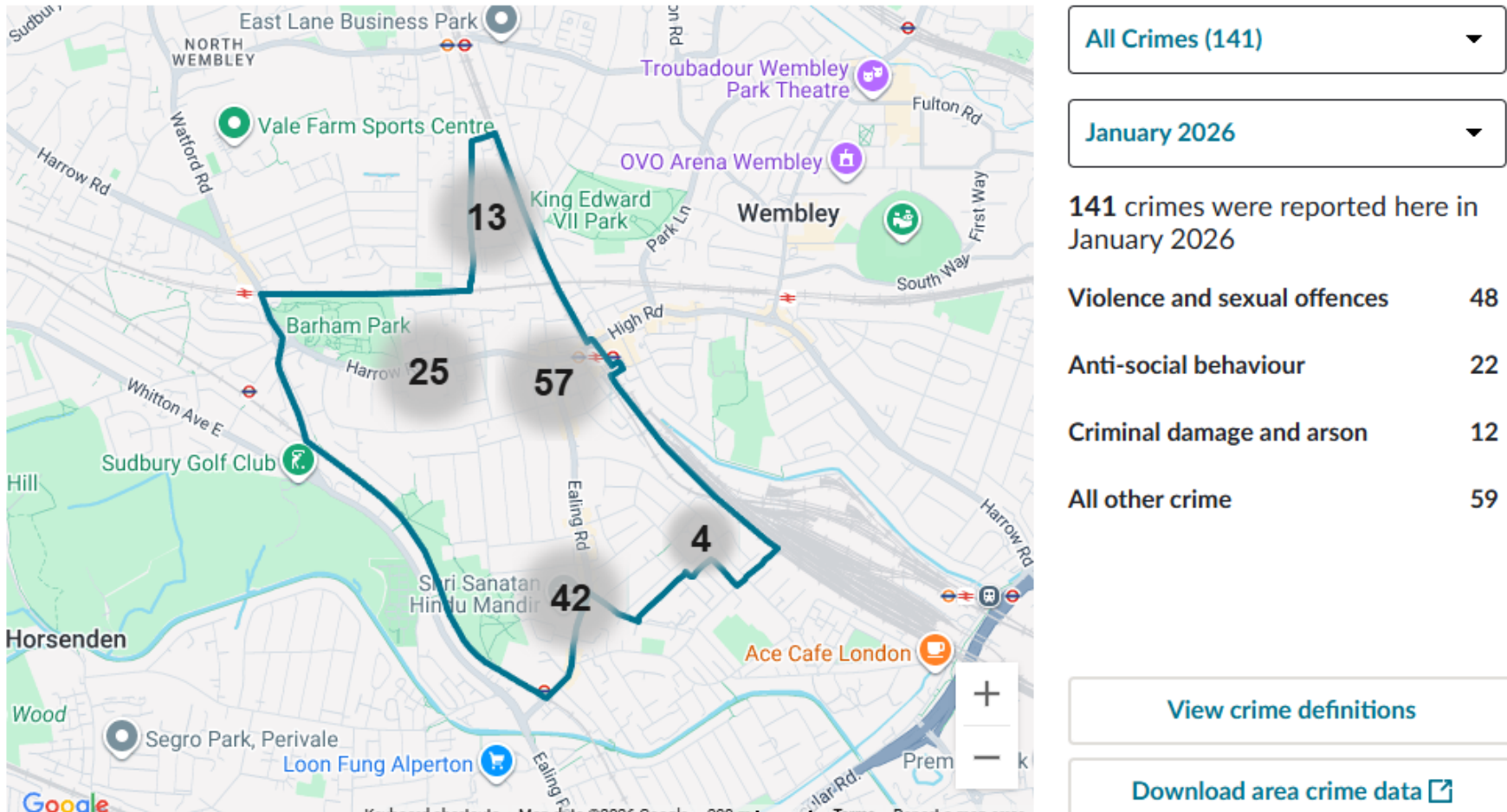
% of people aged 16 years and over

Source: ONS - Census 2021

Small area: Output area

Crime data has been considered using publicly available sources including Police.uk and local authority data. The area reflects crime levels typical of a busy metropolitan high street with high footfall and transport connectivity.

The operator will maintain ongoing liaison with the Metropolitan Police and monitor local crime trends to ensure controls remain effective.



Crime Assessment Summary

The level and type of crime recorded in the area is consistent with a busy metropolitan high street with high footfall and transport connectivity.

There is no direct evidence available to the operator to indicate that gambling premises are a primary driver of crime in the area. However, the operator recognises the elevated baseline risk and has implemented measures including staff supervision, CCTV and incident reporting protocols to mitigate potential impacts.

Brent has a Boroughwide restrictions including

- the consumption of alcohol in public places to cause alarm, distress and harassment
- the use of illegal drugs or psychoactive substances
- public health nuisance including urination, defecation, spitting including paan spitting
- aggressive begging

Risk Interpretation

The presence of schools, community facilities, support services and high footfall areas increases the likelihood of:

- Exposure of children to gambling environments
- Interaction with vulnerable individuals
- Increased risk of anti-social behaviour

These risks are typical of busy high street locations and are not caused by gambling premises themselves. However, they require appropriate mitigation through strong operational controls.

RISKS	RISK LOCATION	EXISTING CONTROL MEASURES	FURTHER CONTROLS ADPOTED
Children entering the site unnoticed or unchallenged particularly after school	<p>Primary Schools:</p> <p>Park Lane Primary School 0.6 miles</p> <p>Elsley Primary School 0.9 miles</p> <p>Sudbury Primary School 1.0 miles</p> <p>Lyon Park Primary School) 1.0 miles</p>	The latest gambling participation survey (2024) reports the most common types of gambling activity that young people participated in were legal such as penny pushers or claw grab machines (20%), 4% played on fruit or slot machines and did not feature age restricted products.	All staff shall receive documented training in gambling harm awareness, vulnerability identification, customer interaction and intervention, prior to being permitted to work unsupervised.

<p>and during school holidays</p>	<p>Wembley Primary School 1.1 miles Oakington Primary School 1.2 miles Preston Park Primary School 1.9 miles Chalkhill Primary School 1.9 miles Brentfield Primary School 2.0 miles</p> <p>Secondary Schools/University/College:</p> <p>Regent College London 0.2 miles Alperton Community School 0.8 miles Alperton Community School(US)0.8 miles Woodstock 0.8 miles Brookwood College 1.4 miles London School of Int. Business 1.5 miles Westfield College 1.6 miles The Stonebridge School 1.9 miles</p> <p>Facilities for the homeless (including hostels) and potentially vulnerable persons are located at:</p> <p>Safe Start Foundation 0.2 miles Cheerful Minds 0.7 miles SNG 0.9 miles The Shelter Scheme 1.0 miles Nick Broderick 1.0 miles Brent Housing 1.1 miles Fresh Horizons 1.1 miles Brent Health Services 1.1 miles Geoff Johnson 1.4 miles Sufra NW London 1.5 miles</p>	<p>The site is strictly 18+ and the Operator has a Think 25 policy in place. Staff age verification training is delivered, with staff receiving training on induction and at least annually. Additional/remedial training is given when considered necessary. There is only one entrance/exit from the High Street which is effectively monitored by staff at all times from the customer service desk. The site frontage is designed to obscure the interior so as not to be attractive to children Over 18s notices are clearly displayed at entrance to the Premises Age verification checks are carried out on anyone who appears to be under the age of 25 and anyone unable to verify their age is asked to leave immediately. Stakes are returned to anyone who has played a machine and unable to verify their age Age test purchasing is undertaken at least four times per year and the results are reported to Gambling Commission. Any failure will be reviewed by senior management and additional training put in place. Further testing will be arranged asap Clear and prominent premises signage and machine labelling</p>	<p>Refresher training shall be undertaken at least annually and recorded.</p> <p>The premises shall operate a strict Challenge 25 policy. No person under the age of 18 shall be permitted to enter the premises. Age verification refusals shall be recorded and made available to the Licensing Authority.</p> <p>A comprehensive safer gambling framework shall be implemented, including staff-led interaction, time and spend awareness prompts, and procedures for intervention where indicators of harm are identified.</p> <p>The premises shall participate in all applicable self-exclusion schemes. Staff shall be trained to identify and manage self-excluded persons in accordance with Gambling Commission requirements.</p> <p>Clear and prominent gambling harm signage shall be displayed internally in multiple languages reflective of the local demographic profile.</p> <p>Management and staff shall apply heightened awareness and monitoring during recognised payday and benefit</p>
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	<p>My Time to Heal 1.6 miles Dr Leon Rozewicz 2.0 miles</p> <p>Care Homes:</p> <p>Beechwood Court Care Home 0.2 miles West Side Homes 0.3 miles Coplands Care Home 0.4 miles Real Life Options 0.5 miles Pettsgrove Care Home 0.6 miles Viola House 0.6 miles Care With Hope Ltd 0.7 miles Lee Valley Care Services 0.8 miles Park Lane Residential Home 0.9 miles Haven Care Home 1.0 miles Active Care & Support 1.1 miles Brook House Care Centre 1.2 miles Tulsi House 1.3 miles Dream Home Care Ltd 1.3 miles Buchanan Court 1.8 miles</p> <p>Job centre/employment agencies in the close area:</p> <p>JJ Recruits Limited 0.1 miles The Best Connection Wembley 0.2 miles Wembley Jobcentre Plus 0.5 miles</p> <p>Family Service Centres/Community Centres:</p> <p>St John’s Community Centre 0.2 miles Muslim Welfare Centre 0.3 miles</p>	<p>The premises is located within immediate proximity (0.1–0.5 miles) of employment support services, including Jobcentre Plus and multiple recruitment agencies located along Wembley High Road. These provide accessible pathways into employment and support services, which mitigate risks associated with economic vulnerability</p> <p>The premises is located within close proximity (0.2–1.5 miles) of multiple family service and community centres, including St John’s Community Centre, Alperton Family Wellbeing Centre and Brent Indian Community Centre. These facilities provide access to social support, family services and community engagement opportunities, which contribute to mitigating risks associated with vulnerability</p>	<p>payment periods, with increased staff interaction where appropriate</p> <p>No promotional activity, inducement-based advertising or incentives shall be displayed externally or in a manner that encourages impulse gambling.</p> <p>All incidents, refusals, interventions and complaints shall be recorded in an incident log. The operator shall maintain appropriate liaison with the Police and Licensing Authority.</p> <p>Staff shall actively monitor customer behaviour for indicators of extended or harmful gambling and intervene in accordance with documented procedures.</p> <p>The premises frontage shall remain neutral in appearance with obscured internal views. Internal layout shall ensure full staff supervision of all customer areas.</p> <p>A designated premises manager shall be responsible for compliance with all licence conditions and operational controls.</p>
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<p>Brent Indian Centre 0.4 miles Alperton Community Centre 0.8 miles Tokyngton Community Centre 1.2 miles Preston Park Family Centre 1.5 miles Chalkhill Community Centre 1.5 miles</p>		
<p>Parks, play grounds and sports/leisure facilities:</p> <p>Barham Park 0.5 miles Sports Field 0.5 miles King Edward VII Park 0.6 miles Sudbury Golf Club 1.0 miles Children’s Play Area 1.0 miles Wembley Stadium 1.1 miles Party World of Play 1.2 miles Vale Farm Sports Centre 1.2 miles Wembley Field 1.2 miles Wembley Football Club 1.4 miles Grove Farm, Ealing 2.0 miles</p>	<p>The proximity of these facilities presents the following potential risks in relation to the licensing objectives:</p> <p>Exposure of children and young persons to the presence of a gambling premises when travelling to and from recreational areas. Increased footfall of families and young people, particularly during school holidays and weekends. Potential for attempted underage access, especially during peak recreational periods. Increased general footfall during events, potentially leading to higher levels of anti-social behaviour in the wider area.</p> <p>Transient customer base, particularly during major events at Wembley Stadium, reducing familiarity with regular customers. These risks are typical of busy urban environments and are not directly caused by the operation of the premises but require appropriate mitigation.</p>	<p>The operator has implemented the following controls to mitigate identified risks:</p> <p>The premises operates a strict over-18s policy, with no access permitted to children at any time. A Challenge 25 age verification policy is in place, with ID required from any individual who appears under 25. Clear and prominent signage is displayed at the entrance stating that the premises is strictly for over-18s only. The premises frontage is designed to obscure internal views, reducing visual attraction to children and young persons. The premises is continuously staffed, with clear sightlines enabling effective monitoring of all customers entering and exiting. Staff receive comprehensive training in age verification and safeguarding, including recognising and challenging underage individuals Incident and refusal logs are maintained and regularly reviewed .The premises does not offer alcohol or external seating,</p>
<p>Entertainment venues:</p> <p>BOXPARK Wembley 0.7 miles London Designer Outlet 0.8 miles MeetspaceVR Wembley 0.9 miles Pop Golf Wembley 0.9 miles OVO Arena Wembley 1.0 miles Bubble Planet London 1.0 miles Macaroni Penguin Soft Play 1.0 miles Wembley Stadium 1.1 miles</p>	<p>The premises is located within close proximity (0.7–1.5 miles) of a wide range of entertainment venues, including BOXPARK Wembley, OVO Arena Wembley and Wembley Stadium. These destinations generate significant footfall, particularly during event periods, contributing to a busy high street environment. The operator has taken this into account and implemented appropriate control measures to manage associated risks</p> <p>The premises is located within close proximity (approximately 2 miles) of specialist addiction support services, including Via – New Beginnings Brent,</p>	

	<p>Vulnerable/addiction support centres:</p> <p>We Are With You (Online & Outreach) Turning Point (Online & Outreach) Alcoholics Anonymous (Various points) Be Gamble Aware (Online & Phone) DrugFAM National (remote access)</p> <p>Foodbanks/soup kitchens within the vicinity of the premises:</p> <p>Ealing Road Food Aid Hub 0.4 miles Church of God Foodbank 0.5 miles Soup Kitchens Free Meals 0.6 miles FoodCycle Wembley 0.6 miles Harvest Soup Kitchen 0.7 miles Brent Foodbank 2.0 miles Sufra NW London 2.0 miles</p> <p>Medical Centres and Mental Health facilities</p> <p>Lancelot Medical Centre 0.1 miles Chinese Medical Centre 0.2 miles S M S Medical Practice 0.5 miles Premier Medical Centre 0.5 miles Sunflower Medical Centre 0.5 miles Pearl Medical Centre 0.5 miles Wembley Centre 0.5 miles The Wembley Practice 0.5 miles Stanley Corner Centre 0.6 miles Alperton Medical Centre 0.7 miles</p>	<p>alongside access to a range of national support organisations such as We Are With You, Turning Point and Be Gamble Aware. These services provide accessible pathways for individuals experiencing vulnerability, including substance misuse and gambling-related harm, and form part of the local safeguarding framework</p> <p>The premises is located within close proximity (approximately 0.4–2 miles) of multiple foodbanks and community food services, including Brent Foodbank, Food Cycle Wembley and Sufra NW London. These services provide access to emergency food provision and community support, demonstrating the presence of established support mechanisms for individuals experiencing financial hardship or vulnerability</p> <p>The premises is located within close proximity (approximately 0.1–1.5 miles) of several medical centres, including Lancelot Medical Centre, Premier Medical Centre and the Brent GP Access Centre, alongside access to NHS mental health services such as Brent Talking Therapies and CAMHS. These facilities provide accessible healthcare and mental health support, forming part of the local safeguarding infrastructure for vulnerable individuals</p>	<p>reducing the likelihood of congregation or attraction to younger persons</p>
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<p>Park Medical Clinic 0.9 miles Preston Medical Centre 1.0 miles Wembley Park Medical Centre 1.1 miles Law Medical Group Practice 1.1 miles Preston Road Surgery 1.1 miles Sudbury Primary Care 1.2 miles NHS GP Hazeldene 1.2 miles NHS GP Pathfinder Clinics 1.2 miles Clementine Churchill Hospital 1.8 miles Brent CAMHS 2.0 miles Brent Talking Therapies (NHS) (referral)</p>		
<p>Pawnbrokers and Pay day loan shops:</p> <p>Alsayed H&T Pawnbrokers 0.1 miles Cash 22 0.1 miles iTalk Gold 0.1 miles Muthoot Pawnbrokers 0.1 miles Throwner & Co 0.1 miles Albemarle & Bond 0.2 miles Fast Credit Pawnbrokers 0.3 miles Lupra Pawnbrokers 0.3 miles</p>	<p>The premises is located within immediate proximity (approximately 0.05–0.3 miles) of multiple pawnbrokers and short-term lending providers along Wembley High Road and Ealing Road, including H&T Pawnbrokers, Cash 22 and Fast Credit Pawnbrokers. These services provide access to high-cost credit and asset-based lending, which are recognised indicators of financial vulnerability. The operator has taken this into account when implementing safeguarding measures for customers at risk of gambling-related harm.</p>	
<p>Gambling premises:</p> <p>Paddy Power >0.1 miles Coral 0.1 miles GR8ODDS Betting 0.1 miles Silvertime Casino Slots 0.1 miles Silvertime Casino Lounge 0.1 miles MERKUR Slots - 0.2 miles Jennings Bet 0.2 miles Betfred 0.2 miles</p>	<p>The premises is located within a high concentration of existing gambling venues along Wembley High Road, including multiple betting shops and adult gaming centres such as Coral, Betfred, Paddy Power, MERKUR Slots and Silver Time, all within approximately 0.05–0.5 miles. This clustering reflects the established commercial character of the area as a gambling destination. The operator has taken this into account and implemented enhanced safeguarding, supervision and responsible gambling measures to mitigate any potential cumulative impact.</p>	

Paddy Power	0.3 miles
Silvertime Casino Slots	0.3 miles
Ladbrokes	0.6 miles
Ladbrokes	1.0 miles
William Hill	1.0 miles
Coral	1.2 miles
Betfred	1.2 miles
William Hill	1.2 miles
William Hill	1.8 miles

Bus stops and other transport links

Bus Stops:

Park Lane (Stop CL)	0.2 miles
Ark Elvin Academy/Park Lane	0.3 miles
Ark Elvin Academy/Park Lane	0.3 miles
Cecil Avenue (Stop SP)	0.4 miles
Cecil Avenue (Stop SE)	0.4 miles
Wembley Triangle (Stop SM)	0.5 miles
Wembley Triangle (Stop SC)	0.5 miles
Wembley Stadium (Stop SA)	0.7 miles
Waverley Avenue	0.7 miles
Waverley Avenue	0.7 miles

Train Stations:

Wembley Central	0.2 miles
Wembley Stadium	0.6 miles
Sudbury Town	0.8 miles
Sudbury & Harrow Road	0.8 miles
North Wembley	0.9 miles
Alperton	0.9 miles

Staff maintain awareness of periods where customers may be more vulnerable to financial harm and apply appropriate interaction where indicators of risk are observed.

	<p>South Kenton 1.6 miles</p> <p>Public houses and Alcohol licensed premises</p> <p>Masti 0.1 miles The Madras Lounge 0.1 miles Vasanta Bhavan Wembley 0.1 miles Barrel & Corner 0.1 miles Zanzi Bar Corner 0.1 miles The Robin Wembley 0.3 miles J.J. Moon's 0.3 miles Arena Lounge UK 0.5 miles The Arch Wembley 0.6 miles The Corner House 0.6 miles Ipanema Restaurant & Bar 0.6 miles Bombay Chow 0.6 miles Panthers 0.7 miles Sixty Six Bar & Grill 0.7 miles TGI Fridays – Wembley 0.9 miles The Swan 0.9 miles The White House, Wembley 1.0 miles The Parish Bar 1.1 miles Feed the Yak Wembley Park! 1.1 miles</p> <p>Places of worship within half a mile</p> <p>Wembley New Masjid >0.1 miles Inner Space >0.1 miles London Nadarajar Temple 0.1 miles Cross Fellowship London 0.1 miles Wembley Central Mosque 0.2 miles Spiritualist Church 0.2 miles</p>	<p>The premises is located within immediate proximity of a range of licensed bars and restaurants along Wembley High Road, including Masti, Savannah Lounge and Barrel & Corner, all within approximately 0.05–0.3 miles. These venues contribute to a busy evening economy, particularly during weekends and event days. The operator has taken this into account and implemented appropriate measures to manage potential risks associated with increased footfall and late-night activity.</p> <p>The premises is located within close proximity (approximately 0.2–1.2 miles) of a wide range of places of worship, including Wembley Central Mosque, St Joseph's Church and Shree Sanatan Hindu Mandir. These facilities reflect the diverse religious composition of the area and contribute to regular community activity and footfall throughout the day and week</p>	
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	<p>St Joseph's Pastoral Centre 0.5 miles Shri Sanatan Hindu Mandir 0.7 miles Truth Vine Church, Wembley 0.9 miles New Life Christian Centre 1.0 miles RCCG Majesty Court of Praise 1.0 miles Wembley Christian Centre 1.2 miles Christ Jesus Healing Ministry 1.4 miles St Andrew's Church, Sudbury 1.3 miles</p>		
<p>Preventing Gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime</p>	<p>Local Police Address: 603 Harrow Road, Wembley, HA0 2HH</p> <p>Public houses and Alcohol licensed premises</p> <p>Masti 0.1 miles The Madras Lounge 0.1 miles Vasanta Bhavan Wembley 0.1 miles Barrel & Corner 0.1 miles Zanzi Bar Corner 0.1 miles The Robin Wembley 0.3 miles J.J. Moon's 0.3 miles Arena Lounge UK 0.5 miles The Arch Wembley 0.6 miles The Corner House 0.6 miles</p>	<p>Continuous staffing, CCTV, incident logging, police liaison</p> <p>Active frontage management, staff intervention, no external facilities</p> <p>Alcohol-free use, no external noise, controlled operation</p> <p>Neutral frontage, obscured internal views, no inducement advertising</p>	<p>A fully operational facial recognition CCTV system shall be installed and maintained, covering all entry points and customer areas. The premises shall be continuously staffed during all hours of operation.</p> <p>Staff shall actively manage the area immediately outside the premises to discourage loitering, nuisance or anti-social behaviour. No external seating or congregation facilities shall be provided.</p> <p>No alcohol shall be sold, supplied or consumed on the premises at any time.</p> <p>Entry and exit shall be controlled to minimise noise and disturbance. No amplified sound shall be audible outside the premises.</p> <p>A designated premises manager shall be responsible for compliance with all</p>

	<p>Ipanema Restaurant & Bar 0.6 miles Bombay Chow 0.6 miles Panthers 0.7 miles Sixty Six Bar & Grill 0.7 miles TGI Fridays – Wembley 0.9 miles The Swan 0.9 miles The White House, Wembley 1.0 miles The Parish Bar 1.1 miles Feed the Yak Wembley Park! 1.1 miles</p> <p>Pawnbrokers and Pay day loan shops:</p> <p>Alsayed H&T Pawnbrokers 0.1 miles Cash 22 0.1 miles iTalk Gold 0.1 miles Muthoot Pawnbrokers 0.1 miles Thrower & Co 0.1 miles Albemarle & Bond 0.2 miles Fast Credit Pawnbrokers 0.3 miles Lupra Pawnbrokers 0.3 miles</p> <p>Banks/ATM</p> <p>Lloyds Bank 0.1 miles Ria Money Exchange 0.1 miles Santander 0.1 miles Barclays Bank 0.1 miles Tesco Bank (GREATER) 0.2 miles Halifax 0.2 miles Sainsbury's (ATM) 1.2 miles Tesco Bank ATM 2.0 miles</p>		<p>licence conditions and operational controls.</p> <p>Operational controls shall be reviewed regularly. Records shall be retained and made available to the Council upon request.</p> <p>Increased staffing levels during peak periods and event days to ensure effective supervision.</p> <p>Active monitoring of the entrance area to prevent loitering or congregation.</p> <p>Regular liaison with the Metropolitan Police and participation in local crime reduction initiatives where appropriate.</p> <p>Dynamic risk assessment during major events to adapt staffing and operational controls.</p> <p>Enhanced staff training in recognising indicators of criminal behaviour, including suspicious financial activity. Strict refusal of entry or service to individuals displaying anti-social or suspicious behaviour.</p> <p>Clear signage stating that CCTV is in operation and that anti-social behaviour will not be tolerated.</p>
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Gambling premises

Paddy Power	>0.1 miles
Coral	0.1 miles
GR8ODDS Betting	0.1 miles
Silvertime Casino Slots	0.1 miles
Silvertime Casino Lounge	0.1 miles
MERKUR Slots -	0.2 miles
Jennings Bet	0.2 miles
Betfred	0.2 miles
Paddy Power	0.3 miles
Silvertime Casino Slots	0.3 miles
Ladbrokes	0.6 miles
Ladbrokes	1.0 miles
William Hill	1.0 miles
Coral	1.2 miles
Betfred	1.2 miles
William Hill	1.2 miles
William Hill	1.8 miles

Regular internal audits of incident logs and CCTV coverage to ensure ongoing effectiveness of controls.

Shift handover procedures to ensure continuity of awareness regarding any ongoing concerns.

<p>Out of control gambling by other vulnerable people and failure to recognise signs associated with problem gambling or substantial changes in gambling behaviour</p> <p>Page 29</p>		<p>The Operator has a robust customer interaction policy & procedure</p> <p>Staff receive training on induction and at least annually on how to identify customers who are or may be at risk of harm from gambling and how to interact with them.</p> <p>Customers are offered a number of self-help tools including timers, time outs and self-exclusion.</p> <p>Customer interactions are reviewed and assessed weekly for effectiveness. Where appropriate further and alternative interactions are used if no change in behaviour is seen. Operator led exclusions are used as a last resort where a customer displaying problems refuses to engage in customer interactions and continues to display signs of extreme problem gambling</p> <p>The site is designed to have effective monitoring of all customers at all times</p> <p>The results of all customer interactions are recorded on SmartEXCLUSION tablet and reported to the Gambling Commission</p> <p>Marketing and advertising complies with the LCCPs, the CAP and BCAP standards</p>	<p>Advanced staff training focused on recognising subtle behavioural indicators, including changes in play patterns, emotional distress, or repeated high-intensity play.</p> <p>Structured customer interaction logs, reviewed regularly by management to identify patterns and repeat behaviours.</p> <p>Proactive engagement with customers displaying extended or intensive play, including encouragement of breaks and awareness of time spent.</p> <p>A multi-stage intervention process, including escalation from informal engagement to formal intervention and, where necessary, refusal of service. Active promotion and enforcement of self-exclusion schemes, ensuring vulnerable customers are supported and prevented from re-entry.</p> <p>Use of CCTV to support staff in monitoring behaviour across the premises.</p> <p>Formal handover procedures between staff shifts to ensure continuity in monitoring vulnerable individuals.</p>
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			<p>Clear and accessible signposting to support services, including BeGambleAware.</p> <p>Consideration of local demographic factors, including language barriers and cultural differences, with staff adapting interactions accordingly.</p>
<p>Failure to provide information on responsible gambling to players</p> <p>Page 30</p>		<p>The Operator has stay in control posters displayed prominently</p> <p>The Cat B gaming machines display safer gambling messages and are programmed with reality checks</p> <p>Stay in control leaflets are made available in racks & discreet locations</p> <p>Regular audit of poster & leaflets to maintain stock levels</p> <p>All machines have Gamcare information and contact details embedded in their screens</p>	<p>Management oversight on a daily and weekly basis to ensure ample information is available to customers who wish to obtain further advice or guidance for problem gambling.</p>
<p>Failure to properly administer the self-exclusion process & maintain its effectiveness, including breaches & reinstatement</p>		<p>Site layout permits effective monitoring of customers entering premises</p> <p>CCTV at entrance to aid identification of known excluders</p> <p>Use of on-site & SmartEXCLUSION self-exclusion schemes</p> <p>Staff review the self-exclusion data before starting each shift</p>	<p>CCTV systems are in place at entry points to support staff in identifying individuals, including those who may be self-excluded. Staff are trained to monitor and manage entry effectively.</p>

		Use of group WhatsApp to notify staff of customers attempting to, or actual breaches of self exclusions	
<p>Failure to deal with customers making complaints about the gaming machines</p> <p>Page 31</p>		<p>All gaming machines are sourced from licensed suppliers only</p> <p>All gaming machines are regularly maintained and switched off immediately where the outcome of a gambling fault is identified.</p> <p>Terms and conditions displayed at premises provide details of how to make a complaint</p> <p>Paper copies of complaints procedure and complaints form are available</p> <p>Staff are trained on induction on how to deal with customer disputes, including referrals to IBAS the ADR provider</p>	<p>The company will undertake weekly interaction analysis to ensure that all complaints made are dealt with as required by the LCCP.</p> <p>Regular compliance refresher courses will be undertaken to ensure staff are fully aware of their obligations in dealing with complaints.</p>
<p>Failure to identify attempts by third parties to launder money through the business</p>		<p>There are a number of pawn shops identified in the local vicinity</p> <p>Effective monitoring of customers' behaviour by good line of sight from customer service desk and CCTV</p> <p>Staff are regularly trained to identify counterfeit money</p> <p>Change machines & note takers regularly inspected</p> <p>Incidents of concern including money lending are reported through the SmartEXCLUSION system and to the MRLRO</p>	<p>Advanced staff training focused specifically on identifying money laundering typologies, including unusual play patterns, rapid cash insertion with minimal gameplay, and structured transactions.</p> <p>Clear procedures for staff to challenge suspicious behaviour and request further information where appropriate. Immediate escalation of concerns to management and, where necessary, reporting to relevant authorities in line with regulatory requirements.</p>

			<p>Regular review and auditing of incident logs to identify patterns or repeat behaviours.</p> <p>Increased vigilance during peak periods and event days when footfall is higher and customer profiles may be less familiar.</p> <p>Monitoring of customer behaviour for signs of third-party involvement or proxy gambling.</p> <p>Reinforcement of staff awareness that all suspicious behaviour must be recorded, regardless of transaction value.</p> <p>Management oversight to ensure consistent application of AML procedures across all shifts.</p> <p>Use of CCTV recordings to support investigation of suspicious incidents and provide evidence where required.</p>
<p>Poor security increasing vulnerability to crime</p>		<p>Liaison with local police teams as appropriate</p> <p>Effective CCTV with data stored for 30 days</p> <p>Toughened glass windows and doors with mag-lock fitted and in operation during quiet hours</p>	<p>Our venues will be doubled manned at all times , and one of the night shifts personnel will hold a valid SIA badge .</p> <p>CCTV systems are in place at entry points to support staff in identifying</p>

<p>Anti-social behaviour outside the premises</p> <p>Page 33</p>		<p>Safe on site for cash and keys</p> <p>All incidents recorded in incident log and reported to the Gambling Commission</p> <p>Intruder alarm installed and regularly serviced</p> <p>The Operator acknowledges its public responsibility to ensure its Premises are not a source that public nuisance and disorder. It will work closely with the police and other local partnerships to reduce the risk of any impact.</p> <p>Staff are trained to monitor the external area around the entrance for any anti-social behaviour and to take appropriate steps. This will include taking steps to prevent street drinking and/ or begging outside the premises.</p> <p>Where an incident appears to be escalating the staff will use the mag-lock and engage with local partnerships to minimise the risk.</p>	<p>individuals, including those who may be self-excluded. Staff are trained to monitor and manage entry effectively. Our alarm system will also include portable panic buttons to be worn by staff at all times.</p>
<p>Ensuring that gambling is conducted in a fair and open way</p>		<p>All gaming machines are fully compliant with the requirements of the UK Gambling Commission and are subject to independent testing and certification.</p> <p>Machines clearly display rules of play, stakes, and maximum prizes.</p>	<p>Staff will receive additional training in explaining gaming machines clearly and consistently to customers.</p> <p>Multilingual communication support will be made available where reasonably practicable to reflect the diverse local population.</p>

		<p>Staff are present at all times and available to assist customers with understanding game mechanics .</p> <p>A clear and accessible complaints procedure is in place and available on request.</p> <p>Customers are treated consistently and fairly in accordance with company policy.</p> <p>Machines are regularly maintained and tested to ensure correct operation.</p>	<p>Staff will proactively engage with customers who appear unfamiliar with the machines or uncertain about gameplay.</p> <p>Clear signage will be displayed within the premises outlining key information about machine use and customer rights.</p> <p>Regular internal audits will be conducted to ensure compliance with fairness and transparency standards.</p> <p>Any customer complaints or disputes will be recorded and reviewed by management to identify trends and improve practices.</p>
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Risk Assessment

The operator acknowledges that Brent’s policy states “The council will pay particular attention to the protection of children and vulnerable people from being harmed or exploited by gambling, as well as issues of crime and disorder.”¹ Considering this, the operator applies a structured approach to assessing local risks, in line with both the LCCP and Brent’s Statement of Licensing Policy. This approach involves the following steps:

1. Identify the level of risk that exists before any mitigation is applied (as identified in the table above)
2. Evaluate the likelihood of the risk and the impact of the risk
3. Set out the existing control measures
4. Determine any additional controls that may be introduced to deal with higher risk circumstances

Key factors influencing the determination of **likelihood** and **impact** of risk were drawn from crime data for the local area and the wider borough, the proximity of the premises to services and facilities used by vulnerable individuals and the level of deprivation within the area.

The operator has established customer interaction protocols that all staff are required to follow. These procedures have been developed in line with the formal guidance set out, and are regularly reviewed to reflect staff experience and customer behaviour. This ensures the operator maintains an accurate understanding of its customer base and remains aware of emerging risks, helping to minimise the potential for gambling related harm.

The policies in place set out measures to address vulnerability including: Combating gambling harm, Access to gambling by children and young people, Information on how to gamble responsibly and help for problem gamblers, Customer interaction, Self-exclusion and Employment of children and young people.

Enhanced Safeguarding Measures

The operator has implemented the following key controls:

- Think 25 age verification policy
- Staff training (induction + annual refreshers)
- Self-exclusion schemes
- Customer interaction logs
- CCTV monitoring
- Refusal procedures
- Signposting to gambling support services

These measures are designed to mitigate risks identified within the local area.

Risk Rating Key

Likelihood		Impact	
Low	There is a possibility but unlikely to occur in normal operation	Low	Consequences are limited and manageable
Medium	Reasonably possible and may occur	Medium	Consequences may be significant but controllable with active management
High	Likely or expected to occur	High	Consequences are serious and directly undermine licensing objectives

Below is the current approach to risk assessment for this premises. This is a live assessment and is subject to change if additional risks are encountered in the course of operation.

Risk	Likelihood & Impact of Risk	Control measures	Added controls
<p>The premises is located within walking distance of several educational facilities</p> <ul style="list-style-type: none"> ➤ Creates a risk that under-18s may pass the premises and be exposed to gambling 	<p>Likelihood <i>Moderate</i> due to the concentration of schools in the area</p> <p>Impact <i>High</i> as protecting children from being harmed or exploited by gambling is a key licensing objective</p>	<ul style="list-style-type: none"> • Strict 18+ Entry • Challenge 25 • Staffed Entry • CCTV • Refusals Log 	<ul style="list-style-type: none"> • Ongoing staff training on identifying under-18s (the process of which will be subject to review) • Continual monitoring of the entrance to the premises (particularly at school start/finish times) • Maintaining a refusals log and reviewing any patterns of refusal • Ensuring the frontage remains neutral and would not serve to appeal to children
<p>There are a small number of support services for homeless or vulnerable individuals nearby</p> <ul style="list-style-type: none"> ➤ Risk that these attract individuals with heightened vulnerability into the immediate vicinity of the premises ➤ Such vulnerable persons may be more susceptible to gambling harm or may attempt to enter the premises in search of shelter or distraction 	<p>Likelihood <i>Moderate</i> as only a small number of these premises are in the area and there is no evidence of congregation</p> <p>Impact <i>High</i> as the protection of vulnerable people forms a key licensing objective and the potential for gambling harm is significant for such individuals</p>	<ul style="list-style-type: none"> • Staff-led interaction • Safer-gambling framework • Payday/benefit awareness • Support pathways 	<ul style="list-style-type: none"> • All staff receive documented training in gambling-harm awareness and in identifying vulnerability • Only fully trained and assessed staff (on customer interaction and intervention) are permitted to work unsupervised • Annual refresher training is mandatory, recorded and reviewed • Management and staff apply heightened vigilance during recognised payday and benefit payment periods (increasing interactions where necessary)
<p>A small number of care homes operate in the surrounding area</p>	<p>Likelihood <i>Low</i> as only a limited number of care homes are located nearby</p>	<ul style="list-style-type: none"> • Controlled entry and egress 	<ul style="list-style-type: none"> • Refusal of entry to individuals displaying signs of such vulnerability including confusion or distress

<ul style="list-style-type: none"> ➤ Such facilities accommodate adults who may be isolated or may have physical or mental difficulty, making them more vulnerable ➤ The proximity to the premises creates a risk that such individuals may attempt to enter, especially if they are confused or lonely 	<p>Impact <i>High</i> as the protection of vulnerable people is a core licensing objective</p>	<ul style="list-style-type: none"> • Intervention protocols • Refusals log 	<ul style="list-style-type: none"> • Staff to actively monitor AGC frontage • Multilingual harm signage as well as support signposting • Obscured internal views
<p>One Jobcentre operates in the wider area</p> <ul style="list-style-type: none"> ➤ Risk that financially vulnerable individuals may pass the premises and attempt to enter 	<p>Likelihood <i>Low</i> as only one Jobcentre is located nearby</p> <p>Impact <i>High</i> as, if a financially vulnerable individual were to enter and gamble, the potential for harm is significant</p>	<ul style="list-style-type: none"> • Payday/benefit-cycle awareness • Support pathways • Staff-led interaction • Supervised entry 	<ul style="list-style-type: none"> • Heightened awareness and vigilance during benefit payment periods • Staff trained fully in interacting and intervening when they identify vulnerable individuals attempting to enter the premises • Staff trained to provide safer gambling materials to vulnerable people where appropriate (provided onsite)
<p>There are a few family Service Centres/Community Centres</p> <ul style="list-style-type: none"> ➤ Such facilities are used by a wide variety of persons including families with children and those seeking support 	<p>Likelihood <i>Moderate</i> as many different groups of people may be frequenting these premises, increasing the general footfall and therefore increasing the chances of them passing the AGC</p> <p>Impact <i>High</i> as these centres may be used by vulnerable individuals or families - the protection of children and</p>	<ul style="list-style-type: none"> • Continuous Staffing • CCTV • Incident Logging • External Area Management 	<ul style="list-style-type: none"> • Staff trained to identify vulnerability and intervene appropriately • Neutral frontage to avoid attracting vulnerable individuals or families • Active supervision of the AGC frontage to prevent loitering

	vulnerable persons form key licensing objectives		
<p>There are several parks, play grounds and sports/leisure facilities</p> <ul style="list-style-type: none"> ➤ Risk of areas where children will gather 	<p>Likelihood <i>Moderate</i> as children and young people frequently use these facilities so may pass the premises</p> <p>Impact <i>High</i> as under-18s must not be exposed to gambling</p>	<ul style="list-style-type: none"> • Strict 18+ Entry • Challenge 25 • Staffed Entry • CCTV • Refusals Log 	<ul style="list-style-type: none"> • Staff trained to identify under-18s and intervene early • Neutral frontage with obscured internal views • Continual surveillance of the entrance during peak school times/school holidays • Review of refusals log to identify patterns
<p>There are a number of variable entertainment venues</p> <ul style="list-style-type: none"> ➤ Places in which children and young people will typically frequent 	<p>Likelihood <i>Moderate</i> as these venues attract families and young people</p> <p>Impact <i>High</i> as exposure of under-18s to gambling premises is a key licensing objective</p>	<ul style="list-style-type: none"> • Refusals Log • Strict 18+ entry • CCTV • Challenge 25 • Staffed entry 	<ul style="list-style-type: none"> • Staff trained to identify and refuse under-18s confidently • Neutral frontage with no advertising that may appeal to children • Staff supervision of the entrance during peak periods (e.g. School holidays) • Review of refusals and incident logs
<p>There are several vulnerable/addiction support centres</p> <ul style="list-style-type: none"> ➤ Risk that individuals experiencing addiction or crisis may pass the premises ➤ Such individuals may be more susceptible to gambling harm 	<p>Likelihood <i>Moderate</i> as these services may bring vulnerable individuals into the vicinity of the AGC</p> <p>Impact <i>High</i> as the potential for gambling harm is significant for individuals experiencing addiction</p>	<ul style="list-style-type: none"> • Staff-led interaction • Safer-gambling framework • Support pathways • CCTV and supervised entry 	<ul style="list-style-type: none"> • Refusal of entry where vulnerability is identified • Staff trained in awareness and safe intervention • Multilingual signposting to support services
<p>There is one Foodbank within the vicinity of the premises</p>	<p>Likelihood</p>	<ul style="list-style-type: none"> • Staff-led interaction • CCTV 	<ul style="list-style-type: none"> • Awareness of Foodbank distribution times

<p>➤ Risk that financially vulnerable individuals may pass the premises</p>	<p><i>Low</i> to <i>Moderate</i> as footfall from the Foodbank will be limited but may include individuals experiencing financial difficulty.</p> <p>Impact <i>Moderate</i> as financial vulnerability is a recognised risk factor for gambling harm</p>	<ul style="list-style-type: none"> • Supervised entry • Support pathways 	<ul style="list-style-type: none"> • Staff trained to provide safer-gambling materials • Refusal of entry to individuals displaying signs of distress • Neutral frontage
<p>There are a large number of both Medical Centres and Mental Health facilities</p> <p>➤ These services are used by individuals who are likely experiencing vulnerability</p> <p>➤ Such individuals may be more susceptible to gambling harm if they pass the premises</p>	<p>Likelihood <i>Moderate</i> as the concentration of these centres increases the chance of a vulnerable person passing the AGC</p> <p>Impact <i>High</i> due to the licensing objective to protect vulnerable persons</p>	<ul style="list-style-type: none"> • Staff-led interaction • Safer-gambling framework • Support pathways • CCTV and supervised entry 	<ul style="list-style-type: none"> • Staff trained in mental health awareness • Refusal of entry where appropriate • Multilingual support materials • Supervising the AGC frontage to prevent loitering
<p>There are several Pawnbrokers and Pay day loan shops</p> <p>➤ Risk that financially stressed individuals may be drawn to gambling</p>	<p>Likelihood <i>Moderate</i> as these premises attract individuals experiencing financial distress</p> <p>Impact <i>Moderate</i> as financial vulnerability is a recognised risk factor for gambling harm</p>	<ul style="list-style-type: none"> • Payday/benefit-cycle awareness • Staff-led interaction • Support pathways • CCTV 	<ul style="list-style-type: none"> • Staff trained to identify financial vulnerability • Early intervention protocols • Neutral frontage • Monitoring patterns in customer behaviour
<p>There are several Gambling premises</p> <p>➤ Gambling Vulnerability area</p>	<p>Likelihood</p>	<ul style="list-style-type: none"> • Safer-gambling framework • Staff-led interaction 	<ul style="list-style-type: none"> • Checking for customers hopping between venues

	<p><i>High</i> due to high concentration of gambling outlets which increases exposure</p> <p>Impact <i>High</i> as greater risk of gambling harm</p>	<ul style="list-style-type: none"> • Self-exclusion procedures • CCTV and supervised entry 	<ul style="list-style-type: none"> • Staff trained to identify signs of extended or harmful play • Liaison with other operators where appropriate • Review of incident logs for patterns
<p>There are a number of Bus stops and other transport links</p> <ul style="list-style-type: none"> ➤ Risk that children congregate at bus stops 	<p>Likelihood <i>Moderate</i> as bus stops generate higher footfall including young people</p> <p>Impact <i>High</i> as exposure of under-18s to gambling premises is a key licensing objective</p>	<ul style="list-style-type: none"> • Strict 18+ entry • Challenge 25 • Staffed entry • CCTV • Refusals log 	<ul style="list-style-type: none"> • Supervising the entrance during school travel times • Neutral frontage to avoid attracting young people • Review of refusals log to identify patterns • Staff trained to intervene early
<p>There is a spread of Public houses and Alcohol licensed premises</p> <ul style="list-style-type: none"> ➤ Risk that intoxicated individuals may attempt to enter 	<p>Likelihood <i>Moderate</i> as alcohol consumption increases impulsivity</p> <p>Impact <i>Moderate</i> as intoxicated individuals are at higher risk of harm or disorder</p>	<ul style="list-style-type: none"> • Alcohol-free operation • Controlled entry • CCTV • Incident logging 	<ul style="list-style-type: none"> • Refusal of entry to intoxicated individuals • Staff trained to identify signs of intoxication • Staffed frontage • No external seating or congregation areas
<p>There is a variation of Places of worship within half a mile</p> <ul style="list-style-type: none"> ➤ Sensitive locations that may be adversely affected by the gambling premises 	<p>Likelihood <i>Low</i> to <i>Moderate</i> as those who attend may pass the premises but are not typically high risk groups</p> <p>Impact</p>	<ul style="list-style-type: none"> • Neutral frontage • Obscured internal views • No inducement advertising • Continuous staffing 	<ul style="list-style-type: none"> • Supervision of shopfront • Multilingual support pathways • No external promotional material

	<i>Low</i> as places of worship are sensitive locations so there may be community concern		
There are a number of ATMs and Banks ➤ Risk that individuals withdrawing cash may be tempted to gamble impulsively	Likelihood <i>Moderate</i> as added convenience through easy access to cash Impact <i>High</i> as financial harm is a key licensing objective concern	<ul style="list-style-type: none"> • Staff-led interaction • Safer-gambling framework • CCTV • Support pathways 	<ul style="list-style-type: none"> • Staff trained to identify signs of financial distress • Monitoring of customers returning repeatedly after cash withdrawals • Early intervention where concerns arise • Neutral frontage (to avoid impulse entry)

Potential exposure to children

A repeated issue identified in the above risk assessment appears to be the opportunities for children to pass the premises. The operator has carefully considered this risk and has set out measures to ensure that the premises operates safely within this area and that the licensing objective of protecting children from being harmed or exploited by gambling is upheld. Specific measures to this effect include staff supervising the entrance to the premises at school start and finish times to ensure that flows of school children who may pass the premises do not attempt to enter. If children were to attempt to enter, a strict 18+ entry policy is in place and staff receive refresher training so that they remain fully aware on how to identify under 18s and the early intervention measures required should they try to enter.

Potential exposure to vulnerable persons

Another key consideration is the potential exposure to vulnerable people. In a similar approach to preventing children entering the premises, the operator has developed specific measures to ensure that vulnerable persons are protected from any risk of gambling harm and that the licensing objective of preventing harm to vulnerable people is promoted. Staff are trained on how to identify vulnerable people and how to act accordingly, ensuring that staff members do not put themselves at risk in the process. Management will also assess any interactions that have taken place to determine the efficacy of these policies and identify where protocols may need amending.

Gambling Cluster

The operator has paid particular attention to the presence of seven other gambling premises within a 400m radius. This cluster has been directly factored into the above risk assessment and the measures set out in response have been specifically tailored to address the risks associated with cumulative gambling exposure.

Gambling facilities around the premises and the Wembley area are primarily made up of high street betting shops, rather than large casinos or destination venues. These premises are concentrated along main shopping streets, making them easily accessible to local residents. They contribute to the evening economy by remaining open later than many retail uses but overall, gambling activity in the area is visible but limited in scale, embedded within the everyday high street environment rather than operating as a major leisure draw.

Nevertheless, the operator recognises that clustering, when combined with local deprivation, vulnerability and the presence of individuals experiencing addiction or other health challenges, can increase the potential for gambling-related harm. Accordingly, strict policies have been implemented to mitigate these risks, including customer interaction protocols, self-exclusion policies, continued staffing and supervision of customer behaviour.

The operator will also engage with the other gambling operators in the surrounding area and share information in order to identify behaviour patterns and to determine any further necessary measures to mitigate gambling harm and to ensure that area is not detrimentally affected by the AGC.

Operator Summary

This local area risk assessment recognises that the premises sits within an area of high vulnerability, with a concentration of gambling venues, clear indicators of deprivation and financial pressure and a significant number of schools and community services. The operator recognises each of these risk factors as incredibly important considerations and has considered each risk in depth as part of this assessment.

In response to these local risks, the operator has committed to a set of safeguards that consider the likelihood and impact of each risk in accordance with the licensing objectives. These include detailed staff training, continuous on-site supervision, strict age-verification procedures, multilingual safeguarding materials, staff supervision of customer behaviour and clear controls on advertising and external appearance. With these measures in place, the premises will operate in a way that minimises harm as much as possible.

Taking all factors together, this assessment provides that, when operated under these controls, the premises will not contribute to cumulative harm within

the Wembley area , and bearing in mind this venue trading prior as a betting premises. The operator fully accepts that this is a sensitive location and is prepared for heightened scrutiny, ongoing engagement with the Licensing Authority and regular review of all safeguards to ensure that the licensing objectives continue to be upheld.

- **All data sources used in this LARA come from credible third-party platforms including the Office for National Statistics (ONS), Brent Local Crime Data (Metropolitan Police) and Crystal Roof. These statistics are drawn from data sets and are not reliant on any subjective assessment by the operator.**

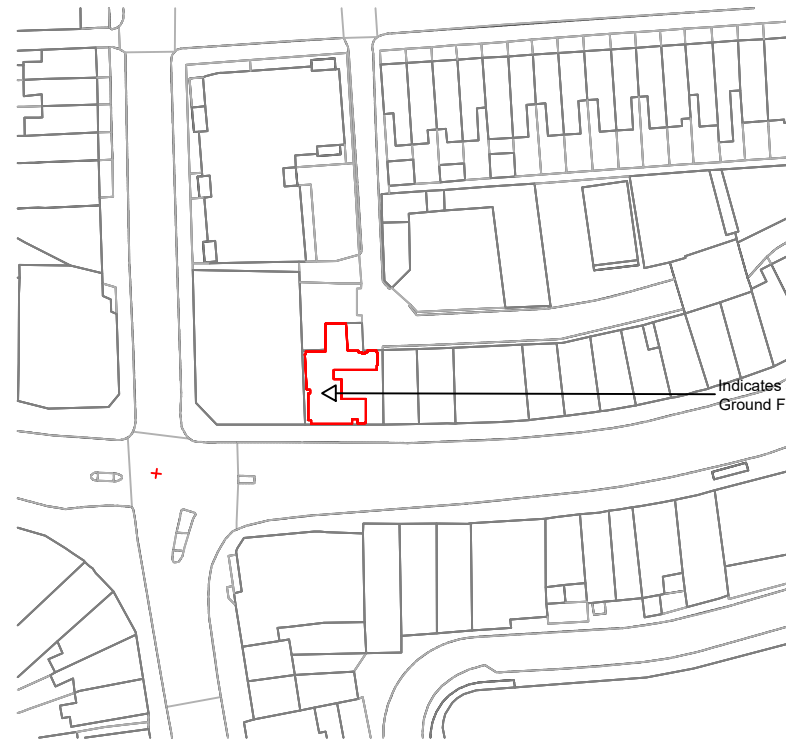
Conclusion

This Local Area Risk Assessment demonstrates that the premises is suitable for its location and that all relevant risks have been identified and appropriately mitigated.

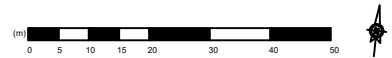
The operator has implemented robust policies, procedures and control measures to ensure compliance with the licensing objectives and to protect children and vulnerable persons.

The premises will continue to review and update this assessment in line with regulatory requirements.

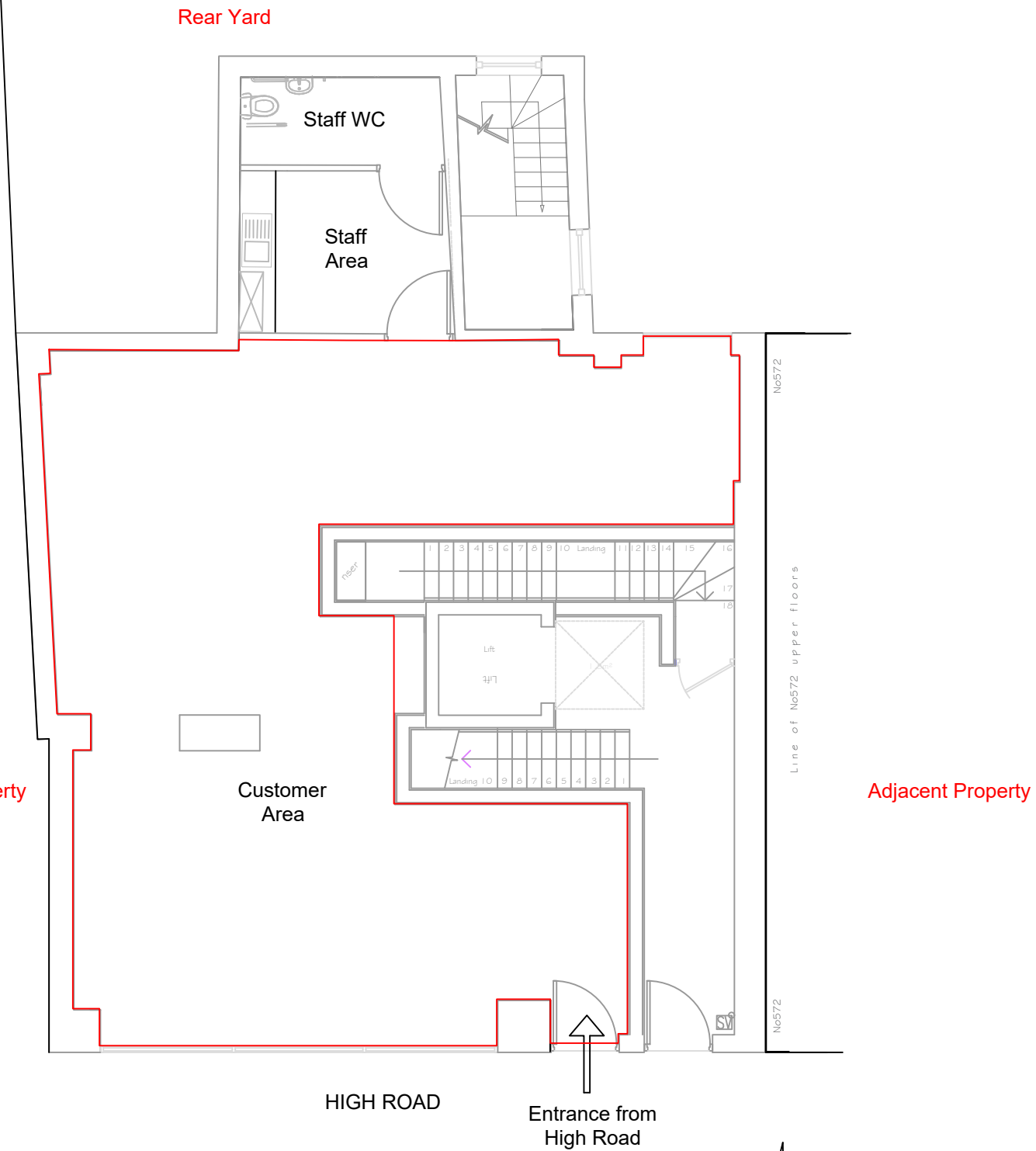
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Indicates site in application at:
Ground Floor, 574 High Road, Wembley HA0 2AA



Location Plan 1:1250 @A3



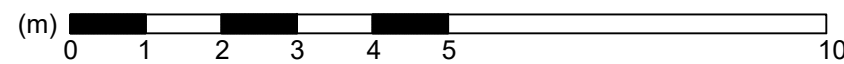
Adjacent Property

Adjacent Property

GAMBLING ACT 2005 LICENSING PLAN

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

— Area in which facilities will be provided for gaming



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

Tel: (0)20 328 7690

www.candpltd.com

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

Drawing Title:
Licence Plan

Project Number: 21.0011

Drawing Number: 01 Revision:

Drawing Status: Issue
First Issue:

Scale:
1:100 @ A3

Date:
12.05.2021

Drawn By: EB

Checked By: AB

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312 Investments Ltd

**Social
Responsibility
and Compliance
Pack**

Contents

1. Introduction

- 1.1 Gambling Act 2005
- 1.2 The Licensing Objectives
- 1.3 The Licensing Conditions and Codes of Practice
- 1.4 Powers of the Gambling Commission and others

2. Social Responsibility

- 2.1 Promotion of Socially Responsible Gambling
- 2.2 Problem Gambling and the Provision of Information
- 2.3 Customer Interaction
- 2.4 Self Exclusion

3. Children and Vulnerable Persons

- 3.1 Access to Gambling
- 3.2 Challenge 25
- 3.3 Employment of Children and Young Persons
- 3.4 Vulnerable Persons

4. Customer Interaction

- 4.1 Identify
- 4.2 Interact
- 4.3 Evaluate
- 4.4 Customer Due Diligence
- 4.5 Enhanced Due Diligence

5. Crime and Disorder

- 5.1 Money Laundering and Proceeds of Crime
- 5.2 Suspicious Activity Reports
- 5.3 Cash Handling
- 5.4 Keeping Alcohol Out
- 5.5 Dealing with Aggressive Customers

6. Fair and Open

- 6.1 General Terms and Conditions
- 6.2 Complaints Procedure
- 6.3 Marketing and Promotional Guidelines

7. Recording Requirements

- 7.1 General Reporting Requirements
- 7.2 Challenge 25 Register
- 7.3 Customer Interaction Register
- 7.4 Digital Self Exclusion Register
- 7.5 SARs Register
- 7.6 Register of Incidents Requiring Police Attendance
- 7.7 Staff Training Register

8. Staff Training

9. Appendices

- 9.1 Management

10. Monitoring

1 Introduction

312 Investments Limited (312 Investments/The Company) and all of its employees are committed to a safer gambling experience for all customers.

These policies and procedures are designed to ensure that the Gambling Act 2005, the LCCP and all relevant guidance is understood and followed by all employees of 312 Investments.

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

- Money Laundering and Terrorist financing Risk Assessment
- Proceeds of Crime and Anti Money Laundering Policy
- Staff Training Policy
- The Local Area Risk Assessment (L.A.R.A)

1.1 The Gambling Act 2005

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

- A notice must be displayed at all entrances to AGCs stating that no person under the age of 18 years will be admitted to the premises.
- There can be no direct access between an AGC and any other premises licensed under the Act or premises with a Family Entertainment Centre (FEC), club gaming, club machine or alcohol licensed premises gaming machine permit. (England and Wales only). This is not relevant for 312 Investments style of operation.
- Any ATM made available for use on the premises shall be located in a place that requires any customer who wishes to use it to cease gambling at any gaming machine in order to do so.
- The consumption of alcohol in AGCs is prohibited at any time during which facilities for gambling are being provided on the premises. A notice stating this should be displayed in a prominent place at every entrance to the premises.

1.2 The Licensing Objectives

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

1.3 The Licensing Conditions and Codes of Practice

The Licence conditions and codes of practice (“LCCP”) set out the requirements 312 Investments must meet in order to hold its operating licence. Relevant Senior Management must subscribe to the Gambling Commission news updates and regularly check the website for updates.

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

- Social responsibility provisions

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

- Ordinary code provisions

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

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

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

1.4 The Powers of the Gambling Commission and others

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

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

determine whether an operating licence or premises licence is held and to determine whether facilities are being provided in accordance with terms and conditions of an operating licence (Section 307).

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

Section 317 sets out powers of the constable, enforcement officer or authorised person and include inspection of any part of the premises or any machine on anything on the premises, questioning any person, access to written or electronic records, remove or retain evidence of committing an offence or breach of terms and conditions. Section 320 provides that the power of inspection must be exercised only at a reasonable time. The enforcement officer or authorised person must provide evidence of their identity and authority (Section 321). Section 323 provides that a constable, enforcement officer or authorised person may use reasonable force to enter a premises. Section 326 provides that it is an offence to obstruct a constable, enforcement officer or authorised person in carrying out their duties.

2 Social Responsibility

2.1 Promotion of Socially Responsible Gambling

The third objective of the Gambling Act is to protect children and other vulnerable persons from being harmed or exploited by gambling and as a condition of our Adult Gaming Centre licence we have appropriate controls in place. The need to prevent young and vulnerable persons from being able to access our products and services is of paramount importance to 312 Investments.

2.2 Problem Gambling and the Provision of Information

312 Investments monitors customer activity and uses a range of in person indicators to identify potential problem gambling. These are all set out within the Customer Interaction section below.

312 Investments clearly displays posters and provides leaflets for customers which detail key organisations which can help, including GamCare.

The following organisations also provide help and assistance in dealing with gambling addiction:

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

2.3 Self-Exclusion

312 Investments is a member of the AGC sector's multi-operator self-exclusion scheme, which prevents the self-excluded individual from gambling in any AGC or High street Bingo venue for up to one kilometre of the venue in which they excluded. Self-exclusion is recognised by the gambling industry as a way for players who feel that their gambling is out of control and want assistance to help them stop.

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

The Self-Exclusion Process:

- When a customer has requested that they be refused entry to our premises, the customer and the appointed manager will formally acknowledge the request on the self-exclusion tablet, which links with the Multi Operator Self Exclusion Scheme (MOSES). This will be preceded by a meaningful discussion about the terms and conditions applicable to the scheme and will include other options available to assist a person having a gambling disorder, including being signposted to counselling and support services. A copy of the terms and conditions will be electronically signed by the excluded as acknowledgement of understanding and consent. Customers are given the opportunity of discussing self-exclusion in a quiet area, but should never be alone in a back office space with any individual.
- A customer can self-exclude without having to enter the premises if necessary. The appointed manager will arrange to meet in an appropriate alternate location on a case by case basis.
- Photographic identification and signature of the excluded person is required for self-exclusion agreements. A photograph is taken. In the event a customer refuses or is unable to provide photographic ID they can still enter into a self-exclusion agreement provided staff are able to identify and verify the individual (for example a bank card)
- The appointed manager will offer the exclusion for a minimum duration of not less than six months, nor more than twelve months; the customer thereafter may request to extend the length of the self-exclusion for one or more further periods of at least six months.
- 312 Investments will take all reasonable steps not to allow the excluded person admittance to the premises during the term of the self-exclusion agreement.
- It is made clear to the customer that they may not revoke the self-exclusion during the agreed period and that if found either in the gambling area or attempting to gamble they will be asked to leave.
- Members of staff must be alert to self-excluded individuals attempting to breach agreements and instances of them getting another person to gamble on their behalf. It is a requirement that staff check the self-excluded register before every shift.

Those self-excluded are removed from any marketing databases held by 312 Investments within two days of receiving the completed self-exclusion request, but we will take all reasonable steps to prevent details being knowingly sent as soon as practicable.

At the end of the self-exclusion period, the exclusion will remain in place for a further six months, unless the customer takes positive action in order to gamble again during that time. At the end of the exclusion period, if the customer wishes to return to gambling, they with the Manager, review the terms of agreement in person.

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

312 Investments retains self-exclusion records for the length of the agreement plus a further 6 months.

3 Children and Vulnerable Persons

3.1 Access to Gambling

312 Investments implements age verification procedures that use various methods to try and detect and deter children and young people from entering including no U18 signage.

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

3.2 Challenge 25

312 Investments operates a challenge 25 policy across all venues.

Acceptable forms of documentation include:

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

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

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

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

The Gambling Commission, Local Licensing Authority and police may conduct underage test entries to assess whether or not 312 Investments Adult Gaming Centre's are allowing under 18's to enter or gamble on the premises. The police are permitted to use individuals under the age of 18 to carry out test purchases.

312 Investments also conduct 3rd party age verification testing in all venues, they are only permitted to use individuals over the age of 18, although they may appear younger.

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

All age verification test failures are fully investigated

If a person over the age of 18 knowingly brings a child under the age of 18 in to the

Adult Gaming Centre and or refuses to leave immediately, that person will be banned from the premises. The names and details where available, will be recorded and the incident reported to senior management.

If an employee of 312 Investments becomes aware that a child or young person is using or has used facilities for gambling provided in relation to the licence, they shall ensure that:

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

This must be recorded and reported to senior management.

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

3.3 Employment of Children and Young Persons

312 Investments do not permit any employee to be hired who is under 18 in any capacity.

3.4 Vulnerable Persons

Although vulnerability is not strictly defined, there are a number of factors which can contribute towards an individual being more vulnerable to experiencing gambling related harms:

- Personal and demographic - if the individual is experiencing poor physical or mental health, physical or cognitive impairment, suffering side effects from a brain injury or medication or has an addiction
- Situational - if the individual is experiencing financial difficulties, is homeless, is suffering from domestic or financial abuse, has caring responsibilities, experiences a life change or sudden change in circumstances
- Behavioural - if an individual has a higher than standard level of trust or high appetite for risk
- Vulnerable factors such as ill health, disability, change in life circumstances such as bereavement, homelessness and loss of a job, financial difficulties, dyslexia, brain injury or the taking of medication
- Previous self-exclusions or customer interactions
- Market-related - if an individual is engaged in an activity which is highly complex; that they have a lack of knowledge and/or experience of the market

- Access - if an individual has difficulty accessing information because of poor literacy or numeracy skills, knowledge, dyslexia.

In the event a customer exhibits any of the above and is suspected of being vulnerable, this is likely to trigger a customer interaction pursuant to the Customer Interaction Policy.

4 Customer Interaction

312 Investments requires staff to observe and interact with all customers who enter their premises.

312 Investments operates the Identify - Interact - Evaluate model.

4.1 Identify

There are several signs which can indicate an individual who has or may have a potential problem with gambling and consequently warrant further investigation.

The following constitute signs of problem gambling:

- Vulnerability factors: ill health, disability, change in life circumstances such as bereavement, homelessness and loss of a job, financial difficulties, dyslexia, brain injury or the taking of medication
- Previous self-exclusions or customer interactions
- Time and spend indicators: observed amount and frequency of time spent or large losses. For example a customer increasing their usual game play by playing on multiple machines, or by becoming more agitated as they attempt to play faster.
- Customer contact and potential social problems: information or hints from customers, frequent complaints, or signs of distress. This might include a customer discussing serious life changes, unemployment or financial struggles, death or illness in their family, or a traumatic event.
- Play indicators: chasing losses or erratic gaming patterns
- Finding it hard to manage or stop gambling
- Such as signs of distress, agitation, or changes which could be an indication that gambling is having a negative impact on a customer's wellbeing. Customers may target aggression at staff following a loss.
- Customer contacts management regularly to express dissatisfaction with gaming outcomes and overall gameplay. This can include actions such as complaining about "rigged" machines Customer-led contact
- May not be displaying obvious signs of, or overt behaviour associated with, problem gambling, however the staff member has suspicions that they are gambling beyond their means
- Have triggered session reminders, present on most B3 machines.
- Multiple interactions with the same customer regarding any of the above

In the event any of the above signs are observed, staff members must then record their findings and interact with the customer.

4.2 Interact

A customer Interaction can take on many forms of action, depending on the circumstances and the individual. Staff members are not provided with a script, or questions which they must ask, as this does not tend to warrant honesty from customers due to the impersonal feel. Staff members are trained on how to interact with customers, and the below constitutes suggestions on how to initiate and carry out conversations.

The staff member should start any interaction by:

- Engaging the customer in friendly conversation to ascertain how the customer is

- feeling
- Offering the customer refreshments as a way to prolong the engagement from the customer.
- Asking the customer if they are comfortable with their level of gambling, helping the customer to think about their gambling activity

A customer may then demonstrate to the staff member that they are happy with their level of gambling, or provide some explanation as to signs of harm that have been observed.

In any event, that customer will continue to be monitored.

If the staff member is still concerned by the customer's behaviour they must continue the interaction with the customer. This may include asking Further Follow Up Questions such as:

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

The interaction, along with the customer's description/details must be logged for the purposes of further interaction including further gambling management options including up to possible exclusion from future participation, should any similar incidents re-occur. This recording will also be reviewed by a member of the Senior Management Team to assess whether the interaction was appropriate in the circumstances, and whether the correct course of action was taken.

Where appropriate, the member of staff will explain the various management tools in place such as self-exclusion, and will provide information on GamCare, to any customers with whom an interaction has taken place. Information regarding self-exclusion and GamCare is clearly displayed throughout the venue.

4.3 Evaluate

The following constitutes the possible result of a customer interaction:

- Allow the customer to continue gambling under observation
- Provide information on available gambling management options
- Conduct Customer Due Diligence on the customer
- Conduct Enhanced Due Diligence on the customer
- Self-Exclusion
- Barring the customer from the premises.

The circumstances of the customer interaction will dictate which of the above takes place. The staff in the premises are well trained and get to know their customers each time they visit the premises. Senior Management are always involved in the evaluation of a customer when Further Questions have been asked.

By way of example, the following would normally result in a customer being asked to consider self-exclusion, and if they refuse they will likely be barred:

- Serious aggression, refusal to engage with staff, refusal to discuss gambling tools such as self-exclusion
- Openly discussing that they are unable to stop
- Openly discussing that they cannot afford to be gambling

This is not an exhaustive list. A combination of any of the indicators listed, repeated observations of any of the indicators or any extreme behaviour can also result in a customer self-excluding or being barred.

Any customer interaction may also be assessed from a Money Laundering or POCA perspective as well if information listed or identified raises a concern in this area

4.4 Customer Due Diligence

In the event a customer is evaluated as requiring Customer Due Diligence (“CDD”), this will likely be carried out by the Area Manager or a member of the Senior Team.

The customer due diligence includes:

- Name, verified with ID such as a driving licence or passport
- Address, verified with ID as above or a utility bill no older than 3 months
- Any other information which a customer might offer during an interaction, for example their employment, any family business, their financial circumstances generally, any financial problems they may be experiencing, any address history (such as a recent move from overseas).

This must be recorded.

4.5 Enhanced Due Diligence

In the event a customer is evaluated as requiring Enhanced Due Diligence (“EDD”), this will be carried out by a member of the Senior Team.

Enhanced Due Diligence is likely to vary between customers but should normally include:

- A secondary piece of ID
- A recent Bank Statement
- Source of Wealth
- Background checks using open sources
- Any other information which a customer might offer during an interaction

This must be recorded.

The Senior Management team will review this process regularly to assess whether it is effective and appropriate.

5 Crime and Disorder

5.1 Money Laundering and Proceeds of Crime

312 Investments maintains a separate ML and POCA policy as well as an AML and TF Risk Assessment which is available to all staff.

5.2 Suspicious Activity Reports

All employees are aware of how and when to records suspicious activity to the Nominated Officer.

Further information is contained in the ML and POCA policy.

5.3 Cash Handling

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

- (i) Monetary stakes introduced to machines (gross takings)
- (ii) Money introduced to re-float machines
- (iii) Customer refunds due to machine malfunctions
- (iv) Money removed from machines (net takings)
- (v) No keys are to be handed to anybody who is unknown – their ID needs to be confirmed with the Operations Manager. The person who hands over the keys will be held responsible. All external visiting engineers need to sign in.

Cash Collection

[Cash is collected and stored in a time-delay safe. The external cash collection will take place every 7-10 days.]

Empty of Machines

The full empty of machines needs to be carried out only when there are no customers in the venue, whilst note empties can be carried out whilst the venue is open under strict security protocols, where licensing conditions permit.

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

Cash Reconciliation

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

All accounting procedures will be recorded by senior management.

5.4 Keeping Alcohol Out

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

Individuals under the influence of alcohol on entry will be asked to leave the premises.

Alcohol consumption on site

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

5.5 Dealing with Aggressive Customers

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

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

- Tensed muscles or sweating
- Twitching muscles, particularly in the face
- Pacing
- Changes in voice (pitch, volume)
- Language, obscenities, threats

In the event a member of staff comes across a customer displaying signs of aggression they should complete the following where there is no danger to themselves:

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

Staff should be cautious in their approach and ensure they do not adopt a confrontational approach and are aware of how they can contact another member of staff if necessary safely. Staff should never put themselves in a violent situation and should always remove themselves to the office.

6 Fair and Open

6.1 General Terms and Conditions

312 Investments utilise and comply with BACTAs general Terms and Conditions and all relevant sections of the LCCP.

6.2 Complaints Procedure

The Complaints procedure is contained within the Complaints policy.

6.3 Marketing and Promotional guidelines

312 Investments has an Advertising and Media Policy which is available to all relevant senior staff. It is important to note, that no employees in venues have any right to create or amend any promotional or marketing material.

7 Recording and Reporting Requirements

7.1 General Reporting Requirements

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

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

7.2 Challenge 25 Register

312 Investments will, at all times, maintain a register at each of its trading venues of all incidents of customers being challenged if they look under the age of 25.

7.3 Self Exclusion Register

312 Investments will at all times maintain a register at each of its trading venues of all customers who enter into a Self Exclusion Agreement and link in to the National Self Exclusion scheme for the AGC and Bingo sector and therefore fulfils the requirement to be part of a Multi Operator Self Exclusion Scheme (MOSES).

7.4 SAR's Register

312 Investments will, at all times, maintain a register at each of its trading venues all incidents that require a SAR's report (Suspicious Activity Report).

7.5 Register of Incidents Requiring Police Attendance

312 Investments will, at all times, maintain a register at each of its trading venues of all incidents that require Police Attendance.

Each of these registers will be available for inspection by the relevant authorities.

8 Training

8.1 Please see Staff Training Policy.

9 Appendices

9.1 Management

Insert org chart

10 Monitoring

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

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

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

Document review:

Date Reviewed	Reviewed by

**312 INVESTMENTS LIMITED
TERMS AND CONDITIONS**



These Terms and Conditions (the “Generic Terms”) apply to all gaming transactions entered into on these premises (the “Premises”) except for Promotions which are covered by separate terms and conditions available on the premises.

Any gaming transactions entered into on the premises shall be between the customer taking part in the particular transaction (the “Customer”) (1) and 312 Investments Limited (the “Company”) (2)

In these General Terms, the terms/conditions/rules displayed on the particular gaming machine are referred to as the “Specific Terms”.

Customers are strongly advised to read the Specific Terms. By entering into any gaming transaction by use of the particular gaming machine, the Customer shall be deemed to have read and accepted the Specific Terms applying.

Minimum and maximum stakes and maximum prizes/wins are those displayed on the gaming machine in the Specific Terms.

Members of staff have no authority to vary or amend the General Terms or the Specific Terms and any assistance or advice offered by them in relation to any gaming transaction shall be without prejudice to that position.

In the event of a disputed outcome to any game, the Company complaint procedure will apply, a copy of which is available from a member of staff or from the Company at the address below:

312 Investments Limited
Grovedell House
15 Knightswick Road
Canvey Island
Essex
SS8 9PA



**312 INVESTMENTS LIMITED
ADVERTISING AND MEDIA POLICY**

- 1. INTRODUCTION**
- 2. UK ADVERTISING CODES**
- 3. CHILDREN AND YOUNG PERSONS**
- 4. IRRESPONSIBLE APPEAL**
- 5. GAMBLING PROBLEM BEHAVIOUR**
- 6. MISLEADINGNESS**
- 7. SELF-EXCLUSIONS & SUBSCRIPTIONS**
- 8. MONITORING THE POLICY**

1. INTRODUCTION

312 Investments Limited is committed to complying with the requirements of all advertising regulations applicable within any jurisdiction it operates in and recognises the importance of honest and socially responsible marketing. It is imperative that 312 Investments Limited acts responsibly and honestly when creating and executing marketing campaigns.

This Policy outlines the principles upon which 312 Investments Limited will manage marketing campaigns in order to safeguard its business and to ensure the protection of young or vulnerable people.

2. UK ADVERTISING CODES

The Codes set out five key advertising principles which must be adhered to by 312 Investments Limited in relation to the management of all advertising.

The general principles of the Codes are that advertising should be:

1. legal, decent, honest and truthful
4. prepared with a sense of responsibility to consumers and to society
5. respectful to the principles of fair competition generally accepted in business
4. not intended to bring advertising into disrepute

The Codes require all gambling advertising to be socially responsible and 312 Investments Limited will ensure it respects the need to protect children, young persons, and other Vulnerable Persons from being harmed or exploited by advertising that features or promotes gambling. Although 'vulnerable' person is not defined in the Gambling Act, the ASA will look at factors such as mental, social, or emotional immaturity, impaired judgement, for example, because of alcohol or drug addiction, or those who are at risk of gambling more than they can afford to or want to. Nothing in Adverts should condone or encourage criminal or anti-social behaviour.

This means 312 Investments Limited must:

- Be socially responsible, with particular regard to the need to protect Children, Young Persons and other Vulnerable Persons.

312 Investments Limited must not:

- Portray, condone, or encourage gambling behaviour that is socially irresponsible or could lead to financial, social or emotional harm.
- Condone or encourage criminal or anti-social behaviour.

A breach of the more specific principles of the Codes will often involve a breach of the social responsibility rules. Adverts that have been investigated under the social responsibility rules have included: portraying gambling as a possible solution to financial concerns and debt; linking gambling and alcohol consumption; and showing problem-gambling behaviours, such as solitary gambling or gambling taking priority in life.

312 Investments Limited's Policy sets out the rules and guidance for advertising and marketing. It is important that all employees, contractors, agents, consultants, partners, or other parties working on behalf of 312 Investments Limited are aware of and understand 312

Investments Limited's Policy. Advertising or media campaigns must not be initiated without prior approval from the Board.

3 CHILDREN AND YOUNG PERSONS

The Codes require marketing communications for gambling products to be socially responsible, with particular regard to the need to protect children, young persons and other vulnerable persons from being harmed or exploited.

This means 312 Investments Limited must:

- Be socially responsible, with particular regard to the need to protect children, young persons and other vulnerable persons from being harmed or exploited.

312 Investments Limited must not:

- Exploit the susceptibilities, aspirations, credulity, inexperience or lack of knowledge of Children, Young Persons or other Vulnerable Persons.
- Suggest peer pressure to gamble or disparage abstention.
- Suggest gambling is a rite of passage.
- Create marketing or advertising likely to be of particular appeal to children or young persons, especially by reflecting or being associated with youth culture.
- Create marketing or advertising directed at those aged below 18 years through the selection of media or context in which they appear.
- Include a child or a young person in marketing or advertising. No-one who is or seems to be under-25 years old may be featured gambling. No-one may behave in an adolescent, juvenile or loutish way.

No advertising should be based around individuals who are or seem to be under 25 years old (18-24 years old).

An advertisement featuring a character that particularly appeals to children is likely to fall foul of the rules. The use of cartoons or licensed characters, such as superheroes and celebrities popular with children, must be used with a due sense of responsibility. In other words, care should be taken when using cartoon-like images; they might be acceptable if they are adult in nature but run the risk of appealing to under-18s if cartoon images are too childish in their execution; and that might be a problem when advertising gambling products. In all cases, steps should be taken to prevent under-18s from viewing ads (for example age-gating online ads) and the likely age of the audience viewing the ad should always be considered.

4 IRRESPONSIBLE APPEAL

312 Investments Limited recognises that irresponsible advertising and marketing related to gambling may appeal to Children, Young Persons or Vulnerable People and create a certain level of attractiveness to gambling. 312 Investments Limited must ensure that all advertising and marketing is created responsibly and as such the below rules and codes must be applied when considering any marketing or advertising campaigns.

Seduction, sexual success and enhanced attractiveness

There must not be any direct or implied link between gambling, seduction, sexual success or enhanced attractiveness through any marketing or advertising.

The CAP & BCAP Codes state:

Marketing communications must not:

- Link gambling to seduction, sexual success or enhanced attractiveness.

It is acceptable to feature attractive people in advertising, as long as the ad as a whole does not link gambling with seduction, sexual success or enhanced attractiveness. Where characters in ads are treated with admiration by others as a result of their gambling, this can breach the Codes by linking gambling and enhanced attractiveness. References to fame, being special and VIP status are common themes in ads that the ASA has investigated under these rules.

Ads linking transformations of characters' appearance after gambling can create an implication that gambling could result in enhanced attractiveness and an improvement in self-image, thereby breaching the rules.

Toughness, resilience, and recklessness

The CAP & BCAP Codes state:

Marketing communications must not:

- Portray gambling in a context of toughness or link it to resilience or recklessness.

No advert or marketing campaign should be created without considering if the context as a whole might create a link between gambling and resilience or toughness, or portraying gambling in a context of toughness.

Enhancing personal qualities

The CAP & BCAP Codes state:

Marketing communications must not:

- Suggest that gambling can enhance personal qualities, for example, that it can improve self-image or self-esteem, or is a way to gain control, superiority, recognition or admiration.

Again, it is acceptable to feature attractive or admired people in advertising, as long as the ad as a whole does not link gambling with these qualities. Where characters in ads are treated with admiration by others as a result of their gambling, this can breach the Codes by linking gambling and improved self-image or self-esteem. References to fame, being special and VIP status are common themes in ads that the ASA has investigated under these rules.

Ads linking transformations of characters' appearance after gambling can create an implication that gambling could result in an improvement in self-image, thereby breaching the rules.

Cultural beliefs or traditions about gambling or luck

The CAP & BCAP Codes state:

Marketing communications must not:

- Exploit cultural beliefs or traditions about gambling or luck.

Advertisements should avoid the use of cultural symbols and systems such as horoscopes if those symbols relate to an existing, strongly, and communally held belief. These rules are not intended to prevent references to symbols or obsolete superstitions that are unlikely to be taken seriously, such as a clover leaf.

Gambling adverts must not:

“be likely to be of strong appeal to children or young persons, especially by reflecting or being associated with youth culture.”

These means not using prominent sports people and celebrities as well as individuals like social media influencers, who are of strong appeal to those under-18.

5 PROBLEM GAMBLING BEHAVIOUR

Taking priority and solving problems

The CAP & BCAP Codes state:

Marketing communications must not:

- Suggest that gambling can provide an escape from personal, professional, or educational problems such as loneliness or depression.
- Suggest that gambling can be a solution to financial concerns, an alternative to employment or a way to achieve financial security.
- Portray gambling as indispensable or as taking priority in life; for example, over family, friends or professional or educational commitments.
- Condone or feature gambling in a working environment. An exception exists for licensed gambling premises.

No marketing activity suggesting that gambling is a solution to financial concerns should be implemented by 312 Investments Limited. 312 Investments Limited views this as socially irresponsible and a breach of this Policy.

Even where risks are clearly set out, care and consideration should always be given to ensure gambling is not portrayed as a viable alternative to employment, or solution to financial concerns in any given context.

References to salary or debts in gambling should also be given specific consideration when planning any marketing or advertising campaign, to ensure there is no breach of the Codes or rules outlined in this Policy.

It is generally acceptable to show gambling as being important and interesting to characters, as long as it is not to the exclusion of other activities or interactions with people.

Solitary gambling

The CAP & BCAP Codes state:

Marketing communications must not:

- Suggest that solitary gambling is preferable to social gambling.

Any advertisement that features an adult losing track of time, retreating into private fantasy, or engaging in secretive gambling is likely to breach the general principle of the Codes that advertisements should not portray, condone or encourage gambling behaviour that is socially irresponsible or could lead to financial, social or emotional harm.

Solitary gambling should not be shown favourably contrasting with social gambling.

6 MISLEADINGNESS

All marketing communications and advertisements must state significant limitations and qualifications. Qualifications may clarify but must not contradict the claims that they qualify and should be presented clearly.

The terms “free”, “gratis”, “without charge” or similar should not be used unless the customer will not pay anything except the unavoidable cost of responding, collecting, or paying for delivery of an item.

All marketing communications and advertising must make clear the extent of the commitment the consumer must make to take advantage of a “free” offer.

312 Investments Limited should ensure:

- Marketing communications or advertisements must not materially mislead or be likely to do so; and
- Marketing communications or advertisements must not mislead the consumer by omitting material information. They must not mislead by hiding material information or presenting it in an unclear, unintelligible, ambiguous, or untimely manner.

Material information is information that the consumer needs in context to make informed decisions in relation to a product and to help them decide whether or how to buy a product or service. Whether the omission or presentation of material information is likely to mislead the consumer depends on the context, the medium and, if the medium of the marketing communication or advertisement is constrained by time or space, 312 Investments Limited must take all measures possible to make that information available to the consumer by other means.

Marketing communications or advertisements that include a promotion and are significantly limited by time or space must include as much information about significant conditions as practicable and must direct consumers clearly to an easily accessible alternative source where all the significant conditions of the promotion are prominently stated. Participants should be able to retain those conditions or easily access them throughout the promotion.

When using media such as banners for adverts, any significant terms and conditions should be no further than one click away from the banner or advert.

Examples of significant terms and conditions are:

- Requiring consumers to deposit the same amount of their own money as a free bet in order to take advantage of the offer.
- Requiring new customers to bet their initial deposit.
- Requiring customers to match a free bet amounts on a certain number of occasions before they are able to withdraw any cash winnings from their account.

- Imposing time limits in which bets must be made before winnings are forfeited; and
- Preventing consumers from being able to withdraw any of their own funds deposited into their account until they have placed bets totalling a certain number of times the value of the free bet.

The terms and conditions of each marketing incentive must be made available for the full duration of the promotion.

The term “risk-free bet” should be avoided unless the offer or free bet is completely free, requires no deposit, has no wagering requirements, and is paid as cash that can be withdrawn by customers.

All free bet, bonus or similar offers should not be created or initiated without prior approval from the Board.

Any and all marketing and promotions must be approved by a manager relevant to the site and must be compliant with this policy.

7 SELF-EXCLUSIONS & SUBSCRIPTIONS

312 Investments Limited is committed to complying with the requirements of the Act and LCCP and recognises the importance of respecting our customer’s rights and freedoms. 312 Investments Limited therefore ensures adherence to the following:

312 Investments Limited must take steps to remove the name and details of a self-excluded individual or any customer that unsubscribes from marketing communications from any marketing databases used by 312 Investments Limited or group (or otherwise flag that person as an individual to whom marketing material must not be sent), as soon as practicable after receiving relevant notification.

8 MONITORING THE POLICY

To ensure that the policy continues to be fit for purpose:

312 Investments Limited are committed to carrying out an ongoing risk assessment of this Advertising and Media policy tailoring it to and any training around new products and newly identified risks as appropriate.

In the course of day-to-day activities and in reaction to any advertising or media cases, 312 Investments Limited will continue to seek best practices and new techniques to improve the processes and procedures in place.

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

Document review:

Date Reviewed	Reviewed by

312 INVESTMENTS LIMITED COMPLAINTS PROCEDURE

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

Issues of concern can usually be resolved by contacting the Customer Support team. A database record will be completed at the time of the contact, detailing your contact details, which team member dealt with the issue, the nature of the complaint and how the complaint was resolved. A copy of this complaint's procedure will be provided to customers upon request, or whenever they make a complaint.

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

There are two levels – Complaints Co-ordinator and the Lead Contact for the Supplier

Level 1 – Complaints Co-Ordinator

If 312 Investments Limited haven't reasonably met your expectations or you wish to make a complaint relating to services, you should write or e-mail in the first instance to the Complaints Co-ordinator: Operations Manager

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

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

Level 2 - Lead Contact for the Supplier

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

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

Level 3 – External arbitration

The Gambling Commission requires that every operator registers with an Alternative Dispute Resolution Service provider; in the case where a Gaming dispute cannot be resolved by the operator, the customer may take their complaint to this provider.

312 Investments Limited intends to contract with Pegasus ADR.

ML and Terrorist Financing Risk Assessment

1 RISK ASSESSMENT PURPOSE

The purpose of this document is to establish a separate Money Laundering and Terrorist Financing (“ML TF”) risk assessment for 312 Investments Limited (“312 Investments”). This risk assessment will be implemented to ensure that sufficient focus is given to ML TF risk. It is noted that in section 17 of the Proceeds of Crime and Anti-Money Laundering policy, reference is made to ML risk assessment, and this document is intended to be read in conjunction with the Proceeds of Crime and Anti-Money Laundering policy whilst operating as a standalone document.

This document is regularly reviewed to take into account changes to circumstances, the introduction of new products or technology, new payment methods and changes to customer demographic. This can be seen on the Document Review table at the end of this Risk Assessment.

2 GUIDANCE DOCUMENTS: DUTIES & RESPONSIBILITIES UNDER THE PROCEEDS OF CRIME ACT

An addendum to this document is the Gambling Commission guidance advice to operators dated November 2020 ‘Duties and Responsibilities under the Proceeds of Crime Act 2002’. All gambling staff will be trained on the contents of this document as part of their Anti-Money Laundering and Proceeds of Crime training. Along with its importance in terms of applying the ML TF risk assessment. A risk based approach will be adopted by 312 Investments, as set out at section 18 of the guidance document, and a number of steps will be established to assess the most proportionate way to manage and mitigate the money laundering risks faced by 312 Investments.

The possibility of gambling facilities being used by criminals to assist in money laundering poses many risks for operators. These include criminal and regulatory sanctions for operators and their employees, civil action against the operator and damage to the reputation of the operator leading to a potential loss of business.

All gambling staff must continually identify, assess, and manage these risks, assess the level of risk in the context of how their business is structured and operated, and put in place controls to minimise the risk posed to businesses by money launderers.

This money laundering risk assessment is based on methodology and sets out attempts to identify, analyse and understand money laundering risks. It serves as the first step in addressing the risks, and involves making judgements about threats, vulnerability, and consequences.

This document will be reviewed every 12 months during an audit of policies, procedures, and all internal documents, or as a result of any changes in circumstances, including for example operational changes or changes to the LCCP.

3 IDENTIFYING AND ASSESSING THE RISKS

This section of the document sets out potential risks and the assessment of the risk posed to this particular business. The risks considered include the country and geographical risks, customer risks, transaction risks and product risks.

The risk assessment is conducted by identifying the potential risk (denoted below as ‘Risk’) and then an analysis of the potential risk to the operator and an evaluation of how any potential risk will be dealt with (denoted below as ‘Assessment’).

The operator carries the following risk profile which has been considered for each of the below risks identified:

- The operator has a non-remote Adult Gaming Centre operating licence issued by the Gambling Commission
- The operator contracts directly with customers and has a number of customer facing staff
- The operator utilises experienced individuals in the industry to advise on their operations, particularly for regulatory and compliance matters

As a consequence of the above profile this risk assessment is appropriate to the nature of the operator’s business.

Risk	Assessment and Mitigation	Overall Risk Category
Operator Risks		
Operators failing to comply with prevention of money laundering and terrorist financing legislation and guidance	312 Investments has a robust set of policies and procedures based on the legislation and guidance which are continuously monitored and updated by senior management. Staff training occurs on induction and at a minimum of 12 monthly intervals.	Low
Arcade businesses being acquired by organised crime to launder criminal proceeds	312 Investments is approved and regulated by the Gambling Commission. Any change in ownership would require a Change of	Low

	Corporate Control.	
Lack of competency of key personnel and licence holders which can then be exploited by criminals seeking to launder the proceeds of crime	312 Investments will train all staff on induction and at regular intervals. It engages with a specialist law firm on a variety of matters including regulatory and compliance issues. Key personnel are all annex A holders.	Low
Third party business relationships and business investors	312 Investments implements a thorough due diligence procedure in relation to all third party business relationships and contracts.	Low
Customer Risks		
What risk is posed by the business profile and the profile of customers using the gambling facilities? Is there a risk of anonymous customers laundering proceeds of crime through gaming machines? Is there a risk posed by customers using forged or stolen identities to remain anonymous?	312 Investments premises tend not to attract more than [XXX] individuals at any one time in any individual premises, the customer profile is [XXX]. The staff are trained to interact with all customers entering the premises and the risk of anonymous customers is medium. Staff are trained on the types of ID they can accept.	Low
Is the business local with regular and generally well-known customers? Is there any concerns relating to country/geographical risk?	312 Investments operates [XXX] style venues. The staff in each venue get to know their regular customers. Staff do not sit behind a screen or a desk, but walk the shop floor and interact with every customer who enters the shop. Senior management are aware of the international sanctions list and will utilise	Low

	this if they are ever concerned about a customer.	
Is the business high volume consisting of many low spending consumers? Is the business low volume with high spending consumers?	312 Investments operates Adult Gaming Centres which tend to be low stake high volume. There are usually machines in the venue with stakes ranging 10p to a maximum of £2, with jackpots of up to £500. Customers tend to spend short periods of time in the venue.	Low - Medium
Is the business a mixed portfolio? That is, consumers are a mix of high spenders and lower spenders and/or a mix of regular and occasional consumers?	312 Investments generally has customers who are low spenders due to the nature of the machines.	Low - Medium
Product Risk		
Are automated ticket redemption (ATR) machines used to facilitate the laundering of criminally derived funds?	ATR machines are not used/Staff are carefully trained on the specific risks of these machines and monitor their use to minimise the risk of them being abused.	Low - Medium
What risk is posed by the products generally on offer to the customers?	Generally low risk, the products on offer are low stakes. The stake and prize limits of machines are strictly regulated through the Gambling Act 2005 and subsequent regulations. At least 80% of the machines in AGCs have the same stake and prize limits as pub fruit machines, with 20% having the same limits as high street bingo premises. The maximum stake is £2. This	Low

	will be monitored and may be amended in light of any changes to the legislation as a result of the white paper.	
Are gaming machines, particularly category B3, being used to launder criminally derived funds?	The premises are all designed to ensure staff, and CCTV, have full view of the premises. The staff also walk the floor continuously and are not sat behind screens, meaning they interact with all customers.	Low
Are Privacy booths available?	312 Investments does not have any privacy booths.	Low
Ticket-in-ticket-out (TITO) facilities used to launder funds when used in conjunction with ATR machines	Staff are trained on the risks of TITO machines and they are careful to monitor any use of them. The Local Area Risk Assessment also deal with any such risks, particular in terms of the physical design of the premises and the CCTV layout.	Low
Customers inserting money then attempting to withdraw it without playing	312 Investments trains its staff to carefully observe and interact with customers to look out for such behaviour. Staff members are all aware of the offence of ‘tipping off’.	Medium
Means of Payment Risk		
Are there likely to be situations where the source of funds cannot easily be established or explained by the customer?	312 Investments adheres to strict policies and procedures and where any signs of concern are observed they are escalated as appropriate.	Low- Medium

	No forms of Cryptocurrency are accepted.	
Are there a large proportion of over-seas consumers using foreign currency or over-seas based bank cheques or debit cards?	312 Investments does not accept foreign currency or cheques in any capacity from customers	Low
Are consumers likely to be engaged in a business which involves significant amounts of cash?	This will vary from customer to customer and premises to premises, as to what their consumer base will look like. 312 Investments will assess each customer individually and will operate a risk-based approach.	Low - Medium
Cash transactions	312 Investments risk assesses each customer and particular caution is given to cash transaction. All staff members are trained on cash transactions and ML procedures.	Low - Medium
Scottish notes	The machines and ATR have a high threshold for fraudulent currency recognition.	Low
Contactless Payments	[There are no machines within the premises which accept contactless payments.]	Low
Other Risks		

<p>Inadequate/lack of due diligence checks on any third party providers (e.g., machine providers).</p>	<p>312 Investments will carry out due diligence checks on any third party providers of gambling product, and only those licensed by the UK Gambling Commission will be used to provide facilities for gambling.</p>	<p>Low</p>
<p>Are procedures in place to monitor consumer transactions across outlets, products and platforms to mitigate any money laundering potential? Is there a potential transaction risk?</p>	<p>312 Investments does not operate remotely, it only operates Adult Gaming Centres. Senior management moves between all venues and shares intelligence as needed.</p>	<p>Low</p>

4 CUSTOMER RISK

The following are categories of potential 312 Investments customers whose activities may indicate a higher risk:

- Unknown or anonymous customers
- High spending customers
- Disproportionate spenders
- Regular customers or casual customers with changing or unusual or inconsistent spending patterns
- Customers using forged or stolen identities to remain anonymous
- Customers from high risk or non-cooperative jurisdictions
- Customers who appear on international sanction lists
- Customers who are citizens or residents of, or associated with, countries of theft by non-government organisations as high risk for corruption and financial crime

In assessing the risk of the above posed to this particular business, the main risk tends to be casual or regular customers with unusual or inconsistent spending patterns. However 312 Investments trains staff on how to spot any concerning behaviour and how to act in such situations.

5 TRANSACTION RISKS

The following are potential transaction risks:

- Proceeds of crime
- Larger cash transactions
- Transfers between customers/in particular customers borrowing money from other customers

312 Investments does not operate account based play and staff are trained to identify and manage any such transactional risks, as well as adherence to the relevant policies and procedures which are updated as necessary with the relevance of any transactional risks to the products it operates.

There are also risks surrounding dyed notes within Adult Gaming Centres and staff are trained to look out for any such occurrences and are aware of the SAR procedure.

6 PRODUCT RISK

Product risks particularly relate to the potential for a money launderer to place funds anonymously such as by using third parties.

Staff at 312 Investments are trained to look out for warning signs of any fraudulent activity taking place in its premises, for example money lending.

In the event a member of staff knows or suspects money lending has taken place or is proposed this matter would be dealt with including a likely possibility of banning those individuals from the premises.

These risks have been considered as part of the assessment and have not been identified as

being present risks. They are also analysed and monitored as part of the Local Area Risk Assessments carried out for each individual premises.

7 SUMMARY OF ASSESSMENT OF RISK AT 312 INVESTMENTS

The AML risks of 312 Investments are limited to the customers visiting its premises. 312 Investments keeps a set of robust and viable policies and procedures which are designed to support and guide its staff in dealing with any potential situations which may arise. This includes any situation which may involve money laundering or terrorist financing.

The overall risk rating to money laundering and terrorist financing is low-medium.

This is corroborated by the Gambling Commission money laundering and terrorist financing risks within the British gambling industry which states Adult Gaming Centres are medium risk.

This document is reviewed annually as a minimum, however it reviewed as a result of any changes within the industry or within 312 Investment's customer base. Internal and External audits are conducted as and when required to ensure this document is robust and is being implemented correctly.

Document review:

Date Reviewed	Reviewed by

312 INVESTMENTS LIMITED

PROCEEDS OF CRIME & ANTI MONEY LAUNDERING POLICY

1	POLICY PURPOSE
2	PROCEEDS OF CRIME (POC) & MONEY LAUNDERING (ML)
3	POCA OFFENCES & PENALTIES
4	KNOWLEDGE OR SUSPICION
5	RESPONSIBILITIES
6	PRODUCTS & RISK MITIGATION
7	RISK TRIGGERS
8	CUSTOMER MONITORING
9	SYSTEM CONTROLS
10	PROACTIVE ANALYSIS- THRESHOLD REVIEW & REPORTS
11	SUSPICIOUS ACTIVITY REPORTS (SARs)
12	SAR MONITORING AND TERMINATION OF CUSTOMER RELATIONSHIPS
13	PREJUDICING AN INVESTIGATION
14	ADVERSE INFORMATION & POLICE INVOLVEMENT
15	INTERNAL RISKS
16	CUSTOMER DUE DILIGENCE AND ENHANCED DUE DILIGENCE
17	TRAINING AND SCREENING
18	MONITORING THE POLICY

1 POLICY PURPOSE

The purpose of this document is to detail the responsibilities of the Company and its staff in relation to the Proceeds of Crime Act 2002 (POCA), Terrorism Act 2000 and to uphold the licensing objective of 'Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime' as outlined within the Gambling Act 2005.

In addition, the contents of the document will outline our Company's policies and procedures to prevent the Company being used in connection with money laundering or terrorist financing as well as our continued compliance with anti-money laundering, counter terrorist financing, licensing and legislative requirements.

312 Investments Limited is committed to ensuring that all necessary safeguards are in place in regard to the receipt of money in order to avoid it being used to launder money that may originate from the proceeds of crime.

2 PROCEEDS OF CRIME & MONEY LAUNDERING

2.1 Proceeds of Crime

The Proceeds of Crime can be broadly defined as property from which a person benefits directly or indirectly, by being party to criminal activity - i.e. stolen money, money from drug dealing, tax evasion or stolen, thieved or robbed property. It includes property that a person gains by spending the proceeds of criminal activity, for example, if a person used money gained in a bank robbery to gamble.

2.2 Money Laundering

Money Laundering is a term used to describe the practice of converting money that has been unlawfully or criminally obtained into legitimate funds, concealing and disguising the original source of the funds.

2.3 Differences

The law does not make any distinction between these two activities. The action we should take, and the penalties for not taking action are the same for both.

3 PROCEEDS OF CRIME ACT (POCA) OFFENCES & PENALTIES

There are 3 key offences under the POCA that are applicable to anyone who knows or suspects that property relates to the Proceeds of Crime:

- Section 327 states that a person commits an offence if they conceal, disguise, convert, or transfer criminal property in the UK.
- Section 328 provides that a person commits an offence if he or she enters into or becomes concerned in an arrangement which he or she knows or suspects facilitates, by whatever means, the acquisition, retention, use or control of criminal property to or on behalf of another person.
- Section 329 states that a person commits an offence if he or she acquires, uses, or has possession of criminal property.

The above offences can be committed by any person, including employees who have knowledge or suspicion that a customer is using the POC. The penalty upon conviction of these sections is a maximum term of 14 years imprisonment, a fine, or both.

There is a defence available for a person to show that they made an authorised disclosure under sections 338 and 339, either for an employee to report to the Compliance Team, and further for responsible parties in the Compliance Team to assess and report where they believe knowledge or suspicion exists to the National Crime Agency (NCA).

Once a report has been made, responsible parties in the Compliance Team will consider whether they hold knowledge or suspicion based on the information provided. However, responsible parties in the Compliance Team may commit an offence under section 332 if there is a failure to report knowledge or suspicion to the NCA as soon as reasonably practicable after the information has been received. The sanction under POCA is a prison term up to 5 years, a fine, or both.

It is also an offence under section 342 to disclose knowledge of the existence of any investigation prior to or following a report which could prejudice the investigation' (this is often related to as 'tipping off' though this is not to be confused with the actual offence of tipping off which is only an offence in the regulated sector). The penalty upon conviction is a maximum of 5 years imprisonment.

4 KNOWLEDGE OR SUSPICION

312 Investments Limited and its employees have an obligation to report when we either have knowledge or suspicion that another person is using the POC or engaged in ML.

The POCA regulations do not define knowledge or suspicion, but case law has provided guidance.

Common sense provides that if, for example, a customer confirms they are laundering money or using money from a robbery, the member of staff would in fact know rather than suspect. Courts have previously gone further and also defined knowledge to include situations where the facts would be clear to an honest and reasonable person. It could also include a member of staff turning a blind eye, for example, if staff do not make normal enquiries of a customer where they believe they already know the answer and do not want to hear it.

Suspicion is subjective and may be based on picking up something unusual or where facts do not tally up. Suspicion does not need to be based on actual facts, but there needs to be some satisfaction beyond speculation that the customer is involved in the use of the POC or ML. A feeling of unease does not amount to suspicion.

5 RESPONSIBILITIES

The POCA and AML regime within 312 Investments Limited is managed within the Compliance Team and supported by the operational management.

All staff have a role to play in combatting the use of criminal proceeds and ML, and are trained to pick up triggers which may lead to concern and further suspicion or knowledge.

Staff are also trained to report general concerns or otherwise knowledge or suspicion to the Compliance Team. Where knowledge or suspicion of money laundering is believed to exist,

the Head of Compliance will determine whether a Suspicious Activity Report (SAR) should be raised with the NCA.

6 PRODUCTS & RISK MITIGATION

312 Investments Limited intends to run AGC premises in the UK.

To identify and manage the risks associated with the above products, 312 Investments Limited applies controls in four broad ways.

RISK TRIGGERS: Training key staff to be aware of risk triggers which may be indicative of ML or the use of POC and how to report concerns.

CUSTOMER MONITORING: Providing facilities to allow 312 Investments Limited to monitor customers, allowing staff to log consumer information, transactions and emerging concerns.

SYSTEM CONTROLS: Implementing controls to mitigate areas of potential risk and highlight potential irregularities.

PROACTIVE ANALYSIS: Carrying out proactive analysis of purchasing activity to help detect unusual activity and risk triggers. This is supported by record keeping, monitoring and customer reviews.

Each is considered in turn below.

7 RISK TRIGGERS

Considering the above product type, there are different types of activity or customer behaviours which could lead to cause for concern leading to the possible formulation of knowledge or suspicion that an individual is participating in gambling activity with the POC or involved in ML.

Some examples of risk triggers are:

- Staff knowledge or reasonable suspicion of local crime, or individuals engaged in local crime
- Asking to or attempting to lend money between customers, staff with a reasonable knowledge or suspicion of money lending taking place
- Customers appearing to engage in potential criminal activity, or discussing potential criminal activity
- Geographical Risk - a customer being located in a high risk jurisdiction. A high risk jurisdiction includes those on the FATF Black List and the FATF Grey list, both of which can be accessed online by the MLRO
- A customer behaving in a secretive manner, refusing to speak to staff or concealing funds
- Customers appearing to have a sudden change in financial circumstances without a reasonable explanation

- Customers playing with a large volume of coins, or attempting to exchange a large volume of coin for notes
- Attempting to cash out another customer's ticket
- Machine play which indicates a possible involvement in POC or ML include:
 - Trying to use cash to load credit and asking for cheque or debit card payment
 - Asking or attempting to use one debit card to load credit and then using another to collect winnings
 - Requesting receipts/copies of their tickets from their pay outs.
 - Loading credit and trying to cash the ticket after little or no play.

These behaviours may be identified by any employee, and are most likely to be recognised by staff working in the Adult Gaming Centres. Full training is carried out on induction and at 6 monthly refreshers. All staff are therefore fully equipped with the skills they need to identify any suspicious behaviour.

Staff are encouraged to ask themselves the following questions to help them understand the nature of the situation. In some circumstances these may be more appropriate for EDD conducted by management (Please see below) however it is useful for staff to be alive to them as ML issues:

- Is the customer employed?
- Are they seeking to play gaming machines with large sums of money?
- Is the customer gambling significant amounts of money and has a lavish lifestyle with no visible means of legitimate support?
- Is the customer located in a high risk jurisdiction, or are there any other geographical risks
- Is the family wealthy?
- Are they known to have criminal connections?
- Have they been in prison, if so, did their lifestyle continue as before, after being released?
- Is there any local knowledge (newspaper articles, gossip, etc.) that may indicate their involvement in criminal activities?
- Is there any background knowledge about the customer that would give concern?
- Who do they talk to in the arcade?

In the event the member of staff has any concerns as a result they must report the customer to the Nominated Officer (Max Davitt) and continue to monitor the customer, being careful not to commit the offence of 'tipping off'. This monitoring must including making notes in the customer observation log.

The Nominated officer (Max Davitt) must then assess the situation and make a decision as to whether a SAR should be submitted, the business relationship with that customer should be terminated, conduct Enhanced Due Diligence, conduct Basic Due Diligence or to continue monitoring.

8 CUSTOMER MONITORING

312 Investments Limited will record any concerns they have with its customers by using the data provided for its own internal records. The customer interaction section of the Responsible Gambling Compliance Pack contains more information on this.

9 SYSTEM CONTROLS

General system controls exist to mitigate the risk of our products and business being used from a POC or ML perspective, and create an environment in which suspicious activity may be effectively detected.

Cash Handling

Location specific operating policies and procedures will be put in place with regards to accounting practices and record keeping, in particular in respect of the following:

- Monetary stakes
- Token transactions
- Customer refunds (due to machine malfunctions)
- Money removed from machines
- Ticket in ticket out functions

This is not an exhaustive list and the risks of each location will be analysed.

10 PROACTIVE ANALYSIS

The Compliance Team are aware and complete pro-active analysis of the data recorded to complete the necessary checks for the purposes of POC and ML.

11 SUSPICIOUS ACTIVITY REPORTS (SARs)

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

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

12 SAR MONITORING AND TERMINATION OF CUSTOMER RELATIONSHIPS

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

312 Investments Limited understands that SAR reporting and the defence of making a disclosure under section 338 of POCA is not intended to be used repeatedly in respect of the same customer.

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

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

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

13 PREJUDICING AN INVESTIGATION (“Tipping Off”)

Staff are trained that subsequent to a report to the Compliance Team, or a SAR being raised with the NCA, it is a criminal offence under section 342 of POCA to release information about the knowledge of the existence of an investigation that may prejudice that investigation.

The Compliance Team will work particularly closely with customer facing staff to ensure that investigations are not disclosed when a payment is being held pending consent, or during the process of ceasing the relationship with a customer.

14 ADVERSE INFORMATION & POLICE INVOLVEMENT

14.1 Previous Convictions or Previous Police Involvement

Where information is obtained which indicates previous Police interest or convictions for a financial crime or related offence, a file will be updated and steps may be taken to gather customer information from the stages above. Where concerns remain, the customer may be requested to provide proof of identity and source of funds.

14.2 Current Police Investigation

All Police requests for information are logged and a file is created in respect of customers subject to the enquiry (where a file does not already exist), and information provided.

If Police request information in respect of a financial crime enquiry, contact will be made to understand the current status of the investigation.

Provided that the following criteria are met, and there is no overriding knowledge of laundering activity, 312 Investments Limited will support and formally cooperate with the Police if there is an explicit request to continue business to preserve the case and evidence.

- The Police must submit a Data Protection Act request for information;
- A formal timeframe for engagement must be established with Police;
- Assurances must be provided by Police that there is a formal investigation, and that the case will be subject to regular review dates. RIPA authority (to provide Police with investigatory and surveillance powers) must be obtained within the first 28 days of engagement;

A Disclosure will be made to the Gambling Commission to advise.

Suspicious Activity Reports will be considered by 312 Investments Limited at the point of Police engagement and at each subsequent Police review date.

This cooperative approach seeks to help to ensure that crime is kept out of gambling in the longer term.

15 INTERNAL RISKS

The internal risks of an AGC premises include, but are not limited to, the following:

Money lending

312 Investments Limited recognises the risks presented by customers who may seek to transfer money to other customers or third parties or receive funds from other customers or third parties. In order to mitigate this risk, identified transfers between customers and third parties must be assessed by the Management team who must satisfy themselves that systematic, organised or commercial money lending is not taking place. Staff will be trained on identifying factors to look out for.

Collusion

Collusion can be the agreement between people to act together secretly or illegally in order to deceive or cheat someone. 312 Investments Limited are aware of the risks collusion present to both the premises and in the context of money laundering and proceeds of crime. All staff are trained to be aware of the signs of collusion and to report such signs to management immediately.

Fraud

Machine fraud is an ever present threat and all staff must be aware of the ways in which fraud can take place and what to do in the event they spot a customer defrauding a machine.

Management will ensure the venue floor is never left unattended and that customers who are not known, or with whom the staff are not familiar with, are given due consideration. Management will ensure photos of known fraudsters are available to all members of staff. Staff must take special care to be aware of situations where large amounts of credit are being played with, machines are regularly going empty, suspicious activity such as large numbers of customers entering a venue trying to distract employees takes place and customers covering parts of machines.

In the event a machine is defrauded, floor staff must inform a manager immediately. Employees must take care not to endanger themselves when dealing with a fraudster.

16 CUSTOMER DUE DILIGENCE AND ENHANCED DUE DILIGENCE

Staff must approach customers on a risk based approach. This may differ between Adult Gaming Centres and will be informed by the Money Laundering Risk Assessment, which is required under LCCP 12.1.1, and the Local Area Risk Assessment.

The customer due diligence includes:

- Name, verified with ID such as a driving licence or passport
- Address, verified with ID as above or a utility bill no older than 3 months

ENHANCED DUE DILIGENCE

Staff must approach customers on a risk based approach. This may differ between Adult Gaming Centres and will be informed by the Money Laundering Risk Assessment which is required under LCCP 12.1.1.

A customer may require enhanced due diligence if the Nominated Officer deems it appropriate in the circumstances, or if a member of staff, having consulted with senior management, deems it appropriate in the circumstances.

Enhanced due diligence can only be carried out by the Area Manager or above. The EDD process will always be supervised either by the CEO or the COO as well as the MLRO.

Enhanced Due Diligence may be carried out on any individuals based in or with strong connections to a high risk jurisdiction.

Enhanced Due Diligence is likely to vary between customers but should normally include:

- A secondary piece of ID
- Source of Wealth and documentary evidence of the same
- A recent Bank Statement
- Background checks using open sources

All EDD must be recorded.

Staff must ensure they also consider the behaviour of established customers when deciding when enhanced due diligence may be appropriate.

In the event there is increasing level of suspicion of money laundering, or even actual knowledge of money laundering, the MLRO must be alerted immediately and a decision made on a case by case basis whether to terminate the customer and/or submit a SAR. All staff are aware of the offence of tipping off.

RECORDING

All customer due diligence and enhanced due diligence interactions must be recorded.

Further, these interactions must be monitored and reviewed monthly in order to ensure that any patterns emerging are noticed and dealt with if appropriate. This review must be conducted by senior management.

Should the customer refuse to provide the requested documents the business relationship with the customer will be terminated and the customer banned.

17 TRAINING AND SCREENING

312 Investments Limited are committed to ensuring that all key staff understand their responsibilities in respect of POCA and this policy, including internal risks, and in particular the triggers to be alert to and the requirement to report concerns, knowledge, or suspicion to the Compliance Team immediately.

Staff are trained as follows:

All employees of 312 Investments Limited are required to undertake and complete AML training and understand our policy and reporting processes.

Head Office

Key customer facing head office staff, including the compliance team, are required to understand and adhere to the Company's POCA & AML policy.

Training refreshers will be held every 12 months and new starters are trained upon induction.

Ad hoc training sessions may be provided to react to developing risks in particular areas.

18 MONITORING THE POLICY

To ensure that the policy continues to be fit for purpose:

312 Investments Limited are committed to carrying out an ongoing risk assessment of its POC & ML regime, tailoring this policy and training around new products and newly identified risks as appropriate.

In the course of day to day activities and in reaction to any POC or ML cases, 312 Investments Limited will continue to seek best practices and new techniques to improve the processes and procedures in place.

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

Document Reviewed By	Date of Review

312 INVESTMENTS LIMITED STAFF TRAINING POLICY

1. INTRODUCTION

312 Investments Limited is committed to high levels of compliance and to providing its customers with a safe and enjoyable experience. It recognises that the members of staff who are in the premises and interacting with customers are crucial in making this happen.

2. INDUCTION

All members of staff employed by 312 Investments will receive training before they begin work. This training will be:

- Introduction to 312 Investments
- Safer Gambling, Compliance and the LCCP
- Underage Gambling
- Basic Machine Management
- Bullying and Harassment
- Conflict Management
- Venue Management Basics
- Venue Conditions (for each venue)
- Anti- Money Laundering

3. ONGOING TRAINING

All members of staff will receive refresher training every 12 months.

If there are any changes or updates to any key area, for example a change to the LCCP, then staff will receive specific training on this area.

If it is identified that there is any area, or an individual, which requires further training, this will be organised at the earliest possible time.

4. TRAINING COURSE

312 Investments Limited will implement an in person training course.

This includes all of the areas listed above. Each area has a course with a test at the end, the test consists of several questions.

No aspect of the course can be skipped and staff must complete all sections of the course before they attempt the test.

If an employee passes the test they will be issued with a certificate which lasts for 12 months. After 12 months they will have to redo the training and retake the test. They will receive a reminder at 12 months.

If an employee fails the test, they will have to retake the test. They only have 3 chances to pass the tests. An employee who fails the test on the third attempt will have their employment contract terminated.

Senior management receives reports on who has completed the training and whether there have been any fails recorded.

5. EMPLOYMENT DETAILS

If a member of staff leaves the company, for whatever reason, their records, including those captured on the training system, will be retained for xx before being confidentially destroyed.

Date Reviewed	Reviewed by

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HOUSE OF COMMONS
LONDON SW1A 0AA

Brent Licensing Authority
Brent Council

By email only to:
business.licence@brent.gov.uk

Our Ref: ZA51650

9 April 2026

To whom it may concern,

Representation objecting to application 37927 for a Premises Licence under the Gambling Act 2005 for Vault Casino, 574 High Road, Wembley, HA0 2AA

I am writing to object to the application 37927 for a new Adult Gaming Centre at 574 High Road, Wembley.

My objection is based on the three licensing objectives under the Gambling Act 2005:

- Preventing gambling from being a source of crime or disorder;
- Ensuring gambling is conducted in a fair and open way; and
- Protecting children and other vulnerable people from being harmed or exploited by gambling.

This is not about opposing gambling in principle. It is about saying enough is enough, we are already at saturation point.

Brent already has one of the highest numbers of gambling premises in London and the United Kingdom. Brent's Joint Strategic Needs Assessment on Gambling says there are 81 licensed gambling premises in Brent, and that the borough has higher-than-average levels of gambling harm. It also says Brent has more people gambling at harmful levels than the national average. Businesses like the applicant are deliberately targeting our borough, because with poverty comes commercial opportunity.

That matters because the harms are not spread evenly. Brent's Joint Strategic Needs Assessment on Gambling says gambling premises are clustered in more deprived parts of the borough, and that Brent's population matches many of the groups most at risk of gambling harm. It also says the estimated economic cost of gambling harm in Brent rose from £2 million in 2012 to £14.3 million in 2022.

The Social Market Foundation report *High Streets at Stake: The rise of Adult Gaming Centres and the case for reform* makes the same point in even starker terms. It says Adult Gaming Centres are spreading, especially in poorer communities, and that there is evidence they are linked to crime, anti-social behaviour and harm to vulnerable people. It also says Brent is a case study in how gambling premises can cluster in deprived areas and deepen local harm. The More in Common report *Ending a Losing Streak* found that a plurality of Britons want the gambling industry to shrink, not grow, and that people would rather have an empty shop on their high street than a gambling shop. It also found that close to half of people think there are already too many gambling premises in their area.

That speaks directly to this application. This site is not going into a vacuum. It is going into a part of Wembley already heavily shaped by gambling uses. As set out locally, the proposed

site sits next to a Coral and within around 50 feet of two Silvertime premises, a Paddy Power, a branch of Gr8odds and a pawnbroker. In plain English, this is a cluster already. Adding another AGC on top does not improve the high street. It drags it further in the wrong direction.

The applicant has submitted an application form together with a Social Responsibility and Compliance Pack. But the point here is that standard company policies do not answer the bigger question the Licensing Authority has to decide: whether this particular premises, in this particular location, is reasonably consistent with the licensing objectives. The applicant's documents set out generic controls like CCTV, Challenge 25, self-exclusion, staff training and incident logs. Those are basic expectations. They do not change the wider local picture – this application is not welcome in our community.

1. Preventing gambling from being a source of crime or disorder

This is the first reason the application should be refused.

The *High Streets at Stake* report says AGCs create risks around crime and disorder. It highlights high cash use, money laundering concerns, and worries from residents about anti-social behaviour around these premises.

The applicant's own documents accept that these risks exist. The application proposes conditions around CCTV, banning disorderly customers, refusing entry to people under the influence of alcohol or drugs, incident logging and staff monitoring. The compliance material also refers to risks around aggressive customers, suspicious activity, money laundering, fraud and police attendance. So even on the applicant's own case, this is the kind of premises that brings crime and disorder risks which have to be taken seriously.

The *Ending a Losing Streak* report backs that up with what people actually say about their towns. People described gambling shops as bringing areas down and linked them to heavy drinking, anti-social behaviour and wider community decline. One Brent participant said: "*It defies logic why you need six betting shops... I just think it just brings the area down.*"

That is exactly the issue here. When you already have a dense row of gambling premises and then add another one, it is not credible to pretend there will be no extra impact. Common sense says otherwise, and the research says otherwise too.

It is also relevant that the application does not clearly set out the intended opening hours. The form says the applicant is not seeking extended hours, but we can see a live planning application to give this site longer operating hours. Either way, this omission makes it harder for the Licensing Authority properly to judge the likely impact on crime, disorder and anti-social behaviour.

2. Ensuring gambling is conducted in a fair and open way

This is the second reason for objection.

The Social Market Foundation *High Streets at Stake* report raises wider concerns about how AGCs operate, including transparency and whether people are really being protected in practice. It says there are real questions about whether these premises always meet the "fair and open" objective.

The applicant's paperwork says the right things in broad terms. It refers to complaints procedures, customer interaction, due diligence, staff training and terms and conditions. But a bundle of standard policies is not the same as a convincing explanation of why this particular site, in this particular stretch of high street, would operate fairly and openly in practice.

There is also little real detail in the application about how this premises will function day to day in such a sensitive local context. Again, the lack of clear stated operating hours matters. The Licensing Authority is being asked to approve a new AGC without a fully clear picture of how the premises will operate across the week.

The bigger point is this: the more gambling premises you pack into one stretch of high street, the harder it is to argue this is a fair, balanced or healthy local environment. It normalises gambling, makes it more visible, and makes it more available to people who may already be struggling. That is not what a fair and open local offer looks like. It looks like oversaturation.

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

This is the strongest ground of all.

Brent's Joint Strategic Needs Assessment on Gambling makes clear that this borough has high levels of vulnerability when it comes to gambling harm. It identifies deprivation, financial stress and other vulnerabilities that increase the risk of harm.

The *High Streets at Stake* report says AGCs are concentrated in poorer areas and that more gambling venues can mean more harm. It also found that 44% of young people aged 14 to 17 said gambling venues near where they live make people their age more interested in gambling, and 27% said they knew young people who had visited an AGC.

The More in Common *Ending a Losing Streak* report makes public concern very clear. It found that 68% of Britons think under-18s should not see gambling advertising at all and that people are deeply worried about how normal gambling is becoming for children and young people.

The applicant's own compliance pack recognises many of the same risks. It refers to vulnerability linked to poor health, addiction, bereavement, financial difficulties, homelessness and impaired judgement, and it sets out tools like Challenge 25, self-exclusion and customer interaction. The application itself also proposes Challenge 25, third-party age testing and visible notices.

But those are baseline measures. They do not answer the much bigger problem here, which is the location and the clustering. If you keep stacking gambling premises on top of one another, you send a message about what this high street is for and who it is for. You make gambling feel normal, constant and unavoidable. That is bad for children, bad for vulnerable adults, and bad for families already dealing with pressure on money and mental health.

Summary

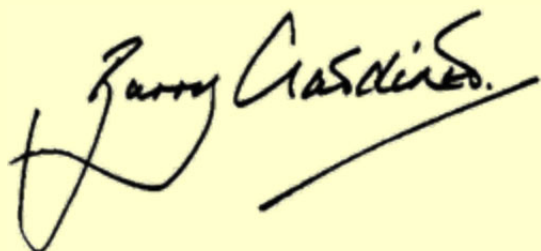
This application should be refused.

Brent already has too many gambling premises and too much gambling harm. Brent's Joint Strategic Needs Assessment on Gambling says so. The *High Streets at Stake* report by the Social Market Foundation says AGCs are clustering in poorer communities and causing harm. The *Ending a Losing Streak* report by More in Common says the public want fewer gambling premises, not more, and would rather see an empty unit than another gambling shop. The applicant has provided standard policies and standard safeguards. But that does not change the basic point. This proposal would put yet another AGC into a part of Wembley already overloaded with gambling premises and related uses.

It is adding one more gambling premises into a cluster that is already too dense. That means more risk of anti-social behaviour, more normalisation of gambling, more harm to vulnerable people, and more damage to the character of the high street.

For those reasons, granting this application would not be reasonably consistent with the licensing objectives. I therefore respectfully ask the Licensing Authority to refuse it.

Yours faithfully,

A handwritten signature in black ink, reading "Barry Gardiner". The signature is written in a cursive style with a long horizontal stroke at the end.

Barry Gardiner
Member of Parliament for Brent West

From: Krupesh Hirani <Krupesh.Hirani@london.gov.uk>

Sent: 23 April 2026 14:58

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

Subject: Representation objecting to application for a Premises Licence under the Gambling Act 2005 for Vault Casino, 574 High Road, Wembley, HA0 2AA

Dear Sir / Madam,

As the Member of the London Assembly for Brent and Harrow, I am writing to formally submit my objection to the application for a new Adult Gaming Centre (AGC) at **574 High Road, Wembley**.

My objection is rooted in the three core licensing objectives set out under the **Gambling Act 2005**:

1. The prevention of gambling from being a source of crime or disorder.
2. Ensuring that gambling is conducted in a fair and open way.
3. The protection of children and other vulnerable persons from being harmed or exploited by gambling.
- 4.

This representation is not an objection to gambling in principle, but rather a firm stance that our community has reached a saturation point. Brent already contends with one of the highest concentrations of gambling premises in the United Kingdom. According to **Brent's Joint Strategic Needs Assessment (JSNA) on Gambling**, there are 81 licensed premises in the borough, and we suffer from higher-than-average levels of gambling harm. It is evident that businesses are targeting our high streets because they view economic deprivation as a commercial opportunity.

1. Preventing Gambling from being a Source of Crime or Disorder

The **Social Market Foundation (SMF)** report, *High streets at stake*, highlights that AGCs frequently create risks regarding crime and anti-social behaviour (ASB) due to high cash turnover and money laundering vulnerabilities.

The applicant's own "Social Responsibility and Compliance Pack" acknowledges these risks by proposing CCTV and staff monitoring to manage aggressive customers and suspicious activity. However, standard policies cannot mitigate the cumulative impact of another gambling hub in this specific location. The **More in Common** report, *Ending a*

Losing Streak, found that residents in Brent and beyond feel these shops "bring the area down," linking them to heavy drinking and community decline. Adding a further unit to an existing cluster of betting shops and pawnbrokers will inevitably exacerbate these issues.

2. Ensuring Gambling is Conducted in a Fair and Open Way

While the applicant provides generic paperwork regarding complaints and due diligence, they fail to provide a convincing argument for how this specific site will operate transparently within such a sensitive local context.

Furthermore, the application is ambiguous regarding opening hours. While the form suggests no extended hours are sought, a concurrent planning application suggests otherwise. This lack of clarity prevents the Licensing Authority from accurately assessing the impact on the local environment. A fair high street is a balanced one; a street dominated by gambling is neither fair nor healthy for the local economy.

3. Protecting Children and Vulnerable People

This is my gravest concern. Brent's JSNA identifies significant local vulnerabilities linked to financial stress and deprivation. The SMF report notes that **44% of young people** feel that the proximity of gambling venues increases interest in gambling among their peers.

The site at 574 High Road does not exist in a vacuum. It sits adjacent to a Coral and is within 50 feet of two Silvertime premises, a Paddy Power, and a branch of Gr8odds. By continuing to stack these premises on top of one another, we are normalising gambling for the children and families who use Wembley High Road daily. Baseline measures like "Challenge 25" are insufficient when the sheer density of these establishments makes gambling feel unavoidable for those already struggling with addiction or mental health pressures.

Summary

The evidence is clear:

- **Brent's JSNA** confirms we already have excessive gambling harm.
- **The SMF** confirms that AGCs cluster in poorer areas to the detriment of the community.
- **The public**, as evidenced by the More in Common report, would prefer an empty shop unit over another gambling establishment.

Standard corporate safeguards do not override the fact that this application is fundamentally inconsistent with the licensing objectives. This proposal will not improve Wembley High Road; it will further degrade it. I therefore respectfully urge the Licensing Authority to **refuse** this application.

Best wishes,

Krupesh

Krupesh Hirani AM

London Assembly Member for Brent and Harrow

LONDONASSEMBLYLABOUR

City Hall, Kamal Chunchie Way, London, E16 1ZE

Phone: 020 7983 4377

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To: Brent Licensing Authority

Re: Representation objecting to application for an Adult Gaming Centre Premises Licence under the Gambling Act 2005

Applicant: 312 Investments Limited

Premises: Vault Casino, 574 High Road, Wembley, HA0 2AA

Link: [Brent | MyPortal | Licence Register | 37927](#)

We write to object to the application by 312 Investments Limited for a new Adult Gaming Centre premises licence at 574 High Road, HA0 2AA. This representation is made on the basis that granting this application would not be consistent with the licensing objectives under the Gambling Act 2005, namely:

- preventing gambling from being a source of crime or disorder
- ensuring gambling is conducted in a fair and open way
- protecting children and other vulnerable persons from being harmed or exploited by gambling.

Brent is already disproportionately affected by gambling related harms and opening another AGC could compound this. Brent's Joint Strategic Needs Assessment (JSNA) on Gambling (2023) highlights that Brent not only has one of the highest numbers of gambling premises across London and the country, but that it is also among the areas with the highest number of people gambling with the most severe consequences. According to the Problem Gambling Severity Index (PGSI) scale used in many official surveys on gambling, it reports that 17.1% are considered to be gambling with at least a low-level of risk (vs 13.4% in the rest of the country), while 6.2% are considered to be gambling with the highest level of risk - more than twice the national average of 2.9%. Latest figures show that those in Brent continue to experience a disproportionate level of harm, recording a much steeper rise in 'at-risk' gambling than the national average. While national levels of 'at-risk' gambling have risen only marginally (13.4% to 14.7%), Brent has experienced a marked increase from 17.1% to 24.9%. This divergence occurring in a borough with one of the highest concentrations of land-based gambling premises in London suggests a local environment of heightened exposure to harm.

Furthermore, this application should also be seen in the wider context of what residents want from their high streets and how they already perceive the proliferation of gambling shops on their doorsteps. Qualitative insights from the JSNA revealed that many felt that gambling companies were actively targeting Brent and the vulnerable people living in deprived areas. As one Brent resident powerfully put it:

“There's a problem in Brent, obviously. They wouldn't have all these bookie shops otherwise. They know they can make money from poor people always trying to make an extra buck.”

Peer Support Group Member to drug and alcohol service users in Brent

1. Preventing gambling from being a source of crime or disorder

The proposed premises is located on Wembley High Road in the ward of Wembley Central. The applicant's own Local Area Risk Assessment (LARA) cites the area's safety score of only 7/100, pointing out that of the 8,763 crimes committed within the last 12 months, most were related to violent crimes and anti-social behaviour. Figures from the Metropolitan Police Service in 2023 also show that Wembley Central saw one of the highest increases in robberies and burglaries in the borough (an increase of 154 from the year before).

As Brent's JSNA reveals, there is some evidence linking gambling behaviour with criminal activity. Crimes committed by gamblers often involve theft or fraud and can also contribute to violent interpersonal crimes like domestic abuse. Though data on this is limited, this is partly because crimes are often recorded for what they are and rarely include what the crime was motivated by. Furthermore, gambling is rarely specifically asked about in these types of assessments.

This is particularly relevant in the context of premises-based gambling, where operators are required not only to manage on-site behaviour but to assess whether the provision and operation of such premises may contribute to wider areas of harm in the local area. Evidence suggests that incidents of violence and disorder in AGCs are likely under-reported, if reported at all. A Freedom of Information (FOI) request to Warwickshire Police revealed that although the current Crime Recording System does not identify AGCs as a location type, the FOI was able to identify from postcode data that 1667 offences had occurred around matching registered AGCs within a 5 month period. It is worth noting that there are 12 AGCs in Brent alone, compared to the 9 premises found across the 5 district and borough councils of Warwickshire County.

In the applicant's LARA there doesn't appear to be an acknowledgement of the relationship between gambling and these wider harms. While the assessment recognises the potential impact of crime as 'severe' for both the business and customer, it categorises the level of risk as 'low.' This conclusion appears to rest primarily on security measures, such as CCTV and intruder alarms, which are presented as sufficient mitigation. These measures focus on managing incidents on-site and fail to address the wider ways in which gambling-related harm can contribute to crime and disorder beyond the site itself.

Lastly, the LARA expressly acknowledges a concentration of nearby gambling premises, pawnbrokers, bars and pubs. As research by More in Common found, this is a key area of public concern. Speaking to Britons, including a focus group with residents in Brent,

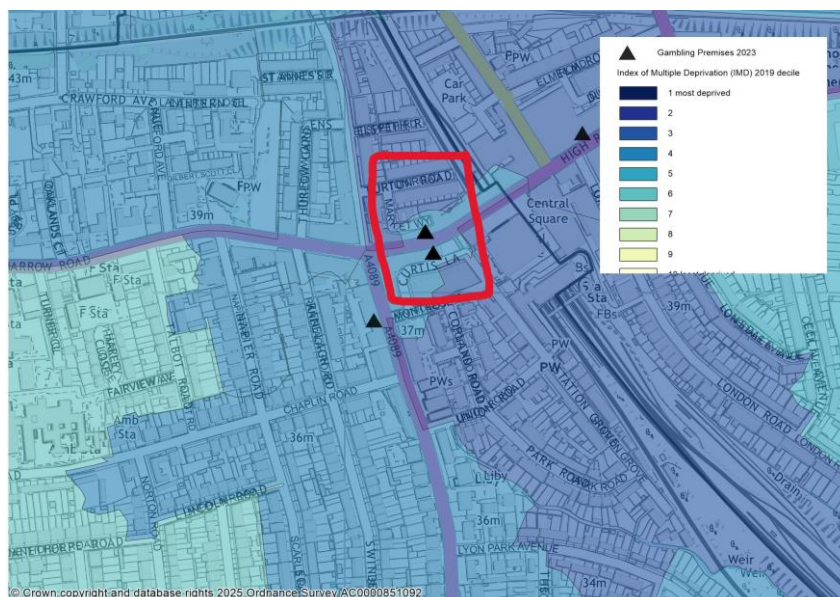
the report revealed specific concern about the relationship between gambling venues, heavy drinking, and anti-social behaviour.

Taken together, this is evidence of a local environment in which the risk of crime is heightened, not reduced.

2. Ensuring that gambling is conducted in a fair and open way

The licensing objective of ensuring that gambling is conducted in a fair and open way is concerned not only with the technical operation of gaming machines, but also with whether customers can reasonably understand the nature of the gambling on offer, the risks involved, and the terms on which they are participating. This includes transparency of information and the extent to which customers are able to make informed decisions.

The proposed premise at 574 Wembley High Road is within the Wembley Central ward which already hosts nine licensed gambling premises – the highest number across the borough. This particular premise would add a fourth venue less than 250 feet away from each other. The applicant’s own LARA highlights nine gambling venues within around a half mile radius, as well many other similar premises nearby that sit outside of the ward’s boundaries. The map below highlights the exact spot of the proposed premises. As the venues are so close together, all four locations are indicated by the two black triangles in the red square. The map also highlights how the premises sits within the most deprived areas of Wembley, indicated by the darker shade of purple, compared to the lighter blue.



Such a high concentration of gambling venues contributes to a cumulative environment where gambling is both normalised and difficult to avoid. This concern is heightened by

the area's high levels of socio-economic deprivation as financial pressure can often influence decision-making and risk perception. Evidence cited in Brent's JSNA shows that 37% of Citizens Advice advisers reported taking calls from people who had turned to gambling in the hope of improving their financial situation, with 19% reporting cases where gambling was being used specifically to cover essential costs such as energy bills. GamCare advisers similarly report callers in receipt of Universal Credit who gamble as a perceived means of generating additional income to meet basic expenses. In this context, the applicant has not demonstrated how the operation of the premises would remain fair and open in an environment where cumulative exposure and vulnerability are likely to affect decision-making.

The applicant recognises failure to provide information on responsible gambling to players as having the potential to severely affect customers, though it still categorises it as a low risk overall. However, it appears that measures mainly adhere to the legal minimum requirement to prominently display safer gambling messaging and to ensure information on safer gambling is readily available. The applicant mentions the provision of generic and passive signage and information available, and does not include anything in relation to the specific characteristics of the premises and its customer base. For example, the LARA identifies that 86% of the local population is non-white while 14% are unable to speak English well. It also points out that at around two-thirds of households in the area are deprived in at least one dimension. However, there is nothing to suggest that there is any targeted support for these groups or that information has been adapted to ensure that customers in these groups are able to meaningfully understand the nature of gambling on offer, the risks involved, or routes to complaint and redress. Furthermore, as Brent's JSNA highlights, ethnic minority groups and those living in areas of higher deprivation (and therefore closer to gambling venues), are some of the worst affected by gambling harms.

Additionally, the applicant's compliance policies include provisions that place significant discretion in the hands of the operator, including the ability to disclaim responsibility where self-excluded customers have still managed to gamble within the premises and have incurred losses.

More generally, the SMF report *High Streets at Stake* raises concerns that some AGCs are not always operated transparently, including examples of apparent attempts to circumvent machine ratio rules and poor presentation of key information to customers. The report concludes that AGCs raise real questions under the "fair and open" objective.

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

“Gambling felt like something I could lean on when things went wrong.”

Student

Granting a premises license for an additional AGC at this location would bring an increased risk of gambling-related harm to the people who live, work, study and spend time in the surrounding area. While gambling-related harms can affect anyone, the evidence consistently shows they fall disproportionately on those already most vulnerable. In fact, research shows that the groups least likely to gamble overall often experience the most severe harms.

Those most likely to be negatively affected by the opening of this new Adult Gaming Centre include:

- children and young people
- people living with mental health conditions
- people in treatment for substance misuse
- people experiencing financial hardship
- people living in areas of high deprivation
- people from ethnic minority groups

Brent is the fourth most deprived borough in London, with a younger-than-average population alongside high levels of ethnic diversity. The estimated prevalence of common mental health conditions is also higher in Brent (20.7%) than across London (19.3%) or the country (16.9%). This demographic profile means Brent is home to a high concentration of groups known to have a greater risk of gambling-related harm.

Evidence shows that these high-risk groups are much more likely to experience harm from gambling compared to their counterparts. For example:

- 21% of 18–24 year olds are classed as “at-risk” gamblers, compared to 10% of those aged 55–64
- 10.6% of people from minority ethnic groups are considered to be ‘problem gamblers’, compared with 3% of white groups
- Individuals who experience gambling harms are up to 15 times more likely to be at risk of suicide

Gambling venues are also known to be disproportionately clustered in areas of higher deprivation. This pattern applies both across Brent as a whole and within Wembley specifically. This is significant as research suggests a relationship between gambling behaviour and proximity to gambling venues. For example, studies have found:

- People living closer to gambling venues (less than 0.7km away) are twice as likely to be ‘problem gamblers’ than individuals living further away (more than 3.1km away)
- The likelihood of young people (aged 18-21) encountering gambling problems, as opposed to never gambling, increases by 39% for each additional form of gambling operator located with their local area
- Higher concentrations of gambling premises are associated with higher rates of ‘problem gambling’
- Those living in more deprived areas are more likely to gamble on faster-paced games such as scratch cards and slot machines - which are known to be more addictive

The applicant’s own LARA identifies similar groups as vulnerable, supporting concerns that opening a further venue would do little to protect them from harm. It identifies numerous schools, colleges, medical centres, care homes, children’s play areas, hostels, foodbanks, all within a mile radius of the proposed premises. It recognises that these groups are susceptible to out of control gambling, yet categorises these risks as ‘low’. This assessment places disproportionate confidence in the proposed mitigation measures and significantly undermines confidence that the risks have been robustly or realistically evaluated.

In particular, the proposed controls rely heavily on staff to identify and respond to harmful gambling behaviours, yet the applicant proposes a minimum of only two staff members on site at any given time. Measures to mitigate harm also rely largely on signage and information available in-store, where there is no guarantee that individuals will take notice.

Public concern further reinforces these risks. Research indicates widespread anxiety about the impact of gambling venues on children and young people. The SMF report found that 44% of young people aged 14–17 agreed that the presence of gambling venues near their homes increases interest in gambling among their age group, while 27% reported knowing young people who had visited an AGC.

Finally, gambling is commonly described as a ‘hidden addiction’, as harmful behaviours often develop gradually without overt warning signs. Normalisation of gambling within everyday environments is therefore one of the most significant risk factors for harm, as it further obscures these early warning signs, minimising the idea that gambling can cause major harm, while increasing exposure for those who may be attempting recovery. Introducing an additional AGC in an area already saturated with gambling premises would further entrench this normalisation and intensify risk.

“You’ve got it in your face all the time – high road, on your phone, it’s everywhere. How do you overcome that when wherever you go, it’s right there, staring in your face?”

Peer Support Group Member to drug and alcohol service users in Brent

Summary

This objection is not to gambling in principle, but to the introduction of an additional Adult Gaming Centre in an area already experiencing the disproportionate burden of gambling-related harm. The evidence set out above demonstrates that **the application fails to provide sufficient assurance** that granting the license would be compatible with the licensing objectives under the Gambling Act 2005.

Yours sincerely,

Ruth du Plessis

Interim Director of Public Health and Leisure

Email: Ruth.du-Plessis@Brent.gov.uk

Arisa Kimaram

Senior Insight Analyst

Email: arisa.kimaram@brent.gov.uk

Public Health

Brent Civic Centre

Wembley

HA9 0FJ

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From: Shah, Councillor Sonia <Cllr.Sonia.Shah@brent.gov.uk>

Sent: 12 April 2026 13:52

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

Subject: Representation objecting to application for a Premises Licence under the Gambling Act 2005 for Vault Casino, 574 High Road, Wembley, HA0 2AA

Importance: High

I am writing to object to the application for a new Adult Gaming Centre at 574 High Road, Wembley.

My objection is based on the three licensing objectives under the Gambling Act 2005:

- preventing gambling from being a source of crime or disorder
- ensuring gambling is conducted in a fair and open way
- protecting children and other vulnerable people from being harmed or exploited by gambling.

This is not about opposing gambling in principle. It is about saying enough is enough, we are already at saturation point.

Brent already has one of the highest numbers of gambling premises in London and the United Kingdom. Brent's Joint Strategic Needs Assessment on Gambling says there are 81 licensed gambling premises in Brent, and that the borough has higher-than-average levels of gambling harm. It also says Brent has more people gambling at harmful levels than the national average. Businesses like the applicant are deliberately targeting our borough, because with poverty comes commercial opportunity.

That matters because the harms are not spread evenly. Brent's Joint Strategic Needs Assessment on Gambling says gambling premises are clustered in more deprived parts of the borough, and that Brent's population matches many of the groups most at risk of gambling harm. It also says the estimated economic cost of gambling harm in Brent rose from £2 million in 2012 to £14.3 million in 2022.

The Social Market Foundation report, High streets at stake: The rise of Adult Gaming Centres and the case for reform, makes the same point in even starker terms. It says

Adult Gaming Centres are spreading, especially in poorer communities, and that there is evidence they are linked to crime, anti-social behaviour and harm to vulnerable people. It also says Brent is a case study in how gambling premises can cluster in deprived areas and deepen local harm.

The More in Common report, Ending a Losing Streak, found that a plurality of Britons want the gambling industry to shrink, not grow, and that people would rather have an empty shop on their high street than a gambling shop. It also found that close to half of people think there are already too many gambling premises in their area.

That speaks directly to this application. This site is not going into a vacuum. It is going into a part of Wembley already heavily shaped by gambling uses. As set out locally, the proposed site sits next to a Coral and within around 50 feet of two Silvertime premises, a Paddy Power, a branch of Gr8odds and a pawnbroker. In plain English, this is a cluster already. Adding another AGC on top does not improve the high street. It drags it further in the wrong direction.

The applicant has submitted an application form together with a Social Responsibility and Compliance Pack. But the point here is that standard company policies do not answer the bigger question the Licensing Authority has to decide: whether this particular premises, in this particular location, is reasonably consistent with the licensing objectives. The applicant's documents set out generic controls like CCTV, Challenge 25, self-exclusion, staff training and incident logs. Those are basic expectations. They do not change the wider local picture – this application is not welcome in our community.

1. Preventing gambling from being a source of crime or disorder

This is the first reason the application should be refused.

The Social Market Foundation report, High streets at stake: The rise of Adult Gaming Centres and the case for reform, says AGCs create risks around crime and disorder. It highlights high cash use, money laundering concerns, and worries from residents about anti-social behaviour around these premises.

The applicant's own documents accept that these risks exist. The application proposes conditions around CCTV, banning disorderly customers, refusing entry to people under the influence of alcohol or drugs, incident logging and staff monitoring. The compliance material also refers to risks around aggressive customers, suspicious activity, money laundering, fraud and police attendance. So even on the applicant's own case, this is the kind of premises that brings crime and disorder risks which have to be taken seriously.

The More in Common report, *Ending a Losing Streak*, backs that up with what people actually say about their towns. People described gambling shops as bringing areas down and linked them to heavy drinking, anti-social behaviour and wider community decline. One Brent participant said: "It defies logic why you need six betting shops... I just think it just brings the area down."

That is exactly the issue here. When you already have a dense row of gambling premises and then add another one, it is not credible to pretend there will be no extra impact. Common sense says otherwise, and the research says otherwise too.

It is also relevant that the application does not clearly set out the intended opening hours. The form says the applicant is not seeking extended hours, but we can see a live planning application to give this site longer operating hours. Either way, this omission makes it harder for the Licensing Authority properly to judge the likely impact on crime, disorder and anti-social behaviour.

2. Ensuring gambling is conducted in a fair and open way

This is the second reason for objection.

The Social Market Foundation report, *High streets at stake: The rise of Adult Gaming Centres and the case for reform*, raises wider concerns about how AGCs operate, including transparency and whether people are really being protected in practice. It says there are real questions about whether these premises always meet the "fair and open" objective.

The applicant's paperwork says the right things in broad terms. It refers to complaints procedures, customer interaction, due diligence, staff training and terms and

conditions. But a bundle of standard policies is not the same as a convincing explanation of why this particular site, in this particular stretch of high street, would operate fairly and openly in practice.

There is also little real detail in the application about how this premises will function day to day in such a sensitive local context. Again, the lack of clear stated operating hours matters. The Licensing Authority is being asked to approve a new AGC without a fully clear picture of how the premises will operate across the week.

The bigger point is this: the more gambling premises you pack into one stretch of high street, the harder it is to argue this is a fair, balanced or healthy local environment. It normalises gambling, makes it more visible, and makes it more available to people who may already be struggling. That is not what a fair and open local offer looks like. It looks like oversaturation.

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

This is the strongest ground of all.

Brent's Joint Strategic Needs Assessment on Gambling makes clear that this borough has high levels of vulnerability when it comes to gambling harm. It identifies deprivation, financial stress and other vulnerabilities that increase the risk of harm.

The Social Market Foundation report, High streets at stake: The rise of Adult Gaming Centres and the case for reform, says AGCs are concentrated in poorer areas and that more gambling venues can mean more harm. It also found that 44% of young people aged 14 to 17 said gambling venues near where they live make people their age more interested in gambling, and 27% said they knew young people who had visited an AGC.

The More in Common report, Ending a Losing Streak, makes public concern very clear. It found that 68% of Britons think under-18s should not see gambling advertising at all and that people are deeply worried about how normal gambling is becoming for children and young people.

The applicant's own compliance pack recognises many of the same risks. It refers to vulnerability linked to poor health, addiction, bereavement, financial difficulties, homelessness and impaired judgement, and it sets out tools like Challenge 25, self-exclusion and customer interaction. The application itself also proposes Challenge 25, third-party age testing and visible notices.

But those are baseline measures. They do not answer the much bigger problem here, which is the location and the clustering. If you keep stacking gambling premises on top of one another, you send a message about what this high street is for and who it is for. You make gambling feel normal, constant and unavoidable. That is bad for children, bad for vulnerable adults, and bad for families already dealing with pressure on money and mental health.

Summary

This application should be refused.

Brent already has too many gambling premises and too much gambling harm. Brent's Joint Strategic Needs Assessment on Gambling says so. The Social Market Foundation report, High streets at stake: The rise of Adult Gaming Centres and the case for reform, says AGCs are clustering in poorer communities and causing harm. The More in Common report, Ending a Losing Streak, says the public want fewer gambling premises, not more, and would rather see an empty unit than another gambling shop.

The applicant has provided standard policies and standard safeguards. But that does not change the basic point. This proposal would put yet another AGC into a part of Wembley already overloaded with gambling premises and related uses.

It is adding one more gambling premises into a cluster that is already too dense. That means more risk of anti-social behaviour, more normalisation of gambling, more harm to vulnerable people, and more damage to the character of the high street.

For those reasons, granting this application would not be reasonably consistent with the licensing objectives. I therefore respectfully ask the Licensing Authority to refuse it.

Best wishes,

Sonia

Councillor for Wembley Central

From: Sheth, Councillor Ketan <Cllr.Ketan.Sheth@brent.gov.uk>

Sent: 09 April 2026 13:50

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

Subject: Representation objecting to application for a Premises Licence under the Gambling Act 2005 for Vault Casino, 574 High Road, Wembley, HA0 2AA

Good afternoon,

I am writing to object to the application for a new Adult Gaming Centre at 574 High Road, Wembley.

My objection is based on the three licensing objectives under the Gambling Act 2005:

- preventing gambling from being a source of crime or disorder
- ensuring gambling is conducted in a fair and open way
- protecting children and other vulnerable people from being harmed or exploited by gambling.

This is not about opposing gambling in principle. It is about saying enough is enough, we are already at saturation point.

Brent already has one of the highest numbers of gambling premises in London and the United Kingdom. Brent's Joint Strategic Needs Assessment on Gambling says there are 81 licensed gambling premises in Brent, and that the borough has higher-than-average levels of gambling harm. It also says Brent has more people gambling at harmful levels than the national average. Businesses like the applicant are deliberately targeting our borough, because with poverty comes commercial opportunity.

That matters because the harms are not spread evenly. Brent's Joint Strategic Needs Assessment on Gambling says gambling premises are clustered in more deprived parts of the borough, and that Brent's population matches many of the groups most at risk of gambling harm. It also says the estimated economic cost of gambling harm in Brent rose from £2 million in 2012 to £14.3 million in 2022.

The Social Market Foundation report, High streets at stake: The rise of Adult Gaming Centres and the case for reform, makes the same point in even starker terms. It says Adult Gaming Centres are spreading, especially in poorer communities, and that there is evidence they are linked to crime, anti-social behaviour and harm to vulnerable people. It also says Brent is a case study in how gambling premises can cluster in deprived areas and deepen local harm.

The More in Common report, Ending a Losing Streak, found that a plurality of Britons want the gambling industry to shrink, not grow, and that people would rather have an

empty shop on their high street than a gambling shop. It also found that close to half of people think there are already too many gambling premises in their area.

That speaks directly to this application. This site is not going into a vacuum. It is going into a part of Wembley already heavily shaped by gambling uses. As set out locally, the proposed site sits next to a Coral and within around 50 feet of two Silvertime premises, a Paddy Power, a branch of Gr8odds and a pawnbroker. In plain English, this is a cluster already. Adding another AGC on top does not improve the high street. It drags it further in the wrong direction.

The applicant has submitted an application form together with a Social Responsibility and Compliance Pack. But the point here is that standard company policies do not answer the bigger question the Licensing Authority has to decide: whether this particular premises, in this particular location, is reasonably consistent with the licensing objectives. The applicant's documents set out generic controls like CCTV, Challenge 25, self-exclusion, staff training and incident logs. Those are basic expectations. They do not change the wider local picture – this application is not welcome in our community.

1. Preventing gambling from being a source of crime or disorder

This is the first reason the application should be refused.

The Social Market Foundation report, High streets at stake: The rise of Adult Gaming Centres and the case for reform, says AGCs create risks around crime and disorder. It highlights high cash use, money laundering concerns, and worries from residents about anti-social behaviour around these premises.

The applicant's own documents accept that these risks exist. The application proposes conditions around CCTV, banning disorderly customers, refusing entry to people under the influence of alcohol or drugs, incident logging and staff monitoring. The compliance material also refers to risks around aggressive customers, suspicious activity, money laundering, fraud and police attendance. So even on the applicant's own case, this is the kind of premises that brings crime and disorder risks which have to be taken seriously.

The More in Common report, Ending a Losing Streak, backs that up with what people actually say about their towns. People described gambling shops as bringing areas down and linked them to heavy drinking, anti-social behaviour and wider community decline. One Brent participant said: "It defies logic why you need six betting shops... I just think it just brings the area down."

That is exactly the issue here. When you already have a dense row of gambling premises and then add another one, it is not credible to pretend there will be no extra impact. Common sense says otherwise, and the research says otherwise too.

It is also relevant that the application does not clearly set out the intended opening hours. The form says the applicant is not seeking extended hours, but we can see a live planning application to give this site longer operating hours. Either way, this omission makes it harder for the Licensing Authority properly to judge the likely impact on crime, disorder and anti-social behaviour.

2. Ensuring gambling is conducted in a fair and open way

This is the second reason for objection.

The Social Market Foundation report, High streets at stake: The rise of Adult Gaming Centres and the case for reform, raises wider concerns about how AGCs operate, including transparency and whether people are really being protected in practice. It says there are real questions about whether these premises always meet the “fair and open” objective.

The applicant’s paperwork says the right things in broad terms. It refers to complaints procedures, customer interaction, due diligence, staff training and terms and conditions. But a bundle of standard policies is not the same as a convincing explanation of why this particular site, in this particular stretch of high street, would operate fairly and openly in practice.

There is also little real detail in the application about how this premises will function day to day in such a sensitive local context. Again, the lack of clear stated operating hours matters. The Licensing Authority is being asked to approve a new AGC without a fully clear picture of how the premises will operate across the week.

The bigger point is this: the more gambling premises you pack into one stretch of high street, the harder it is to argue this is a fair, balanced or healthy local environment. It normalises gambling, makes it more visible, and makes it more available to people who may already be struggling. That is not what a fair and open local offer looks like. It looks like oversaturation.

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

This is the strongest ground of all.

Brent’s Joint Strategic Needs Assessment on Gambling makes clear that this borough has high levels of vulnerability when it comes to gambling harm. It identifies deprivation, financial stress and other vulnerabilities that increase the risk of harm.

The Social Market Foundation report, High streets at stake: The rise of Adult Gaming Centres and the case for reform, says AGCs are concentrated in poorer areas and that more gambling venues can mean more harm. It also found that 44% of young people

aged 14 to 17 said gambling venues near where they live make people their age more interested in gambling, and 27% said they knew young people who had visited an AGC.

The More in Common report, Ending a Losing Streak, makes public concern very clear. It found that 68% of Britons think under-18s should not see gambling advertising at all and that people are deeply worried about how normal gambling is becoming for children and young people.

The applicant's own compliance pack recognises many of the same risks. It refers to vulnerability linked to poor health, addiction, bereavement, financial difficulties, homelessness and impaired judgement, and it sets out tools like Challenge 25, self-exclusion and customer interaction. The application itself also proposes Challenge 25, third-party age testing and visible notices.

But those are baseline measures. They do not answer the much bigger problem here, which is the location and the clustering. If you keep stacking gambling premises on top of one another, you send a message about what this high street is for and who it is for. You make gambling feel normal, constant and unavoidable. That is bad for children, bad for vulnerable adults, and bad for families already dealing with pressure on money and mental health.

Summary

This application should be refused.

Brent already has too many gambling premises and too much gambling harm. Brent's Joint Strategic Needs Assessment on Gambling says so. The Social Market Foundation report, High streets at stake: The rise of Adult Gaming Centres and the case for reform, says AGCs are clustering in poorer communities and causing harm. The More in Common report, Ending a Losing Streak, says the public want fewer gambling premises, not more, and would rather see an empty unit than another gambling shop.

The applicant has provided standard policies and standard safeguards. But that does not change the basic point. This proposal would put yet another AGC into a part of Wembley already overloaded with gambling premises and related uses.

It is adding one more gambling premises into a cluster that is already too dense. That means more risk of anti-social behaviour, more normalisation of gambling, more harm to vulnerable people, and more damage to the character of the high street.

For those reasons, granting this application would not be reasonably consistent with the licensing objectives. I therefore respectfully ask the Licensing Authority to refuse it.

Thank you,

Councillor Dr Ketan Sheth

Chair, Community and Wellbeing Scrutiny Committee

Brent Council

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29-04-2026

I object to this bingo hall on the following grounds: Protecting children and other vulnerable persons from being harmed or exploited by gambling: Reference the proximity to local schools, foodbanks and the high footfall of minors at this junction. Preventing gambling from being a source of crime or disorder: Highlight concerns regarding anti-social behaviour often associated with late-night high-street gambling hubs including shoplifting. Ensuring that gambling is conducted in a fair and open way: (Usually less applicable for residents, but can be used to question the operator's transparency).

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29-04-26

I strongly object to a new adult gaming centre in Kilburn on the following grounds: -

Potential harm to vulnerable members of the community, including children -Increased anti-social behaviour associated with gambling centres

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29-04-26

This is very close to two primary schools and at least 1 food bank. The area already has other gambling facilities which often attract disorderly behaviour from customers at night, though also during daylight. There are so many children in this part of Kilburn (because of the schools); we really don't want additional gambling hubs to populate their imagination and be a part of their culture.

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Silvertime Amusements Ltd
48/50, High Street
Watford, Herts
WD17 2BS

Brent Licensing Department
Brent Council Regulatory Services
Brent Civic Centre
Engineers Way
Wembley
HA9 0FJ

28th April 2026

Dear Sirs,

Representation to a Licence Application at 574 Wembley High Road, Wembley, HAO 2AA-312 Investments Limited

This representation is made on behalf of Silvertime Amusements Limited to an application for a premises licence under the Gambling Act 2005 in respect of Vault Casino at 574 Wembley High Road, Wembley, HAO 2AA. The application is made by 312 Investments Limited.

We are an interested party under the Gambling Act 2005 s158(b). We operate the following businesses in the nearby area;

- 509 High Road, Wembley, HAO 2DH - Adult Gaming Centre
- 572 High Road, Wembley, HAO 2DH - Adult Gaming Centre
- 446 High Road, Wembley, HA9 6AH - Bingo

We acknowledge that this is a somewhat unusual representation as we operate Gambling Act 2005 premises licences, and we would therefore be a trade competitor to the application site if the licence is granted. We accept that "demand" is not a relevant ground for making a representation under the Gambling Act 2005, and our representation is not based on demand, but on the potential impact of the application on the licensing objectives.

Our objection is based on the assertion that the application as submitted is not reasonably consistent with the licensing objectives, is not in accordance with the relevant code of practice issued under the Gambling Act 2005 section 24, is not in accordance with any relevant guidance issued by the Gambling Commission under the Gambling Act section 25 and is not in accordance with the Brent Statement of Gambling Policy Issued under the Gambling Act section 349.

- (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.



Silvertime Amusements Ltd

48/50, High Street

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WD17 2BS

The Licensing Objectives are set out in the Gambling Act 2005 section 1, and this application is to be considered under the principles to be applied set out in the Gambling Act 2005 section 153.

The application is submitted in a location that has a large number of Gambling Act 2005 premises, and suffers from anti-social behaviour and crime and disorder.

A Local Area Risk Assessment has been submitted by the applicant which does acknowledge that the application site is situated between a licensed bar and Coral's betting shop to one side, a money transfer shop and bank to the other, and is immediately opposite one of our Adult Gaming Centres, and that there are also other premises nearby.

The Local Area Risk Assessment is limited to the following information on the area:

- 3 pages of statistics which have clearly just been pulled from a website.
- 1 page on crime statistics
- 1 page on nearby schools and colleges
- Information on banks, pawn shops, pubs and bars, churches and a list of other gambling premises, as well as medical centres, care homes and transport hubs
- The actual risk assessment runs to only 4 pages and no more, and although not absolutely clear, it appears that this is an application for a 24/7 site.
- The risk management measures set out in the 4 pages are extremely limited, and do not, in our opinion, show an understanding of the area, the risks, or how to manage the risks in this area.

We understand that the applicant does not trade any other Gambling Act 2005 premises and is a new entrant to the industry. Many things are not clear from the risk management details provided within the local area risk assessment, including the number of staff to be employed at all times, the training to be provided by staff, the applicant's understanding of the unique characteristics of the area, details of customer interactions and monitoring of customers.

As an operator in the area, it is our submission that the risk management measures put forward are very limited, not clear, and certainly not sufficient for a Gambling Act 2005 premises in this area.

There is no evidence to demonstrate that this applicant understands the unique characteristics of this area, and no evidence to suggest that the applicant will effectively promote the licensing objectives in Wembley.

The Gambling Commission guidance to local authorities sets out clearly in part 5 the principles to be applied by local authorities, and the Gambling Act 2005 sets out the principles to be applied by a licensing authority at s153.

The Gambling Commission's Licence Conditions and Codes of Practice (LCCP) set out the need for operators to consider local risks specifically. Social responsibility code 10.1.1 requires all premises licensees to assess the local risks to the licensing objectives posed by the provision of gambling facilities at each of their premises, and to have policies, procedures and control



Silvertime Amusements Ltd

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measures to mitigate those risks. In undertaking their risk assessment, they must take into account the relevant matters identified in the licensing authority's statement of policy.

The relevant policy is Brent Statement of Principles for Gambling 2025-2028. It is a detailed policy with 15 separate sections, and 11 additional schedules.

The Applicant does not refer at all to the Brent Statement of Gambling Policy, it has not shown any understanding of the policy or implementing policy, and as a consequence, it is not an application which is consistent with the licensing objectives, Brent's or indeed the Gambling Commission LCCP, or the Gambling Commission's guidance.

The Statement of gambling policy is specific on requirements for Adult Gaming Centre applications, these are set out in the following paragraphs:

- 4.2 objective 1 -preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.
- 4.4 objective 3 - protecting children and other vulnerable persons from being harmed or exploited by gambling
- 4.5 - protecting vulnerable adults.

There are a large number of requirements set out in these paragraphs, which all start with "licensees will be expected to demonstrate that they have given careful consideration "

It is clear from the application and Local Area Risk Assessment submitted that this applicant is not demonstrating that they have given careful consideration of the licensing objectives, and the measures required to support the licensing objectives, protect children and protect vulnerable persons.

Section 5.3 of the Statement of Gambling policy sets out information with regard to Local Area Risks Assessments. Unfortunately this Local Area Risk Assessment is not adequate or fit for purpose.

Section 8.2 of the Statement of Gambling Policy makes it clear that the licensing Authority will expect the Applicant to satisfy it that there will be sufficient measures in place to ensure that under 18s do not have access to the premises, and sets out appropriate measures, such as:

Entry control system

The number of staff on duty at any one time Door supervisors

Specific opening hours

Other requirements

This is a new applicant to the Adult Gaming Centre market which has no track record to rely on. The applicant seeks to rely on a very brief and generic Local Area Risk Assessment, and specific local issues are not dealt with. The Local Area Risk Assessment has not been properly prepared and does not take into account the Brent Statement of Gambling Policy at all.



Silvertime Amusements Ltd
48/50, High Street
Watford, Herts
WD17 2BS

It is our assertion therefore that this application fails applying the principles to be applied under the Gambling Act 2005 s153, and should be refused.

We would like to stress that this is not a representation based on demand, but based on the principles set out in the Gambling Act s153, and the Applicant's apparent failure to apply Brent's Statement of Gambling Policy, and to understand local issues and have the relevant measures in place.

Yours sincerely,

Silvertime Amusements Limited

From:

Sent: 30 April 2026 16:08

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

Subject: Local residents Objection to the premises licence application submitted for 574 Wembley High Road, HAO 2AA

Dear Brent Licensing Department,

We are writing as a group of concerned local residents to formally object to the premises licence application submitted for 574 Wembley High Road, HAO 2AA.

As residents of the Wembley Central area, we have significant concerns regarding the potential impact of an additional gambling premises on our community. Wembley High Road already has a considerable number of gambling establishments, and we believe that the introduction of another venue would contribute to an overconcentration, which may exacerbate existing issues within the area.

In particular, we are concerned about the potential for increased anti-social behaviour and the wider social impact on a community that already faces economic challenges. We do not believe that granting this licences would align with the licensing objectives set out under the Gambling Act 2005, particularly in relation to protecting vulnerable persons and preventing harm.

We respectfully urge the Licensing Authority to give full consideration to the concerns raised by local residents and to refuse this application in the best interests of the community.

Please find attached our signed letter of objection supported by multiple residents.

Yours faithfully,

On behalf of local residents

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Brent Licensing Department
Brent Council Regulatory Services
Brent Civic Centre
Engineers Way
Wembley
HA9 0FJ

Dear Sirs

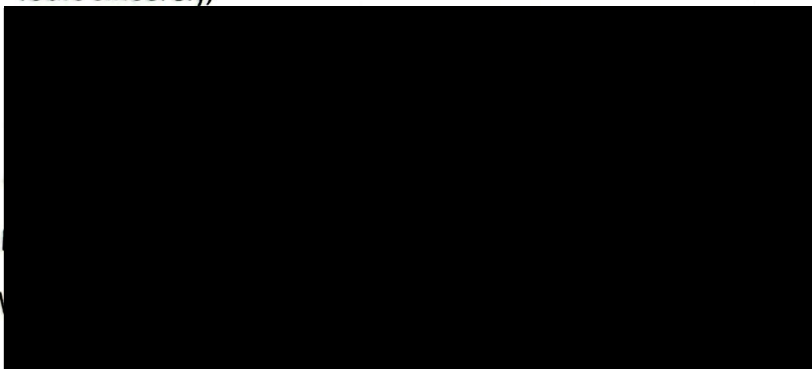
Representation to a Licence Application at 574 Wembley High Road, Wembley, HAO
2AA312 Investments Limited

I am writing to object to an application which has been made by 312 Investments Limited in respect of premises at 574 Wembley High Road, Wembley, HAO 2AA. I am a resident in the area, and my name and address is at the bottom of this letter. I understand that I am therefore an interested party.

Wembley is an area that suffers from many problems, including poverty and anti-social behaviour. There are many families with very low incomes in the area, and we already have a large number of gambling premises in the area.

I understand that any application for a Gambling Act 2005 premises needs to comply with the Gambling Act 2005, the Licensing Objectives, and also the local gambling policy. I have looked at the application and supporting documents, and do not believe that the application is consistent with the licensing objectives, or the local gambling policy, and in the circumstances the application should be refused.

Yours sincerely,



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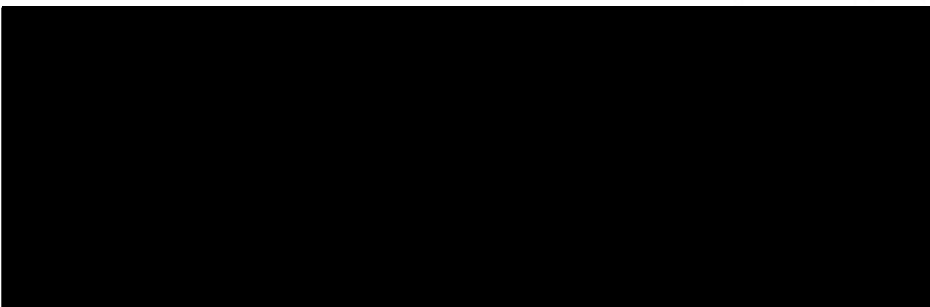
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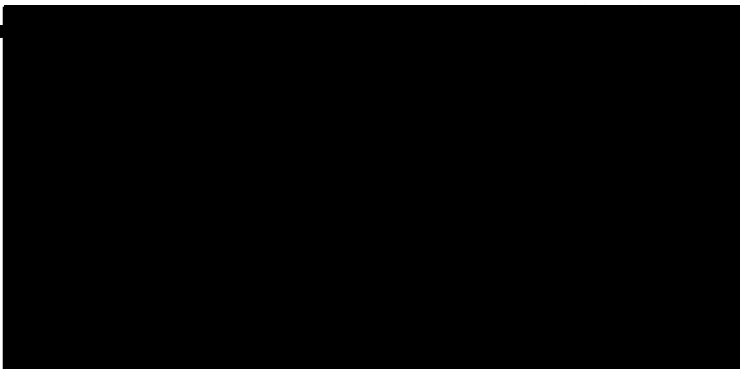
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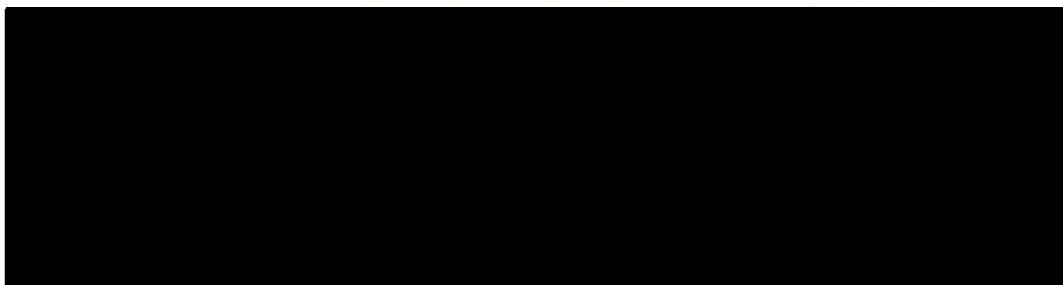
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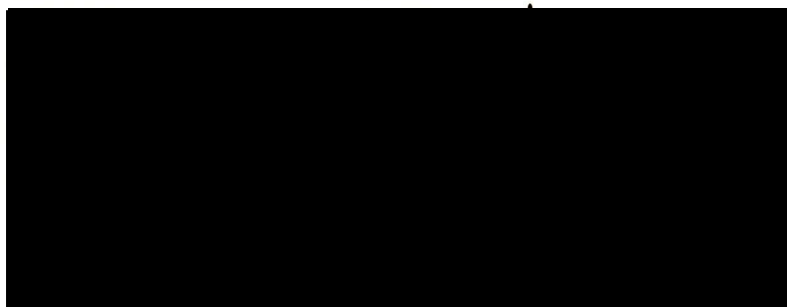
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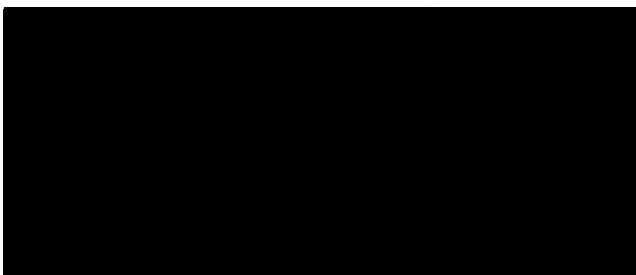
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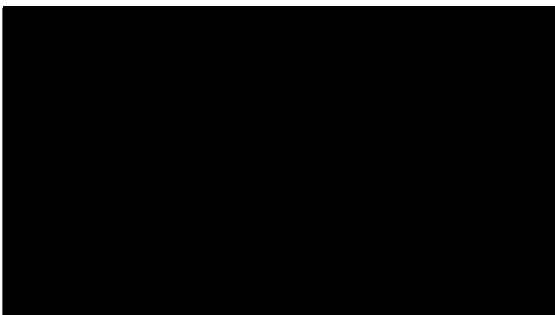
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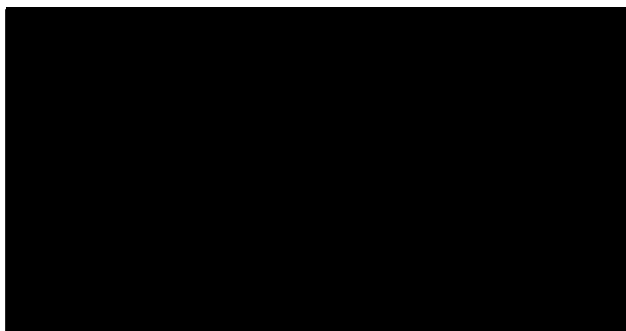
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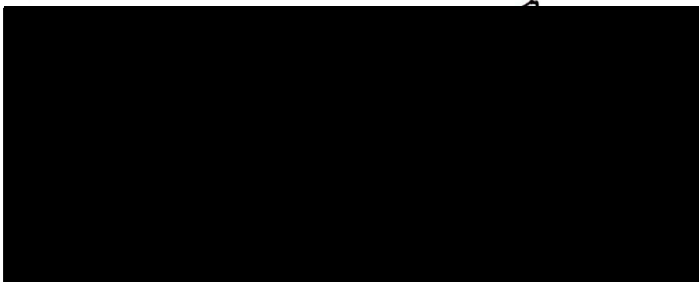
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Yours sincerely,

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Brent Licensing Department
Brent Council Regulatory Services
Brent Civic Centre
Engineers Way
Wembley
HA9 0FJ

Dear Sirs

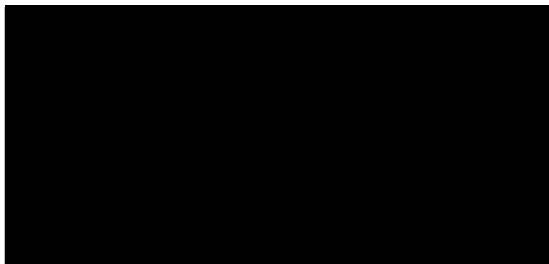
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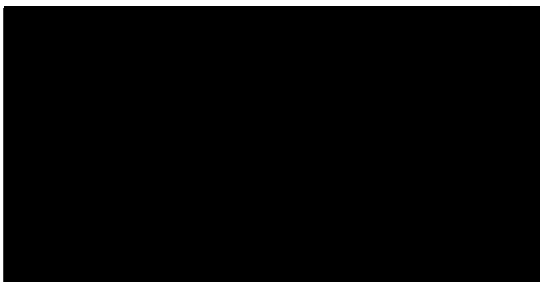
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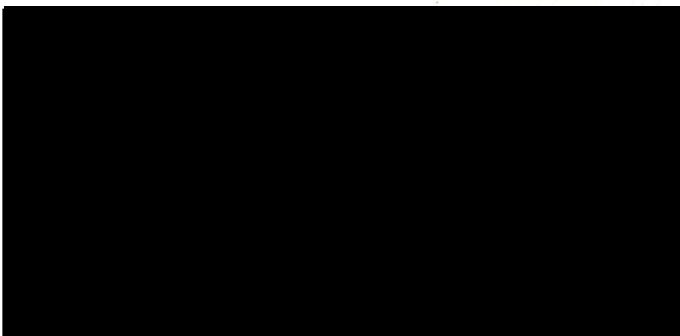
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Members of the Committee, thank you for allowing me the opportunity to address you today.

I would first like to make clear that I fully recognise the seriousness and importance of the licensing objectives under the Gambling Act 2005, namely the prevention of crime and disorder, ensuring gambling is conducted fairly and openly, and protecting children and vulnerable persons from being harmed or exploited by gambling. Our business fully supports those objectives, and we take them extremely seriously in the operation of our premises.

I would also respectfully ask the Committee to consider my own personal operational and regulatory history within the industry. Over a period spanning approximately 32 years, I have owned, operated, and successfully sold three gaming companies and during that time I have held three separate licences issued by the Gambling Commission without any regulatory issues. Throughout my time operating within the sector, I have maintained a strong compliance culture, worked constructively with regulators and licensing authorities, and operated within the framework and expectations of the Gambling Act and Gambling Commission requirements.

In addition, I have previously held an Adult Gaming Centre premises licence within Kilburn under the jurisdiction of Brent Council itself, again without any licensing issues, enforcement concerns, or regulatory problems arising during that operation. Brent Council has therefore previously entrusted me with the operation of a licensed Adult Gaming Centre within the borough without issue.

I respectfully submit that this is highly relevant because it demonstrates not only long-standing industry experience generally, but also direct experience operating compliantly within Brent's own regulatory and licensing framework.

I say that not simply as background information, but because licensing decisions must ultimately be evidence-based and operator-specific. My own professional history demonstrates long-standing experience operating responsibly and compliantly within regulated gambling environments.

However, it is equally important that this application is assessed on evidence, facts, and the specific operation before you today, rather than on broad generalisations concerning the gambling industry as a whole.

The statutory starting point under the Gambling Act is not whether gambling is universally supported as a matter of public opinion, but whether the licensing objectives can be upheld through appropriate regulation and conditions. Parliament deliberately adopted a permissive licensing framework under the Gambling Act 2005, where the legal test is whether the premises can operate consistently with the licensing objectives and within the framework of regulation, supervision, and enforceable safeguards.

Several of the objections and public policy documents referred to during these proceedings rely heavily upon wider concerns relating to gambling harms generally, particularly online gambling, mobile betting applications, digital casino-style gambling, gambling advertising, and social media exposure. Respectfully, those concerns are fundamentally different from the operation of a properly managed, licensed Adult Gaming Centre such as the one proposed here.

One of the documents relied upon is the Brent Joint Strategic Needs Assessment together with the report “Ending a Losing Streak” produced by More in Common. When those documents are examined carefully, it becomes immediately clear that their strongest criticisms are overwhelmingly directed towards online gambling and digital betting products. The reports repeatedly discuss concerns surrounding mobile phone gambling, online slots and roulette, unrestricted digital access, social media advertising, football sponsorship, and the ability for individuals to gamble anonymously and continuously from home at any time of day or night.

That environment is entirely different from a regulated Adult Gaming Centre.

There is also a very important distinction that must be recognised between bookmakers and Adult Gaming Centres. Although they both fall within the broader gambling sector, they are entirely different business models operating in very different ways and carrying very different operational characteristics and customer behaviours.

Bookmakers are fundamentally betting-led operations. Their core business model centres around sports betting, racing, odds-based wagering, online account betting, and historically high-speed betting products such as FOBTs and B2 machines. Betting shops are often heavily linked to live sporting events, mobile betting applications, online account integration, televised betting markets, and rapid transactional gambling linked to external sporting outcomes.

An Adult Gaming Centre operates entirely differently.

AGCs are machine-based leisure environments operating within fixed premises and under a different style of customer interaction and supervision. Customers are physically present within a controlled adult-only environment where staff interaction, customer monitoring, welfare observation, and intervention are all possible in real time. AGCs do not operate as sports betting venues, they do not revolve around live racing or football betting markets, and they are not structured around online account gambling or remote digital wagering.

Critically, Adult Gaming Centres have never operated FOBTs or B2 machines. Those products were historically associated with licensed betting offices and bookmakers, not AGCs. That distinction is highly significant because many of the public-health criticisms and political concerns referred to throughout the JSNA and other objection materials are specifically rooted in historical concerns relating to betting-shop FOBTs and high-stakes betting products rather than Adult Gaming Centre operations.

Indeed, one of the most heavily relied upon and emotive claims within the Brent JSNA is the statement that FOBTs and B2 machines are “more addictive than heroin.” However, that statement specifically relates to betting-shop products which have never operated within Adult Gaming Centres. Accordingly, it is incorrect and unfair to conflate those historic betting-shop concerns directly with modern AGC operations.

Many of the public concerns raised in reports such as these — including concerns surrounding football sponsorship, online gambling apps, social media betting advertisements, rapid mobile gambling, unrestricted digital access, and FOBT-related harms — therefore relate far more closely to bookmakers and online operators than they do to Adult Gaming Centres.

Similarly, much of the historical criticism surrounding FOBTs and B2 machines has traditionally related to betting shops rather than AGCs. The period that gave rise to national concern regarding FOBTs related primarily to high-stakes betting shop products where stakes of up to £100 every 20 seconds were previously permitted. Those concerns were overwhelmingly associated with betting-shop environments rather than supervised Adult Gaming Centres, and the regulatory framework surrounding those products has since materially changed.

The Brent JSNA itself expressly recognises that gambling is not one single homogenous activity and that different gambling products carry different levels of risk. The report specifically acknowledges that gambling encompasses “a wide range of products, each with different rules and risk levels.”

That is an important admission because it directly supports the position that Adult Gaming Centres cannot properly or fairly be treated in the same way as online gambling platforms, betting shops, or other entirely different gambling sectors. The report itself therefore accepts that broad assumptions cannot simply be applied across all forms of gambling without distinction.

The JSNA also expressly acknowledges that in-person gambling remains popular and widely participated in across society. That is significant because it reinforces the fact that land-based gambling premises such as Adult Gaming Centres continue to operate as lawful and recognised leisure premises within the statutory framework established by Parliament.

The Brent JSNA also expressly recognises the distinction between betting shops and Adult Gaming Centres within Brent’s own planning framework. The report confirms that Brent Local Plan policy separates betting shops and Adult Gaming Centres into different categories and acknowledges that appeal decisions have accepted that they are materially different uses.

Importantly, Brent’s own Local Plan already contains specific planning controls designed to prevent overconcentration and clustering of gambling premises, including frontage percentage limits and minimum separation requirements between premises.

That is highly significant because it demonstrates that even within Brent’s own adopted policy framework, bookmakers and Adult Gaming Centres are not viewed as interchangeable operations. They are recognised as distinct premises types with different operating models, different customer behaviours, and different planning considerations. The borough already possesses planning mechanisms specifically designed to control concentration where appropriate.

An Adult Gaming Centre is a fixed, supervised, adult-only premises operating within a strict legal and regulatory framework. Unlike online gambling, customers cannot gamble anonymously from their bedroom or through unrestricted mobile applications. Unlike bookmakers, the operation is not centred around sports wagering, live betting markets, or rapid account-based betting activity linked to external events.

Customers within an AGC are physically present, visible to trained staff, monitored through CCTV, and operating within a controlled environment where interaction, supervision, and intervention are all possible in real time.

Our premises will operate with strict age verification procedures, controlled adult-only access, facial recognition CCTV at the entry point and further CCTV coverage throughout the premises, safer gambling policies, staff welfare intervention training, self-exclusion systems, incident recording procedures, and full compliance with the Gambling Commission's Licence Conditions and Codes of Practice. These are robust and enforceable safeguards which simply do not exist to the same degree in the betting and online gambling environments.

It is also important to note that throughout this process we have worked proactively and constructively with the responsible authorities. Prior to submitting the application, we attempted to engage in a pre-application consultation with the Police and offered conditions which had previously been requested from Chongie Amusements Limited in relation to comparable operations.

In response, we received the following reply from the Police:

“In short we are going through a re-structure here in the Met meaning I am currently doing 2/3 roles and haven't got time to do the research you are asking for. I can only suggest you submit the application in the normal way.”

In light of that response, we proceeded with the application in the usual way and nevertheless proposed a comprehensive suite of operating conditions within the application itself.

Notably, the conditions ultimately agreed by Brent Council were, in the round, largely reflective of and consistent with those already volunteered within the application. Likewise, the Police also proposed conditions to be attached to the licence, and we agreed to those immediately and without hesitation. That is because we are not resistant to regulation or scrutiny. On the contrary, we actively welcome robust safeguards and regulatory oversight because responsible operation and compliance are fundamental to how we conduct our business.

The Police expressly confirmed during the consultation process that they were content with the conditions already proposed within the application. They simply sought the addition of further measures designed to ensure continuity of safe operation within the venue.

Those measures were intended to ensure that, in circumstances where a member of staff may be delayed, unwell, absent, or temporarily taking a break, the premises could continue to operate without inadvertently breaching licence conditions. They also provided an additional layer of operational resilience and security, further safeguarding both staff and customers at all times.

Of particular relevance is the fact that at no stage during the consultation process was there any indication from the Police of increased concern regarding the operation of an Adult Gaming Centre itself. The focus of the discussions was operational continuity, resilience, and practical safeguarding measures rather than any allegation that the premises, or AGC operations generally, inherently gave rise to crime, disorder, or heightened risk.

I respectfully submit that the willingness of both the local authority and the Police to resolve matters through agreed conditions is highly significant. It demonstrates that the statutory authorities tasked with assessing crime prevention, public safety, operational management, and compliance were ultimately satisfied that any concerns raised could be properly and

proportionately addressed through enforceable licence conditions and robust operating procedures.

Conditions exist precisely as the legal mechanism through which perceived risks are managed and mitigated within the licensing system. The fact that conditions were agreed and accepted without hesitation demonstrates both our willingness to operate transparently and the confidence of the responsible authorities that the licensing objectives can be fully upheld through appropriate safeguards.

Members should also note that the Brent JSNA itself expressly confirms that the Gambling Act 2005 is “a permissive piece of legislation.” Parliament deliberately chose a regulatory framework based upon control, supervision, licensing, and compliance rather than prohibition. Adult Gaming Centres are therefore lawful and recognised premises within that statutory framework, provided they uphold the licensing objectives.

The report further acknowledges that local authorities are not entitled to refuse premises licences simply because there may be objections to gambling generally, because there are concerns about overconcentration, or because there is community opposition to gambling premises in principle. The JSNA expressly states that local authorities “are not currently able to decline a premises licence based solely on the view that there are too many in the area or because there is community backlash.”

That is an extremely important point because the Committee must determine this application based upon evidence relating to the licensing objectives and the operation of this specific premises, rather than on generalised opposition to gambling or wider political debate surrounding the gambling industry.

It is also relevant to note that this particular premises previously traded as a betting shop and, as far as records indicate, did not suffer from any regulatory issues.

The Brent JSNA also contains another very significant admission which, in my submission, must not be overlooked. The report states that “since no issues have been reported across the 80-odd gambling premises in Brent, in at least the last five years, none have had to face any scrutiny on whether the preventative measures in place have worked to deter crime and protect vulnerable populations.”

That statement is highly material. Brent’s own evidence base therefore acknowledges that there has not been a pattern of reported operational failures across existing gambling premises requiring formal scrutiny or enforcement action in recent years. In my submission, that significantly undermines any suggestion that licensed gambling premises inherently fail to uphold the licensing objectives or that Adult Gaming Centres should automatically be assumed to create crime, disorder, or exploitation.

The additional Brent Gambling Harm Data Profile mentioned by objectors is similarly based on borough-wide population modelling and statistical estimates rather than premises-specific evidence. The document itself expressly acknowledges that the figures are “indicative estimates” based upon modelling techniques and broad demographic assumptions rather than evidence concerning this individual premises or this operator.

Area-wide public health modelling and borough-level prevalence statistics cannot automatically justify refusal of an individual premises licence application where there is no evidence that this operator or this premises has failed, or is likely to fail, to uphold the licensing objectives.

The More in Common report itself also acknowledges that the public does not view all forms of gambling equally. The report repeatedly recognises that many people distinguish between low-risk, socially managed, in-person gambling environments and what they regard as higher-risk forms of online or digital gambling. It specifically notes that many people view social, supervised, lower-stakes gambling very differently from isolated digital gambling taking place anonymously through mobile phones and online platforms.

That distinction is highly significant in the context of this application because even the public opinion evidence relied upon by objectors itself accepts that not all gambling environments are viewed equally and that there is a clear difference between supervised in-person gambling and unrestricted online gambling.

The report's strongest concerns relate to unrestricted online gambling, rapid digital betting behaviour, gambling advertising, and exposure of children to gambling content online and through sports sponsorship. Those concerns are not applicable to this premises. This is an adult-only environment where under-18s are prohibited entry entirely. Children will not be permitted access. Unlike online gambling platforms, this premises operates within a physically controlled environment where customer behaviour can be monitored and where intervention is possible if concerns arise.

The report also devotes significant attention to gambling advertising, online targeting, and football sponsorship. Again, respectfully, those issues have no relevance to the determination of this specific premises licence application. The Committee is not being asked to determine national policy on advertising, online gambling reform, or sports sponsorship. The Committee is being asked to determine whether this specific premises is likely to uphold the licensing objectives under the Gambling Act 2005.

That assessment must be evidence-based and premises-specific.

Critically, both the Brent JSNA and the More in Common report are not enforcement reports, licensing audits, crime assessments, or operational reviews of this premises. They are broad public health and public opinion documents. They do not identify this premises, they do not identify operational failings by this operator, and they do not provide evidence that this premises will cause crime, disorder, exploitation, or harm. They do not demonstrate breaches of licensing objectives, nor do they establish that a properly managed Adult Gaming Centre operating within the framework of the Gambling Act 2005 inherently undermines those objectives.

Indeed, recent authority from the Highbury Corner Magistrates' Court in *Future Leisure Limited v London Borough of Haringey* strongly reinforces this principle. In that case, the Court allowed an appeal relating to a 24-hour Adult Gaming Centre application and held that speculative concerns about what "might happen" could not outweigh actual operational evidence, safeguards, and a proven compliance history.

The Court reached that conclusion despite evidence of deprivation, vulnerability concerns, public-health evidence, and local objections similar to those raised in this matter.

The Court expressly recognised that public health concerns and generalized fears alone were insufficient where there was no evidence that the operator had failed to uphold the licensing objectives or that safeguards were ineffective.

That authority is highly relevant here.

Many of the objections before this Committee are similarly based on broad public-health concerns, assumptions, or speculation about what could theoretically occur, rather than on actual evidence relating to this operator or this premises.

Licensing decisions must be evidence-based.

There is no evidence before this Committee that this operator has failed to uphold licensing objectives, no evidence of crime or disorder associated with our operation, no evidence of safeguarding failures, no evidence of complaints arising from our operation, and no evidence that the robust measures proposed are inadequate.

Our operational history, compliance standards, regulatory track record over more than three decades, previous successful operation within Brent itself, and willingness to accept stringent conditions all demonstrate the exact opposite.

Indeed, the reports themselves repeatedly acknowledge that many members of the public still regard some forms of gambling as legitimate leisure activity when conducted responsibly and in moderation. They also recognise that many people continue to believe that personal responsibility remains an important factor in gambling behaviour.

Members should also note that the reports frequently conflate entirely different sectors of the gambling industry into one broad narrative, grouping together online casinos, mobile gambling applications, betting shops, sports betting, gambling advertising, and physical premises. However, these sectors are fundamentally different in operation, risk profile, customer interaction, regulatory oversight, and safeguarding capability.

A supervised Adult Gaming Centre with trained staff, controlled entry, CCTV monitoring, welfare procedures, and direct customer interaction is entirely different from an anonymous online gambling platform accessible 24 hours a day through a mobile phone.

That distinction is highly material.

The Gambling Act 2005 itself is founded upon the principle of regulation and control, not prohibition. Parliament expressly created a lawful framework for Adult Gaming Centres to operate subject to licensing conditions, regulatory oversight, and compliance obligations. The legal question before this Committee is therefore not whether some people object to gambling generally, nor whether there are wider political debates concerning gambling policy.

The question is whether there is evidence that this specific premises, operated in the manner proposed, is likely to undermine the licensing objectives.

No such evidence has been presented.

There is no evidence of operational failings. There is no evidence of crime linked to this operator. There is no evidence of safeguarding failures. There is no evidence that the agreed conditions and extensive safeguards would be ineffective.

What has instead been presented are broad societal concerns relating primarily to online gambling, gambling advertising, and national policy debates. Those are matters for Parliament and national regulators. They are not direct evidence against this individual premises application.

Our operation will be professionally managed, closely supervised, fully compliant with Gambling Commission requirements, and operated with a strong commitment to safer gambling, customer welfare, and regulatory compliance. We are not seeking to avoid regulation. We welcome regulation. We support responsible gambling measures, safeguarding obligations, staff training, customer protection procedures, and proactive welfare intervention where appropriate.

For those reasons, I respectfully submit that this application should be determined based on the actual evidence relating to this premises, together with the robust operational safeguards proposed, rather than broad generalised concerns relating predominantly to online gambling and national policy issues which are materially different from the operation of a regulated Adult Gaming Centre.

Thank you, Members.

APPLICANT: 312 INVESTMENTS LIMITED

PREMISES: VAULT CASINO 574 HIGH ROAD WEMBLEY HA0 2AA

APPLICANT'S ADDITIONAL INFORMATION

Introduction

This document has been prepared on behalf of 312 Investments Limited in support of its application made under the Gambling Act 2005 (“the Act”) for an Adult Gaming Centre (AGC) premises licence for 574 High Road Wembley HA0 2AA.

The application was submitted by email on 8 April 2026 and included:

- Proposed conditions
- a copy of the site plan,
- the applicants policies and procedures and
- a Local Area Risk Assessment (LARA)

The wrong LARA had been submitted with the application, as soon as the error was identified the correct document which was drafted on and dated 7 April was emailed to the licensing team.

The application form does not require an Operator to include the opening hours and it is a common misconception that it does. The timings table in Part 4 is for Operators requesting alternatives to timings restricted by a Default Condition on a Premises Licence.

A representation was received from the Licensing Department; the Applicant was asked to and did agree the following conditions that the Licensing Authority believed would meet the Licensing objectives and reduce impact on the area. These conditions which are broadly in line with conditions voluntarily proposed in the Client’s application are set out below:

1. The premises shall operate and maintain a digital colour CCTV system. The CCTV system shall be in operation and recording at all times whilst the premises are open for authorised activities and whilst customers are present. All recordings shall be kept for 31 days. The CCTV system shall also display the correct date and time on any recordings.
2. The CCTV system shall capture clear images of every person entering or leaving the premises with further CCTV cameras covering the publicly accessible areas stipulated on the premises plan, including the immediate frontage on High Road, Wembley. A monitor shall also be installed inside the premises, positioned above the front entrance door, displaying live CCTV images of customers entering and exiting the premises.

3. CCTV footage shall be made available for immediate viewing upon request by the Police and any authorised Officers from Brent Council by a member of staff who is conversant with the operation of the CCTV system. CCTV footage shall also be provided to the Police and any authorised Officers from Brent Council, in a readily accessible format on removable media or via digital transfer within 24 hours of request.
4. Notices stating that CCTV is in operation shall be clearly and prominently displayed.
5. A 'Think 25', or any other similarly recognised age verification policy, shall be operated at the premises, whereby the only acceptable forms of identification are recognised photographic identification cards, such as a driving licence, passport, or a proof of age card bearing the PASS hologram. Notices advising customers of the age verification policy shall be conspicuously displayed within the premises.
6. A physical or electronic refusals log shall be kept at the premises which records all age verification challenges made by staff to customers. The log shall record the date/time of the challenge, a description of the customer, the name of the member of staff who made the challenge, and any other relevant observations. The refusals log shall be made available for inspection upon request by an authorised officer of Brent Council or the Police.
7. Independent third-party test purchasing shall be carried out at the premises at least twice per year to assess compliance with the prohibition on under-18s entering the premises and using gaming machines. The results of such test purchasing shall be made available for inspection upon request by an authorised officer of Brent Council or the Police.
8. There shall be a minimum of two members of staff on duty at all times whilst the premises are open for authorised activities and whilst customers are present, one of whom shall be SIA licensed between the hours of 2300 and 0700
9. Staff shall continuously monitor customer activity when they are in the premises.
10. A policy shall be implemented to ban any customer who engages in crime, disorder, or anti-social behaviour within the premises or in the immediate vicinity of the premises. A record of all banned customers shall be maintained and shall be made available for inspection upon request by an authorised officer of Brent Council or the Police

11. No open alcoholic drinks shall be permitted on any publicly accessible area defined on the premises plan.
12. Staff shall refuse the use of any gambling machines to customers who appear to be under the influence of alcohol or drugs, and such customers shall be asked to leave the premises. Any such incidents shall be recorded in the incident log.
13. All seating within the premises shall be secured to the floor or suitably weighted to prevent lifting.
14. An intruder alarm system and a panic button behind the counter shall be installed and maintained.
15. Customer toilets shall be checked hourly for evidence of drug taking, and a record of the time of the check and the staff member undertaking it shall be maintained.
16. GamCare, self-exclusion, or any other relevant information relating to responsible gambling and problem gambling shall be prominently displayed within the premises and made readily available to customers.
17. All Category B gaming machines on the premises shall display safer gambling messages and be programmed to provide reality check to customers.
18. Staff training shall be undertaken by all members of staff involved in authorised activities. All staff shall also undergo refresher training at least once every 12 months, with all training recorded. Training shall include the following topics, although this list is not exhaustive:
 - a. customers who are, or may be, at risk of harm from gambling, and how to interact with them appropriately.
 - b. self-exclusion.
 - c. customer disputes
 - d. any other potential issues identified within the local area risk assessment, or other relevant operating procedures and policies set by the operator.
 - e. the three licensing objectives and premises licence conditions.
19. Training records shall include the date and time of the training, the name of the staff member trained, and the training topic covered. Staff training records shall be made available for inspection upon request by the Police or authorised officers of Brent Council.
20. All reasonable steps shall be taken to prevent customers from consuming alcohol directly outside the premises. Any customer found consuming alcohol

outside the premises shall be banned from the premises in accordance with the premises' banning policy. A notice shall also be prominently displayed and visible from the exterior of the premises stating that the consumption of alcohol outside the premises is not permitted and that customers who do so will be banned.

21. An up-to-date incident log shall be maintained, which shall record the following:
 - a. any incidents of crime and disorder.
 - b. any incidents where a customer is ejected or asked to leave the premises.
 - c. any incidents where a customer is barred from the premises.
 - d. any complaints received.
 - e. any faults in the CCTV system.
 - f. any visit by a relevant authority or emergency service.

22. Any entries into the incident log shall be made as soon as reasonably practicable following any such incident and shall include the date and time of the incident, the nature of the incident, a description of the persons involved, the action taken, and the name of the person responsible for the management of the premises at the time of the incident. The incident log shall be made available for inspection upon request by an authorised officer of Brent Council or the Police.

A pre-application consultation on proposed conditions was attempted with the Metropolitan Police but the agent was told to submit the application in the usual way. Representations were received from the Police who were satisfied with the proposed conditions and requested the following additional conditions that were agreed by the Applicant:

1. 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.

2. There shall be no pre-planned single staffing between 23:00hrs to 07:00hrs. Should the premises be single staffed after this time the magnetic door locking system must be in constant use.

3. Lone working staff will be provided and required to carry on their person a personal fob alarm which will activate the alarm if pressed by the member of staff.

4. Toilet doors shall remain locked and access is permitted by staff members.

A representation was received by Public Health **who are not** a Responsible Authority (Guidance to Licensing Authorities para 6.4). It was based on a standard template used to raise representations against other applications for gambling premises in the locality with details of the premises cut and pasted in.

Representations were also received from interested parties who are members of the public, and those who represent the public. Representations 1-3 appear to relate to another premises licence application. The majority of the public representations were made using the same template (5 further – 19). Representations received from Barry Gardiner MP, Councillor Sonia Shah, and Councillor Ketan Seth were also based on the same template that has also been used for making representations against applications for other gambling premises in the locality.

It is important to note that when considering an application, generally more weight should be given to individually produced, detailed letters rather than form letters or petitions, where it is less clear if each signatory has a genuine, individual concern related to the specific case.

A representation was also received from Silvertime as a business likely to be effected by the authorised licensed activity. It is an Operator with 3 licensed premises in close proximity to the proposed premises. No doubt submitted for commercial reasons it is in part based on the contents of the first LARA erroneously submitted with the application and a misconception as to the experience of the Applicant in operating AGCs.

The Applicant

312 Investments Limited is a recently established, independently owned business that holds an Operating Licence (ref 67529) granted by the Gambling Commission to operate AGCs. It will conduct a legitimate business, contributing to the local and national economy, paying business rates, and taxes in many forms. Although this is its first application for a premises licence, Maxwell Davitt who is a Director/owner, has 30 years of experience working in the industry at Director level; a copy of his CV is at **Annex A** to this document. Mr Davitt will provide further information about his experience and the proposed operations in his evidence at the hearing.

The Applicant included a copy of its policies and procedures with the application and which are intended to promote the Licensing Objectives set out in the Gambling Act 2005. These were approved by the Gambling Commission when considering its decision to grant the company an Operating Licence in December last year.

The Premises

The premises have previously operated as a betting shop and in August 2021 was granted an AGC premises licence for 24-hour operations. The premises never opened and the licence was surrendered. A precedent has therefore already been set for its use as an AGC . The site will subject to any planning conditions be open 24/7 in line with other similar venues in the locality. The Applicant intends to offer high end ambience, blending luxury lounge aesthetics with next-generation technology to redefine the gaming experience across London. Its core values are

- **Innovation with Responsibility:** Leveraging emerging technologies while adhering to the highest standards of responsible gaming.
- **Entertainment with Integrity:** Creating vibrant experiences grounded in ethical conduct and regulatory compliance.
- **Design with Purpose:** Crafting atmospheres that marry visual appeal with operational functionality.
- **Customer-First Culture:** Delivering personalised service that anticipates needs and rewards loyalty.

Adult Gaming Centres are one of the most heavily regulated types of premises in mainland Britain.

Legally the following gaming machines can be made available in AGCs:-

- Category B3 maximum stake £2 maximum prize £500
- Category C – maximum stake £1, maximum prize £100
- Category D – maximum stake 10p maximum prize £5

Within the AGC an operator can offer unlimited category C and D machines but only 20% of the gaming machines can be category B3.

Once ready to trade the business will employ 10 people at the shop and contribute to the local and national economy through rates and taxes.

The premises will be fitted with CCTV and the external cameras that will enhance the security of the immediate area particularly at night with late night surveillance in the area.

Industry Background

Prior to the introduction of the Gambling Act 2005 (The Act), a business simply needed a section 34e Permit issued by a licensing authority under the Gaming Act 1968 to

operate an adult only arcade; it cost £250 and was valid for 3 years. There was little in the way of regulation and no talk of socially responsible gambling. The Act introduced a highly regulated regime requiring most businesses offering gambling facilities to hold an Operating Licence. The application process for an Operating Licence is costly; application fees are in excess of £1400 with annual fees in excess of £1500. The application fees for an AGC Premises Licence are capped at £2000 with annual fees capped at £1000.

Contrary to recent media reporting, the Gambling Commission’s own data shows a decline in premises licensed under the Act. In 2011 there was a combined total of 12,462 licensed premises, by March 2024 that number had dropped across all sectors to a total of 8,329, with the largest declines seen in Betting and Arcade premises (fig 1).

Whilst there may have been an increase since 2022, this must be taken within the context of Covid when many premises shut and numbers dropped as low as 1,354 before recovering to 1,451, still well below the 2012 high of 2,247.

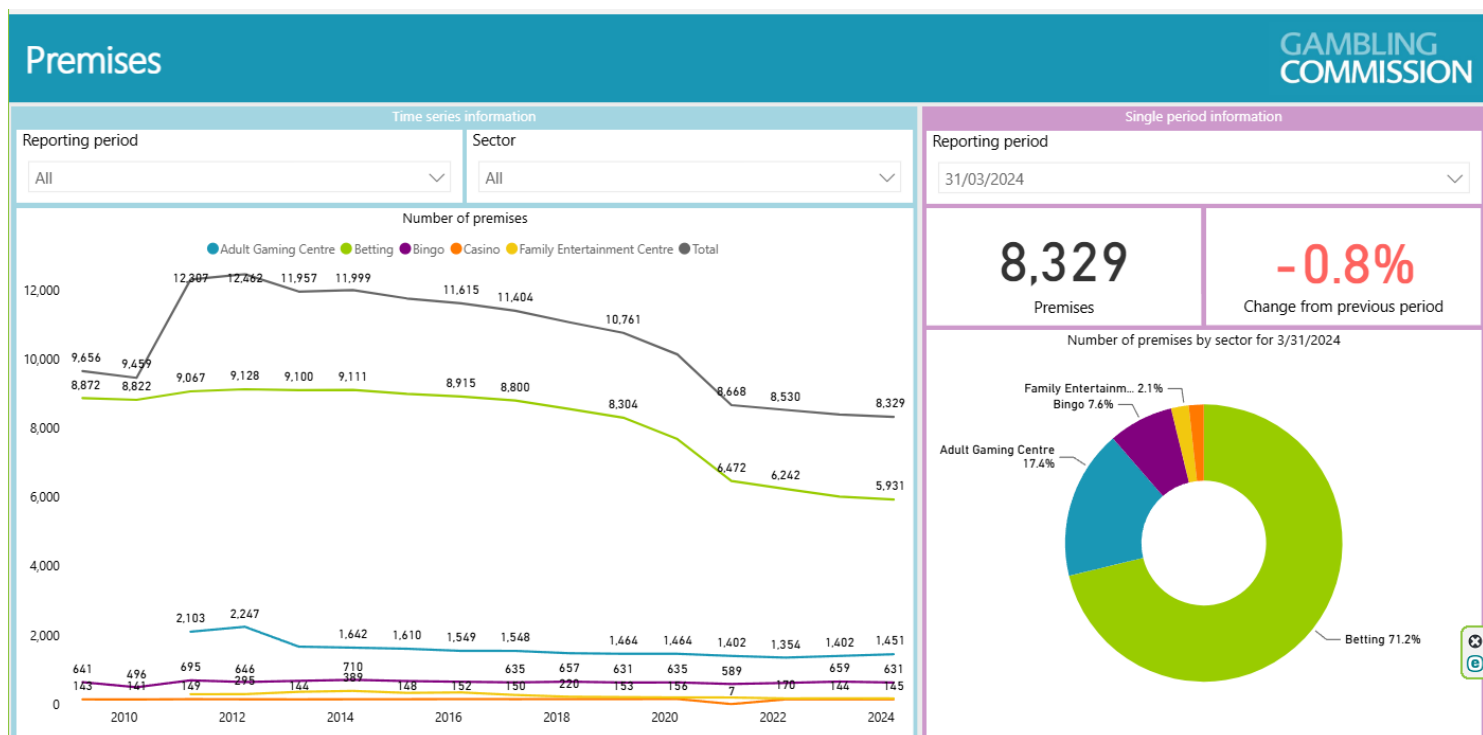


Fig 1 Number of gambling premises. Source: Gambling Industry Statistics April 2008 to March 2024 - Gambling Commission

Furthermore the total Gross Gambling Yield for land based gambling in the year 23/24 (£2490m) is still significantly below the 08/09 figures (£2903). Within the overall context of income derived from various forms of gambling, AGCs are among the lowest income generating sector at 4.2% of the total for the last reporting period (Fig 2)

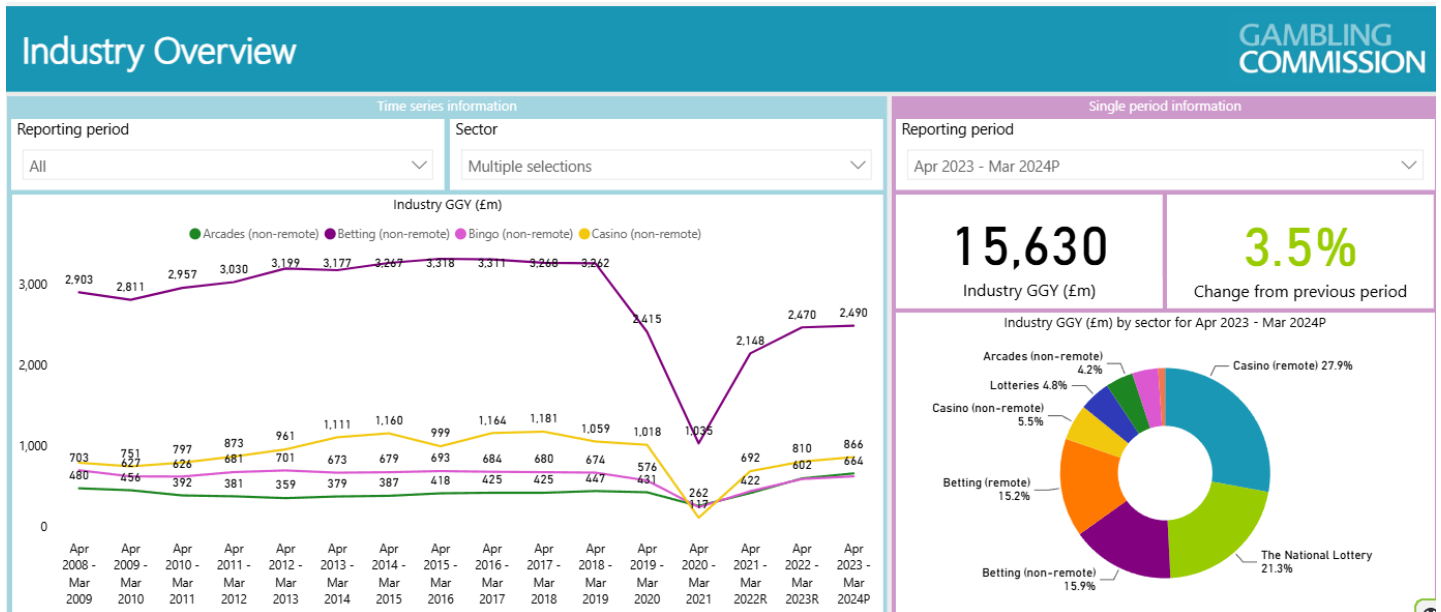


Fig 2 Gross Gambling Yield by premises. Source Gambling Industry Statistics April 2008 to March 2024 - Gambling Commission

Despite the decrease in premises, gambling creates local employment opportunities (circa 82,000 according to the latest DCMS publication) and provide economic benefits locally through business rates. For the vast majority who take part in visit gambling premises, gambling is their social interaction, their fun and enjoyment, and leisure time. Sometimes their ‘only’ leisure time and human interaction.

The Gambling Commission’s latest data on participation rates (detailed below), sets out how and where people are gambling, highlighting the fact that lottery ticket purchases are by far the most popular gambling activity.

In February 2026 the Gambling Commission published its findings from the [Gambling Survey for Great Britain, for the period 30 June 2025 to 31 October 2025](#), where a nationally representative sample of 4,179 adults aged 18 and over responded to the survey sent to 25,850 addresses (18% response rate).

- Overall participation in any gambling activity has remained consistent at 48%.
- When those who only took part in a lottery draw are excluded from the overall gambling participation rate, gambling participation falls to 27% a slight reduction on the previous period.
- The in-person gambling participation rate was 28% and this falls to 17% when lottery draw only players are removed
- The most popular in-person gambling activities were buying tickets for a National Lottery draw (16%); buying a scratchcard (12%) or buying tickets for another charity lottery draw.

- The online gambling participation rate was 39% falling to 16% when lottery draw only players were removed, highlighting the large proportion of online players that only gamble on lottery draws (whether online or in person).
- Overall, 42% of people who reported gambling in the last 12 months felt positive about the last time they spent money gambling, followed by an additional 35% who felt neutral towards their last gambling experience.

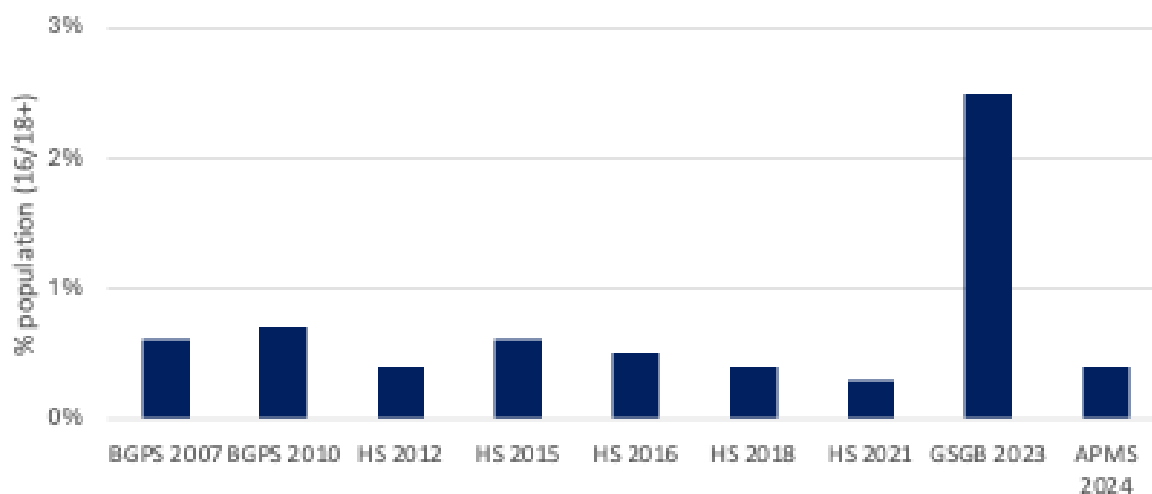
The Commission's most recent official statistics about young people's exposure to and involvement in gambling, Young People and Gambling November 2024 collected data from pupils aged 11 – 17 years old and found:

- 27% of those surveyed had spent their own money on any gambling activity in the 12 months prior to completing the survey
- The most common types of gambling activity were legal and did not feature age restricted products, namely:
 - Penny pusher/claw grab arcade machines (20%)
 - Placing bet for money between friends or family (11%)
 - Playing cards for money with family or friends (5%)
- 6% of those who had gambled had spent their own money on regulated forms of age restricted gambling (up from 4% in 2023). This included placing a bet in person or online and playing casino games in person or online.

Problem gambling rates have remained the statistically stable for nearly 20 years. Since 2007 the Problem Gambling Severity Index (PGSI) has been used to estimate Great Britain's population prevalence of problem gambling. Data collected via the NHS Health Surveys showed rates were consistently in the range of 0.3%-0.7% over that period.

The Gambling Survey for Great Britain (GSGB) first started collecting data in July 2023 and reported a rate of 2.5% - ten times higher than the figure reported in the NHS "Health Survey" for England in 2021. However serious concerns have been raised over the reliability of the GSGB number.

Prevalence of PGSI 'problem gambling' in official surveys
(2007-2024)



[BGPS – British Gambling Prevalence Survey \(National Centre for Social Research\)](#), [APMS - Adult Psychiatric Morbidity Study \(NHS\)](#), [Health Surveys \(NHS\)](#), [Telephone Surveys \(GC\)](#)

Professor Patrick Sturgis of the London School of Economics and Political Science was asked by the Gambling Commission to carry out an independent evaluation of the GSGB in 2024 ; he highlighted the risk that the GSGB substantially overstates rates of harmful gambling. As a result the Commission published guidance stating that ***the GSGB should not be used to calculate an overall rate of gambling related harms in Great Britain nor to gross up the prevalence of problem gambling or the consequences of gambling to whole population.***

In May 2025 the Office for Statistics Regulation’s (OSR) undertook a compliance review to assesses the GSGB statistics against the Code of Practice for Statistics.

The OSR’s 9 recommendations included that the Gambling Commission should:

- *clearly communicate to users within the statistical releases the potential biases that may affect the GSGB estimates, the possible impact of these, and Professor Sturgis’ conclusion regarding the risk that the statistics potentially overestimate some gambling behaviour; and*
- *do more to investigate the coherence and comparability of GSGB statistics with other relevant data, such as from the Health Survey for England and the Adult Psychiatric Morbidity Survey that will be published later in 2025 and communicate these findings to users.*

In June 2025 the Adult Psychiatric Morbidity Survey (APMS) Survey of Mental Health & Wellbeing, England (2023/24) was published. Chapter 7 of the report, focuses on gambling behaviour, with some of the key findings being:

- Overall, 1.6% of adults experienced at least moderate risk gambling (PGSI score of 3+). **0.4% of adults experienced problem gambling** (as indicated by a PGSI score of 8+). ***This is significantly lower than the GSGB's 2.5% and not dissimilar to the NHS Health Survey evidence.***
- Most adults experiencing moderate risk gambling had never used services or support specifically related to gambling. Whereas 25% of adults with a PGSI score of 3+ had used some form of gambling-specific treatment or service.

The recent claim that one problem gambler dies by suicide every day in England has been formally discredited. It appears to have originated from a Public Health England report in September 2013 that was then used by the Office for Health Improvement and Disparities in January 2023. Believed to have been taken from a Swedish Study of Swedish gambling addicts in a Swedish Institution over 10 years ago attempts were made to extrapolate and apply the data to England. However, the Gambling Commission have said that it was wholly unacceptable to misuse this data and the Office for Statistics Regulation (ONS) have written to the Chair of the Health and Social Care Committee about misusing the suicide figures in a letter it sent to the Parliamentary Undersecretary for Public Health. Subsequently the Office for Health Improvement and Disparities has formally apologised for its misuse and ceased referring to the statistic.

Gambling Regulations

When processing an application for an Operating Licence the Gambling Commission carries out lengthy and detailed due diligence to ensure that an applicant is suitable to hold an operating licence. It checks:

- The identity and ownership of the applicant
- The integrity of the applicant
- The competence of the applicant, to carry on the licensed activities in a manner consistent with the pursuit of the licensing objectives
- The financial and other circumstances of the applicant past and present
- The criminality of the applicant

This is then rechecked every time there is a change of ownership.

To support an application, a business must submit detailed policies and procedures that demonstrate how it will conduct its business so that it complies with the legislation and regulations governing the industry. The Commission also carries out compliance checks, including site visits to land-based Operators to ensure they are conducting their business in a manner consistent with the licensing objectives.

The Gambling Commission is also required under the Act to issue Licence Conditions and Codes of Practice (LCCPs) that all licensed Operators must comply with. A breach of the LCCPs can result in the Gambling Commission reviewing an Operator's Licence with potential sanctions including a fine, suspension or revocation of the Operating Licence. Furthermore, a breach of a Social Responsibility Code set out within the LCCPs can result in prosecution. A copy of the LCCPs applicable to the arcade sector is at **Annex B** to this document and which may be referred to at the hearing.

LCCPs - Section 3 Socially Responsible Codes applicable to the Protection of children and other vulnerable persons

There is no definition of a vulnerable person, within the Act. The Commission's says that *..for regulatory purposes we consider that the group of 'other vulnerable persons' will include:*

- *people who spend more money and/or time gambling than they want to*
- *people who gamble beyond their means*
- *people who may not be able to make informed or balanced decisions about gambling, for example because of health problems, learning disability, or substance misuse relating to alcohol or drugs.*

The Act clearly did not intend it to include everyone; if it did then the third licensing objective would simply state to protect everyone from being harmed or exploited by gambling.

When determining this application it is important to have regard to these LCCPs and a summary of Section 3 is set out below.

SR Code 3.2.3 dealing with underage gambling requires Operators to have procedures for:

- checking the age of apparently underage customers
- removing anyone who appears to be underage and cannot produce an acceptable form of identification
- taking action when there are attempts by under-18s to enter the premises.

Operators must

- take account of the layout of their premises
- not deliberately provide facilities that appeal particularly to children or young people
- must refuse service where an adult is accompanied by a child or young person.
- train Staff on their responsibilities for preventing underage gambling.
- only accept valid photo ID which includes a date of birth
- must conduct age test purchasing and provide the results to the Gambling Commission, annually.

SR Code 3.3.1 Operators to make information readily available to customers on how to gamble responsibly and how to access information about and help for problem gambling.

The information must cover:

- any measures to help individuals monitor or control their gambling, such as restricting the time spent gambling or the amount of money they can spend
- timers and 'reality checks'
- self-exclusion options
- information about the availability of further help or advice.

The information must be

- displayed prominently
- available in all areas where gambling facilities are provided and adjacent to ATMs

- available to take away
- and in locations which enable the customer to obtain it discreetly.

SR Code 3.4.1 Operators must interact with customers to minimise the risk of customers experiencing harms associated with gambling. This must include:

- identifying customers who may be at risk of or experiencing harms associated with gambling.
- interacting with customers who may be at risk of or experiencing harms associated with gambling.
- understanding the impact of the interaction on the customer, and the effectiveness of the Operator's actions and approach.

Operators must take into account the Commission's guidance on customer interaction, this includes evaluating the success of previous customer interactions in order to determine whether an alternative interaction may be more successful as well as consideration of an Operator led exclusion.

SR Code 3.5.1 Operators must have a self-exclusion scheme and refuse service to anyone who has self-excluded . Procedures must be in place to ensure that an individual who has self-excluded cannot gain access to gambling including:-

- a register of those excluded;
- photo identification and a signature;
- staff training to ensure that staff can effectively administer the systems; and
- the removal of any self-excluder found in or attempting to gamble from the premises.

SR Code 3.5.6 Operators must offer anyone self-excluding the ability to self-exclude from other local premises by participating in one or more available multi-operator self-exclusion schemes.

It will be noted that the Applicant's policies and procedures deal with all of these Social Responsibility Code provisions. The Applicant adheres to them; failure to do so would leave the company and its directors liable to prosecution.

Promoting the Licensing Objectives

The Licensing Objectives as set out in the Gambling Act 2005 are:

- preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime
- ensuring that gambling is conducted in a fair and open way
- protecting children and other vulnerable persons from being harmed or exploited by gambling.

The Applicant has prepared a Local Authority Risk Assessment on behalf of the Applicant which sets out the measures and more, in terms of promoting the licensing objectives of protecting the vulnerable and preventing the premises being connected to crime and/or disorder. The most recent version of the Local Area Risk Assessment is included in the hearing pack

The Local Area Risk Assessment sets out the measures that will be in place to ensure that the Licensing Objectives are promoted.

- (a) Staff are continuously located on the shop floor, walking around, monitoring customers entering the premises and speaking to customers who are playing the machines.
- (b) There is always a clear line of sight in the shop so that customers can always be seen by staff.
- (c) The Applicant will have SIA registered security between 2300 -0700 daily and will liaise with the local police as required.
- (d) Staff are trained to monitor the entrance for customers entering the shop.
- (e) There will be CCTV cameras at the front entrance monitoring the outside of the premises monitored from inside.
- (f) Training is provided to staff on induction and is refreshed every 3 months.
- (g) Over 18 notices and no alcohol notices prominently displayed at the entrance to the shop.
- (h) Information posters and leaflets advising customers on where to get help if they need any help with gambling problems
- (i) Staff are trained to interact with customers particularly those displaying signs of problems with gambling.
- (j) Customer interactions are reviewed and assessed weekly for effectiveness
- (k) The Applicant offers customers the opportunity to self-exclude from its premises and participates in the SmartEXCLUSION multi-operator self-exclusion scheme.
- (l) Age verification testing is undertaken via Check Policy on an annual basis by an independent party and the results reported to the Gambling Commission.
- (m) Staff are aware of all education facilities and will ensure that under 18s are not permitted within the premises, whilst the Applicant operates a check 25 policy.

The Gambling Act 2005

The Licensing Act 2003 and Gambling Act 2005 set out different approaches to be taken when deciding whether to grant a Premises Licence. For gambling the approach is set out in section 153 of the Gambling Act 2005:

“In exercising their functions under this Part, a licensing authority shall aim to permit the use of premises for gambling in so far as the authority thinks it:

- a) in accordance with any relevant code of practice under section 24*
- b) in accordance with any relevant guidance issued by the Commission under section 25*
- c) reasonably consistent with the licensing objectives (subject to (a) and (b))*
- d) in accordance with the [authority’s statement of licensing policy] (subject to (a) to (c)).”*

The aim to permit in section 153 of the Act is explained in the Gambling Commission’s Guidance to Licensing Authorities as follows:

1.20 The Act places a legal duty on both the Commission and licensing authorities to aim to permit gambling, in so far as it is considered to be reasonably consistent with the pursuit of the licensing objectives. The effect of this duty is that both the Commission and licensing authorities must approach their functions in a way that seeks to regulate gambling by using their powers, for example, powers to attach conditions to licences, to moderate its impact on the licensing objectives rather than by starting out to prevent it altogether.

It is important when making a decision to note that

1. The test in section 153 is mandatory: *“a licensing authority **shall**”*
2. The obligation to “aim to permit” is set out in the Gambling Commission’s Guidance at paragraph 7.56 and described as **“the licensing authority’s primary obligation”**.
3. The “aim to permit” is also explained in the Patersons Licensing Acts, which states:
“... it creates a presumption in favour of granting the premises licence since it is only if the licence is granted that the premises may lawfully be used for gambling. But the duty seems to go further than that. The verb ‘to aim’ is defined by the OED as meaning ‘To calculate one’s course with a view to arrive (at a point); to direct one’s course, to make it one’s object to attain. Hence fig To have it as an object, to endeavour earnestly...’ A person who ‘aims’ to achieve a result will usually take active steps to bring it about. The provision appears to place a duty upon the licensing authority to exercise their powers so far as is lawfully possible to achieve a position in which they can grant the premises licence and thus permit the premises to be used for gambling.”

4. Any conditions imposed by the licensing authority must be proportionate to the circumstances which they are seeking to address. In particular, licensing authorities should ensure that the premises licence conditions are:
 - relevant to the need to make the proposed building suitable as a gambling facility
 - directly related to the premises (including the locality and any identified local risks) and the type of licence applied for
 - fairly and reasonably related to the scale and type of premises
 - reasonable in all other respects. (para 9.31).
5. Other considerations such as moral or ethical objections to gambling are not a valid reason to reject applications for premises licences.
6. In deciding to reject an application, a licensing authority should rely on reasons that demonstrate that the licensing objectives are not being, or are unlikely to be, met, and such objections do not relate to the licensing objectives.
7. The licensing authority's determination should be evidence-based, justified as being appropriate for the promotion of the licensing objectives and proportionate to what it is intended to achieve (s182 Guidance on LA 2003)
8. A licensing authority may not have regard to the expected demand for the facilities which it is proposed to provide (s 153 Gambling Act 2005).
9. Licensing authorities should generally consider disorder as activity that is more serious and disruptive than mere nuisance. Factors to consider in determining whether a disturbance was serious enough to constitute disorder would include whether police assistance was required and how threatening the behaviour was to those who could see or hear it.

Case Law (ANNEX C)

Daniel Thwaites plc v Wirral Borough Magistrates' Court [2008] EWHC 838 (Admin)

The claimant applied for judicial review of a magistrates' court decision that imposed conditions on a premises licence restricting a hotel's hours of operation. The High Court quashed the decision, holding that the magistrates had failed to take proper account of the changed approach to licensing introduced by the Licensing Act 2003 (LA 2003). The Court held that by proceeding without proper evidence and giving their own views excessive weight, the magistrates had limited the hours of operation without having established that it was necessary to do so to promote the licensing objectives set out in the LA 2003.

Future Leisure Limited v London Borough of Haringey Dec 2025 (Magistrates)

The Claimant appealed the decision of the licensing subcommittee (LSC) to refuse an application to extend the operating hours from 0900-2300 hours, 7 days per week to 24 hours opening, 7 days a week. The DJ found that there was no evidence to demonstrate that the licensing objectives and Statement of Gambling Policy would not or were unlikely to be met and that the LSC had given too much weight to evidence of what might happen rather than proper counterbalancing weight as to the track record of the Claimant throughout its business.

Representations

With the exception of Silvertime's representation premised on the incorrect LARA and ignorance of the ownership/management of the Applicant, the remainder are based on 2 standard templates.

The objections refer to

1. Preventing Gambling from Being a Source of Crime and Disorder
 - a. May lead to anti-social behaviour
 - b. Money laundering
2. Protecting Children and Vulnerable Persons
 - a. Increasing accessibility of gambling facilities to vulnerable individuals
 - b. Normalises gambling, making it more visible and available
3. Clustering/Cumulative Impact

The points raised are generalised and speculative concerns about what effects an additional AGC **may** have. None provide any specific substantiated documented evidence that the Applicant's operations at that particular site will put the licensing objectives at risk.

The Brent's Joint Strategic Needs Assessment (JSNA) is frequently referred to. A report based on literature reviews and qualitative research conducted through focus groups individual interviews and open-ended survey questions, it is noted that the qualitative research was limited to only 26 persons in focus groups or individual interviews and 17 anonymous questionnaires; this is not a representative sample for statistical purposes.

It is also noted that the JSNA expressly recognises that "Gambling is an umbrella term for the activity, but it incorporates a wide range of activities in a variety of settings, each with different levels of risks and harms". It accepts, that broad assumptions cannot simply be applied across all forms of gambling without distinction. The JSNA draws a clear distinction between AGCs and Betting shops; crucially the fact that AGCs do not and have never operated Fixed Odds Betting Terminals that prior to 2019 had a maximum stake of £100, since reduced to £2. For that reason AGCs cannot and should not be treated in the same way as online gambling platforms, betting shops, or other entirely different gambling sectors.

The JSNA more crucially reports, based on conversations with Brent Licensing Team, that "*no issues have been reported across the 80-odd gambling premises in Brent, in at least the last five years,(so) none have had to face any scrutiny on whether the preventative measures in place have worked to deter crime and protect vulnerable populations*". It also acknowledges that there are no gambling premises with Stonebridge which is the most deprived area in Brent, despite asserting that gambling premises cluster in more deprived areas.

And it is overwhelmingly clear that the strongest criticisms within the JSNA are directed towards online gambling and digital betting products. They raise concerns surrounding mobile phone gambling, online slots and roulette, unrestricted digital access, social media advertising, football sponsorship, and the ability for individuals to gamble anonymously and continuously from home at any time of day or night.

In response to the particular objections:

- One concern was raised that the premises may lead an increase in anti-social behaviour that could negatively impact the area. Other concerns about crime and disorder suggest that the fact the Applicant has raised the possibility in its Risk Assessment, then it must be so. **Anything identified as a risk in a risk assessment cannot and should not be cited or accepted as evidence of an actual event occurring.**
- The Gambling Commission's Guidance at 5.10 states "*Licensing authorities do not need to investigate the suitability of an applicant for a premises licence,*

including in relation to crime. The issue of suitability will already have been considered by the Commission, because any applicant (except occupiers of tracks who do not propose to offer gambling themselves) will have to hold an operating licence from the Commission before the premises licence can be issued”.

- 11.8 of the latest SoGP–“*When considering applications, we will always take the location of the premises into account with regard to the crime and disorder objective*”. The precedent has been set and there are already other gambling premises in the locality.
- There is no formal evidence locally or nationally that establishes a link between increased crime and the location of gambling premises. The High Street Stakes Report referred to in representations refers to residents’ concerns and worries but does not point to any documented evidence of an increase in crime and disorder associated with gambling premises.
- There are other gambling premises in the vicinity and yet the Representors have not cited any evidence of loitering and disruptive behaviour associated with the operation of those premises.
- The Metropolitan Police has made no representations that the operating of the premises will place a burden on their resources or otherwise.
- The Licensing Team have proposed conditions but made no specific reference to the risk of crime in the locality. The Applicant has already accepted these conditions which are sufficient to address the representations that have been made on this issue.
- The Applicant has specific mitigations in place within its LARA for dealing with any issue that may arise.
- Alcohol is not permitted in the premises and the Applicant will take steps to ensure that no one loiters at the front of its premises drinking alcohol.
- Adult Gaming Centres are normally quiet, calm places where the majority of people who visit, do so to spend part of their leisure time and some of their money on an enjoyable and legitimate pastime playing gaming machines. They may visit for 15 mins or half an hour and then leave. They usually visit alone and do not congregate in large groups outside or inside the Premises. Unlike bars and clubs AGCs are not associated with large crowds or people behaving in an anti-social way.
- Visitors to AGCs are not to be found out on the streets committing crimes in order to fund that pastime. It is a fact that the majority of people participating in shop lifting, burglary and thefts do so to feed a drug and/or alcohol habit and it is a fact that the majority of people committing violent acts and displaying anti-social behaviour do so because they are under the influence of drugs and/or alcohol. These are not the same people visiting Adult Gaming Centres

- The Applicant is bound by the LCCPs applicable to its Operating Licence that ensure the protection of children and other vulnerable persons. It has policies and procedures in place that comply with the LCCPs and promote all the licensing objectives. Furthermore the Applicant has prepared a LARA that has identified potential risk and stated the mitigations it will put in place to ensure promotion of all the licensing objectives.
- The Applicant's LARA has identified all schools in the vicinity as well as nearby transport hubs used by children and stated the procedures it will take to prevent any children entering its premises.
- 11.17-18 of the latest SoGP - *Protecting children from being harmed or exploited by gambling means:*
 - *preventing children from taking part in gambling and,*
 - *restricting activities such as advertising, so that gambling products are not aimed at or appear attractive to children.*

To ensure the above we will pay particular attention to licence applications for premises situated near schools or areas where there may be a high concentration of children or families. We will expect applicants to have carefully considered their operation and any potential for exposing children and young people to gambling. Where the Gambling Premises requires a restriction to not admit persons under 18 to the gambling premises or area operators should demonstrate policies and procedures that will prevent children and young people from entering such premises/area or partaking in gambling activities”.

- A licence precedent has been set in that the premises have previously been licensed both as a Betting shop and as an AGC. The AGC Premises licence was surrendered but no further premises licences have been granted for an AGC in the locality so it would not result in an increase per se.
- The location of schools and colleges should not be a reason to refuse to grant a premises where adequate policies and procedures can prevent children and young people from entering such premises/area or partaking in gambling activities locality.
- The Applicant has identified locations providing services to vulnerable people and has robust policies and procedures in place that will ensure staff
 - can identify anyone displaying signs of problem gambling
 - interact with such customers displaying signs of problem gambling, offering a number of self-help options
 - record interactions and any agreed plan with a customer
 - review any interactions a week later and note any changes
 - undertake further interactions and offer alternative options where there is no positive change

The Applicant will initiate an Operator led exclusion where it is clear a customer is not willing to engage and continues to display signs of problem gambling

- The Licensing committee is not permitted to take into account any demand for gambling.

Reference has been made to the case of Royal Amusements v Sheffield City Council (“the Sheffield case”), which as a case at first instance did not set a precedent for any licensing decision. Subsequently the case of Future Leisure Ltd v London Borough of Haringey which considered the Sheffield case, considered concerns raised by Public Health about vulnerable individuals with addictions and other similar issues living in the ward who are at risk from the presence of Premises. DJ Brennan found that there was no actual evidence that those risks could not be met by existing measures and mitigations employed at the Premises; that the applicant operates premises with the same risks at other locations in similar areas in London and managed them; that the decision to refuse the application gave too much weight to evidence as to what might happen, rather than counterbalancing the track record of the applicant.

Summary

The Applicant is partly owned and managed by Maxwell Davitt who has over 30 years’ experience in the industry operating amusement arcades, without any compliance issues or regulatory action.

The Applicant is committed to promoting the Licensing Objectives and supporting Thanet’s Statement of Gambling Principles.

All staff are fully trained and staff training is refreshed every 3 months.

The Metropolitan Police do not object to this application and have raised no concerns over anti-social behaviour or crime and disorder.

The Applicant has already agreed conditions with the Police and Licensing Department some of which duplicate those set by the Gambling Commission in the LCCPs.

None of the representations made provide any substantiated evidence that the granting of the premises licence for these specific premises will have a detrimental impact on or undermine the licensing objectives.

ANNEX A – MAXWELL DAVITT’S CV

MAX DAVITT

Curriculum Vitae

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PROFESSIONAL OBJECTIVE

To create and lead one final, high-quality group of Adult Gaming Centres in the United Kingdom, focused on first-class customer facilities, strict licensing compliance, controlled access, safe gambling standards and a premium operating environment. The objective is to build a modern, professionally managed AGC brand in the Greater London area that combines strong commercial performance with responsible operation, robust regulatory standards and a customer experience that is visibly above the traditional high-street gaming model.

PROFESSIONAL PROFILE

Experienced gaming-sector operator, director and shareholder with approximately 30 years of direct involvement in the UK amusement and gaming industry. Career experience spans Adult Gaming Centres, Family Entertainment Centres, site development, operational management, brand creation, compliance oversight, finance, marketing, supplier relationships, premises development, staff leadership and security. Previously acquired, grew and sold the City Slots group in 2019, having managed a multi-site estate and a sizeable team across operational, commercial and compliance functions.

EDUCATION

Wylde Green College

Developed early commercial, communication and organisational skills that supported progression into business ownership and operational leadership.

Subsequent career development has been primarily industry-led, gained through direct ownership, licensing exposure, site acquisition, operational delivery and management of regulated gaming premises.

INDUSTRY EXPERIENCE

September 1996 - July 2003 | Shareholder / Company Director | BKM Amusements Limited

Held a director-level role during the early foundation period of the career, gaining practical experience in day-to-day gaming and amusement operations and developing a strong understanding of how regulated venues must be managed on the ground.

Built hands-on knowledge of venue operations, customer service, cash handling, machine performance, staffing and premises standards.

Gained first-hand exposure to licensing expectations, operating discipline and the importance of maintaining a controlled and professional environment.

Developed commercial judgement around machine mix, site presentation, local customer demand and the need for consistent operational standards.

Established the foundations for later ownership and multi-site leadership within the AGC and FEC sectors.

August 2003 - August 2007 | Dual Shareholder / Company Director | Tivoli Leisure Limited

Continued in a senior director role, broadening experience across the leisure and gaming environment and taking greater responsibility for commercial delivery, staff supervision and business development.

Oversaw operational performance and helped ensure venues were run in a professional, customer-facing and commercially aware manner.

Strengthened understanding of supplier relationships, machine procurement, venue profitability and operational cost control.

Contributed to staffing decisions, rota discipline, customer standards and the practical management of venue teams.

Expanded knowledge of how to balance customer experience, compliance requirements and commercial sustainability.

August 2007 - July 2010 | Compliance Co-Ordinator / Site Development | Agora Gaming Limited

Moved into Compliance Oversight and site development role, focusing on site performance, operational consistency and the improvement of gaming premises across a wider estate.

Supported multiple locations by monitoring operational standards, staff performance, customer service, site presentation and trading performance.

Assisted with identifying, developing and improving premises, including operational layout, machine positioning, brand standards and customer-flow considerations.

Worked between senior management and venue teams to ensure strategic decisions were implemented effectively at site level.

Built deeper experience in site development, area supervision, performance review and the practical challenges of operating multiple gaming venues.

August 2010 - October 2019 | Shareholder / Company Director | GT Promotions Limited

Owned and led a substantial gaming business, culminating in the acquisition, growth and sale of the City Slots group in 2019. This period included responsibility for overall strategy, finance, compliance, marketing, commercial development, IT provision, security and team leadership across a nine-venue estate.

Built and operated a multi-site gaming business trading from nine venues and employing more than 57 people.

Led overall company strategy, including growth planning, financing, site acquisition, operational delivery and exit planning.

Managed compliance responsibilities in a regulated gaming environment, including the need for clear operating procedures, staff accountability and adherence to licensing expectations.

Oversaw marketing activity, local promotion, brand positioning and customer-facing standards across the group.

Managed commercial relationships with landlords, suppliers, machine providers, IT providers, professional advisers and other stakeholders.

Developed experience in gambling-related IT provision, security systems, operational controls, machine performance monitoring and customer protection measures.

Successfully grew and sold the City Slots group in 2019, demonstrating the ability to build value within a regulated gaming business.

SECTOR EXPERIENCE

Approximately 30 years of continuous involvement in the UK gaming and amusement industry.

Direct experience owning and operating both Adult Gaming Centres and Family Entertainment Centres.

Strong understanding of regulated premises, customer access controls, safer gambling standards, staff training needs, venue security and licensing objectives.

Practical experience in acquiring, developing, improving and disposing of gaming businesses and trading locations.

Understanding of the commercial relationship between machine performance, customer environment, staffing, compliance, local competition and site profitability.

KEY SKILLS

Strategic Leadership: Able to set a clear commercial direction for a regulated gaming business, align teams around a common objective and maintain focus on quality, compliance and profitability.

Operational Management: Experienced in supervising multi-site operations, setting standards, monitoring performance, identifying weaknesses and improving consistency across venues.

Licensing and Compliance Awareness: Strong appreciation of the importance of licensing objectives, responsible gambling, staff discipline, controlled operations, record keeping and professional engagement with regulators.

Budget Planning and Financial Control: Experienced in managing business costs, revenue performance, investment decisions, supplier costs, staffing budgets and commercial planning.

Marketing and Brand Development: Practical experience promoting venues, shaping local brand identity, improving customer perception and developing a premium customer-facing offer.

Project Management: Capable of coordinating site openings, refurbishments, supplier installations, IT/security provision, staffing requirements and operational launch planning.

Commercial Development: Experienced in identifying trading opportunities, negotiating with stakeholders, assessing site potential and building value in gaming businesses.

Communication: Comfortable dealing with staff, customers, landlords, advisers, regulators, suppliers and business partners in a clear and direct manner.

Team Building: Strong belief that team culture drives business success, with experience recruiting, motivating and managing sizeable teams across multiple venues.

Security and IT Oversight: Practical exposure to gaming-related IT systems, security arrangements, CCTV, access control and operational controls required in a modern AGC environment.

COMMUNICATION AND PEOPLE MANAGEMENT

In the previous business, directly oversaw an organisation employing more than 57 people across nine venues. Responsibilities covered overall strategy, financing, compliance, marketing, commercial development, gambling-related IT provision and security. This required clear communication with staff and external stakeholders, the ability to manage pressure, and a consistent focus on team standards. The guiding principle throughout has been that the team delivers success, and that strong leadership is shown through clarity, consistency, accountability and support.

Experienced in communicating expectations to managers and staff in a clear, practical and commercially focused way.

Able to build trust with teams by setting standards, supporting delivery and maintaining accountability.

Comfortable dealing with professional advisers, landlords, suppliers and regulatory stakeholders where accuracy and credibility matter.

Strong advocate of creating a positive team culture where staff understand both the commercial goals and the compliance obligations of the business.

LEADERSHIP

Leadership approach is based on building a capable team, setting high standards and creating a business culture that takes compliance, customer service and brand quality seriously. The next business objective is to create a bespoke team for the Vault and Trident brand, with the right skillset to deliver premium venues, strong regulatory standards and a professional gaming environment that staff can be proud of.

Focused on recruiting people with the correct attitude, discipline and understanding of regulated venue operations.

Committed to creating a management structure that supports consistent standards across every site.

Emphasises compliance with legislation, responsible operation and a strong customer environment as core business values rather than box-ticking exercises.

Aims to build Vault and Trident as premium, modern AGC brands with strong operational controls and a first-class customer experience.

CURRENT BUSINESS AMBITION

The current ambition is to establish Vault and Trident as premium Adult Gaming Centre's brand in Greater London, positioned around quality, compliance, security, responsible operation and a higher standard of customer environment. The intention is to combine extensive industry experience with a modern operating model, strong site presentation, controlled access, effective staff training and a professional management culture.

REFERENCES

Available upon request.

ANNEX B – THE LICENCE CONDITIONS AND CODES OF PRACTICE
APPLICABLE TO THE ARCADE SECTOR

Extract of Licence Conditions and Codes of Practice (LCCP) for Arcades

Version effective from 6 April 2026

1.1.1 - Qualified persons – qualifying position

Applies to:

All operating licences, except ancillary remote licences, issued to small-scale operators.

1. In this condition the terms ‘small-scale operator’, ‘qualifying position’ and ‘qualified person’ have the meanings respectively ascribed to them by the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006¹.
2. Schedule X² lists those individuals notified to the Commission as qualified persons.
3. If, whilst the licensee remains a small-scale operator, an individual begins or ceases to occupy a qualifying position in relation to the licensee, the licensee must within 28 days apply to the Commission under section 104(1)(b) of the Act³ for amendment of the details of the licence set out in Schedule X.
4. An application for amendment under section 104(1)(b) of the Act may be made in advance of an individual beginning or ceasing to occupy a qualifying position provided it specifies the date from which the change to which it relates is to be effective.
5. In this condition ‘qualified person’ has the same meaning as in the Gambling Act 2005(Definition of Small-scale Operator) Regulations 2006.

¹ [Gambling Act 2005 \(Definition of Small-scale Operator\) Regulations 2006](#)(opens in new tab)

² The schedules mentioned here will be attached to individual licences.

³ [Section 104\(1\)\(b\) of the Act](#) (opens in new tab)

4.2.1 - Disclosure to customers

Applies to:

All operating licences, except gaming machine technical, gambling software, host ancillary, remote bingo, and ancillary remote casino licences. Paragraph 3 does not apply to any lottery licences except where the holder of which provides facilities for participation in instant win¹ or high frequency² lotteries.

1. Licensees who hold customer funds must set out clearly in the terms and conditions under which they provide facilities for gambling information about whether customer funds are protected in the event of insolvency, the level of such protection and the method by which this is achieved.
2. Such information must be according to such rating system and in such form the Commission may from time to time specify. It must be provided in writing to each customer, in a manner which requires the customer to acknowledge receipt of the information and does not permit the customer to utilise the funds for gambling until they have done so, both on the first occasion on which the customer deposits funds and on the occasion of any subsequent deposit which is the first since a change in the licensee's terms in relation to protection of such funds.
3. Where the licensee has selected a 'not protected' rating (as set out in the rating system specified by the Commission), it must remind the customer, once every six months, that their funds are not protected in the event of insolvency. The reminder must refer to the value of funds held for the customer. The licensee must require the customer to acknowledge receipt of the information and must not permit the customer to utilise the funds for gambling until they have done so.
4. In this condition 'customer funds' means the aggregate value of funds held to the credit of customers including, without limitation:
 - a. cleared funds deposited with the licensee by customers to provide stakes in, or to meet participation fees in respect of, future gambling;
 - b. winnings or prizes which the customer has chosen to leave on deposit with the licensee or for which the licensee has yet to account to the customer; and

c. any crystallised but as yet unpaid loyalty or other bonuses, in each case irrespective of whether the licensee is a party to the gambling contract.

¹ An instant win lottery is defined as "A lottery in which every draw takes place either before, or at the point of, purchase of tickets by participants in the lottery" (RTS).

² A high frequency lottery is defined as "A lottery in which any draw takes place less than one hour after a draw in a previous lottery promoted on behalf of the same non-commercial society or local authority or as part of the same multiple lottery scheme." (Remote gambling and software technical standards (RTS)).

5.1.1 - Cash and cash equivalents

Applies to:

All operating licences except gaming machine technical, gambling software and host licences.

1. Licensees, as part of their internal controls and financial accounting systems, must implement appropriate policies and procedures concerning the usage of cash and cash equivalents (for example, bankers drafts, cheques and debit cards and digital currencies) by customers, designed to minimise the risk of crimes such as money laundering, to avoid the giving of illicit credit to customers and to provide assurance that gambling activities are being conducted in a manner which promotes the licensing objectives.
2. Licensees must ensure that such 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 guidelines published by the Gambling Commission from time to time.

6.1.1 - Provision of credit

Applies to:

All gaming machine general operating licences for adult gaming centres and family entertainment centres.

1. Licensees must neither:
 - a. provide credit themselves in connection with gambling; nor
 - b. participate in, arrange, permit or knowingly facilitate the giving of credit in connection with gambling.

7.1.1 - Fair and transparent terms and practices

Applies to:

All operating licences except gaming machine technical and gambling software licences.

1. Licensees must ensure that the terms on which gambling is offered, and any consumer notices relating to gambling activity, are not unfair within the meaning of the Consumer Rights Act 2015¹. Licensees must comply with those terms.
2. The contractual terms on which gambling is offered and any consumer notices relating to gambling activity must be transparent within the meaning of the Consumer Rights Act 2015. The contractual terms on which gambling is offered must be made available to customers in an easily accessible way.
3. Licensees must ensure that changes to customer contract terms comply with the fairness and transparency requirements under the Consumer Rights Act 2015. Customers must be notified of material changes to terms before they come into effect.
4. Licensees must ensure that they do not commit any unfair commercial practices within the meaning of the Digital Markets, Competition and Consumers Act 2024² at any stage of their interactions with consumers.

¹ [Consumer Rights Act 2015 \(opens in new tab\)](#).

² [Digital Markets, Competition and Consumers Act 2024 \(opens in new tab\)](#)

12.1.1 - Anti-money laundering - Prevention of money laundering and terrorist financing

Applies to:

All operating licences except gaming machine technical and gambling software licences.

1. Licensees must conduct an assessment of the risks of their business being used for money laundering and terrorist financing. Such risk assessment must be appropriate and must be reviewed as necessary in the light of any changes of circumstances, including the introduction of new products or technology, new methods of payment by customers, changes in the customer demographic or any other material changes, and in any event reviewed at least annually.
2. Following completion of and having regard to the risk assessment, and any review of the assessment, licensees must ensure they have appropriate policies, procedures and controls to prevent money laundering and terrorist financing.
3. Licensees must ensure that such policies, procedures and controls are implemented effectively, kept under review, revised appropriately to ensure that they remain effective, and take into account any applicable learning or guidelines published by the Gambling Commission¹ from time to time.

¹ [Guidelines on the prevention of money laundering and combating the financing of terrorism \(opens in new tab\)](#)

14.1.1 - Access to premises

Applies to:

All operating licences.

1. Licensees must have and put into effect policies and procedures (including staff training programmes) designed to ensure that their staff co-operate with the Commission's enforcement officers in the proper performance of their compliance functions and are made aware of those officers' rights of entry to premises contained in Part 15 of the Act¹.

¹ [Part 15 of the Gambling Act 2005 \(opens in new tab\)](#)

15.1.1 - Reporting suspicion of offences etc – non-betting licences

Applies to:

All operating licences except betting, betting intermediary, ancillary remote betting, betting host and remote betting intermediary (trading rooms only) licences.

1. Licensees must as soon as reasonably practicable, in such a form or manner as the Commission may from time to time specify, provide the Commission with any information that they know relates to or suspect may relate to the commission of an offence under the Act, including an offence resulting from a breach of a licence condition or a code provision having the effect of a licence condition.¹

Read additional [guidance on the information requirements](#) contained within this section.

¹ These matters are to be reported to us online via our [‘eServices’](#) digital service on our website

15.1.3 - Reporting of systematic or organised money lending

Applies to:

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

1. Licensees must as soon as reasonably practicable, in such form or manner as the Commission may from time to time specify, provide the Commission with any information relating to cases where they encounter systematic, organised or substantial money lending between customers on their premises, in accordance with the ordinary code provisions on money lending between customers.¹

Read additional [guidance on the information requirements](#) contained within this section.

¹ These matters are to be reported to us online via our [‘eServices’](#) digital service on our website

15.2.1 - Reporting key events

Applies to:

All operating licences.

A key event is an event that could have a significant impact on the nature or structure of a licensee's business. Licensees must notify the Commission, in such form or manner as the Commission may from time to time specify, of the occurrence of any of the following key events as soon as reasonably practicable and in any event within five working days of the licensee becoming aware of the event's occurrence¹.

Operator status

1. Any of the following applying to a licensee, any person holding a key position for a licensee, a group company or a shareholder or member (holding 5% or more of the issued share capital of the licensee or its holding company):
 - o presenting of a petition for winding up
 - o making of a winding up order
 - o entering into administration or receivership
 - o bankruptcy (applying to individuals only)
 - o sequestration (applicable in Scotland), or
 - o an individual voluntary arrangement.

Relevant persons and positions

2. In the case of licensees who are companies, bodies corporate or other legal entities (but excluding society lottery licensees where stated), the name and address of any person or entity who (whether or not already a shareholder):
 - a. becomes a shareholder holding 5 percent or more of the issued share capital of the licensee or its holding company; or
 - b. controls 5 percent or more of the voting rights of the licensee or its holding company, excluding society lottery licensees; or

- c. is entitled to 5 percent or more of the dividends or profits of the licensee, excluding society lottery licensees.
3. The taking of any loan by the licensee, or by a group company who then makes an equivalent loan to the licensee, from any person not authorised by the Financial Conduct Authority: a copy of the loan agreement, if any, must be supplied.
4. The appointment of a person to, or a person ceasing to occupy, a 'key position' (including leaving one position to take up another). A 'key position' in relation to a licensee is:
 - a. in the case of a small-scale operator, a 'qualifying position' as defined in the Gambling Act 2005 (Definition of Small-scale Operator) Regulations 2006²
 - b. in the case of an operator which is not a small-scale operator, a 'specified management office' as set out in (current) LCCP licence condition 1.2
 - c. a position where the holder of which has overall responsibility for the licensee's anti-money laundering and/or terrorist financing compliance, and/or for the reporting of known or suspected money laundering or terrorist financing activity.
 - d. any other position for the time being designated by the Commission as a 'key position'. (Notification is required whether or not the person concerned is required to hold a personal management licence and whether or not the event notified requires the licensee to apply for a variation to amend a detail of their licence.)

Financial events

5. Any material change in the licensee's banking arrangements, in particular the termination of such arrangements or a particular facility and whether by the licensee or the provider of the arrangements.
6. Any breach of a covenant given to a bank or other lender.
7. Any default by the licensee or, where the licensee is a body corporate, by a group company in making repayment of the whole or any part of a loan on its due date.
8. Any change in the licensee's arrangements as to the methods by which, and/or the payment processors through which, the licensee accepts payment from customers using their gambling facilities (this key event applies to remote casino, bingo and betting operating licences, except ancillary and remote betting intermediary (trading room only) licences).

Legal or regulatory proceedings or reports

9. The grant, withdrawal or refusal of any application for a licence or other permission made by the licensee, or in the case of a licensee which is a body corporate, any group company of theirs, to a gambling regulator in another jurisdiction. In the case of a withdrawal or refusal of the application, the licensee must also notify the reasons for such withdrawal or refusal. (This condition does not apply to applications for licences or other permissions to carry on activities which would fall outside the scope of a Gambling Commission operating licence if carried out in Britain or with customers in Great Britain.)
10. Any investigation by a professional, statutory, regulatory or government body (in whatever jurisdiction) into the licensee's activities, or the activities of a person in a 'key position', where such an investigation could result in the imposition of a sanction or penalty which could reasonably be expected to raise doubts about the licensee's continued suitability to hold a Gambling Commission licence.
11. Any criminal investigation by a law enforcement agency in any jurisdiction in which the licensee, or a person in a 'key position' related to the licensee, is involved and where the Commission might have cause to question whether the licensee's measures to keep crime out of gambling had failed.
12. The referral to the licensee's Board, or persons performing the function of an audit or risk committee, of material concerns raised by a third party (such as an auditor, or a professional, statutory or other regulatory or government body (in whatever jurisdiction)) about the provision of facilities for gambling: a summary of the nature of the concerns must be provided.
13. The imposition by the licensee of a disciplinary sanction, including dismissal, against the holder of a personal licence or a person occupying a qualifying position for gross misconduct; or the resignation of a personal licence holder or person occupying a qualifying position following commencement of disciplinary proceedings in respect of gross misconduct against that person.
14. The commencement (in whatever jurisdiction) of any material litigation against the licensee or, where the licensee is a body corporate, a group company: the licensee must also notify the outcome of such litigation.
15. The making of a disclosure pursuant to section 330, 331, 332 or 338 of the Proceeds of Crime Act 2002³ or section 19, 20, 21, 21ZA, 21ZB or 21A of the Terrorism Act 2000⁴ (a suspicious activity report): the licensee should inform the Commission of the unique reference number issued by the United Kingdom Financial Intelligence Unit of the National Crime Agency⁵ in respect of each disclosure and for the purposes of this key event the five working day period

referred to above runs from the licensee's receipt of the unique reference number. The licensee should also indicate whether the customer relationship has been discontinued at the time of the submission.

Gambling facilities

16. Any security breach to the licensee's environment that adversely affects the confidentiality of customer data; or prevents the licensee's customers, staff, or legitimate users from accessing their accounts for longer than 12 hours.
17. Where a gaming system fault has resulted in under or overpayments to a player (this includes instances where a fault causes an incorrect prize/win value to be displayed).
18. In the case of remote gambling, the commencement or cessation of trading on website domains (including mobile sites or mobile device applications) or broadcast media through which the licensee provides gambling facilities (including domains covered by 'white label' arrangements). In this condition: 'body corporate' has the meaning ascribed to that term by section 1173 of the Companies Act 2006⁶ or any statutory modification or re-enactment thereof
 - a. in respect of a company, 'holding company' and 'subsidiary' have the meaning ascribed to that term by section 1159 of the Companies Act 2006⁷ or any statutory modification or re-enactment thereof
 - b. a 'group company' is any subsidiary or holding company of the licensee and any subsidiary of such holding company.

Read additional [guidance on the information requirements](#) contained within this section.

¹ Key events are to be reported to us online via the ['eServices' \(opens in new tab\)](#) digital service on our website.

² [Gambling Act 2005 \(Definition of Small-scale Operator\) Regulations 2006 \(opens in new tab\)](#)

³ [Proceeds of Crime Act 2002 \(opens in new tab\)](#)

⁴ [Terrorism Act 2000 \(opens in new tab\)](#)

⁵ [United Kingdom Financial Intelligence Unit of the National Crime Agency \(opens in new tab\)](#)

⁶ [Section 1173 of the Companies Act 2006 \(opens in new tab\)](#).

⁷ [Section 1159 of the Companies Act 2006 \(opens in new tab\)](#).

15.2.2 - Other reportable events

Applies to:

All operating licences.

1. Licensees must also notify the Commission in such form or manner as the Commission may from time to time specify, as soon as reasonably practicable of the occurrence of any of the following events¹:
 - a. any material change in the licensee's arrangements for the protection of customer funds in accordance with licence condition 4 (protection of customer funds) (where applicable)
 - b. any change in the identity of the ADR entity or entities for the handling of customer disputes, as required by the social responsibility code provision on complaints and disputes.
 - c. their becoming aware that a group company which is not a Commission licensee is advertising remote gambling facilities to those residing in a jurisdiction in or to which it has not previously advertised, or their becoming aware of a sustained or meaningful generation of 3% or 10% of group Gross Gambling Yield being exceeded by the group in that jurisdiction.
 - d. any actual or potential breaches by the licensee of the requirements imposed by or under Parts 7 or 8 of the Proceeds of Crime Act 2002², or Part III of the Terrorism Act 2000³, or any UK law by which those statutes are amended or superseded.
2. The licensee must notify the Commission, as soon as reasonably practicable, if it knows or has reasonable cause to suspect that a person who has gambled with it has died by suicide, whether or not such suicide is known or suspected to be associated with gambling. Such notification must include the person's name and date of birth, and a summary of their gambling activity, if that information is available to the licensee.

In this condition:

- a. 'group company' has the same meaning as in condition 15.2.1; and

b. without prejudice to section 327 of the Gambling Act 2005⁴, 'advertising' includes: having a home page directed towards a jurisdiction and written in, or in one of, that jurisdiction's official language(s), having arrangements enabling that jurisdiction's currency to be selected for gambling or the use of payment methods available only in that jurisdiction, and providing a specific customer service facility referable to that jurisdiction.

Read additional [guidance on the information requirements](#) contained within this section.

¹ Key events are to be reported to us online via the ['eServices' \(opens in new tab\)](#) digital service on our website.

² [Proceeds of Crime Act 2002 \(opens in new tab\)](#)

³ [Part III of the Terrorism Act 2000 \(opens in new tab\)](#)

⁴ [Section 327 of the Gambling Act 2005 \(opens in new tab\)](#)

15.3.1 - General and regulatory returns

Applies to:

All operating licences.

On request, licensees must provide the Commission with such information as the Commission may require, in such a form or manner as the Commission may from time-to-time specify, about the use made of facilities provided in accordance with this licence and the manner in which gambling authorised by this licence and the licensee's business in relation to that gambling are carried on.

In particular within 28 days of the end of each quarterly period licensees must submit an accurate Regulatory Return to the Commission containing such information as the Commission may from time to time specify.

¹Regulatory returns are to be submitted to us online via the ['eServices'](#) digital service on our website.

Ordinary code

These do not have the status of operator licence conditions but set out good practice. Operators may adopt alternative approaches to those set out in ordinary code provisions if they have actively taken account of the ordinary code provision and can demonstrate that an alternative approach is reasonable in the operator's particular circumstances; or that to take an alternative approach would be 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 an operator may be taken into account by the Commission on a licence review, but cannot lead to imposition of a financial penalty.

Social responsibility code

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

1.1.1 - Cooperation with the Commission

Ordinary code

Applies to:

All licences.

1. As made plain in its Statement of principles for licensing and regulation¹, the Commission expects licensees to conduct their gambling operations in a way that does not put the licensing objectives at risk, to work with the Commission in an open and cooperative way and to disclose anything which the Commission would reasonably need to be aware of in exercising its regulatory functions. This includes, in particular, anything that is likely to have a material impact on the licensee's business or on the licensee's ability to conduct licensed activities compliantly. Licensees should have this principle in mind in their approach to, and when considering their compliance with, their obligations under the conditions attached to their licence and in relation to the following provisions of this code.

¹ [Statement of principles for licensing and regulation \(opens in new tab\)](#)

1.1.2 - Responsibility for third parties – all licences

Social responsibility code

Applies to:

All licences.

1. Licensees are responsible for the actions of third parties with whom they contract for the provision of any aspect of the licensee's business related to the licensed activities.
2. Licensees must ensure that the terms on which they contract with such third parties:
 - a. require the third party to conduct themselves in so far as they carry out activities on behalf of the licensee as if they were bound by the same licence conditions and subject to the same codes of practice as the licensee
 - b. oblige the third party to provide such information to the licensee as they may reasonably require in order to enable the licensee to comply with their information reporting and other obligations to the Commission
 - c. enable the licensee, subject to compliance with any dispute resolution provisions of such contract, to terminate the third party's contract promptly if, in the licensee's reasonable opinion, the third party is in breach of contract (including in particular terms included pursuant to this code provision) or has otherwise acted in a manner which is inconsistent with the licensing objectives, including for affiliates where they have breached a relevant advertising code of practice.

1.1.3 - Responsibility for third parties – remote

Social responsibility code

Applies to:

All remote licences.

1. Remote licensees must ensure in particular:
 - a. that third parties who provide user interfaces enabling customers to access their remote gambling facilities:
 - i. include a term that any such user interface complies with the Commission's technical standards for remote gambling systems¹; and
 - ii. enable them, subject to compliance with any dispute resolution provisions of such contract, to terminate the third party's contract promptly if, in the licensee's reasonable opinion, the third party is in breach of that term.

¹ [Remote gambling and software technical standards \(opens in new tab\)](#)

2.1.2 - Anti-money laundering – other than casino

Ordinary code

Applies to:

All licences except casino licences.

1. As part of their procedures for compliance with the requirements in respect to the prevention and detection of money laundering in the Proceeds of Crime Act 2002¹ and the Terrorism Act 2000², licensees should take into account the Commission's advice on the Proceeds of Crime Act 2002, *Duties and responsibilities under the Proceeds of Crime Act 2002 – Advice for operators³ (excluding casino operators). *

¹ [Proceeds of Crime Act 2002 \(opens in new tab\)](#)

² [Terrorism Act 2000 \(opens in new tab\)](#)

³ [Proceeds of Crime Act 2002 – Advice for operators \(opens in new tab\)](#)

3.1.1 - Combating problem gambling

Social responsibility code

Applies to:

All licences.

1. Licensees must have and put into effect policies and procedures intended to promote socially responsible gambling including the specific policies and procedures required by the provisions of section 3 of this code.

3.2.3 - AGC SR code

Social responsibility code

Applies to:

All adult gaming centre licences.

1. Licensees must have and put into effect policies and procedures designed to prevent underage gambling, and monitor the effectiveness of these.
2. This must include procedures for:
 - a. checking the age of apparently underage customers
 - b. removing anyone who appears to be under age and cannot produce an acceptable form of identification
 - c. taking action when there are attempts by under-18s to enter the premises.
3. Licensees must ensure that their policies and procedures take account of the structure and layout of their gambling premises.
4. Licensees must not deliberately provide facilities for gambling in such a way as to appeal particularly to children or young people, for example by reflecting or being associated with youth culture.
5. In premises restricted to adults, service must be refused in any circumstances where any adult is accompanied by a child or young person.
6. Licensees must take all reasonable steps to ensure that all staff understand their responsibilities for preventing underage gambling. This must include appropriate training which must cover all relevant prohibitions against inviting children or young persons to gamble or to enter gambling premises, and the legal requirements on returning stakes and not paying prizes to underage customers.
7. Licensees must only accept identification which:

- a. contains a photograph from which the individual can be identified
 - b. states the individual's date of birth
 - c. is valid
 - d. is legible and has no visible signs of tampering or reproduction.
8. All licensees must conduct test purchasing or take part in collective test purchasing programmes, as a means of providing reasonable assurance that they have effective policies and procedures to prevent underage gambling, and must provide their test purchase results to the Gambling Commission, in such a form or manner as the Commission may from time to time specify.

Read additional [guidance on the information requirements](#) contained within this section.

3.2.4 - AGC ordinary code

Ordinary code

Applies to:

All adult gaming centre licences.

1. The Commission considers acceptable forms of identification to include any identification carrying the PASS logo (for example Citizencard or Validate); a military identification card; a driving licence (including a provisional licence) with photocard; or a passport.
2. Licensees should put into effect procedures that require their staff to check the age of any customer who appears to them to be under 25.
3. Licensees should consider permanent exclusion from premises for any adult accompanied by a child or young person on more than one occasion to premises restricted to adults, or if there is reason to believe the offence was committed knowingly or recklessly.
4. Procedures should be put into effect for dealing with cases where a child or young person repeatedly attempts to gamble on premises restricted to adults, including oral warnings, reporting the offence to the Gambling Commission¹ and the police, and making available information on problem gambling.
5. In providing training to staff on their responsibilities for preventing underage gambling, licensees should have, as a minimum, policies for induction training and refresher training.

Read additional [guidance on the information requirements](#) contained within this section.

¹ These matters are to be reported to us online via our [‘eServices’](#) digital service on our website.

3.2.5 - Bingo and FEC SR code

Social responsibility code

Applies to:

All non-remote bingo and family entertainment centre licences.

1. Licensees must have and put into effect policies and procedures designed to prevent underage gambling, and monitor the effectiveness of these.
2. This must include procedures for:
 - a. checking the age of apparently underage customers
 - b. refusing entry to any adult-only areas to anyone unable to produce an acceptable form of identification
 - c. taking action when there are unlawful attempts to enter the adult-only areas.
3. Licensees must ensure that their policies and procedures take account of the structure and layout of their gambling premises.
4. Licensees must not permit children or young people to gamble in the adults-only areas of premises to which they have access. If there is a 'no under-18s' premises policy, licensees must pay particular attention to the procedures they use at the entrance to the premises to check customers' ages.
5. Licensees must take all reasonable steps to ensure that all staff understand their responsibilities for preventing underage gambling. This must include appropriate training which must cover:
 - a. all relevant prohibitions against inviting children or young persons to gamble on age-restricted products or to enter age-restricted areas;
 - b. the legal requirements on returning stakes and not paying prizes to underage customers; and
 - c. procedures for challenging any adult who may be complicit in allowing a child or young person to gamble.

6. Licensees must only accept identification which:

- a. contains a photograph from which the individual can be identified
- b. states the individual's date of birth
- c. is valid
- d. is legible and has no visible signs of tampering or reproduction.

7. All licensees must conduct test purchasing or take part in collective test purchasing programmes, as a means of providing reasonable assurance that they have effective policies and procedures to prevent underage gambling, and must provide their test purchase results to the Commission, in such a form or manner as the Commission may from time to time specify.

Read additional [guidance on the information requirements](#) contained within this section.

3.2.6 - Bingo and FEC ordinary code

Ordinary code

Applies to:

All non-remote bingo and family entertainment centre licences.

1. The Commission considers acceptable forms of identification to include: any identification carrying the PASS logo (for example Citizencard or Validate); a military identification card; a driving licence (including a provisional licence) with photocard; or a passport.
2. Licensees should require a person who appears to relevant staff to be under the age of 25 to be asked to produce proof of age, either at the point of entry to the gambling area or as soon as it comes to the attention of staff that they wish to access gambling facilities.
3. Licensees should have procedures for dealing with cases where an adult knowingly or recklessly allows a child or young person to gamble. These procedures might include refusing to allow the adult to continue to gamble, removing them from the premises, and reporting the incident to the police or local authorities, or taking action where forged identification is produced.
4. Procedures should be put into effect for dealing with cases where a child or young person repeatedly attempts to gamble on their premises, including oral warnings, reporting the offence to the Gambling Commission¹ and the police, and making available information on problem gambling to the child or young person concerned.
5. Where it is likely that customers' young or otherwise vulnerable children will be left unattended on or adjacent to their premises, licensees should consider reminding customers of their parental responsibilities and assess whether there is a need to develop procedures for minimising the risk to such children.
6. In providing training to staff on their responsibilities for preventing underage gambling, licensees should have, as a minimum, policies for induction training and refresher training.

Read additional [guidance on the information requirements](#) contained within this section.

¹ These matters are to be reported to us online via our [‘eServices’](#) digital service on our website.

3.2.11 - Remote SR code

Social responsibility code

Applies to:

All remote licences (including ancillary remote betting licences in respect of bets made or accepted by telephone or email), except lottery licences, gaming machine technical, gambling software, host, ancillary remote casino, and ancillary remote bingo licences.

1. Licensees must have and put into effect policies and procedures designed to prevent underage gambling and monitor the effectiveness of these.
2. Such procedures must include:
 - a. Verifying the age of a customer before the customer is able to:
 - i. deposit any funds into their account;
 - ii. access any free-to-play versions of gambling games that the licensee may make available; or
 - iii. gamble with the licensee using either their own money or any free bet or bonus.
 - b. warning potential customers that underage gambling is an offence;
 - c. regularly reviewing their age verification systems and implementing all reasonable improvements that may be made as technology advances and as information improves;
 - d. ensuring that relevant staff are properly trained in the use of their age verification procedures; in particular customer services staff must be appropriately trained in the use of secondary forms of identification when initial verification procedures fail to prove that an individual is of legal age; and
 - e. enabling their gambling websites to permit filtering software to be used by adults (such as parents or within schools) in order to restrict access to relevant pages of those sites.

3.2.12 - Remote ordinary code

Ordinary code

Applies to:

All remote licences (including ancillary remote betting licences), except gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading rooms only) licences.

1. Licensees should, and should request their contracted partners to, draw attention to parental responsibility as part of the purchasing process of facilities such as mobile phones and interactive television.

3.3.1 - Responsible gambling information

Social responsibility code

Applies to:

All licences, except gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino and remote betting (remote platform) licences.

1. Licensees must make information readily available to their customers on how to gamble responsibly and how to access information about, and help in respect of, problem gambling.
2. The information must cover:
 - a. any measures provided by the licensee to help individuals monitor or control their gambling, such as restricting the duration of a gambling session or the amount of money they can spend
 - b. timers or other forms of reminders or 'reality checks' where available
 - c. self-exclusion options
 - d. information about the availability of further help or advice.
3. The information must be directed to all customers whether or not licensees also make available material which is directed specifically at customers who may be 'problem gamblers'.
4. For gambling premises, information must be available in all areas where gambling facilities are provided and adjacent to ATMs. Information must be displayed prominently using methods appropriate to the size and layout of the premises. These methods may include the use of posters, the provision of information on gambling products, or the use of screens or other facilities in the gambling premises. Information must also be available in a form that may be taken away and may also be made available through the use of links to be accessed online or using smart technology. Licensees must take all reasonable steps to ensure that this information is also readily accessible in locations which enable the customer to obtain it discreetly.

3.3.2 - Foreign languages

Ordinary code

Applies to:

All licences, except gaming machine technical, gambling software, host, ancillary remote bingo and ancillary remote casino licences.

1. Licensees who market their services in one or more foreign languages should make available in that, or those, foreign languages:
 - a. the information on how to gamble responsibly and access to help referred to above
 - b. the players' guides to any game, bet or lottery required to be made available to customers under provisions in this code
 - c. the summary of the contractual terms on which gambling is offered, which is required to be provided to customers as a condition of the licensee's operating licence.

3.3.4 - Remote time-out facility

Social responsibility code

Applies to:

All remote licences except: any remote lottery licence the holder of which does not provide facilities for participation in instant win lotteries, ancillary remote betting licences, remote betting (remote platform), gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading room only) licences.

1 Licensees must offer a 'time out' facility for customers for the following durations:

- a. 24 hours
- b. one week
- c. one month or
- d. such other period as the customer may reasonably request, up to a maximum of 6 weeks.

3.4.1 - Premises-based customer interaction

Social responsibility code

Applies to:

All non-remote licences (except non-remote lottery, gaming machine technical, gambling software and host licences); only the following remote licences – ancillary remote bingo, ancillary remote casino, ancillary remote betting, remote general betting limited, and remote betting intermediary (trading rooms only).

1. Licensees must interact with customers in a way which minimises the risk of customers experiencing harms associated with gambling. This must include:
 - a. identifying customers who may be at risk of or experiencing harms associated with gambling.
 - b. interacting with customers who may be at risk of or experiencing harms associated with gambling.
 - c. understanding the impact of the interaction on the customer, and the effectiveness of the Licensee's actions and approach.
2. Licensees must take into account the Commission's guidance on customer interaction¹.

¹ [Customer interaction: formal guidance for premises-based operators \(opens in new tab\)](#)

3.5.1 - Self exclusion – Non-remote and trading rooms SR code

Social responsibility code

Applies to:

All non-remote licences (except lottery, gaming machine technical and gambling software licences) and remote betting intermediary (trading rooms only) licences.

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.
2. Licensees must, as soon as practicable, take all reasonable steps to prevent any marketing material being sent to a self-excluded customer.
3. Licensees must take steps to remove the name and details of a self-excluded individual from any marketing databases used by the company or group (or otherwise flag that person as an individual to whom marketing material must not be sent), within two days of receiving the completed self-exclusion notification.
4. This covers any marketing material relating to gambling, or other activities that take place on the premises where gambling may take place. However, it would not extend to blanket marketing which is targeted at a particular geographical area and where the excluded individual would not knowingly be included.
5. Licensees must close any customer accounts of an individual who has entered a self-exclusion agreement and return any funds held in the customer account. It is not sufficient merely to prevent an individual from withdrawing funds from their customer account whilst still accepting wagers from them. Where the giving of credit is permitted, the licensee may retain details of the amount owed to them by the individual, although the account must not be active.
6. Licensees must put into effect procedures designed to ensure that an individual who has self-excluded cannot gain access to gambling. These procedures must include:

- a. a register of those excluded with appropriate records (name, address, other details, and any membership or account details that may be held by the operator);
 - b. photo identification (except where the Licensee can reasonably satisfy themselves that in the circumstances in which they provide facilities for gambling an alternative means of identification is at least as effective) and a signature;
 - c. staff training to ensure that staff are able to administer effectively the systems; and
 - d. the removal of those persons found in the gambling area or attempting to gamble from the premises.
7. Licensees must ensure that their procedures for preventing access to gambling by self-excluded individuals take account of the structure and layout of the gambling premises.
8. Licensees must, when administering the self-exclusion agreement, signpost the individual to counselling and support services.

3.5.2 - Self-exclusion – non-remote ordinary code

Ordinary code

Applies to:

All non-remote licences and remote betting intermediary (trading rooms only) licences, but not gaming machine technical and gambling software licences.

1. Self-exclusion procedures should require individuals to take positive action in order to self-exclude. This can be a signature on a self-exclusion form.
2. Individuals should be able to self-exclude without having to enter gambling premises.
3. Before an individual self-excludes, licensees should provide or make available sufficient information about what the consequences of self-exclusion are.
4. Licensees should take all reasonable steps to extend the self-exclusion to premises of the same type owned by the operator in the customer's local area. In setting the bounds of that area licensees may take into account the customer's address (if known to them), anything else known to them about the distance the customer ordinarily travels to gamble and any specific request the customer may make.
5. Licensees should encourage the customer to consider extending their self-exclusion to other licensees' gambling premises in the customer's local area.
6. Customers should be given the opportunity to discuss self-exclusion in private, where possible.
7. Licensees should take steps to ensure that:
 - a. the minimum self-exclusion period offered is of a duration of not less than 6 nor more than 12 months
 - b. any self-exclusion may, on request, be extended for one or more further periods of at least 6 months each
 - c. a customer who has decided to enter a self-exclusion agreement is given the opportunity to do so immediately without any cooling-off period. However, if the customer wishes to

consider the self-exclusion further (for example to discuss with problem gambling groups), the customer may return at a later date to enter into self- exclusion

- d. at the end of the period chosen by the customer, the self-exclusion remains in place for a further 6 months, unless the customer takes positive action in order to gamble again
 - e. where a customer chooses not to renew the self-exclusion, and makes a positive request to begin gambling again during the 6 month period following the end of their initial self-exclusion, the customer is given one day to cool off before being allowed access to gambling facilities. The contact must be made via telephone or in person
 - f. notwithstanding the expiry of the period of self-exclusion chosen by a customer, no marketing material should be sent to them unless and until they have asked for or agreed to accept such material.
8. The licensee should retain the records relating to a self-exclusion agreement at least for the length of the self-exclusion agreement plus a further 6 months.
 9. Please note that the Commission does not require the licensee to carry out any particular assessment or make any judgement as to whether the previously self-excluded individual should again be permitted access to gambling. The requirement to take positive action in person or over the phone is purely to a) check that the customer has considered the decision to access gambling again and allow them to consider the implications; and b) implement the one day cooling-off period and explain why this has been put in place.
 10. Licensees should have, and put into effect, policies and procedures which recognise, seek to guard against and otherwise address, the fact that some individuals who have self-excluded might attempt to breach their exclusion without entering a gambling premises, for example, by getting another to gamble on their behalf.
 11. Licensees should have effective systems in place to inform all venue staff of self-excluded individuals who have recently attempted to breach a self-exclusion in that venue, and the licensees neighbouring venues.
 12. In providing training to staff on their responsibilities for self-exclusion, licensees should have, as a minimum, policies for induction training and refresher training.

3.5.3 - Self-exclusion – remote SR code

Social responsibility code

Applies to:

All remote licences except: gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino, betting intermediary (trading room only) and remote betting (standard) (remote platform) licences. Paragraph 8 does not apply to ancillary remote betting licences, remote general betting (limited), or any remote lottery licence the holder of which does not provide facilities for participation in instant win lotteries.

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.
2. Licensees must, as soon as practicable, take all reasonable steps to prevent any marketing material being sent to a self-excluded customer.
3. Licensees must take steps to remove the name and details of a self-excluded individual from any marketing databases used by the company or group (or otherwise flag that person as an individual to whom marketing material must not be sent), within two days of receiving the completed self-exclusion notification.
4. This covers any marketing material relating to gambling. However, it would not extend to blanket marketing which is targeted at a particular geographical area and where the excluded individual would not knowingly be included.
5. Licensees must close any customer accounts of an individual who has entered a self-exclusion agreement and return any funds held in the customer account. It is not sufficient merely to prevent an individual from withdrawing funds from their customer account whilst still accepting wagers from them. Where the giving of credit is permitted, the licensee may retain details of the amount owed to them by the individual, although the account must not be active.
6. Licensees must put into effect procedures designed to ensure that an individual who has self-excluded cannot gain access to gambling. These procedures must include:

- a. a register of those excluded with appropriate records (name, address, other details, and any membership or account details that may be held by the operator);
 - b. a record of the card numbers to be excluded;
 - c. staff training to ensure that staff are able to administer effectively the systems; and
 - d. the removal of access from those persons found to have gambled or who have attempted to gamble on the facilities.
7. Licensees must when administering the self-exclusion signpost the individual to counselling and support services.
8. Customers must be given the opportunity to self-exclude by contacting customer services and in addition by entering an automated process using remote communication. In order to avoid inadvertent self-exclusion it is acceptable for an automated process to include an additional step that requires the customer to confirm that they wish to self-exclude. The licensee must ensure that all staff who are involved in direct customer service are aware of the self-exclusion system in place, and are able to direct that individual to an immediate point of contact with whom/which to complete that process.

3.5.4 - Self-exclusion – Remote ordinary code

Ordinary code

Applies to:

All remote licences (including ancillary remote betting licences), except gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino, remote betting intermediary (trading rooms only) and remote betting (standard) (remote platform) licences.

1. Self-exclusion procedures should require individuals to take positive action in order to self-exclude:
 - a. over the internet; this can be a box that must be ticked in order to indicate that they understand the system
 - b. by telephone; this can be a direct question asking whether they understand the system.
2. Before an individual self-excludes, licensees should provide or make available sufficient information about what the consequences of self-exclusion are.
3. Licensees should encourage the customer to consider extending their self-exclusion to other remote gambling operators currently used by the customer.
4. Within the licensee's information about self-exclusion policies, the licensee should provide a statement to explain that software is available to prevent an individual computer from accessing gambling internet sites. The licensee should provide a link to a site where further information is available.
5. Licensees should take all reasonable steps to ensure that:
 - a. the minimum self-exclusion period offered is of a duration of not less than 6 nor more than 12 months;
 - b. any self-exclusion may, on request, be extended for one or more further periods of at least 6 months;
 - c. the self-exclusion arrangements give customers the option of selecting a self-exclusion period of up to at least five years;

- d. a customer who has decided to enter a self-exclusion agreement is given the opportunity to do so immediately without any cooling-off period. However, if the customer wishes to consider the self-exclusion further (for example to discuss with problem gambling groups) the customer may return at a later date to enter into self-exclusion;
 - e. at the end of the period chosen by the customer, self-exclusion remains in place, for a minimum of 7 years, unless the customer takes positive action to gamble again;
 - f. where a customer chooses not to renew, and makes a positive request to begin gambling again, during the 7 year period following the end of their initial self-exclusion, the customer is given one day to cool off before being allowed to access gambling facilities. Contact must be made via phone or in person; re-registering online is not sufficient; and
 - g. notwithstanding the expiry of the period of self-exclusion chosen by a customer, no marketing material should be sent to them unless and until they have asked for or agreed to accept such material.
6. The licensee should retain the records relating to a self-exclusion agreement for as long as is needed to enable the self-exclusion procedures set out in paragraph 5 above to be implemented.
7. Please note that the Commission does not require the licensee to carry out any particular assessment or make any judgement as to whether the previously self-excluded individual should again be permitted access to gambling. The requirement to take positive action in person or over the phone is purely to a) check that the customer has considered the decision to access gambling again and allow them to consider the implications; and b) implement the one day cooling-off period and explain why this has been put in place.
8. In providing training to staff on their responsibilities for self-exclusion, licensees should have, as a minimum, policies for induction training and refresher training.

3.5.5 - Remote multi-operator SR code

Social responsibility code

Applies to:

All remote licences except: any remote lottery licence the holder of which does not provide facilities for participation in instant win lotteries, ancillary remote betting when relied upon to provide facilities for betting via a machine (commonly known as self-service betting terminals) on premises where a betting or track premises licence has effect, remote general betting (remote platform), remote betting intermediary (trading room only), gaming machine technical, gambling software, host, ancillary remote bingo, and ancillary remote casino licences.

1. Licensees must participate in the national multi-operator self-exclusion scheme.

3.5.6 - Multi-operator non-remote SR code

Social responsibility code

Applies to:

All non-remote casino, bingo and betting licences (except in respect of the provision of facilities for betting in reliance on a track premises licence) and holders of gaming machine general operating licences for adult gaming centres.

1. Licensees must offer customers with whom they enter into a self-exclusion agreement in respect of facilities for any kind of gambling offered by them at licensed gambling premises the ability to self-exclude from facilities for the same kind of gambling offered in their locality by any other holder of an operating licence to whom this provision applies, by participating in one or more available multi-operator self-exclusion schemes.

3.6.5 - AGCs

Ordinary code

Applies to:

All adult gaming centre licences.

1. Licensees who employ children (under-16-year-olds) and young persons (those aged 16 and 17) should be aware that it is an offence:
 - a. to employ them to provide facilities for gambling;
 - b. if gaming machines are sited on the premises, for their contracts of employment to require them, or for them to be permitted, to perform a function in connection with a gaming machine at any time; and
 - c. to employ them to carry out any other function on adult gaming centre licensed premises while any gambling activity is being carried on in reliance on the premises licence.
2. As to 1b, it should be noted that in the Commission's view the relevant provision of the Act applies to any function performed in connection with a gaming machine. This includes servicing or cleaning such a machine.
3. Accordingly, licensees should have and put into effect policies and procedures designed to ensure that:
 - a. children and young persons are never asked to perform tasks within 1a or 1b, above
 - b. all staff, including those who are children or young persons themselves, are instructed about the laws relating to access to gambling by children and young persons.
4. Licensees should consider adopting a policy that:
 - a. children and young persons are not employed to work on adult gaming centre licensed premises at any time when the premises are open for business
 - b. gaming machines are turned off if children and young persons are working on the premises outside the hours when the premises are open for business.

3.6.6 - FECs

Ordinary code

Applies to:

All family entertainment centre licences.

1. Licensees who employ children (under-16-year-olds) and young persons (those aged 16 and 17) should be aware that it is an offence:
 - a. to employ them to provide facilities for gambling; and
 - b. if gaming machines are sited on the premises, for their contracts of employment to require them, or for them to be permitted, to perform a function in connection with a gaming machine at any time.
2. As to 1b, it should be noted that in the Commission's view the relevant provision of the Act applies to any function performed in connection with a gaming machine. This includes servicing or cleaning such a machine.
3. Accordingly, licensees should have and put into effect policies and procedures designed to ensure that:
 - a. children and young persons are never asked to perform tasks within 1a or 1b, above; and
 - b. all staff, including those who are children or young persons themselves, are instructed about the laws relating to access to gambling by children and young persons.
4. Licensees should consider adopting a policy that:
 - a. children and young persons are not employed to carry out any work in an adult-only area of family entertainment licensed premises at a time when any gambling is taking place; and
 - b. gaming machines sited in adult-only areas are turned off if children and young persons are working on the premises outside the hours when the premises are open for business.

3.8.2 - Money-lending – other than casinos

Ordinary code

Applies to:

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

1. Licensees should seek to prevent systematic or organised money lending between customers on their premises. As a minimum, they should have arrangements in place to ensure staff are requested to report any instances of substantial money lending when they become aware of them.

3.9.1 - Identification of individual customers - remote

Social responsibility code

Applies to:

All remote licences (including ancillary remote betting licences) except gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading rooms only) licences.

1. Licensees must have and put into effect policies and procedures designed to identify separate accounts which are held by the same individual.
2. Where licensees allow customers to hold more than one account with them, the licensee must have and put into effect procedures which enable them to relate each of a customer's such accounts to each of the others and ensure that:
 - a. if a customer opts to self-exclude they are effectively excluded from all gambling with the licensee unless they make it clear that their request relates only to some forms of gambling or gambling using only some of the accounts they hold with the licensee;
 - b. all of a customer's accounts are monitored and decisions that trigger customer interaction are based on the observed behaviour and transactions across all the accounts;
 - c. where credit is offered or allowed the maximum credit limit is applied on an aggregate basis across all accounts; and
 - d. individual financial limits can be implemented across all of a customer's accounts.
3. Licensees which are companies or other bodies corporate must take all reasonable steps to comply with the above provision as if reference to a customer holding more than one account with them included a reference to a customer holding one or more accounts with them and one or more accounts with a group company.
4. A company is a 'group company' in relation to a licensee if it is the holding company of, subsidiary of, or shares a common holding company with, the licensee. For these purposes 'holding company' and 'subsidiary' have the meanings ascribed to them by section 1159 of the Companies Act 2006¹ or any statutory modification or re-enactment thereof.

¹ [Section 1159 of the Companies Act 2006 \(opens in new tab\)](#)

4.1.1 - Fair terms

Social responsibility code

Applies to:

All licences, except gaming machine technical and gambling software licences.

1. Licensees must be able to provide evidence to the Commission, if required, showing how they satisfied themselves that their terms are not unfair.

5.1.1 - Rewards and bonuses – SR code

Social responsibility code

Applies to:

All licences (including ancillary remote licences), except gaming machine technical and gambling software licences.

1. The following applies where a licensee makes available to any customer, or potential customer, an incentive or reward scheme or other arrangement under which a customer may receive money, goods, services or any other advantage (including the discharge in whole or in part of any liability of his) ('the benefit').
2. Licensees must:
 - a. Set out terms and conditions, in relation to an incentive, which are clear, transparent, and fair and readily accessible to any customer or potential customer to whom it is offered.
3. Licensees must not:
 - a. Apply wagering requirements, which requires a customer to play through bonus funds, over a maximum of 10 times. A wagering requirement is where a customer is required to make wagers totalling a particular value for funds to become withdrawable.
 - b. Include more than one type of gambling product (betting, casino, bingo, and lottery) within an incentive.
 - c. Alter or increase the receipt or the value, or amount of the incentive if the qualifying activity or spend is reached within a shorter time than the whole period over which the benefit is offered.
 - d. Construct incentives where, if the benefit comprises of free or subsidised travel or accommodation which encourages the customer's attendance at a particular licensed premises, it is offered on terms that directly relate to the level of the customer's prospective gambling.
4. If a licensee makes available an incentive or reward scheme for customers, designated by the licensee as 'high value, 'VIP' or equivalent, it must be offered in a manner which is consistent

with the licensing objectives.

5. Licensees must take into account the Commission's guidance on high value customer incentives¹.

¹ [Guidance on high value customer incentives \(opens in new tab\)](#)

5.1.2 - Proportionate rewards

Ordinary code

Applies to:

All licences (including ancillary remote licences), except gaming machine technical and gambling software licences.

1. Licensees should only offer incentive or reward schemes in which the benefit available is proportionate to the type and level of customers' gambling.

5.1.6 - Compliance with advertising codes

Social responsibility code

Applies to:

All licences, except lottery licences.

1. All marketing of gambling products and services must be undertaken in a socially responsible manner.
2. In particular, Licensees must comply with the advertising codes of practice issued by the Committee of Advertising Practice (CAP)¹ and the Broadcast Committee of Advertising Practice (BCAP)² as applicable. For media not explicitly covered, licensees should have regard to the principles included in these codes of practice as if they were explicitly covered.
3. The restriction on allowing people who are, or seem to be, under 25 years old (that is, those in the 18-24 age bracket) to appear in marketing communications need not be applied in the case of non-remote point of sale advertising material, provided that the images used depict the sporting or other activity that may be gambled on and not the activity of gambling itself and do not breach any other aspect of the advertising codes.

¹ [Committee of Advertising Practice \(opens in new tab\)](#)

² [Broadcast Committee of Advertising Practice \(opens in new tab\)](#)

5.1.8 - Compliance with industry advertising codes

Ordinary code

Applies to:

All licences.

1. Licensees should follow any relevant industry code on advertising, notably the Gambling Industry Code for Socially Responsible Advertising¹.

¹ [Gambling Industry Code for Socially Responsible Advertising](#) (opens in new tab).

5.1.9 - Other marketing requirements

Social responsibility code

Applies to:

All licences.

1. Licensees must ensure that their marketing communications, advertisements, and invitations to purchase (within the meaning of the Digital Markets, Competition and Consumers Act 2024¹) do not amount to or involve misleading actions or misleading omissions within the meaning of this Act.
2. Licensees must ensure that all significant conditions which apply to marketing incentives are provided transparently and prominently to consumers. Licensees must present the significant conditions at the point of sale for any promotion, and on any advertising in any medium for that marketing incentive except where, in relation to the latter, limitations of space make this impossible. In such a case, information about the significant conditions must be included to the extent that it is possible to do so, the advertising must clearly indicate that significant conditions apply and where the advertisement is online, the significant conditions must be displayed in full no further than one click away.
3. The terms and conditions of each marketing incentive must be made available for the full duration of the promotion.

¹ [Digital Markets, Competition and Consumers Act 2024 \(opens in new tab\)](#)

5.1.10 - Online marketing in proximity to information on responsible gambling

Ordinary code

Applies to:

All licences.

1. Licensees should ensure that no advertising or other marketing information, whether relating to specific offers or to gambling generally, appears on any primary web page/screen, or micro site that provides advice or information on responsible gambling

5.1.11 - Direct electronic marketing consent

Social responsibility code

Applies to:

All licences.

1. Unless expressly permitted by law consumers must not be contacted with direct electronic marketing without their informed and specific consent. Whenever a consumer is contacted the consumer must be provided with an opportunity to withdraw consent. If consent is withdrawn the licensee must, as soon as practicable, ensure the consumer is not contacted with electronic marketing thereafter unless the consumer consents again. Licensees must be able to provide evidence which establishes that consent.

6.1.1 - Complaints and disputes

Social responsibility code

Applies to:

All licences (including ancillary remote licensees) except gaming machine technical and gambling software licences.

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.
2. Licensees must 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.
3. The services of any such ADR entity must be free of charge to the customer.
4. Licensees must 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.
5. Licensees' complaints handling policies and procedures must 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.
6. Licensees must 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 Commission¹ from time to time.
7. Licensees should keep records of customer complaints and disputes and make them available to the Commission on request.

In this Code, 'ADR entity' means

- a. a person offering alternative dispute resolution services who has been granted accreditation by the Secretary of State under Chapter 4 of Part 4 of the Digital Markets, Competition and Consumers Act 2024².

Read additional [guidance on the information requirements](#) contained within this section.

¹ [Complaints and disputes: Guidance published by the Gambling Commission \(opens in new tab\)](#)

² [Digital Markets, Competition and Consumers Act 2024 \(opens in new tab\)](#)

7.1.2 - Responsible gambling information for staff

Social responsibility code

Applies to:

All licences, including betting ancillary remote licences, but not other ancillary remote licences.

1. Licensees must take all reasonable steps to ensure that staff involved in the provision of facilities for gambling are made aware of advice on socially responsible gambling and of where to get confidential advice should their gambling become hard to control.

8.1.1 - Ordinary code

Ordinary code

Applies to:

All licences.

1. As stated earlier in this code, the Commission expects licensees to work with the Commission in an open and cooperative way and to inform the Commission of any matters that the Commission would reasonably need to be aware of in exercising its regulatory functions. These include in particular matters that will have a material impact on the licensee's business or on the licensee's ability to conduct licensed activities compliantly and consistently with the licensing objectives.
2. Thus, licensees should notify the Commission, or ensure that the Commission is notified, as soon as reasonably practicable and in such form and manner as the Commission may from time to time specify¹, of any matters which in their view could have a material impact on their business or affect compliance. The Commission would, in particular, expect to be notified of the occurrence of any of the following events in so far as not already notified in accordance with the conditions attached to the licensee's licence²:
 - a. any material change in the licensee's structure or the operation of its business
 - b. any material change in managerial responsibilities or governance arrangements
 - c. any report from an internal or external auditor expressing, or giving rise to, concerns about material shortcomings in the management control or oversight of any aspect of the licensee's business related to the provision of gambling facilities.

Read additional [guidance on the information requirements](#) contained within this section.

¹ These matters are to be reported to us online via our ['eServices'](#) digital service on our website.

² Events which must be reported, because the Commission considers them likely to have a material impact on the nature or structure of a licensee's business, are set out in general licence condition 15.2.1

10.1.1 - Assessing local risk

Social responsibility code

Applies to:

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

1. Licensees must assess the local risks to the licensing objectives posed by the provision of gambling facilities at each of their premises, and have policies, procedures and control measures to mitigate those risks. In making risk assessments, licensees must take into account relevant matters identified in the licensing authority's statement of licensing policy¹.
2. Licensees must review (and update as necessary) their local risk assessments:
 - a. to take account of significant changes in local circumstances, including those identified in a licensing authority's statement of licensing policy;
 - b. when there are significant changes at a licensee's premises that may affect their mitigation of local risks;
 - c. when applying for a variation of a premises licence; and
 - d. in any case, undertake a local risk assessment when applying for a new premises licence.

¹This is the [statement of licensing policy \(opens in new tab\)](#) under the Gambling Act 2005.

10.1.2 - Sharing local risk assessments

Ordinary code

Applies to:

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

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

ANNX C CASE LAW

All England Official Transcripts (1997-2008)

Daniel Thwaites plc v Wirral Borough Magistrates' Court

Licensing - Licence - Application for licence - Guidance issued by Secretary of State as to discharge of functions under legislation - Licensing authority granting licence - Local objectors appealing to magistrates' court - Magistrates' court imposing restrictions - Whether restrictions necessary to promote licensing objective - Whether magistrates' court having proper regard to guidance - Whether decision of magistrates' court lawful - Licensing Act 2003, s 4

[2008] EWHC 838 (Admin), CO/5533/2006, (Transcript: Wordwave International Ltd (A Merrill Communications Company))

QUEEN'S BENCH DIVISION (ADMINISTRATIVE COURT)

BLACK J

10 MARCH, 6 MAY 2008

6 MAY 2008

This is a signed judgment handed down by the judge, with a direction that no further record or transcript need be made pursuant to Practice Direction 6.1 to Pt 39 of the Civil Procedure Rules (formerly RSC Ord 59, r (1)(f), Ord 68, r 1). See Practice Note dated 9 July 1990, [1990] 2 All ER 1024.

D MW Pickup for the Claimant

The Defendant did not appear and was not represented

D Flood for the First Interested Party

M Copeland for the Second Interested Party

Naphens plc; Kirwans; Wirral MBC

BLACK J:

[1] This is an application by Daniel Thwaites plc ("the Claimant") for judicial review of a licensing decision made by the Wirral Magistrates' Court ("the Magistrates' Court") on 5 April 2006 and that court's decision on 21 April 2006 concerning the costs of the proceedings. The Claimant seeks an order quashing both decisions. Permission to apply for judicial review was granted by Pitchford J on 2 November 2006.

THE FACTUAL BACKGROUND

[2] The Claimant owns the Saughall Hotel in Saughall Massie, Wirral which it operates as licensed premises ("the premises"). It originally held a licence under the Licensing Act 1964. In June 2005, it commenced an application to the Licensing Sub-Committee of the Metropolitan Borough of Wirral ("the licensing authority")

for the existing licence to be converted to a premises licence under the Licensing Act 2003 and for the licence to be varied simultaneously.

[3] In essence, the Claimant was seeking to conduct business at the premises for longer hours than were permitted under the original licence. The police did not support the extension of the hours to the extent that the Claimant initially proposed. The Claimant agreed to restrict the hours to those that were acceptable to the police. Accordingly, the licensing authority was asked to grant a licence that would permit music and dancing to 11pm and alcohol sales until midnight on all nights except Friday and Saturday and, on Friday and Saturday nights, music and dancing to midnight and alcohol sales until 1pm, with the doors closing one hour after the last alcohol sale every night.

[4] The police withdrew their representations against the modified proposals and did not appear before the licensing authority when the matter was heard on 23 August 2005. No representations were made by the Wirral Environmental Health Services either. However, there was opposition to the proposals at the hearing from the Saughall Massie Conservation Society ("the First Interested Party") and other Saughall Massie residents.

[5] The Claimant told the licensing authority at the hearing that the hours of operation at the premises would not vary significantly from the existing hours of operation and that the application for extended hours was to allow flexibility to open later "on special occasions" This was a matter of which the licensing authority took note as is recorded in the minutes of their determination.

[6] The licence was granted in the modified terms requested together with an additional hour for licensable activities and an extra 30 minutes for the hours the premises were to be open to the public over Christmas and at the major bank holidays. Special arrangements were also permitted for New Year's Eve. The licensing authority removed certain conditions that had been imposed on the old licence (requiring all alcohol to be consumed within 20 minutes of the last alcohol sale and banning children under 14 from the bar) and imposed other conditions which were obviously aimed at controlling noise, namely that the area outside must be cleared by 11pm, that the premises must promote the use of taxi firms which use a call-back system, that all doors and windows must be kept closed when regulated entertainment was provided and that prominent notices should be placed on the premises requiring customers to leave quietly.

[7] The Saughall Massie Conservation Society and "others" appealed against the licensing decision to the Magistrates' Court on the ground that the licensing authority's decision "was not made with a view to promotion of and in accordance with the licensing objectives pursuant to s 4, Pt 2 of the Licensing Act 2003".

[8] The appeal occupied the Magistrates' Court from 3 - 5 April 2006. The Respondents to the appeal were the licensing authority and the Claimant which both defended the licensing authority's decision. Witnesses were called including Saughall Massie residents, Police Sergeant Yehya who dealt with the stance of the Merseyside police, and Mr Miller, the manager of the premises.

[9] The justices granted the appeal. Their Reasons run to three pages of typescript, one page of which is entirely taken up with setting out the new hours of operation they imposed. These permitted entertainment until 11pm and alcohol sales until 11.30pm on all nights except Friday and Saturday when entertainment would be permitted until 11.30pm and alcohol sales until midnight. The premises could remain open to the public until midnight on all nights except Friday and Saturday when they could close at 1am. Similar provisions were imposed to those imposed by the licensing authority in relation to later opening at Christmas and major bank holidays and the provisions relating to New Year's Eve and the conditions of the licence remained unaltered.

[10] The new licence had come into effect on 24 November 2005 so the new arrangements had been running for several months by the time of the hearing before the Magistrates' Court. There had been no formal or recorded complaints against the premises under the old or the new regime as the justices acknowledged in their Reasons. The residents who gave evidence were fearful of problems if the extended hours were allowed in the summer. The Chairman of the Conservation Society, who gave oral evidence, spoke of people urinating in the gardens and a problem with litter. It appears from the statement filed by the Chairman of the Bench for these judicial review proceedings that evidence was also given of interference with machinery on nearby Diamond Farm. The justices' Reasons make no reference at all to these matters. As to the statements of the "Witnesses of the Appellant", they say simply that they have read and considered them but attached little or no weight to them.

[11] The justices and their legal advisor have filed a considerable amount of material in response to the judicial review proceedings, in all 31 closely typed pages. These comprise their Response to the Claim, statements from Alistair Beere (who was the chairman of the bench), Mary Woodhouse (another of the bench) and Stephen Pickstock (the legal advisor), and what is said in the index to be a document by Mr Beere from which he prepared his statement. There was limited argument before me as to the status of these documents and the weight that I should give to them. It was not submitted that I should decline to have *any* regard to them although I think it is fair to say that it was common ground between the parties, rightly in my view, that I should concentrate principally on the Reasons. It is established by authorities such as *R v Westminster City Council ex parte Ermakov* [1996] 2 All ER 302, 95 LGR 119, [1996] 2 FCR 208 that the court can admit evidence to elucidate or, exceptionally, correct or add to the reasons given by the decision maker at the time of the decision but that it should be very cautious about doing so. The function of such evidence should generally be elucidation not fundamental alteration, confirmation not contradiction. In the circumstances, I have read carefully what the magistrates have provided but approached its role in the judicial review proceedings cautiously.

THE BROAD NATURE OF THE CLAIM IN RELATION TO THE LICENSING DECISION

[12] The Claimant argues that the Magistrates' Court decision is unlawful for a number of reasons. It is argued that the decision was not in line with the philosophy of the Licensing Act 2003 ("the Act") and imposed restrictions on the Claimant's operation which were not necessary to promote the licensing objectives set out in that Act, that it was based on speculation rather than evidence, that it took into account irrelevant considerations and failed to take into account proper considerations, and that it was a decision to which no properly directed Magistrates' Court could have come on the evidence. In so far as the court imposed conditions as to the time at which the premises must close, it is submitted that this was not a matter which can be regulated under the Act. It is further argued that the magistrates failed to give adequate reasons for their decision.

THE LEGAL BACKGROUND

[13] The Licensing Act 2003 was intended to provide a "more efficient" "more responsive" and "flexible" system of licensing which did not interfere unnecessarily. It aimed to give business greater freedom and flexibility to meet the expectations of customers and to provide greater choice for consumers whilst protecting local residents from disturbance and anti-social behaviour.

[14] Note 12 of the explanatory notes to the Act gives an indication of the approach to be taken under the Act. It reads:

"12 In contrast to the existing law, the Act does not prescribe the days or the opening hours when alcohol may be sold by retail for consumption on or off premises. Nor does it specify when other licensable activities may be carried on.

Instead, the Applicant for a premises licence or a club premises certificate will be able to choose the days and the hours during which they wish to be authorised to carry on licensable activities at the premises for which a licence is sought. The licence will be granted on those terms unless, following the making of representations to the licensing authority, the authority considers it necessary to reject the application or vary those terms for the purpose of promoting the licensing objectives."

[15] Section 1 of the Act provides:

"S1(1) For the purposes of this Act the following are licensable activities -

- (a) the sale by retail of alcohol,
- (b) [clubs]
- (c) the provision of regulated entertainment, and
- (d) the provision of late night refreshment."

[16] To carry on a licensable activity, a premises licence granted under Pt 3 of the Act is generally required, s 2. Application for a premises licence must be made to the relevant licensing authority, s 17(1).

[17] By virtue of s 4, the licensing authority must carry out all its functions under the Act (including its functions in relation to determining an application for a premises licence or an application for a variation of a premises licence) with a view to promoting the "licensing objectives". These are set out in s 4 as follows:

"S4(2) The licensing objectives are -

- (a) the prevention of crime and disorder;
- (b) public safety;
- (c) the prevention of public nuisance; and
- (d) the protection of children from harm."

[18] In carrying out its licensing functions, by virtue of s 4(3) the licensing authority must also have regard to its licensing statement published under s 5 and any guidance issued by the Secretary of State under s 182.

[19] Section 182 obliges the Secretary of State to issue guidance to licensing authorities on the discharge of their functions under the Act. Guidance was issued in July 2004 ("the Guidance"). It was updated in June 2007 but it is the original guidance that is relevant in this case. In any event, none of the changes made are material to the issues I have to determine.

[20] The Foreword says that the Guidance:

"is intended to aid licensing authorities in carrying out their functions under the 2003 Act and to ensure the spread of best practice and greater consistency of approach. This does not mean we are intent on eroding local discretion. On

the contrary, the legislation is fundamentally based on local decision-making informed by local knowledge and local people. Our intention is to encourage and improve good operating practice, promote partnership and to drive out unjustified inconsistencies and poor practice."

[21] As the Guidance says in para 1.7, it does not replace the statutory provisions of the Act or add to its scope. Paragraph 2.3 says:

"Among other things, section 4 of the 2003 Act provides that in carrying out its functions a licensing authority must have regard to guidance issued by the Secretary of State under section 182. The requirement is therefore binding on all licensing authorities to that extent. However, it is recognised that the Guidance cannot anticipate every possible scenario or set of circumstances that may arise and so long as the Guidance has been properly and carefully understood and considered, licensing authorities may depart from it if they have reason to do so. When doing so, licensing authorities will need to give full reasons for their actions. Departure from the Guidance could give rise to an appeal or judicial review, and the reasons given will then be a key consideration for the courts when considering the lawfulness and merits of any decision taken."

[22] An application to the licensing authority for a premises licence must be accompanied by an operating schedule in the prescribed form including a statement of the matters set out in s 17(4) which are as follows:

- "(a) the relevant licensable activities,
- (b) the times during which it is proposed that the relevant licensable activities are to take place,
- (c) any other times during which it is proposed that the premises are to be open to the public,
- (d) where the Applicant wishes the licence to have effect for a limited period, that period,
- (e) where the relevant licensable activities include the supply of alcohol, prescribed information in respect of the individual whom the Applicant wishes to have specified in the premises licence as the premises supervisor,
- (f) where the relevant licensable activities include the supply of alcohol, whether the supplies are proposed to be for consumption on the premises or off the premises, or both,
- (g) the steps which it is proposed to take to promote the licensing objectives,
- (h) such other matters as may be prescribed."

[23] Section 18 deals with the determination of an application for a premises licence. Section 35 deals in very similar terms with the determination of an application to vary a premises licence. It will be sufficient only to set out here the provisions of s 18.

[24] Section 18(2) provides that, subject to sub-s (3), the authority must grant the licence in accordance with the application subject only to:

- "(a) such conditions as are consistent with the operating schedule accompanying the application, and
- (b) any conditions which must under section 19, 20 or 21 be included in the licence."

[25] Section 19 deals with premises licences which authorise the supply of alcohol. Such licences must include certain conditions ensuring that every supply of alcohol is made or authorised by a person who holds a personal licence and that no supply of alcohol is made when there is no properly licensed designated premises supervisor. Sections 20 and 21 are not relevant to this claim.

[26] Section 18(3) provides that where relevant representations are made, the authority has certain specified obligations. In so far as is relevant to this appeal "relevant representations" are defined in s 18(6) as follows:

"(6) For the purposes of this section, 'relevant representations' means representations which -

(a) are about the likely effect of the grant of the premises licence on the promotion of the licensing objectives,

(b) meet the requirements of sub-section (7),

(c) . . ."

[27] Sub-section (7) provides:

"(7) The requirements of this subsection are -

(a) that the representations were made by an interested party or responsible authority within the period prescribed under section 17(5)(c),

(b) that they have not been withdrawn, and

(c) in the case of representations made by an interested party (who is not also a responsible authority), that they are not, in the opinion of the relevant licensing authority, frivolous or vexatious."

[28] Where relevant representations are made, the authority must hold a hearing to consider them unless the authority, the Applicant and each person who has made representations agrees that a hearing is unnecessary. By virtue of s 18(3)(b), the authority must also "(b) having regard to the representations, take such of the steps mentioned in sub-section (4) (if any) as it considers necessary for the promotion of the licensing objectives."

[29] Section 18(4) provides:

"(4) The steps are -

(a) to grant the licence subject to -

(i) the conditions mentioned in sub-section (2)(a) modified to such extent as the authority considers necessary for the promotion of the licensing objectives, and

(ii) any condition which must under section 19, 20 or 21 be included in the licence;

(b) to exclude from the scope of the licence any of the licensable activities to which the application relates;

(c) to refuse to specify a person in the licence as the premises supervisor;

(d) to reject the application."

[30] Conditions are modified for the purposes of sub-s (4)(a)(i) if any of them is altered or omitted or any new condition is added.

[31] During the currency of a premises licence, by virtue of s 51, an interested party (broadly speaking, a local resident or business) or a responsible authority (police, fire, environmental health etc) may apply to the relevant licensing authority for a review of the licence on a ground which is relevant to one or more of the licensing objectives. By virtue of s 52, a hearing must be held to consider the application and any relevant representations and the authority must take such steps from a specified list as it considers necessary for the promotion of the licensing objective. The steps range from modifying the conditions of the licence to suspending it or revoking it completely.

[32] The Act makes provision in Pt 5 for "permitted temporary activity" which, loosely speaking, is a form of ad hoc licensing to cover licensable activities which are not covered by a more general licence. The system involves proper notification of an event to the licensing authority and the police. Provided the applicable number of temporary event notices has not been exceeded and the police do not intervene, the event is automatically permitted. Temporary event notices can only be given in respect of any particular premises 12 times in a calendar year and the period for which each event lasts must not exceed 96 hours.

[33] Section 181 provides for appeals to be made against decisions of the licensing authority to a Magistrates' Court which is, of course, how the decisions in relation to which judicial review is sought in this case came to be made.

THE DETAIL OF THE CLAIM

[34] The Claimant submits that in making its decision to allow the appeal in relation to the premises licence, the Magistrates' Court failed in a number of respects to take account of the changes that the new licensing regime has made and failed to adopt the approach required by the Act. It is further submitted that the magistrates failed properly to consider and take into account the Guidance.

[35] There is no doubt that the Guidance is relevant in the magistrates' decision making. As I have set out above, s 4(3) requires the licensing authority to "have regard" to the Guidance. By extension, so must a Magistrates' Court dealing with an appeal from a decision of the licensing authority. The Guidance says:

"10.8 In hearing an appeal against any decision made by a licensing authority, the Magistrates' Court concerned will have regard to that licensing authority's statement of licensing policy and this Guidance. However, the court would be entitled to depart from either the statement of licensing policy or this Guidance if it considered it is justified to do so because of the individual circumstances of any case."

[36] Mr Pickup submits that although the Guidance is not binding and local variation is expressly permitted, it should not be departed from unless there is good reason to do so.

[37] Mr Flood for the First Interested Party submits that the Guidance simply serves to provide information for the magistrates and provided that they have had regard to it, that is sufficient. He also points out that, in

some respects (as is clear from the wording of the Guidance), the Guidance is a statement of Government belief rather than proved fact. Inviting attention to the judgment of Beatson J in *J D Weatherspoon plc v Guildford Borough Council* [2006] EWHC 815 (Admin), [2007] 1 All ER 400, [2006] LGR 767, he identifies that different policy elements in the Guidance may pull in different directions in a particular case, flexibility and customer choice potentially conflicting with the need to prevent crime and disorder. He submits that provided that the magistrates consult the Guidance, they do not need to use it as "a decision making matrix that the deciding Court has to sequentially address in making its decision in the manner it would if considering a section of a statute".

[38] There is no doubt that regard must be had to the Guidance by the magistrates but that its force is less than that of a statute. That is common ground between the parties. The Guidance contains advice of varying degrees of specificity. At one end of the spectrum, it reinforces the general philosophy and approach of the Act. However, it also provides firm advice on particular issues, an example being what could almost be described as a prohibition on local authorities seeking to engineer staggered closing times by setting quotas for particular closing times. I accept that any individual licensing decision may give rise to a need to balance conflicting factors which are included in the Guidance and that in resolving this conflict, a licensing authority or Magistrates' Court may justifiably give less weight to some parts of the Guidance and more to others. As the Guidance itself says, it may also depart from the Guidance if particular features of the individual case require that. What a licensing authority or Magistrates' Court is not entitled to do is simply to *ignore* the Guidance or fail to give it any weight, whether because it does not agree with the Government's policy or its methods of regulating licensable activities or for any other reason. Furthermore, when a Magistrates' Court is entitled to depart from the Guidance and justifiably does so, it must, in my view, give proper reasons for so doing. As para 2.3 of the Guidance says in relation to the need for licensing authorities to give reasons:

"When [departing from the Guidance], licensing authorities will need to give full reasons for their actions. Departure from the Guidance could give rise to an appeal or judicial review, and the reasons given will then be a key consideration for the courts when considering the lawfulness and merits of any decision taken."

This is a theme to which the Guidance returns repeatedly and is a principle which must be applicable to a Magistrates' Court hearing an appeal as it is to a licensing authority dealing with an application in the first instance. I agree with Mr Flood for the First Interested Party that the magistrates did not need to work slavishly through the Guidance in articulating their decision but they did need to give full reasons for their decision overall and full reasons for departing from the Guidance if they considered it proper so to do.

[39] In this case, Mr Pickup submits that proper attention to the Guidance would have helped the magistrates to come to a correct and reasonable decision and that they have failed to adhere to it without proper reason and failed to carry out their licensing function in accordance with the Act.

[40] The foundation of the Claimant's argument is that the Act expects licensable activities to be restricted only where that is *necessary* to promote the four licensing objectives set out in s 4(2). There can be no debate about that. It is clearly established by the Act and confirmed in the Guidance. For example, in the Act, s 18(3)(b), dealing with the determination of an application for a premises licence, provides that where relevant representations are made the licensing authority must "take such of the steps mentioned in sub-s (4) (if any) as it considers necessary for the promotion of the licensing objectives" (the steps in sub-s (4) include the grant of the licence subject to conditions). Section 34(3)(b), dealing with the determination of an application to vary a premises licence, is in similar terms. The Guidance repeatedly refers, in a number of different contexts, to the principle that regulatory action should only be taken where it is *necessary* to promote the licensing objectives. In particular, it clearly indicates that conditions should not be attached to premises licences unless they are necessary to promote the licensing objectives, see for example para 7.5 and also para 7.17 which includes this passage:

"Licensing authorities should therefore ensure that any conditions they impose are only those which are necessary for the promotion of the licensing objectives, which means that they must not go further than what is needed for that

purpose."

[41] The Guidance also refers a number of times to the need for regulation to be "proportionate". This is not a term contained in the Act but if a regulatory provision is to satisfy the hurdle of being "necessary", it must in my view be confined to that which is "proportionate" and one can understand why the Guidance spells this out.

[42] Mr Pickup submits, and I accept, that the Act anticipates that a "light touch bureaucracy" (a phrase used in para 5.99 of the Guidance) will be applied to the grant and variation of premises licences. He submits that this means that unless there is evidence that extended hours will adversely affect one of the licensing objectives, the hours should be granted. A prime example of this arises when an application for a premises licence is made and there are no relevant representations made about it. In those circumstances, s 18(2) obliges the licensing authority to grant the licence and it can only impose conditions which are consistent with the operating schedule submitted by the Applicant. Mr Pickup says that such a light touch is made possible, as the Guidance itself says, by providing a review mechanism under the Act by which to deal with concerns relating to the licensing objectives which arise following the grant of a licence in respect of individual premises. He invites attention also to the existence of other provisions outside the ambit of the Act which provide remedies for noise, for example the issue of a noise abatement notice or the closure of noisy premises under the Anti-Social Behaviour Act 2003. The Guidance makes clear that the existence of other legislative provisions is relevant and may, in some cases, obviate the need for any further conditions to be imposed on a licence. Paragraph 7.18 from the section of the Guidance dealing with attaching conditions to licences is an illustration of this approach:

"7.18 It is perfectly possible that in certain cases, because the test is one of necessity, where there are other legislative provisions which are relevant and must be observed by the Applicant, no additional conditions at all are needed to promote the licensing objectives."

[43] The Guidance includes a section dealing with hours of trading which the Claimant submits further exemplifies the philosophy of the Act. It begins with para 6.1 which reads "This Chapter provides guidance on good practice in respect of any condition imposed on a premises licence or club premises certificate in respect of hours of trading or supply."

[44] It continues:

"6.5 The Government strongly believes that fixed and artificially early closing times promote, in the case of the sale or supply of alcohol for consumption on the premises, rapid binge drinking close to closing times; and are a key cause of disorder and disturbance when large numbers of customers are required to leave premises simultaneously. This creates excessive pressures at places where fast food is sold or public or private transport is provided. This in turn produces friction and gives rise to disorder and peaks of noise and other nuisance behaviour. It is therefore important that licensing authorities recognise these problems when addressing issues such as the hours at which premises should be used to carry on the provision of licensable activities to the public.

6.6 The aim through the promotion of the licensing objectives should be to reduce the potential for concentrations and achieve a slower dispersal of people from licensed premises through longer opening times. Arbitrary restrictions that would undermine the principle of flexibility should therefore be avoided. We will monitor the impact of the 2003 Act on crime and disorder and the other licensing objectives. If necessary in the light of these findings, we will introduce further legislation with the consent of Parliament to strengthen or alter any provisions."

[45] The Claimant submits that in imposing shorter hours than it requested for the supply of alcohol and for entertainment, the magistrates went beyond that which was necessary for these premises and failed to take into account that, as the Guidance explains, longer opening times would in fact reduce the potential for problems arising from licensed premises whereas curtailing operations could run counter to the licensing

objectives.

[46] The magistrates' Reasons record their acceptance that there had been no reported complaint in regard to public nuisance and that the extended hours had operated without any incidents. The magistrates also record in the Reasons, as I have already said, that they had attached little or no weight to the statements from witnesses of the Appellant. Nothing is said about difficulties mentioned in evidence by the witnesses. As it was clearly incumbent on the magistrates at least to advert in broad terms to those matters that they took into account, it is fair to conclude in the circumstances that they proceeded upon the basis that there was no reliable evidence of actual problems linked to the premises either under the old licence or under the new revised licence. This was in line with the oral evidence of Police Sergeant Yehya (as recorded in the rather truncated notes of the legal advisor):

"1. reported incident for the site. No other incidents or complaints have been received. There are none in my file. There are no incidents we can directly link to the Saughall Hotel since previously open. There have been incidents locally but not linked to these premises."

[47] To judge by the Reasons therefore, what led the magistrates to impose restricted hours of operation was their forecast as to what would occur in the future in association with the premises, notwithstanding the absence of reliable evidence of past problems. The First Interested Party observes that the manager of the premises had given evidence that he intended in the summer to "make hay while the sun shines" and submits, correctly in my view, that the magistrates were entitled to take this apparent change of emphasis into account. However, Mr Flood further submits that the evidence of what had happened in the winter months was therefore of "little evidential value" in determining what was likely to happen in the future and I cannot wholly agree with him about this. Undoubtedly the fact that the Claimant intended in future to make more use of the extended hours reduced the value of the premises' past record as a predictor of the future but it could not, in my view, be completely discarded by the magistrates. They still had to take into account that there had been extended hours for some months without apparent problems.

[48] It is plain that the magistrates' particular concern was "migration" rather than problems generated by those coming directly to the premises for their evening out. Under the heading "The Four Licensing Objectives", they say that they accept that there have been no formal or recorded complaints against the premises "but feel that because of the concept of migration that public nuisance and crime and disorder would be an inevitable consequence of leaving the hours as granted by the Local Authority". Under the heading "Migration/Zoning" they begin:

"The Saughall Hotel due to its location and the fact that a number of license premises in the surrounding area have reduced hours to that of the Saughall Hotel we believe that as a consequence of this would be that customers would migrate from these premises to the Saughall Hotel. [sic]"

and end:

"We appreciate that the extended hours have been in operation for several months without any incidents but have taken into consideration this was during the Winter months and inevitable numbers will increase in the Summer causing nuisance/criminality."

[49] They reiterate their concern under the heading "Nuisance (Existing/Anticipated)" saying that they "feel that public nuisance will be inevitable".

[50] The Claimant complains that the magistrates' treatment of the issue of "migration" was fundamentally flawed on a number of grounds.

[51] Firstly, it submits that there was no evidence on which the magistrates could find that customers *would* come to the premises when other premises in the vicinity closed or cause trouble and their concerns were no more than inappropriate speculation. The Claimant's position was that there was no evidence of migration to their premises. There were no recorded complaints of any kind about the premises let alone specifically about migration. Ms Lesley Spencer who lives opposite the premises and is the Secretary of the Saughall Massie Conservation Society gave evidence of her fear that customers would migrate but said that she did not think there had been any migration.

[52] Apart from their own local knowledge, the only material on which the magistrates could possibly have formed their views about migration was what Police Sergeant Yehya said in evidence. According to the legal advisor's notes, whilst being cross-examined by Mr Kirwan, the sergeant gave evidence about the other licensed premises operating in the vicinity (which I have seen marked on a local map and which were within walking distance of the premises) and their closing hours and said that there were three assaults each week at one of the premises. The legal advisor records that he also said:

"We have staggered closing. This could cause problems it has the potential to cause difficulties in the area. I have a list of considerations but none would rank as high as crime, not even noise. No complaints have been made to me even regarding noise. One concern was dispersal. We gave people one hour to disperse and therefore reduced from 2.00am to 1.00am. 1.00am closing at 2. 280 people leaving premises. Other premises subject to high levels of crime *migration not an issue.*" [my italics]

[53] I appreciate that this evidence acknowledged that staggered closing *could* cause problems but, had migration been a significant issue as opposed to a mere possibility, one can, I think, assume that the police would have made representations on that score, particularly given that they had plainly considered the impact of trading hours specifically and *had* initially objected to the even longer hours originally proposed by the Claimant. It is noteworthy that even when they were in opposition to the plans, it was never on the basis of migration of disruptive characters from other licensed premises and always simply on the basis of late noise from ordinary customers of the premises dispersing. The absence of police objections before either the licensing authority or the Magistrates' Court seems to have surprised the magistrates who said so in their Reasons, commenting "We were surprised that the Police originally objected to the application but withdrew that objection after a slight variation of the terms." In so saying, they convey, in my view, not only their surprise about the Police approach but also their disagreement with it.

[54] It was not open to the magistrates, in my view, to elevate what Sergeant Yehya said in the witness box to evidence that a problem with migration could reasonably be expected, nor do they say anything in their reasons which suggests that they did rely on his evidence in this way. The only concerns about migration were therefore the magistrates' own with perhaps some fears expressed by local residents though not on the basis of firm historical examples of migration to the premises.

[55] It is clear from the Guidance that drawing on local knowledge, at least the local knowledge of local licensing authorities, is an important feature of the Act's approach. There can be little doubt that local magistrates are also entitled to take into account their own knowledge but, in my judgment, they must measure their own views against the evidence presented to them. In some cases, the evidence will require them to adjust their own impression. This is particularly likely to be so where it is given by a responsible authority such as the police. They must also scrutinise their own anxieties about matters such as noise and other types of public nuisance particularly carefully if the responsible authorities raise no objections on these grounds. These magistrates did recognise the absence of police objections which caused them surprise and they chose to differ from the police in reliance on their own views. The Claimant submits that in so doing they departed into the realms of impermissible speculation not only in concluding that there would be migration but also in concluding that in this case it would generate nuisance and disorder. The First Interested Party is correct in submitting that the Guidance accepts a link between migration and a potential breach of the licensing objectives but it is also clear from the Guidance that each case must be decided on its individual facts so the magistrates could not simply assume that if people came from other premises, there would be

trouble.

[56] The Claimant complains that the magistrates' treatment of the migration issue also flies in the face of the Guidance because firstly it was an improper attempt to implement zoning and secondly it ignored the general principle of longer opening hours.

[57] Zoning is the setting of fixed trading hours within a designated area so that all the pubs in a given area have similar trading hours. The problem created by it, as demonstrated by experience in Scotland, is that people move across zoning boundaries in search of pubs opening later and that causes disorder and disturbance. The Guidance says, at para 6.8:

"The licensing authority should consider restricting the hours of trading only where this is necessary because of the potential impact on the promotion of the licensing objectives from fixed and artificially-early closing times."

It stresses that above all, licensing authorities should not fix predetermined closing times for particular areas.

[58] I am not convinced that the magistrates' limiting of the Claimant's operational hours can properly be described as implementing zoning which, in my view, is a term that is more appropriate to describe a general policy imposed by a licensing authority for a defined area than an individual decision of this type, albeit made with reference to the opening hours of other premises in the vicinity and having the effect of imposing the same hours as those premises.

[59] What has more weight, however, is the Claimant's submission that the magistrates failed to give proper weight to the general principle of later opening hours and to the intention that the approach to licensing under the Act would be to grant the hours sought for the premises unless it was necessary to modify them in pursuit of the licensing objectives. The Reasons include a heading "Flexibility" under which the magistrates say simply "We have considered the concept of Flexibility." In so saying, they may be referring to the sort of flexibility to which reference is made, for example, in para 6.6 of the Guidance (see above) but their shorthand does not enable one to know to what conclusions their consideration of the concept led them in this case nor whether they had reliably in mind that the starting point should be that limitations should not be imposed upon the licence sought unless necessary to promote the licensing objectives rather than that the licensing authority or the court should form its own view of what was necessary for the premises and only grant that.

[60] The Claimant was seeking to have the freedom to open later on certain occasions when the trade justified it or, as the magistrates put it, "the application for extended hours was to allow *flexibility* to open later on certain occasions". As the First Interested Party would submit, the magistrates may have inferred from Mr Miller's comment about making hay that the premises would *often* be open late rather than this happening only infrequently in accordance with the picture presented to the licensing authority. If this was their inference, however, it is odd that they considered that the Claimant could deal with the position by applying for a temporary certificate because this would have allowed the premises to open later on only a limited number of occasions. They make no express finding in their Reasons as to the frequency on which they considered the Claimant intended to keep the premises open late. This was material not only to the degree of disturbance that might be caused generally by late opening but also specifically to the issue of whether there would be migration. It would seem unlikely that customers from nearby pubs would bother to walk or even drive to the Saughall Hotel in search of another drink at the end of their evenings unless the Saughall Hotel was open late sufficiently frequently to lead them to a reasonable expectation that their journey would be worthwhile.

[61] The magistrates' comment about the temporary certificate also seems to me to be an example of a

failure by them to adopt the lighter approach that the Act dictated and to allow flexibility to those operating licensed premises unless the licensing objectives required otherwise. Temporary certificates would be a cumbersome and restricted means of achieving flexibility, not responsive to the day to day fluctuations in business, only available a limited number of times, and not in line with the philosophy of the Act.

[62] There is no consideration in the magistrates' decision of whether the imposition of conditions to control noise or other nuisance (which were going to be imposed) would be sufficient to promote the licensing objectives without reducing the operating hours of the premises. Given that the Act dictates that only such steps as are necessary should be taken with regard to the variation of the terms of operation sought, such consideration was required.

MY OVERALL CONCLUSIONS

[63] It would be wrong, in my judgment, to say that the magistrates failed to take account of the licensing objectives. At the outset of their Reasons, they correctly identify those which are relevant. Similarly, as the First Interested Party submits, whilst they did not *articulate* that the curtailment of the hours sought was "necessary" to promote those objectives, it is implied in their decision that they did take this view and it can also be inferred from their comment that because of the concept of migration, public nuisance and crime and disorder would be "an inevitable consequence" of leaving the hours as granted by the Local Authority. However, in my view their approach to what was "necessary" was coloured by a failure to take proper account of the changed approach to licensing introduced by the Act. Had they had proper regard to the Act and the Guidance, they would have approached the matter with a greater reluctance to impose regulation and would have looked for real evidence that it was required in the circumstances of the case. Their conclusion that it was so required on the basis of a risk of migration from other premises in the vicinity was not one to which a properly directed bench could have come. The fact that the police did not oppose the hours sought on this basis should have weighed very heavily with them whereas, in fact, they appear to have dismissed the police view because it did not agree with their own. They should also have considered specifically the question of precisely how frequently the premises would be likely to be open late and made findings about it. They would then have been able to compare this to the winter opening pattern in relation to which they accepted there had been no complaints and draw proper conclusions as to the extent to which the summer months would be likely to differ from the winter picture. Having formed a clear view of how frequently late opening could be anticipated, they would also have been able to draw more reliable conclusions about the willingness of customers from further afield to migrate to Saughall Massie. They proceeded without proper evidence and gave their own views excessive weight and their resulting decision limited the hours of operation of the premises without it having been established that it was necessary to do so to promote the licensing objectives. In all the circumstances, their decision was unlawful and it must be quashed.

[64] I have said little so far about what appears in the magistrates' response for the judicial review proceedings. The various documents comprising the response did nothing to allay my concerns about the magistrates' decision. Indeed quite a lot of what was said reinforced my view that the magistrates had largely ignored the evidence and imposed their own views. They refer in their response to incidents about which the residents had given evidence and to the residents not having complained formally for various reasons, for example because it was Christmas or because there was thought to be no point. If the magistrates considered these matters to be relevant, it was incumbent on them to say so clearly in their reasons whereas they there recorded their acceptance that there had been no formal or recorded complaints, that the extended hours had been in operation for several months without incidents and that they had attached little or no weight to the statements of the witnesses of the Appellant. They also refer extensively in their response to their thoughts on migration, including that people may come from further afield than the pubs in the vicinity in cars. Particularly concerning is that they refer repeatedly to a perceived issue over police resources which is not something that, as far as I can see, had been raised by Sergeant Yehya or explored with him in evidence. Mr Beere says in his statement for example, ". . . there is also the question of Police resources and

their ability to effectively police this area especially at weekends with already stretched resources being deployed in Hoylake."

[65] Reference is made in the response documents to the court feeling that the Brewery's proposed opening hours contradicted the acceptable activities of a family pub and that the Saughall Hotel is "a village pub and not a night spot in the centre of town". For the court to take matters such as this into account seems to me to be an interference with the commercial freedom of the premises of a type that was not permissible under the Act unless it was necessary to promote the licensing objectives. I appreciate that the magistrates' response seems to suggest that they feared that a different type of customer was being courted or would invite themselves once it got too late for families but this does not seem to have been founded on anything that was given in evidence so was really not much more than speculation.

[66] Mr Beere's statement ends with a reference to the Brewery wanting to make hay while the sun shines, of which he says, "I believe that this statement was indicative of the Brewery's attitude to local residents and to the general management of the premises." Given that problems with or in the vicinity of the premises had been almost non-existent and that the magistrates had not seen fit to make reference in their Reasons to any difficulties caused by the Hotel, it is hard to see how this belief could be justified but it does perhaps exemplify the approach of the magistrates.

[67] I have considered quite separately the argument as to whether the hours of opening can be regulated as part of the licensing of premises as opposed to the hours during which licensable activities take place. It was suggested during argument that there was no power to regulate the time by which people must leave the premises. I cannot agree with this. Clearly keeping premises open (as opposed to providing entertainment or supplying alcohol there) is not a licensable activity as such. However, the operating schedule which must be supplied with an application for a premises licence must include a statement of the matters set out in s 17(4) and these include not only the times when it is proposed that the licensable activities are to take place but also "any other times during which it is proposed that the premises are to be open to the public". On a new grant of a premises licence, where there are no representations the licensing authority has to grant the application subject only to such conditions as are consistent with the operating schedule. I see no reason why, if it is necessary to promote the licensing objectives, these conditions should not include a provision requiring the premises to be shut by the time that is specified in the operating schedule. If representations are made and the licensing authority ultimately grants the application, it can depart from the terms set out in the operating schedule when imposing conditions in so far as this is necessary for the promotion of the licensing objectives. It must follow that it can impose an earlier time for the premises to be locked up than the Applicant wished and specified in its operating schedule. It is important to keep in mind in this regard that the role of the licensing authority and, if there is an appeal, the court, has two dimensions: the fundamental task is to license activities which require a licence and the associated task is to consider what, if any, conditions are imposed on the Applicant to ensure the promotion of the licensing objectives. A requirement that the premises close at a particular time seems to me to be a condition just like any other, such as keeping doors and windows closed to prevent noise. I see no reason why a condition of closing up the premises at a particular time should not therefore be imposed where controlling the hours of the licensable activities on the premises (and such other conditions as may be imposed) is not sufficient to promote the licensing objectives.

THE COSTS ARGUMENT

[68] In the light of my conclusion that the magistrates' decision is unlawful and therefore must be quashed, it is not appropriate for me to consider the arguments in relation to their costs order further. The Appellants had given an undertaking to the Licensing Authority that they would not seek costs against the Licensing Authority and they sought the entirety of their costs of the appeal from the Claimant. The magistrates granted that order and the Claimant submits that that was not an order that was open to them. Whatever the merits of that argument, the magistrates' order in relation to costs cannot now stand. The basic foundation for the

order for costs was that the appeal had succeeded and the Claimant had lost. That position has now been overturned and the costs order must go along with the magistrates' main decision. The magistrates would have had no reason to grant costs against the Claimant if the appeal had been dismissed.

Appeal dismissed.

Judgments

QBD, ADMINISTRATIVE COURT

Neutral Citation Number: [2016] EWHC 1265 (Admin)

CO/345/2016

IN THE HIGH COURT OF JUSTICE

QUEEN'S BENCH DIVISION

THE ADMINISTRATIVE COURT

Royal Courts of Justice

Strand

London WC2A 2LL

Thursday, 14 April 2016

B e f o r e:

MR JUSTICE JAY

Between:

EAST LINDSEY DISTRICT COUNCIL

Appellant

v

ABU HANIF

(TRADING AS ZARA'S RESTAURANT AND TAKEAWAY)

Respondent

Computer- Aided Transcript of the Stenograph Notes of

WordWave International Limited trading as DTI

165 Fleet Street London EC4A 2DY

Tel No: 020 7404 1400 Fax No: 020 7404 1424

(Official Shorthand Writers to the Court)

Mr P Kolvin QC & Mr D Dadds (instructed by David Dadds LLP) appeared on behalf of the **Appellant**

The **Respondent** did not appear and was not represented

J U D G M E N T

(Approved)

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1. MR JUSTICE JAY: This is an appeal by way of case stated from the decision of the Lincoln Magistrates' Court, District Judge Veits, given on 23 June 2015, whereby he allowed an appeal from the revocation of a premises licence by the licensing authority.
2. The appellant, the East Lindsey District Council, is the licensing authority. The Magistrates' Court in the usual way is not a party to these proceedings. The respondent, Mr Abu Hanif, trading as Zara's Restaurant and Takeaway, is the licence holder. He through a licensing consultant has submitted correspondence making various limited points, but indicating that he would not be taking any part in these proceedings.
3. The premises in question are Zara's Restaurant and Takeaway situated in North Summercoates on the Lincolnshire coast. They are licensed to sell alcohol ancillary to the supply of food. The restaurant is owned and managed by the licensee, Mr Hanif. On 29 April 2014, the premises were the subject of a joint visit by the police and immigration officers, and it was discovered that Mr Miah was working in the kitchen as a chef. It was common ground that Mr Miah had no current entitlement to remain in the UK, let alone to work. I was told that he arrived here illegally some years ago. Furthermore, it was also accepted by the respondent that he (i) employed Mr Miah without paperwork showing a right to work in the United Kingdom; (ii) paid Mr Miah cash in hand; (iii) paid Mr Miah less than the minimum wage; (iv) did not keep or maintain PAYE records; (v) purported to deduct tax from Mr Miah's salary; and (vi) did not account to HMRC for the tax deducted.
4. The police then applied for a review of the respondent's licence under section 51 of the Licensing Act 2003 and the matter came before the appellant's subcommittee on 30 June 2014. The subcommittee decided to revoke the respondent's licence. Its reasons were as follows:
5. "The subcommittee were satisfied that Mr Hanif did not take the appropriate checks of staff members having knowledge that there were problems previously at the other premises with overstayers, and that he continued to allow staff to work at Zara's restaurant without making appropriate checks.
6. The subcommittee were satisfied that Mr Hanif had not undertaken the relevant checks to ensure the employee concerned was eligible to work in the United Kingdom. Instead of not allowing employees to work if they had not provided the correct documentation he allowed them to work and paid cash in hand. With all this in mind the subcommittee were satisfied that Mr Hanif had knowingly employed person/s unlawfully in the United Kingdom.

7. The subcommittee considered the evidence by Mr Kheng on behalf of Mr Hanif and the Home Office section 182 Guidance to Licensing Authorities. The subcommittee were of the view that the premises licence should be revoked and that revocation was an appropriate step with a view to promoting the crime prevention licensing objective."
8. The respondent then appealed to the Magistrates' Court. There was a hearing on 27 March 2015, and on 23 June the district judge decided to allow the respondent's appeal. On 1 September 2015, the district judge determined the issue of costs and on 7 January 2016 he stated the case. The appeal to the district judge was de novo, but he accepted that he could only allow the appeal if the subcommittee's decision was "wrong", the burden being on the appellant before him to establish that.
9. Looking now at the stated case, the district judge noted that the respondent had received a civil penalty for employing an illegal worker under section 15 of the Immigration, Asylum and Nationality Act 2006. An immigration officer gave evidence to the effect that although by virtue of section 21 a criminal offence was committed, such proceedings were rarely brought. The district judge also noted that the police and the Council's licensing officer were no longer saying that the respondent was a serial offender, but a redacted report which was placed before the subcommittee still gave the impression that he "was in a much worse position than he actually was". As for the failure to pay the minimum wage, the district judge said this:
 - A. "In his evidence before me Mr Hanif accepted that he had not paid the minimum wage and this in itself can be a criminal offence. I found that this was not the main basis of the subcommittee's decision however and again there was no evidence that he had been reported for that alleged offence. It would appear from their reasons that the subcommittee used the evidence of paying cash in hand as justification for the finding that he knowingly employed Mr Miah. The prosecuting authority however appear to have taken a different view in offering the civil penalty."
10. The district judge's core reasoning was that no crime had been committed. As he put it:
 - A. "It appeared to me that no crime had been committed as a result of the visit to the premises in April of last year. A civil penalty had been imposed rather than prosecution for the section 21 offence and no other crime had been reported in relation to not paying the minimum wage."
11. In the district judge's view, the crime prevention objective was not engaged.
12. The district judge also criticised the subcommittee for adopting an inconsistent approach because in other similar cases only warnings were issued. Finally, he considered that the subcommittee may have been influenced by comments in the police report, leading them to believe that they were dealing with a serial offender.

13. At the conclusion of the stated case, the district judge posed two questions for my determination. I will address these at the end of my judgment.
14. I was taken by Mr Philip Kolvin QC to various provisions of the Licensing Act 2003 as amended. Under section 4(1)and(2) a licensing authority must carry out its licensing functions with a view to promoting the licensing objectives, which include "the prevention of crime and disorder". The provisions dealing with the review application brought by the police are contained in sections 51 and 52. Under section 52(3), the licensing authority (and on appeal the Magistrates' Court):
- A. "... must, having regard to the application and any relevant representations, take such of the steps mentioned in subsection (4) (if any) as it considers appropriate for the promotion of the licensing objectives."
15. The epithet "appropriate" was introduced by amendment in 2011. Previously the test had been stricter. In my judgment, it imports by necessary implication the concepts of proportionality and relevance.
16. Mr Kolvin submitted that the district judge erred in a number of respects. First, he wrongly held that, given that criminal proceedings were never brought, the crime prevention objective (see section 4(2)) was not engaged. The statute is concerned with the prevention rather than the fact of crime. Secondly, and in any event, the interested party had committed criminal offences in relation to tax evasion, the employment of an illegal worker, and employing an individual at remuneration below the minimum wage. As for the employment of an illegal worker, Mr Kolvin accepted that this requires knowledge on the part of the employer, and he also accepted that it is not altogether clear whether the district judge found as a fact that the respondent possessed the requisite knowledge. However, the core question is the promotion of the licensing objectives, not the fact of anterior criminal activity, and in this regard a deterrence approach is appropriate.
17. Thirdly, Mr Kolvin submitted that there was no evidence of an inconsistent approach by the subcommittee in giving warnings in some cases because all cases turn on their own facts. Finally, Mr Kolvin submitted that there was no basis for the district judge's conclusion that the subcommittee may have been influenced by a suggestion that the respondent was a serial offender.
18. I accept Mr Kolvin's submissions. In my view the district judge clearly erred. The question was not whether the respondent had been found guilty of criminal offences before a relevant tribunal, but whether revocation of his licence was appropriate and proportionate in the light of the salient licensing objectives, namely the prevention of crime and disorder.

This requires a much broader approach to the issue than the mere identification of criminal convictions. It is in part retrospective, in as much as antecedent facts will usually impact on

the statutory question, but importantly the prevention of crime and disorder requires a prospective consideration of what is warranted in the public interest, having regard to the twin considerations of prevention and deterrence. The district judge's erroneous analysis of the law precluded any proper consideration of that issue. In any event, I agree with Mr Kolvin that criminal convictions are not required.

19. To the extent that the analysis must be retrospective, the issue is whether, in the opinion of the relevant court seized of the appeal, criminal offences have been committed. In the instant case they clearly had been: in relation to tax evasion (see the common law offence of cheating the Revenue and the offence of fraudulent evasion of tax contrary to section 106A of the Taxes and Management Act 1970); and the employment of Mr Miah at remuneration below the minimum wage (see section 31 of the National Minimum Wage Act 1998). Moreover, given the evidence that Mr Miah never provided the relevant paperwork, notwithstanding apparent requests, the obvious inference to be drawn is that the respondent well knew that he could not, and that no tax code and National Insurance number had been issued. The corollary inference in my judgment is that the respondent well knew that Mr Miah could not provide the relevant paperwork because he was here illegally.
20. I also accept Mr Kolvin's submission that each case must turn on its own facts. As a matter of law, unless it could be said that some sort of estoppel or related abuse of process arose in the light of warnings given in other cases, the alleged inconsistent approach led nowhere. In my judgment, it could not be so said.
21. Finally, I agree with Mr Kolvin that there is nothing in the point that the subcommittee could have been misled about the interested party being a serial offender. The point that the subcommittee was making was the fact that the respondent had worked at premises where illegal workers were also employed meant that he should have been vigilant to the issue.
22. Thus the answer to the district judge's two questions are as follows:
 - A. Q. "Was I correct to conclude that the crime prevention objective was not engaged as no crimes had been proceeded with, the appellant only receiving a civil penalty?"
 - B. No.
 - C. Q. "Was I correct in concluding that the respondent had been inconsistent in similar decisions in not revoking the licence [sic]?"
 - D. No.

23. Having identified errors of law in the district judge's decision, the next issue which arises is whether I should remit this case for determination in the light of my ruling or whether I have sufficient material to decide the issue for myself. I should only adopt the latter course if satisfied that the issue is so obvious that no useful purpose would be served by remission. I am so satisfied. Having regard in particular to the twin requirements of prevention and deterrence, there was in my judgment only one answer to this case. The respondent exploited a vulnerable individual from his community by acting in plain, albeit covert, breach of the criminal law. In my view his licence should be revoked. Another way of putting the matter is that the district judge had no proper basis for overturning the subcommittee's assessment of the merits.
24. It follows in my judgment that the only conclusion open to the district judge in the present case was to uphold the revocation of the respondent's licence. This appeal must be allowed and the respondent's licence must be revoked.
25. MR KOLVIN: My Lord, I'm very grateful. Can I deal with the question of costs, both here and below.
26. MR JUSTICE JAY: Yes.
27. MR KOLVIN: Should I start with here.
28. MR JUSTICE JAY: Yes.
29. MR KOLVIN: My Lord, we would ask for the costs before this court. I just want to pray in aid four very brief points. The first is the result. The second is that the district judge's approach was expressly urged on him by the respondent's legal team. Thirdly, that the respondent was expressly urged to concede this appeal to stop costs running, he was given that opportunity at pages 42 and 43 of the bundle. Fourthly, perhaps a little bit tugging at the heart strings, but there's no reason why the Council Tax payers of East Lindsey should bear the cost of establishing what has been established in this court. So we would ask for the costs up here.
30. There is a schedule and the schedule has been served upon Mr Hanif by letter dated 16 March of 2016. I don't know whether the schedule has found its way to my Lord, if not I can hand up a copy.
31. MR JUSTICE JAY: It has.
32. MR KOLVIN: It has. My Lord, I can see that VAT has been added on. It doesn't need to be because of course the Council can retrieve the VAT, so my application is for £16,185. I know there's not a lot of explanation around my fee, but it was

taken on a single fee for all work involved in relation to the case stated; advice, the skeleton argument and attendance today, so it's one single - -

33. MR JUSTICE JAY: What about your junior's fees?
34. MR KOLVIN: My learned junior is also my instructing solicitor, he wears two hats.
35. MR JUSTICE JAY: I see.
36. MR KOLVIN: He has his own firm which is Dadds LLP, and he is also a member of the bar, so although he has appeared as my junior, his fee is wrapped up in the solicitors' fees set out in the schedule.
37. MR JUSTICE JAY: Okay. What about the costs below?
38. MR KOLVIN: My Lord, I'm just trying to ascertain what the position is.
39. MR JUSTICE JAY: I thought there was no order for costs below.
40. MR KOLVIN: There was no order for costs below, that was on the basis that the appeal had been allowed. The situation in relation to costs of licensing appeals are set out in section 181 of the Act, which enables the court to make such order as it thinks fit. Normally when appeals are dismissed there is no real question about it, costs follow the event. When appeals are allowed, some further considerations come into play, which are expressed by the Master of the Rolls in a case which you may have come across called City of Bradford v Booth, which is the case where the Master of the Rolls said that local authorities shouldn't be put off from trying to make honest and reasonable decisions in the public interest. And so one has to take account additionally of the means of the parties and their conduct in relation to the dispute, but in this case of course the appeal has now been dismissed, and so we would say that the ordinary rule is that the costs should follow the event, the appeal having failed. I'm just trying to ascertain whether schedules were ever served below, in the light of the way the case came out. **(Pause)**
41. My Lord, I'm really sorry that we don't actually have the schedule here, apparently it was £15,000. If you were minded to order costs below the options are either I suppose to wait and we will have the thing emailed up, or to say, "Look, it was below, it's a little bit more complex, they should be assessed if not agreed."
42. MR JUSTICE JAY: This is going to wipe him out, isn't it?
43. MR KOLVIN: Well he has already said, I have to say, I'm just telling you frankly what I've been told this morning, that when the bundles and the schedules were

served on him, he had clearly read them, but he said, "If you win in the High Court and get costs against me, then I'm just going to declare myself bankrupt." So there may well be a bit of football(?) about this, but nonetheless it was his appeal, his team raised a point which in retrospect was very surprising, and caused an awful lot of costs to be incurred.

44. MR JUSTICE JAY: Yes. Well I am going to assess the costs here in the round figure of £15,000.

45. MR KOLVIN: Thank you.

46. MR JUSTICE JAY: If there was a schedule, which you tell me there was, below, it is proportionate that I assess those costs rather than put you to the trouble of a detailed assessment, so if you could have that emailed to my clerk in due course, I will assess the costs below.

47. MR KOLVIN: Thank you, my Lord.

48. MR JUSTICE JAY: On the basis of that schedule.

49. MR KOLVIN: We're not trying to be too ambitious, but we would like to see what we can - -

50. MR JUSTICE JAY: I'll take a broad brush approach to that.

51. MR KOLVIN: Thank you.

52. My Lord, the only other thing to mention is that this isn't the only case which is kicking around the east of England where licensing subcommittees are being urged to take no action because there has been no prosecution in these immigration cases. Although I appreciate that this is hardly stellar law making, it's an application of pretty well established legal principles to the facts, I'm asking whether my Lord would be minded to certify this so that we can adduce the authority in other cases, because it's a clear statement of the law that there doesn't need to have been a prosecution. So with the practice direction in mind, would my Lord be minded to - -

53. MR JUSTICE JAY: Just remind me of the practice direction.

54. MR KOLVIN: Yes, can I hand it up?

55. MR JUSTICE JAY: Yes. **(Handed)**

56. MR KOLVIN: If Mr Hanif had come I wouldn't need to make the application. It's paragraph 6.1. The judgment has to clearly indicate that it purports to establish a new principle or extends the present law and that has to take the form of an express statement to that effect, and then 6.2 says what categories of judgment we're dealing with, which include applications attended by one party only.
57. So that's the situation we're in. In reality these judgments get around anyway, because we're dealing with administrative tribunals and not courts, but sometimes the point is taken, "Ah yes, but the court didn't certify".
58. MR JUSTICE JAY: But where's the new principle I've established?
59. MR KOLVIN: My Lord, what you have said clearly, which hasn't been said before, by dint of the fact that not many licensing cases reach the lofty heights of this building, is that there does not need to have been a prosecution in order for the crime to have - -
60. MR JUSTICE JAY: Oh, I see. Well that's so obvious it almost goes without saying, that's why it hasn't been said before.
61. MR KOLVIN: My Lord, it was obvious to everyone except the district judge, the appellant and other licensees in the east of England.
62. MR JUSTICE JAY: Okay.
63. In terms of the logistics, if you want a copy of the judgment, don't you have to pay for it?
64. MR KOLVIN: We may have to, and we would be obviously very pleased to do so.
65. MR JUSTICE JAY: Because I'm not sure that all judgments are, in the Administrative Court, they're not all transcribed and published.
66. MR KOLVIN: That is correct, and I have no doubt that my client would be - this isn't a matter about the costs of the judgment.
67. MR JUSTICE JAY: No, fortunately it doesn't cost that much. But I will give the certification. I have never been asked to do so before, I must confess.
68. MR KOLVIN: Yes.

69. MR JUSTICE JAY: Because these cases are referred to almost willy nilly, if they're available on Lawtel or wherever.
70. MR KOLVIN: Yes, they are.
71. MR JUSTICE JAY: Then they're just provided.
72. MR KOLVIN: They get into the textbooks and they - -
73. MR JUSTICE JAY: No- one objects.
74. MR KOLVIN: Yes. It has happened once before, in relation to the meaning of the Court of Appeal judgment in Hope and Glory, and Lindblom J, as he then was, was asked repeatedly would he certify in relation to the meaning of Hope and Glory, which is an important test, and he was pretty engaged in the practice direction. But since then that judgment, there's always an argument in court about whether it can be cited or not. The difference between licensing and some other fields of law is that very few cases reach here, so when they do, the judgments of High Court judges are gold dust.
75. MR JUSTICE JAY: Yes, well I'm happy to make the certification.
76. MR KOLVIN: Thank you very much indeed.
77. MR JUSTICE JAY: We wouldn't want this point to be taken again successfully.
78. MR KOLVIN: No.
79. MR JUSTICE JAY: Now as a matter of courtesy, is the judgment, once available, sent to the district judge, or is it something that I should do informally?
80. MR KOLVIN: I don't know, my Lord, what the normal practice is. I don't think that I have previously been on a legal team which has sent judgments, but we're very happy to undertake to do so.
81. MR JUSTICE JAY: Yes, I think if you're going to get a copy, obviously you're going to send it to the respondent - -
82. MR KOLVIN: Indeed.

83. MR JUSTICE JAY: - - so he can ingest it. I think you should send it to the district judge, just saying that the judge directed that out of courtesy he should see it.
84. MR KOLVIN: We're very happy to do that. Thank you very much indeed.
85. MR JUSTICE JAY: Thank you very much.



JUDICIARY OF
ENGLAND AND WALES

Judge Denis Brennan

In the Highbury Corner Magistrates' Court

BETWEEN: Future Leisure Limited

Appellant

V

London Borough of Haringey

Respondent

Date of Hearing: 5th November 2025

Date of Judgement: 17th December 2025

Background and introduction

1 This is an appeal against the decision of the Licensing Sub Committee of the London Borough of Haringey (the Respondent) to refuse an application by the Appellant, Future Leisure Limited, for a variation of its Adult Gaming Centre (“AGC”) Premises Licence in respect of its premises at 519 Green Lanes, N4 1AN (“The Premises”). The variation sought and refused was to extend the operating hours from the current 0900-2300 hours, 7 days per week, to 24 hours opening, 7 days per week.

2 The Appellant is represented by Andrew Woods and the Respondent by Asitha Ranatunga. I am grateful to both advocates not only for their oral and written work but also for the preparation that has gone into this case. Not only have I received and considered both opening and closing written arguments but also the written evidence and bundles of documents running to 1867 pages together with live evidence and cross examination.

3 Of necessity, I will not set out the evidence in detail but will summarise it.

4 The appeal relates to the AGC owned and run by the Appellant, known as Royal Casino Slots, at 519 Green Lanes, London N4 1AN. The Premises Licence (PL) was granted by the Respondent's Licensing Sub Committee (LSC) on 8/9/2020. It has been operating since February 2022. On 22/11/24, the Appellant made an application to vary the Premises Licence to allow it to operate 24/7. Representations both for and against the variation were made to the LSC and on the 24/4/25, the application was refused, with reasons. On 1/5/25, written reasons for the refusal were provided to the Appellant. An appeal, by complaint dated 15/5/25 was laid under Section 206 Gambling Act 2005 (GA05). Under Section 207 *ibid*, the magistrates' court may dismiss the appeal or substitute its own decision or remit it back to the LSC, and make an order as to costs.

5 The reasons given for refusing the variation have been summarised by Mr Ranatunga (at para 6 of his original skeleton argument) as follows:-

- (a) The Respondent's Statement of Gambling Policy (SoGP) requires enhanced safeguards in high risk wards like Harringay (this is the ward in the Borough of Haringey where The Premises are located)
- (b) The Appellant's Local Area Risk Assessment (LARA) is largely generic, not site specific and does not take into account the high risk profile of Harringay
- (c) There was no community engagement prior to the application
- (d) There is evidence from Public Health regarding the detrimental impact on communities where gambling outlets are in operation
- (e) The absence of police objection is not determinative (the police did initially object but by agreement with the appellant adding conditions to the PL withdrew its objections)

The Law

7 The law has been set out by both parties. I follow Mr Woods in para 8 of his Opening Skeleton. Section 153 (1) Of The GA05 says

“In exercising their functions under this Part, the licensing authority shall aim to permit the use of the premises for gambling in so far as the authority thinks it:

- (a) in accordance with any relevant code of practice (issued by the Gambling Commission)
- (b) in accordance with any guidance issued by the Commission
- (c) reasonably consistent with the licensing objectives (subject to (a) and (b))

(d) In accordance with the (authority's statement of licensing policy)(subject to (a) to (c).

8 The Licensing Objectives (LO) are in Section 1 of the GAO5, and are as follows

- (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 gambling is conducted in an open and fair way
- (c) Protecting children and vulnerable persons from being harmed or exploited by gambling

9 The issue between the parties concerns the ability of the Appellant to meet LO (a) and (c); or, putting it as Mr Woods does, is the variation application reasonably consistent with the LO (as above)? The burden is on the Appellant to the civil standard. Hearsay evidence is admissible and I have received both live and written evidence.

10 In hearing the evidence, and it is upon the evidence applied to the law in this case that I decide whether the appellant has so satisfied me, I step into the shoes of the LSC, hear the evidence (new and old), and make a decision based on an evaluative judgement of that evidence. I should, and will be, slow to and not lightly reverse their opinion (*Stepney BC v Joffe*, as cited by Mr Ranatunga at para 14 of opening skeleton).

The Evidence

A The Appellant

11. The primary evidence relied on by the Appellant came from its owner/director, Gavin Tressider. He is steeped in the relevant business, having worked with his father as a young man and now, having started his own business in 1993, he is joined in its current iteration by both his adult sons. His business has 18 sites (full details provided) with 15 AGCs and 3 Bingo outlets. The Appellant is a member of the relevant Trade Association and is fully endorsed by the Gambling Commission. His business is largely London (rather than national) related. 14 of his 15 AGCs have 24/7 licenses already. His written and oral evidence dealt extensively with his knowledge, understanding, procedures, training, oversight and the quality of service provided. I found him to be an impressive witness, notwithstanding extensive cross examination

by Mr Ranatunga. Whatever one's views are of such places on a moral basis (irrelevant to this case), I find he runs a business entirely consistent with best practice and consistent, in principle, with the Licensing Objectives in issue.

12 He has had no issues at the other AGCs he runs, in similar areas in London, which are open 24/7. He has had no issues or complaints about behaviour at The Premises in question in the over 3.5 years it has been open. There is no evidence to the contrary from the Respondent.

13 It is right to acknowledge that the original LARA prepared for the LSC hearing did contain some errors (since corrected by a third version) and, as pointed out in cross examination, there is no reference to a bus stop outside the Premises (in use 24/7) which would enable vulnerable people to travel to and from the Premises if open 24/7. I do not propose to dwell on the make up of the inside of the Premises save to record that it is entirely consistent with good practice, Codes of Practice, and is lawful. The staff are clearly well trained and systems appropriate to managing vulnerable individuals are ostensibly present; in any event, these procedures have clearly worked at the Premises in the last three and a half years. Mr Tressider has reached out to the local community since the LSC decision but no-one has taken up that offer.

14 Mr Tressider concedes that if the variation is granted, the AGC will not trade 24/7 as planning permission (before the Planning Sub Committee) is granted. Through his lawyer (closing written skeleton) Mr Tressider offers to have further conditions attached to the PL if the variation is granted, namely SIA doorstaff on duty 11pm-9am, toilet doors locked during those hours and only opened by a member of staff upon request by a customer and meetings twice a year with the Respondent's appropriate officer(s) to discuss any issues that have arisen (see para 77 of Mr Woods' closing skeleton).

15. The Appellant also relied on two reports from Leveche Associates Ltd (Mr Nicholas Mason of the company attended but his evidence in itself was not challenged but the subject of submissions by Mr Ranatunga as to weight). This is a company that deals with Licensing and security in the private sector. This evidence corroborated that of Mr Tressider of the AGC being a well run business entirely consistent (in its current operating hours) with the LO of the GA05. It conducted

covert visits on 2 days in August 2025 to the Premises as well as another AGC run by the Appellant (and doing business 24/7) in Mare Street in Hackney.

B The Respondent

16 The Respondent relied on live evidence from 3 witnesses and the written evidence of 2 witnesses. The first live witness was Daliah Barret. Ms Barret is the lead officer for Licensing the Respondent borough, with over 30 years' experience. She knows her area of work extremely well. Her concerns involved the risk of crime or disorder and the risk to vulnerable people in the locality. It is not in dispute, as she attests, that this stretch of Green Lanes had historical issue with crime due to a late night economy but very much now controlled by reducing opening hours; the latest restaurant in the area now closes at 2am. There are no current crime or disorder issues and have never been any, nor any complaints, about the Premises since it opened. She attested to the opposition from local councillors and residents to the extension of opening hours, due to the risks to vulnerable people. This ward has high levels of deprivation, and the "at risk" individuals are those living in supported accommodation locally, with mental health and addiction issues, and a disproportionate number of HMOs, together with the proximity of St Ann's Hospital, treating those with mental health problems. She does visit AGCs and has seen some bad behaviour but recorded none at the Premises (and had done one visit to it for the application). Contrary to Mr Tressider, she asserted that a different type of individual is likely to attend after 11pm than to before that time. Save for her observations on site, her evidence was a culmination of her knowledge of the area and those of local residents, together with supporting documentation.

17 Secondly, evidence was called from Councillor Zena Brabazon, a ward Councillor for Harringay and cabinet member for Children, Schools and Families since 2021. Again, an honest and credible witness, bringing her knowledge of the area and the risks to its residents from this application. She objected to the original grant of the PL in 2020 and accepted in evidence that none of her then concerns have come to fruition since the Premises opened.

18 There was additional written evidence from Gabriella Martino, a local resident, and Councillor Abela, whose evidence was corroborative of the live evidence given by the Respondent's witnesses.

19. The final live witness relied on by the Respondent is Dr Will Maimaris, the Director of Public Health at the Respondent borough. It is accepted, and I find, that Dr Maimaris is an experienced, authoritative and respected witness. He is also medically qualified. He gave both written and oral evidence about his concerns that the effect of the variation would have on the health and well being of the most disadvantaged living in the area, and on children exposed to the existence of such a culture, thus normalising it and being prejudicial to their well being. He relied on a number of scientific studies and reports, both here and in Australia. He was consulted and provided evidence to the local authority in assisting it setting it SoGP. He pointed out, inter alia, that Haringey is the sixth most deprived borough in London and that deprivation is concentrated in the east of the borough, where the Premises are located; that the borough has a significantly higher number of people experiencing gambling harms (according to the Problem Gambling Severity Index (PGSI)) and the risks increase the later premises stay open. A 2018 study showed that an estimated 8000 residents in Haringey experiencing direct harm from gambling. Haringey has a higher than average number and rate of children living in poverty. Late night gambling will, in his opinion, expose vulnerable people, addicts or sleep deprived or just deprived people, and children (through harms caused to them directly and indirectly) to harm. Added to that are the nearby residential and other services providing assistance to people with mental health and addictions who oppose the variation due to the risks to their clientele. He also relies on the decision at first instance of my colleague, DJ (MC) Tim Spruce in *Royal Amusements v Sheffield City Council* from December 2024; therein, the Judge, on a similar appeal, refused a PL to a proposed AGC on grounds, inter alia, that there were no mitigations or measures an AGC (in that area) could put in place to reduce the risks as these are often “hidden, intangible and invisible to traditional regulation” (para 93 in that judgment).

20. Dr Maimaris did accept that the Sheffield case was not the same as this case (and I certainly do not find I am bound by it, though I am assisted by its overall approach) and that the data for Haringey in the PGSI is not inconsistent with that of other boroughs in London, as against nationally.

Submissions

A Respondent

21 Given the nature of the area in which the Premises are located, based on the available evidence, like in the Sheffield case, it is not possible to identify the additional measures which could meet the concerns expressed or that the current conditions would meet those concerns, and that extending operating hours to 24/7 will undermine the LO. In summary, Mr Ranatunga points out and relies on the following:

- (i) The ward in which the Premises is located is at risk from gambling harms as evidenced by the data from Dr Maimaris and others
- (ii) The concentration of gambling outlets in the locale with its primary schools premises for vulnerable individuals
- (iii) Allowing 24/7 gambling would be inconsistent with the Respondent's SoGP, as the Harringay ward is identified as at risk of harm from gambling
- (iv) Allowing 24/7 gambling would run counter to the partnership working that reduced crime and disorder by moving to an evening rather than late night economy locally
- (v) Evidence from Dr Maimaris and Ms Barrett point to the venue being a magnet for problem gamblers and the clientele will be different to the daytime
- (vi) The current LARA is inadequate to meet concerns expressed as it downplays risk and indicative of that is it doesn't even identify the bus stop outside of the Premises.

B Appellant

22 The Appellant's case, in a nutshell, is that what evidence exists (rather than speculation) does not demonstrate that the LO and SoGP will not or are unlikely to be upheld at its Premises. First, great reliance is placed on the track record of the Appellant over the last three and a half years' at the Premises. Secondly, the evidence of successful compliance in London, in many areas not dissimilar to that of this ward, of 14 other 24/7 AGCs run by the Appellant.

23 The Appellant acknowledges that there were mistakes made in the original LARA and the current one leaves out reference (re accessibility) to the bus stop outside the Premises. But those are minor in comparison to the overwhelmingly positive information in the selection and training of staff, it's good track record with the Gambling Commission in upholding the LO, and its policies, procedures and operational measures, including interactions with customers. None of that is

undermined by the evidence of any local residents' objections, or indeed that of the local councillors or the very experienced Ms Barrett.

23. So far as the evidence of Dr Maimaris is concerned, Mr Woods rightly acknowledges his experience and expertise. But equally appropriately he argues that the weight to be given to that evidence is reduced as it was taken into account when the Respondent borough drew up its latest SoGP in January 2025 and nowhere within that SoGP is there a restriction on the operating hours of AGCs anywhere in the borough. Whatever challenges there may be in that location, Mr Woods submits, there is in fact no evidence that this organisation will not be able to meet those challenges, as it has done since opening in 2022 and elsewhere at its other 24/7 AGCs.

Discussion and analysis

24 The starting point for me is to analyse the evidence I have heard through the prism of the legislation and the Gambling Commission Guidance to local authorities. I respectfully agree with the learned authors of Patterson's Licensing Acts (as quoted in Mr Woods' initial skeleton argument at para 42 that "aim to permit" in Section 153 GA05 "...creates a presumption in favour of granting a premises licence".

25. That presumption is to be used in accordance with GC Codes of Practice, guidance from the GC and the statement of licensing (here I take that to mean gambling) policy and be "reasonably consistent" with the with the LO. The latter are found in S 1 GA05. Engaged here are (a) the prevention of gambling being a source of crime or disorder, being associated with crime or disorder or being used to support crime and (c) protecting children and vulnerable persons from being harmed or exploited by gambling.

26 There is, quite frankly, no evidence that these premises have been undermining the LO concerning crime and disorder. I respect that locals and councillors fear that their successful efforts to reduce crime, disorder and anti-social behaviour in the ward in the recent years, by a reduction to an evening economy rather than an all night economy, will be undermined by a 24 hour gambling emporium. There is no alcohol consumed on these Premises (unlike those in the Australian project relied on by Dr Maimaris), and all the evidence available shows the Appellant to run a business generally, and specifically at the Premises, which is consistent with this LO. There

have been no issues at these Premises, unlike at others (not run by the Appellant) as seen by Ms Barrett.

27 I accept that there is evidence that there are vulnerable individuals, with addictions and other similar issues, living in the ward or attending for treatment at St Anns Hospital, who are at risk from the presence of these Premises if it moves to a 24/7 operation. What is absent is actual evidence that those risks cannot be met by the existing measures and mitigations already employed at the Premises since its inception in 2022. Where the Appellant operates at a 24/7 basis in other similar areas in London, those same risks exist and are managed, otherwise there would be evidence before me of failures at those premises. The respondent itself, when setting its most recent SoGP, took into account Dr Maimaris' evidence and did not set limits on operating hours for AGCs either borough wide or specifically at "high risk" wards such as Harringay, as here. Given the disparity between the facts here and those in the Sheffield case (such as they are known from the judgment), I give little weight to that decision in coming to my conclusions here.

28 I also agree with Mr Ranatunga that whilst giving due respect to the original decision of the LSC, my exercise is to apply an evaluative judgement to the evidence before me in the context of the legislative framework. The decision made by the LSC was one open to it on the evidence before it. I do not find that it took into account irrelevant matters or gave as reasons ones which no reasonable authority could give. The burden is on the Appellant to satisfy on the balance of probabilities that the extension of its operating hours should be granted. My judgement is that there is no evidence to demonstrate that the LO and SoGP will not or are unlikely to be met. This is because of the excellent track record of the Appellant at these Premises since opening, a similar record at the other premises in London generally but specifically as it runs 14 other 24/7 AGCs without issue. These Premises are run entirely in accordance with the legislation on the evidence before me and I am satisfied that the measures already in place, together with the additional conditions suggested by the Appellant (set out in paragraph 14 above), mean the appeal succeeds.

29 In reaching my decision, I have stepped back to reconsider the decision of the LSC. That was a decision, as I have said, that was open to it but my decision, finely balance as it is, differs as I consider that the previous decision gave too much weight to the evidence of Dr Maimaris as to what might happen rather than, as here, proper

counterbalancing weight to the fine track record of the Appellant both in the immediate premises and throughout its business.

17th December 2025

DJ(MC) Denis Brennan

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Police forces in the United Kingdom are routinely required to provide crime statistics to government bodies and the recording criteria is set nationally. However, the systems used for recording these figures are not generic, nor are the procedures used locally in capturing the crime data. It should be noted that for these reasons this force's response to your questions should not be used for comparison purposes with any other response you may receive.

IMPORTANT: Please ensure that the Notes Page is read in conjunction with the data in this report to ensure that it is interpreted correctly.

Offences in Brent borough (and Wembley wards separately) by crime group, recorded year and location type group, where the location type is pub, bar, nightclub, off licence, betting shop, casino or adult gaming centre for the period 1st January 2020 to 30th

Brent borough - where the offence location type group is Pub/Bar/Nightclub							
Group	2020	2021	2022	2023	2024	2025	2026
ARSON AND CRIMINAL DAMAGE	12	16	16	16	10	5	0
BURGLARY	7	9	11	16	11	6	2
DRUG OFFENCES	0	4	4	5	1	3	1
MISCELLANEOUS CRIMES AGAINST SOCIETY	1	0	2	2	0	0	0
POSSESSION OF WEAPONS	2	1	0	3	0	1	0
PUBLIC ORDER OFFENCES	15	17	24	20	18	10	2
ROBBERY	2	1	3	4	4	3	1
SEXUAL OFFENCES	2	2	6	10	0	4	2
THEFT	25	29	60	62	44	28	12
VEHICLE OFFENCES	2	2	1	1	5	5	1
VIOLENCE AGAINST THE PERSON	51	78	102	90	68	43	20
Total	119	159	229	229	161	108	41

Brent borough - where the offence location type group is Off Licence							
Group	2020	2021	2022	2023	2024	2025	2026
ARSON AND CRIMINAL DAMAGE	2	0	1	0	1	2	0
BURGLARY	1	0	1	0	1	1	0
DRUG OFFENCES	0	0	0	0	0	0	1
MISCELLANEOUS CRIMES AGAINST SOCIETY	0	0	0	0	0	0	0
POSSESSION OF WEAPONS	0	0	0	0	0	0	0
PUBLIC ORDER OFFENCES	1	1	1	1	1	0	0
ROBBERY	0	1	0	4	2	0	0
SEXUAL OFFENCES	0	0	0	0	1	1	0
THEFT	6	4	8	6	6	4	0
VEHICLE OFFENCES	0	0	0	2	0	1	0
VIOLENCE AGAINST THE PERSON	3	2	0	1	5	7	2
Grand Total	13	8	11	14	17	16	3

Wembley wards (Central, Hill, Park) - where the offence location type group is Pub/Bar/Nightclub							
Group	2020	2021	2022	2023	2024	2025	2026
ARSON AND CRIMINAL DAMAGE	3	5	1	2	1	1	0
BURGLARY	0	0	0	1	1	1	0
DRUG OFFENCES	0	1	2	2	0	1	0
MISCELLANEOUS CRIMES AGAINST SOCIETY	0	0	0	0	0	0	0
POSSESSION OF WEAPONS	1	0	0	1	0	0	0
PUBLIC ORDER OFFENCES	4	6	7	5	3	1	0
ROBBERY	0	1	1	0	2	1	0
SEXUAL OFFENCES	0	1	1	5	0	2	0
THEFT	6	4	12	27	8	5	2
VEHICLE OFFENCES	0	0	0	1	2	2	0
VIOLENCE AGAINST THE PERSON	10	29	31	32	17	9	5
Total	24	47	55	76	34	23	7

Wembley wards (Central, Hill, Park) - where the offence location type group is Off Licence							
Group	2020	2021	2022	2023	2024	2025	2026
ARSON AND CRIMINAL DAMAGE	0	0	1	0	0	0	0
BURGLARY	0	0	0	0	0	0	0
DRUG OFFENCES	0	0	0	0	0	0	0
MISCELLANEOUS CRIMES AGAINST SOCIETY	0	0	0	0	0	0	0
POSSESSION OF WEAPONS	0	0	0	0	0	0	0
PUBLIC ORDER OFFENCES	0	0	0	0	1	0	0
ROBBERY	0	0	0	0	0	0	0
SEXUAL OFFENCES	0	0	0	0	0	0	0
THEFT	0	1	2	1	4	2	0
VEHICLE OFFENCES	0	0	0	0	0	0	0
VIOLENCE AGAINST THE PERSON	0	1	0	0	2	1	2
Total	0	2	3	1	7	3	2

30th April 2026

Page 308

Brent borough - where the offence location type group is Adult Gaming Centre/Casino/Betting Shop							
Group	2020	2021	2022	2023	2024	2025	2026
ARSON AND CRIMINAL DAMAGE	25	28	42	31	13	8	4
BURGLARY	3	1	2	3	3	2	1
DRUG OFFENCES	3	0	3	0	0	0	0
MISCELLANEOUS CRIMES AGAINST SOCIETY	0	1	0	2	1	1	0
POSSESSION OF WEAPONS	0	0	1	0	0	0	0
PUBLIC ORDER OFFENCES	9	23	16	23	10	5	0
ROBBERY	3	1	0	2	2	2	0
SEXUAL OFFENCES	0	0	0	0	1	0	0
THEFT	11	5	8	16	15	6	2
VEHICLE OFFENCES	0	1	0	0	0	0	0
VIOLENCE AGAINST THE PERSON	16	6	5	15	13	11	4
Total	70	66	77	92	58	35	11

Wembley wards (Central, Hill, Park) - where the offence location type group is Adult Gaming Centre/Casino/Betting Shop							
Group	2020	2021	2022	2023	2024	2025	2026
ARSON AND CRIMINAL DAMAGE	5	9	7	2	1	2	0
BURGLARY	0	0	1	2	1	0	0
DRUG OFFENCES	0	0	0	0	0	0	0
MISCELLANEOUS CRIMES AGAINST SOCIETY	0	0	0	0	0	1	0
POSSESSION OF WEAPONS	0	0	0	0	0	0	0
PUBLIC ORDER OFFENCES	2	5	3	8	4	0	0
ROBBERY	0	0	0	2	1	0	0
SEXUAL OFFENCES	0	0	0	0	0	0	0
THEFT	1	2	3	0	2	2	0
VEHICLE OFFENCES	0	0	0	0	0	0	0
VIOLENCE AGAINST THE PERSON	3	1	1	3	7	4	0
Total	11	17	15	17	16	9	0

From: Krupesh Hirani

Sent: 23 May 2026 11:44

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

Subject: RE: New AGC - Vault Casino, 574 High Road, HA0 2AA - 37927

Thank you for forwarding the applicant's additional submission.

Having reviewed the response in detail, I do not wish to withdraw my objection to the proposed Adult Gaming Centre at 574 High Road, Wembley.

While I acknowledge the applicant has now provided further operational detail and accepted a series of conditions, these measures do not adequately address the fundamental issue at the heart of my representation: the cumulative concentration of gambling premises in this immediate locality and the impact this has on vulnerable residents, children, and the wider character of Wembley High Road.

The applicant's submission largely relies on generic assertions regarding compliance with Gambling Commission requirements and the existence of standard operating procedures. However, compliance with minimum regulatory standards does not automatically mean an application is reasonably consistent with the licensing objectives in a particular local context.

My objection remains grounded in the licensing objectives under the Gambling Act 2005, particularly:

- the prevention of gambling being a source of crime or disorder; and
- the protection of children and vulnerable persons from being harmed or exploited by gambling.

The applicant repeatedly characterises objections as "speculative" and "template based". I reject that characterisation. My representation was based specifically on Brent's own Joint Strategic Needs Assessment (JSNA), the concentration of gambling premises in the immediate vicinity of this site, and the well-documented relationship between deprivation and gambling harm.

Importantly, the applicant's own submission confirms several matters that reinforce concern rather than alleviate it:

1. The premises intend to operate on a 24-hour basis.
A 24/7 gambling premises in an area already saturated with gambling establishments materially increases the availability and visibility of gambling activity at all hours. The fact that additional security measures are proposed, including SIA staff, maglocks, panic alarms, CCTV monitoring, locked toilets, and lone-worker alarms, itself demonstrates the extent of the operational risks anticipated.
2. The applicant acknowledges nearby gambling clustering.
The submission explicitly recognises the concentration of gambling premises in the locality. My concern is not simply the operation of one premises in isolation, but the continued clustering effect on Wembley High Road. Residents experience these premises collectively, not individually.
3. The applicant places significant weight on there being no formal police objection.
However, the absence of a police objection is not determinative. The Licensing Authority must independently consider whether granting the licence is reasonably consistent with the licensing objectives and Brent's Statement of Gambling Principles. The Act clearly provides discretion to refuse applications where local risks and cumulative impacts are considered significant.
4. The applicant seeks to dismiss Brent's JSNA evidence.
The JSNA remains Brent Council's own evidence base regarding gambling harms and local vulnerability. It identifies gambling harm as a public health concern and highlights the relationship between deprivation and gambling exposure. I do not accept that this evidence should be discounted simply because the applicant disagrees with aspects of its methodology.
5. The argument that AGCs are heavily regulated does not answer the central concern.
Many heavily regulated activities can still produce harmful cumulative impacts when concentrated in one locality. The question before the Licensing Authority is not whether regulation exists in theory, but whether another gambling premises in this particular location is appropriate and consistent with the licensing objectives.

I am also concerned by the applicant's attempt to frame opposition from elected representatives and residents as somehow carrying reduced weight because similar concerns have been raised by multiple parties. In reality, the consistency of objections from local residents, ward councillors, Members of Parliament and elected representatives reflects the strength and breadth of local concern regarding the overconcentration of gambling premises in Wembley.

The "aim to permit" principle under section 153 of the Gambling Act does not create an automatic presumption in favour of every application regardless of local circumstances. Licensing Authorities are still required to determine whether granting a licence is reasonably consistent with the licensing objectives and local gambling policy. In my view, this application fails that test.

For these reasons, I maintain my objection and respectfully request that this application is refused.

Best wishes,

Krupesh Hirani AM

Krupesh Hirani AM

London Assembly Member for Brent and Harrow

LONDONASSEMBLYLABOUR

City Hall, Kamal Chunchie Way, London, E16 1ZE

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From: Maldoom, Edwin
Sent: 24 April 2026 15:35
To: Debbie Bollard
Cc: Legister, Linda ; Business Licence
Subject: RE: Application for a new premises licence: Vault Casino, 574 High Road, HA0 2AA (Ref: 37927)

Good afternoon Debbie,

Perfect, thank you. I've amended condition 8 to include this clarification.

Given the below agreement regarding the attached conditions, I can confirm that the Licensing Authority have no objections to make against the premises licence application.

Edwin Maldoom

Licensing Enforcement Officer

From: Debbie Bollard
Sent: 24 April 2026 15:25
To: Maldoom, Edwin
Subject: Re: Application for a new premises licence: Vault Casino, 574 High Road, HA0 2AA (Ref: 37927)

Hi Edwin

My clients have confirmed that it will be 2300-0700 daily

Kind regards

From: Maldoom, Edwin
Sent: Friday, April 24, 2026 3:11 pm
To: Debbie Bollard
Cc: Legister, Linda ; Business Licence
Subject: RE: Application for a new premises licence: Vault Casino, 574 High Road, HA0 2AA (Ref: 37927)

Good afternoon Debbie,

That's great — thank you for letting me know.

Before I confirm that the Licensing Authority has no objections to this application, I would be most grateful if you or your client could confirm the start and finish times for SIA staff as per condition 8:

8. There shall be a minimum of two members of staff on duty at all times whilst the premises are open for authorised activities and whilst customers are present, one of whom shall be SIA licensed between the hours of xx and xx.

As stated below, I leave this to you and your client's discretion as to what specific time that will be.

Many thanks,

Edwin Maldoom

Licensing Enforcement Officer

From: Debbie Bollard

Sent: 24 April 2026 12:26

To: Maldoom, Edwin

Subject: Re: Application for a new premises licence: Vault Casino, 574 High Road, HA0 2AA (Ref: 37927)

Hi Edwin

My Clients have come back already and said they can accept in full. There are no issues with the proposed conditions

Kind regards

From: Maldoom, Edwin

Sent: Friday, April 24, 2026 11:30 am

To: Debbie Bollard

Cc: Legister, Linda; Business Licence

Subject: RE: Application for a new premises licence: Vault Casino, 574 High Road, HA0 2AA (Ref: 37927)

Good morning Debbie,

Thank you for your prompt response – I hope you enjoy your well-deserved holiday.

Given that you are away until 6 May, and the last day of the consultation period is 5 May, I might put in a holding representation in due course, just to ensure that we can discuss conditions further if needs be and make amendments where/if appropriate following instructions from your client. Of course, any representation will be made in good faith and with a view to subsequent withdrawal, subject to agreement between both parties.

Many thanks,

Edwin Maldoom

Licensing Enforcement Officer

Regulatory Services

From: Debbie Bollard

Sent: 23 April 2026 17:16

To: Maldoom, Edwin

Subject: Re: Application for a new premises licence: Vault Casino, 574 High Road, HA0 2AA (Ref: 37927)

Hi Edwin

I'm away on holiday until 6 May when I will take my Clients instructions

Kind regards

From: Maldoom, Edwin

Sent: Thursday, April 23, 2026 5:09 pm

To: debbie@houghandbollard.co.uk

Cc: Legister, Linda; Business Licence

Subject: Application for a new premises licence: Vault Casino, 574 High Road, HA0 2AA (Ref: 37927)

Good afternoon Debbie,

I hope you are keeping well.

As you may recall, I am the delegated officer acting on behalf of the Licensing Authority, in whose area the above-mentioned premises is situated, and which is authorised to exercise its statutory functions as a 'Responsible Authority' under the Gambling Act 2005.

Having carefully reviewed the premises licence application and the local area risk assessment, I would be most grateful if you could let me know whether your client would consider accepting the attached proposed conditions as part of their premises licence. I don't believe the conditions to be materially dissimilar to the information already set out within the application or the LARA, I've just translated that information into what I believe are clear and enforceable conditions that are readily understandable to responsible authorities, your client, and staff working at the premises.

Of course, I fully respect your client's right to accept, amend, or reject the proposed conditions, and I would be grateful for your thoughts either way.

I would also like to bring condition 8 to your attention. I note that the application refers to an SIA-licensed staff member being on duty during night-time hours, however I would prefer for those hours to be explicitly stipulated within the condition. I will, of course, leave this to you and your client's discretion, and if you are able to confirm the specific hours, I can include that into the condition.

If you have any questions or would like to discuss the proposed conditions further, please don't hesitate to let me know.

Many thanks,

Edwin Maldoom

Licensing Enforcement Officer

Regulatory Services

Brent Council

**Application for a premises licence: Vault Casino, 574 High Road, HA0
2AA (REF: 37927)
Proposed Conditions**

1. The premises shall operate and maintain a digital colour CCTV system. The CCTV system shall be in operation and recording at all times whilst the premises are open for authorised activities and whilst customers are present. All recordings shall be kept for 31 days. The CCTV system shall also display the correct date and time on any recordings.
2. The CCTV system shall capture clear images of every person entering or leaving the premises with further CCTV cameras covering the publicly accessible areas stipulated on the premises plan, including the immediate frontage on High Road, Wembley. A monitor shall also be installed inside the premises, positioned above the front entrance door, displaying live CCTV images of customers entering and exiting the premises.
3. CCTV footage shall be made available for immediate viewing upon request by the Police and any authorised Officers from Brent Council by a member of staff who is conversant with the operation of the CCTV system. CCTV footage shall also be provided to the Police and any authorised Officers from Brent Council, in a readily accessible format on removable media or via digital transfer within 24 hours of request.
4. Notices stating that CCTV is in operation shall be clearly and prominently displayed.
5. A 'Think 25', or any other similarly recognised age verification policy, shall be operated at the premises, whereby the only acceptable forms of identification are recognised photographic identification cards, such as a driving licence, passport, or a proof of age card bearing the PASS hologram. Notices advising customers of the age verification policy shall be conspicuously displayed within the premises.
6. A physical or electronic refusals log shall be kept at the premises which records all age verification challenges made by staff to customers. The log shall record the date/time of the challenge, a description of the customer, the name of the member of staff who made the challenge, and any other relevant observations. The refusals log shall be made available for inspection upon request by an authorised officer of Brent Council or the Police.
7. Independent third-party test purchasing shall be carried out at the premises at least twice per year to assess compliance with the prohibition on under-18s entering the premises and using gaming machines. The results of such test purchasing shall be made available for inspection upon request by an authorised officer of Brent Council or the Police.
8. There shall be a minimum of two members of staff on duty at all times whilst the premises are open for authorised activities and whilst customers are

present, one of whom shall be SIA licensed between the hours of 23:00 and 07:00.

9. Staff shall continuously monitor customer activity when they are in the premises.
10. A policy shall be implemented to ban any customer who engages in crime, disorder, or anti-social behaviour within the premises or in the immediate vicinity of the premises. A record of all banned customers shall be maintained and shall be made available for inspection upon request by an authorised officer of Brent Council or the Police
11. No open alcoholic drinks shall be permitted on any publicly accessible area defined on the premises plan.
12. Staff shall refuse the use of any gambling machines to customers who appear to be under the influence of alcohol or drugs, and such customers shall be asked to leave the premises. Any such incidents shall be recorded in the incident log.
13. All seating within the premises shall be secured to the floor or suitably weighted to prevent lifting.
14. An intruder alarm system and a panic button behind the counter shall be installed and maintained.
15. Customer toilets shall be checked hourly for evidence of drug taking, and a record of the time of the check and the staff member undertaking it shall be maintained.
16. GamCare, self-exclusion, or any other relevant information relating to responsible gambling and problem gambling shall be prominently displayed within the premises and made readily available to customers.
17. All Category B gaming machines on the premises shall display safer gambling messages and be programmed to provide reality check to customers.
18. Staff training shall be undertaken by all members of staff involved in authorised activities. All staff shall also undergo refresher training at least once every 12 months, with all training recorded. Training shall include the following topics, although this list is not exhaustive:
 - a. customers who are, or may be, at risk of harm from gambling, and how to interact with them appropriately.
 - b. self-exclusion.
 - c. customer disputes
 - d. any other potential issues identified within the local area risk assessment, or other relevant operating procedures and policies set by the operator.
 - e. the three licensing objectives and premises licence conditions.

Training records shall include the date and time of the training, the name of the staff member trained, and the training topic covered. Staff training records shall be made available for inspection upon request by the Police or authorised officers of Brent Council.

19. All reasonable steps shall be taken to prevent customers from consuming alcohol directly outside the premises. Any customer found consuming alcohol outside the premises shall be banned from the premises in accordance with the premises' banning policy. A notice shall also be prominently displayed and visible from the exterior of the premises stating that the consumption of alcohol outside the premises is not permitted and that customers who do so will be banned.
20. An up-to-date incident log shall be maintained, which shall record the following:
 - a. any incidents of crime and disorder.
 - b. any incidents where a customer is ejected or asked to leave the premises.
 - c. any incidents where a customer is barred from the premises.
 - d. any complaints received.
 - e. any faults in the CCTV system.
 - f. any visit by a relevant authority or emergency service.

Any entries into the incident log shall be made as soon as reasonably practicable following any such incident and shall include the date and time of the incident, the nature of the incident, a description of the persons involved, the action taken, and the name of the person responsible for the management of the premises at the time of the incident. The incident log shall be made available for inspection upon request by an authorised officer of Brent Council or the Police.

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Debbie Bollard
Hough & Bollard Ltd
5 Tarleton Avenue
Woodhall Spa
LON10 6SE

Ref: 37927

Wembley Police Station
603 Harrow Road
Wembley
HA0 2HH

Mobile: 07747221024

Email: michael.sullivan3@met.police.uk

Date: 5 May 2026

Dear Debbie Bollard,

**Gambling Act 2005 – New Adult Gaming Centre
Police representations to the application for a New Adult Gaming Centre for Vault
Casino, 574 High Road, Wembley, HA0 2AA**

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.

*Officer: PS Michael Sullivan
Licensing Sergeant PS 238NW*

Police certify that we have considered the application shown above and wish to make representations that the likely effect of the grant of the application is detrimental to the gambling objectives for the reasons indicated below.

- **preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime,**
- **ensuring that gambling is conducted in a fair and open way, and**
- **protecting children and other vulnerable persons from being harmed or exploited by gambling.**

The police are satisfied with the conditions proposed on the application. In addition to those, I would like to request that the following conditions also be included:

1. 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.
2. There shall be no pre-planned single staffing between 23:00hrs to 07:00hrs. Should the premises be single staffed after this time the magnetic door locking system must be in constant use.
3. Lone working staff will be provided and required to carry on their person a personal fob alarm which will activate the alarm if pressed by the member of staff.
4. Toilet doors shall remain locked and access is permitted by staff members.

If these additional conditions are agreed in writing, I will be content to withdraw my representation.

Yours sincerely,

A handwritten signature in cursive script that reads "Michael Sullivan".

**Sergeant Michael Sullivan PS 238NW
Brent Licensing Police**

From: Michael.J.Sullivan@met.police.uk

Sent: 06 May 2026 09:51

To: debbie@houghandbollard.co.uk; Business Licence

Cc: Esther, Chan; Vagarwal, Rhea; Petros.Loizou@met.police.uk; Maldoom, Edwin

Subject: RE: New Adult Gaming Centre for Vault Casino, 574 High Road, Wembley, HA0 2AA

Dear all

Following discussions with the applicant and their legal representative, I can confirm that agreement has been reached in respect of all proposed licence conditions.

In light of this, I am satisfied that my concerns have been addressed, and I therefore withdraw my representations in relation to this application.

Kind regards,

Michael Sullivan

Police Sergeant

Strategic Delivery Unit

Metropolitan Police Service

From: debbie@houghandbollard.co.uk

Sent: 06 May 2026 09:30

To: Sullivan Michael - Strategic Delivery Unit

Cc: [business.licence](#); [Esther.Chan](#); [rhea.vagarwal](#); Loizou Petros - Strategic Delivery Unit ; [edwin.maldoom](#)

Subject: RE: New Adult Gaming Centre for Vault Casino, 574 High Road, Wembley, HA0 2AA

Michael

My Client confirms that these conditions already form part of their internal protocol and are therefore readily agreed

Kind regards

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Basemap Map



1:1250

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