



Alcohol and Entertainment Licensing Sub-Committee

Wednesday 8 July 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)
Burn
Clinton

Substitute Members:

Councillors:

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

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 Golden Slots (Southern) Ltd for the premises known as Macau Casino Slots, 131-135 Kilburn High Road, NW6 7HS, pursuant to the provisions of the Licensing Act 2003	1 - 208

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Gambling Act 2005

Application for an Adult Gaming Centre

1. The Application

Name of Applicant:	Golden Slots (Southern) Ltd
Name & Address of Premises:	Macau Casino Slots, 131-135 Kilburn High Road, NW6 7HS
Applicants Agent:	Hough & Bollard Ltd – Debbie Bollard

The application is for a Bingo Premises Licence.

2. Background

None

3. Relevant Representations

Representation was received and withdrawn from the 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 **X** Adult Gaming Centre Family Entertainment Centre
Betting (Track) Betting (Other)

Do you hold a provisional statement in respect of the premises? Yes No **X**

If you answer “yes”, please give the unique reference number for the provisional statement (as set out at the top of the first page of the statement):

Part 2 – Applicant Details

If you are an individual, please fill in Section A. If the application is being made on behalf of an organisation (such as a company or partnership), please fill in Section B.

**Section A
Individual Applicant**

1. Title: Mr Mrs Miss Ms Dr Other (please specify)

2. Surname: Other name(s):

3. Applicant’s address (home or business – *[delete as appropriate]*):

Postcode:

4(a) The number of the applicant’s operating licence (as set out in the operating licence):

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

5. Tick the box if the application is being made by more than one person

Section B

Application on behalf of an organisation

6. Name of applicant business or organisation: **Golden Slots (Southern) Limited**

7. The applicant's registered or principal address: **15-17 Upper George Street, Connaught House, Luton**

Postcode: **LU1 2RD**

8(a) The number of the applicant's operating licence (as given in the operating licence):
043695-N-323074-012

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): **Macau Casino Slots**

11. Address of the premises (or, if none, give a description of the premises and their location): **131-135 Kilburn High Road, London,**

Postcode: **NW6 7HS**

12. Telephone number at premises (if known): Not 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 storey 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 Premises will be open between 08:00-23:00 (Monday-Friday) and 09:00-23:00 (Saturday, Sunday and Bank/Public Holidays). There will be min 2 members of staff at all times and will be have 24/7 CCTV that covers all spaces within the premises as well as the entrance/exit.**

The applicant is an established operator, that has held an Operating Licence since January 2016 without any enforcement action taken against it. It operates other sites in Leighton Buzzard Milton Keynes, Haringey, Cricklewood and Northampton. The applicant has included a complete set of its operating policies and procedures with the application together with a local area risk assessment in order to demonstrate how it operates its sites and promotes the licensing objectives.

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: 16/4/2026 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

Servicing of the site should be in line with existing arrangement.

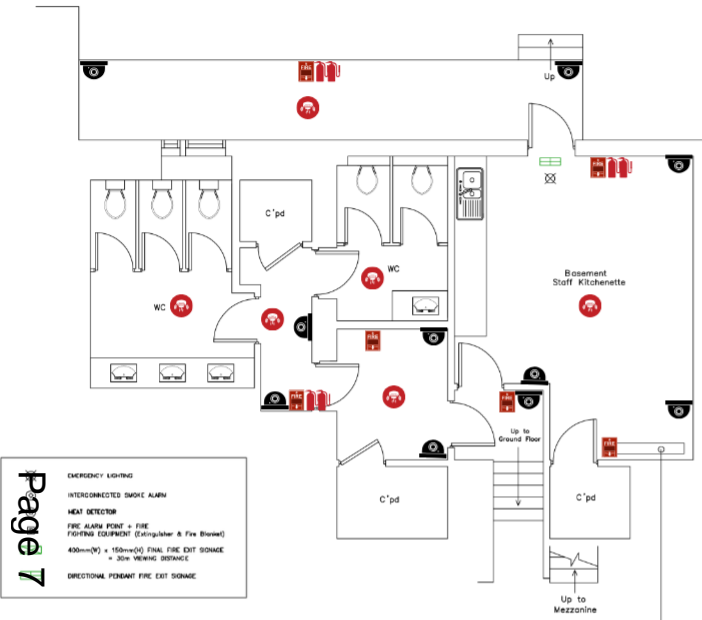
During the renovation/construction phase of the proposal, the footpath and carriageway of Kilburn High Road or Victoria Road must not be blocked/obstructed, and hinder the safe passage of pedestrians, cyclists and vehicular traffic. All construction vehicles must load/unload/park during the existing permitted period at permitted locations.

No skip/construction materials shall be deposited/kept on the footway or carriageway at anytime.

Delivery & Servicing Plan (DSP):

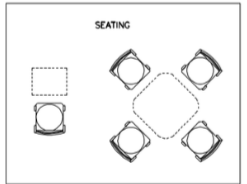
During the lifetime of the proposed development deliveries & Servicing will be during off-peak hours as not to hinder the safe passage of pedestrians, cyclists and vehicular traffic. All deliveries will be consolidated to ensure they are kept to a minimum. They will be carried out in existing permitted locations.

All requirements will be provided by persons using active transport.



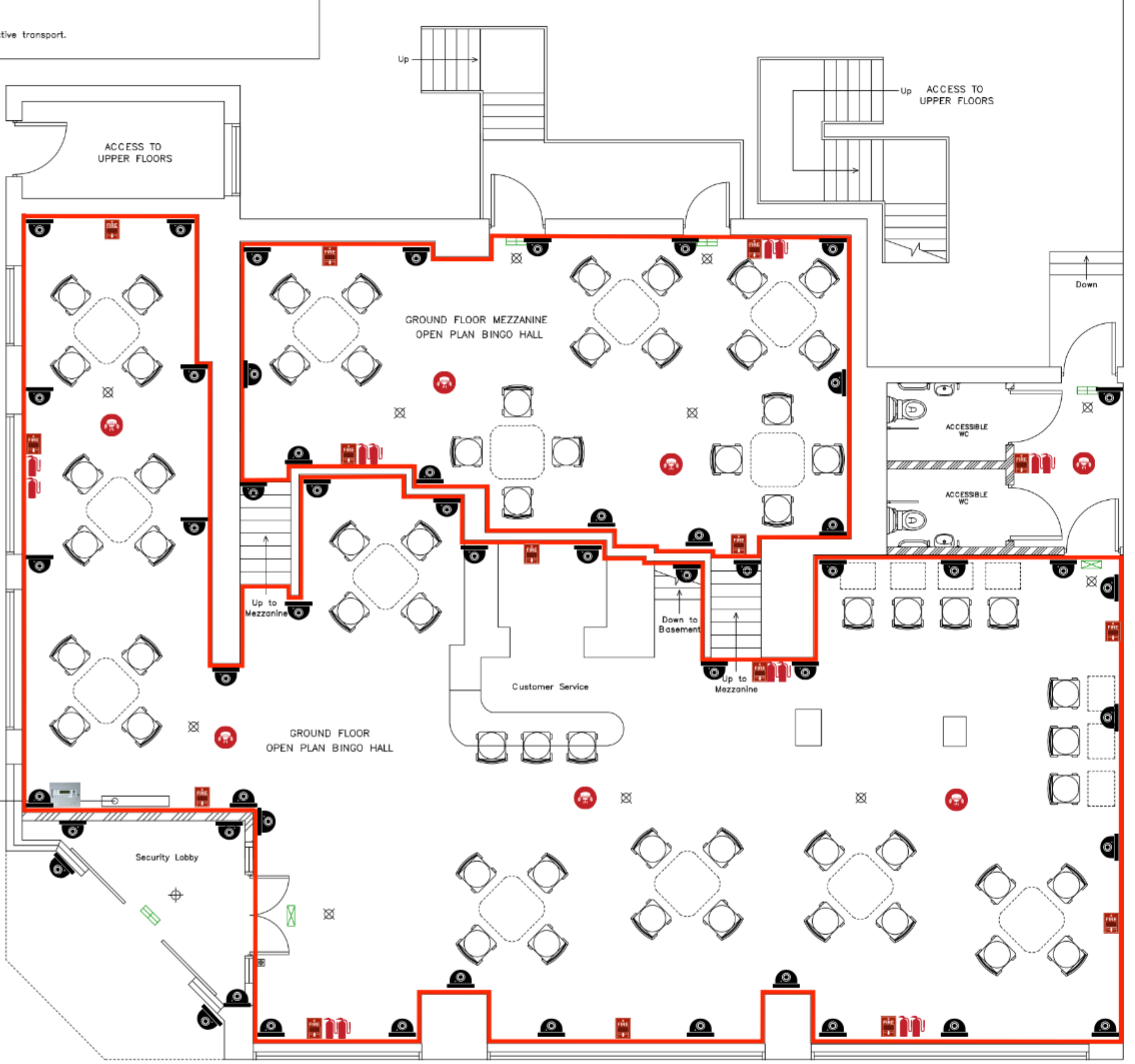
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EMERGENCY LIGHTING
INTERCONNECTED SMOKE ALARM
HEAT DETECTOR
FIRE ALARM POINT + FIRE FIGHTING EQUIPMENT (Extinguisher & Fire Blanket)
400mm(W) x 150mm(H) FINAL FIRE EXIT SIGNAGE + 300mm VIEWING DISTANCE
DIRECTIONAL PENDANT FIRE EXIT SIGNAGE



- Principal Contractor to Comply with Current CDM & Building Regulations
- F10 Notification to be Submitted to Health & Safety Executive Before On-Site Works Commence
- Emergency Lighting to be in accordance with BS 5266-1: 2016
- Fire Extinguishers are to be provided in accordance with BS EN3
- Fire alarm system to comply with BS 5839-1: 2017 & manual call points to comply with Part 2: 1983
- Fire safety exit signs to comply with BS 5499 & the Safety Signs and Signals Regulations 1996
- Final exit signs positioned above doors at 2.3m from finished floor level
- Simple single action fasteners are to be positioned to all doors on escape route with final exit door to have panic bolts fitted with heights complying with Part M of the Building Regs
- Competent Persons & Parties are to be Employed Throughout the Construction Phase
- Construction Phase Plan to be Provided by the Principal Contractor & Reviewed by the CDM Co-ordinator
- All Information Provided is to be Reviewed & Commented on by CDM Co-ordinator Before Works Commence
- Owner or Main Contractor to Confirm Means of Escape F10s are in position to all Escape Routes
- Light Level Requirements to BS 5266
- Emergency Lighting Duration to be Minimum 3 hours
- Ducting to comply with BS EN 12101-7 for smoke extraction
- Manually operated non-powered entrance door to have an opening force at the leading edge and will be no greater than 20N. If fitted with a latch the door will have a Lever Handle and contrast visually with the surface of the door & not be cold to the touch

- Internal & External Lighting to comply with Non Domestic Service Compliance Guide Section 12: Lighting Table 42 & 43 & BRE Digest 498 "Selecting Lighting Controls"
- Indoor Lighting to comply with BS EN 12464-1:2021 "Lighting of work places" Pendant LED Lighting (800watt) to hang 4.2m from Finished Floor Level at 0.5m spacing
- All light fittings to maintain an average 95 luminaire lumens per circuit watt
- If required all light fittings to be installed with TP(s) non-amblyot-rated diffusers



- CCTV Camera
- Fire Alarm Call Point
- Fire Extinguisher
- Smoke Detector
- Fire Alarm Panel



- NOTES
1. ALL WORK TO BE COMPLETED IN ACCORDANCE WITH THE SPECIFICATION AND DRAWINGS. THE CONTRACTOR SHALL BE RESPONSIBLE FOR THE PROVISION OF ALL MATERIALS AND LABOUR.
 2. ALL WORKING IS TO BE COMPLETED IN ACCORDANCE WITH THE DESIGN/DETAILS OF CONSTRUCTION.
 3. ALL WORK TO BE COMPLETED IN ACCORDANCE WITH THE SPECIFICATION AND DRAWINGS. THE CONTRACTOR SHALL BE RESPONSIBLE FOR THE PROVISION OF ALL MATERIALS AND LABOUR.
 4. FOR ALL INFORMATION NOT COVERED BY THE DRAWINGS THE CONTRACTOR SHALL BE RESPONSIBLE FOR THE PROVISION OF ALL MATERIALS AND LABOUR.
 5. THE CONTRACTOR SHALL BE RESPONSIBLE FOR THE PROVISION OF ALL MATERIALS AND LABOUR.
 6. THE CONTRACTOR SHALL BE RESPONSIBLE FOR THE PROVISION OF ALL MATERIALS AND LABOUR.
 7. THE CONTRACTOR SHALL BE RESPONSIBLE FOR THE PROVISION OF ALL MATERIALS AND LABOUR.
 8. THE CONTRACTOR SHALL BE RESPONSIBLE FOR THE PROVISION OF ALL MATERIALS AND LABOUR.
 9. THE CONTRACTOR SHALL BE RESPONSIBLE FOR THE PROVISION OF ALL MATERIALS AND LABOUR.
 10. THE CONTRACTOR SHALL BE RESPONSIBLE FOR THE PROVISION OF ALL MATERIALS AND LABOUR.

Colneside Building Design
www.colneside.co.uk
07976098772
colneside@gmail.com

Drawing No. 131KHR/BH/FUL/25/04
REV ---
Scale: 1:50
Paper: A1
Issue Date: 11/09/2025

Client: Sunni-Ed Limited
131-135 Kilburn High Road
North Maida Vale, London
NW6 7HS

Description: Change of Use of Basement & Ground Floor from a Vacant Bank to a Bingo Hall

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LOCAL GAMBLING RISK ASSESSMENT

Premises: Macau Casino Slots, 131-135 Kilburn High Road, London, NW6 7HS

Operator: Golden Slots (Southern) Limited

Operating Licence: 043695-N-323074-012

Prepared by: Debbie Bollard

Date: 16/4/2026

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 are located on the ground floor of a 4 storey building at the intersection of Kilburn High Road, Victoria Road and Quex Road and sit across the road from a Merkur Slots. The site which will offer Bingo will be open between the hours 08:00-23:00 Monday – Friday and 09:00-23:00 weekends and public holidays. It is restricted to persons age 18+ and will be staffed by at least 2 members of staff on site at all times and 24/7 CCTV of the play space and entrance/exit to the building. Kilburn High Road is a busy high street offering the usual selection of retail, and takeaways with residential and office space above. Directly opposite on Victoria Road is a MacDonalds open 0500-0445 daily, the rest of Victoria Road is residential flats and houses many divided into apartments. Opposite on the corner of Quex Road is Popeyes open 0800-0100 daily, Quex Road has some retail but is mainly residential flats and apartments. Residential accommodation sits behind both sides of Kilburn High Road.

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

Kilburn has a population of 28,618 (ONS) in 13,207 households, many living alone and/or in flats and apartments. It has a multi-ethnic community with less than half the population being white and a higher-than-average percentage speaking English other than as a first language. Household deprivation in all dimensions is above the national average. Unemployment is higher than average, but general health is good

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

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

Kilburn West

Population

2024

16,444
people

58,620,101 people in England

Source: ONS - Mid-year estimates

Small area: Output area

Number of households

2021

7,648
households

23,436,085 households in England

Source: ONS - Census 2021

Small area: Output area

Household composition

2021

Kilburn West (England)

One person household **38.8%** (30.1%)

Single family household **49.1%** (63.0%)

Other household types **12.1%** (6.9%)

% of all households

Source: ONS - Census 2021

Small area: Output area

Household deprivation

2021

Kilburn West (England)

Household is not deprived in any dimension **42.9%** (48.4%)

Household is deprived in one dimension **34.6%** (33.5%)

Household is deprived in two dimensions **16.1%** (14.2%)

Household is deprived in three dimensions **5.9%** (3.7%)

Household is deprived in four dimensions **0.5%** (0.2%)

% of all households

Source: ONS - Census 2021

Small area: Output area

Ethnic group

2021

Kilburn West (England)

Asian, Asian British or Asian Welsh **12.9%** (9.6%)

Black, Black British, Black Welsh, Caribbean or African **24.6%** (4.2%)

Mixed or Multiple ethnic groups **7.2%** (3.0%)

White **44.8%** (81.0%)

Other ethnic group **10.5%** (2.2%)

% of all people

Source: ONS - Census 2021

Small area: Output area

General health

2021

Kilburn West (England)

Very good health **55.1%** (48.5%)

Good health **29.5%** (33.7%)

Fair health **10.4%** (12.7%)

Bad health **3.6%** (4.0%)

Very bad health **1.3%** (1.2%)

% of all people

Source: ONS - Census 2021

Small area: Output area

Embedded area profile

English

2021

Kilburn West (England)

Main language is English (English or Welsh in Wales) **75.3%** (90.8%)

Can speak English very well **12.1%** (4.0%)

Can speak English well **8.5%** (3.3%)

Cannot speak English well **3.5%** (1.6%)

Cannot speak English **0.6%** (0.3%)

% of people aged three years and over

Source: ONS - Census 2021

Small area: Output area

Accommodation type

2021

Kilburn West (England)

Whole house or bungalow **11.6%** (77.4%)

Flat, maisonette or apartment **88.2%** (22.2%)

A caravan or other mobile or temporary structure **0.1%** (0.4%)

% of all households

Source: ONS - Census 2021

Small area: Output area

Economic activity status

2021

Kilburn West (England)

Economically active: In employment **62.1%** (57.4%)

Economically active: Unemployed **6.7%** (3.5%)

Economically inactive **31.2%** (39.1%)

% of people aged 16 years and over

Source: ONS - Census 2021

Small area: Output area

Kilburn East

Population

2024

12,174

people

58,620,101 people in England

Source: ONS - Mid-year estimates

Small area: Output area

Number of households

2021

5,559

households

23,436,085 households in England

Source: ONS - Census 2021

Small area: Output area

Household composition

2021

Kilburn East (England)

One person household **41.8%** (30.1%)

Single family household **46.9%** (63.0%)

Other household types **11.4%** (6.9%)

% of all households

Source: ONS - Census 2021

Small area: Output area

Household deprivation

2021

Kilburn East (England)

Household is not deprived in any dimension **35.0%** (48.4%)

Household is deprived in one dimension **35.5%** (33.5%)

Household is deprived in two dimensions **20.4%** (14.2%)

Household is deprived in three dimensions **7.9%** (3.7%)

Household is deprived in four dimensions **1.3%** (0.2%)

% of all households

Source: ONS - Census 2021

Small area: Output area

Ethnic group

2021

Kilburn East (England)

Asian, Asian British or Asian Welsh **16.5%** (9.6%)

Black, Black British, Black Welsh, Caribbean or African **15.2%** (4.2%)

Mixed or Multiple ethnic groups **6.6%** (3.0%)

White **49.6%** (81.0%)

Other ethnic group **12.1%** (2.2%)

% of all people

Source: ONS - Census 2021

Small area: Output area

General health

2021

Kilburn East (England)

Very good health **51.2%** (48.5%)

Good health **30.2%** (33.7%)

Fair health **12.1%** (12.7%)

Bad health **4.9%** (4.0%)

Very bad health **1.6%** (1.2%)

% of all people

Source: ONS - Census 2021

Small area: Output area

Proficiency in English

2021

Kilburn East (England)

Main language is English (English or Welsh in Wales) **73.0%** (90.8%)

Can speak English very well **13.1%** (4.0%)

Can speak English well **9.1%** (3.3%)

Cannot speak English well **4.2%** (1.6%)

Cannot speak English **0.7%** (0.3%)

% of people aged three years and over

Source: ONS - Census 2021

Small area: Output area

Accommodation type

2021

Kilburn East (England)

Whole house or bungalow **5.7%** (77.4%)

Flat, maisonette or apartment **94.1%** (22.2%)

A caravan or other mobile or temporary structure **0.2%** (0.4%)

% of all households

Source: ONS - Census 2021

Small area: Output area

Economic activity status

2021

Kilburn East (England)

Economically active: In employment **56.0%** (57.4%)

Economically active: Unemployed **5.9%** (3.5%)

Economically inactive **38.1%** (39.1%)

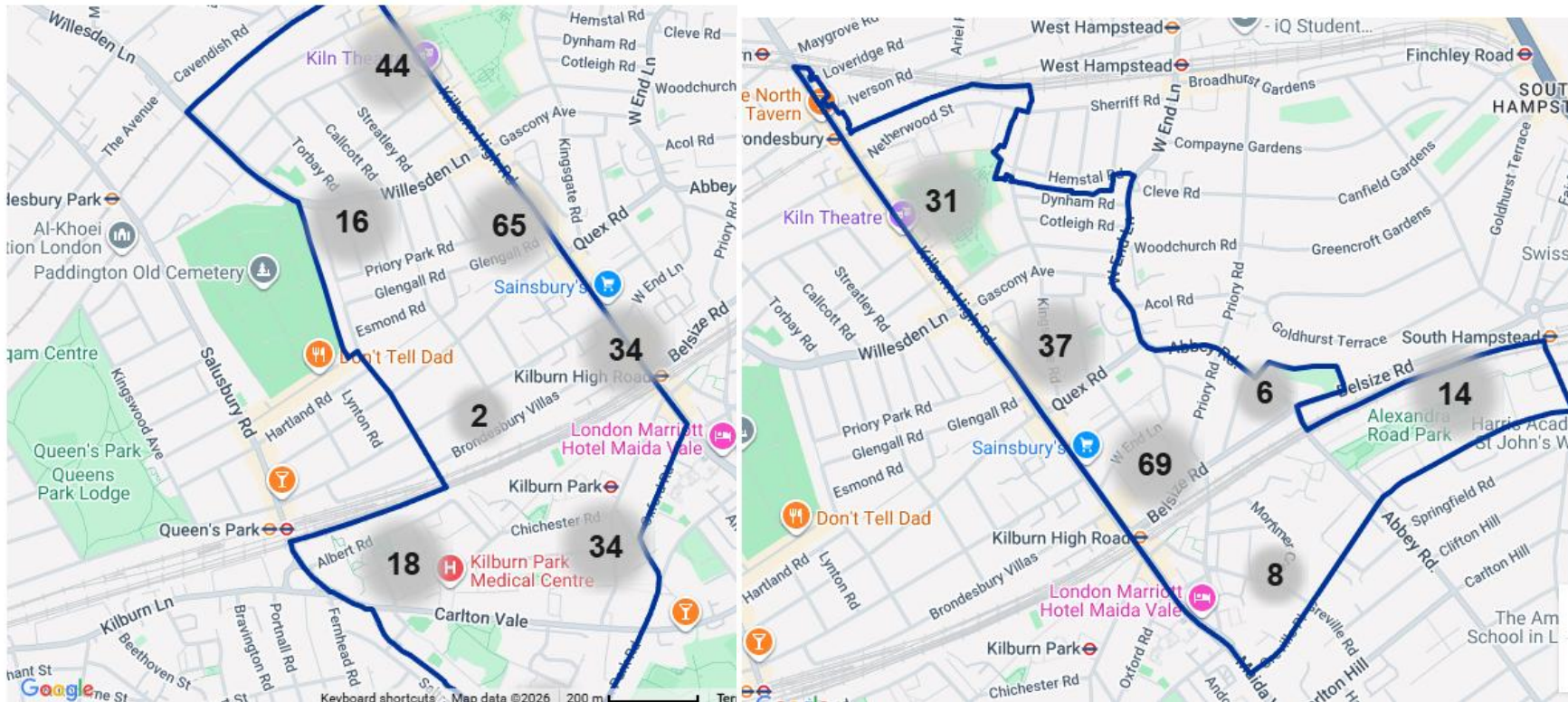
% of people aged 16 years and over

Source: ONS - Census 2021

Small area: Output area

Crime

The nearest police station is Kentish Town (3.5 miles) at 10-12A Holmes Road NW5 3AE open Monday – Friday 1000-2200 and weekends 0900-1900



The most common crimes in Kilburn are violence and sexual offences, with 915 offences during 2026, giving a crime rate of 38. This is 2.8% lower than 2025's figure of 941 offences and a difference of 1.09 from 2025's crime rate of 39. Kilburn's least common crime is other crime, with 29 offences recorded in 2026, an increase of 7% from 2025's figure of 27 crimes.

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

The level and type of crime recorded in the area is consistent with a busy 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.

Crime Risk Scores

Kilburn • 12 Months Ending January 2026

The typical five-minute walk within Kilburn has a crime risk score of 632. This is based on analysis of 687 nearby areas within Kilburn, with "most" referring to roughly two thirds of the nearby locations.



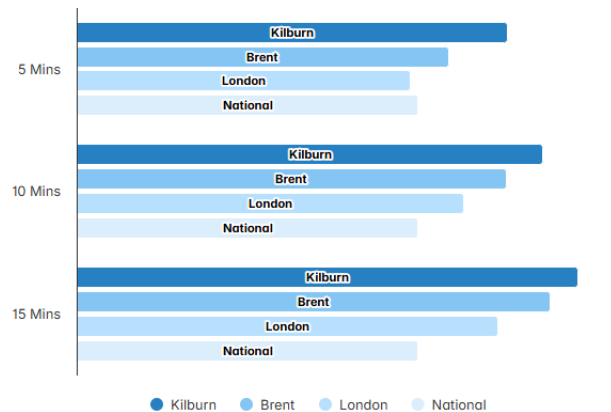
Crime risk scores are on a scale of 1 to 1,000 and consider the severity of the crimes involved, as determined by sentencing guidelines. A score of 1 represents the lowest risk, and 1,000 the highest risk. This approach ensures that - unlike overall crime rate figures - bicycle theft is *not* given the same importance in Kilburn's risk scores as, for example, robbery, or violence & sexual offences.

Within a five-minute walk of the typical location in Kilburn, crime risk scores are typically around 632, while in Brent they are average 546.

Areas within a ten-minute walk typically see crime risk scores of 684 (630 for Brent), and scores within a fifteen-minute walk are most often around 735 (Brent 695).

Typical Crime Risk Scores by Walking Distance

CrimeRate.co.uk



Highest Crime Rates

Kilburn • 12 Months Ending January 2026

Excluding *other crime* and *other theft* because their geographic location is often not relevant, *anti-social behaviour* as its definition is too wide, and *bicycle theft* for its specificity.



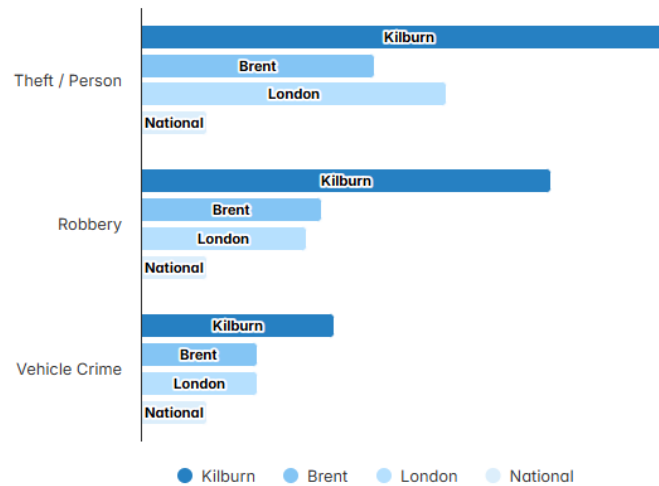
Theft From the Person offences have a crime rate of 13 reports per 1,000 people in Kilburn, which is **8.11** times the national average. This figure is calculated from 321 crime reports logged by Metropolitan Police during the 12-month period ending January 2026.

For the same period, Metropolitan Police recorded 170 reports of Robbery in Kilburn, resulting in a crime rate of 7.09 reports per 1,000, and a CrimeRate Index of **6.22**.

The crime rate for Vehicle Crime is **2.93** times the national average at 13 reports per 1,000. This is from 304 crime reports reported to Metropolitan Police.

CrimeRate Index Comparisons

CrimeRate.co.uk



Primary Schools:

- Kilburn Grange School (02075040547) >0.1 miles
- St Eugene de Mazenod Primary School (02076244837) 0.2 miles
- St Mary's C of E Primary School (02073726565) 0.2 miles
- Kingsgate Primary School (02076245379) 0.3 miles
- St Augustine's CE Primary School (02073280221) 0.4 miles
- Christ Church Primary School (02076244967) 0.6 miles
- St Mary's Catholic Primary School (02076241830) 0.6 miles
- Salusbury Primary School (02076240311) 0.6 miles
- Kilburn Park School (02076247603) 0.8 miles
- St Luke's Church of England Primary School (02081031780) 0.8 miles
- Islamia Primary School (02073722532) 0.8 miles
- Al-Sadiq & Al-Zahra Schools (02073727706) 0.8 miles
- The Avenue School (02038294690) 0.9 miles
- Kingsgate KS1 Primary School (02079745379) 0.9 miles
- Kingsgate Primary Lower School (02076245379) 1.0 miles
- George Eliot Primary School (02045061530) 1.0 miles
- Wilberforce Primary School – Westminster Borough (02080544100) 1.0 mile
- Emmanuel C of E Primary School (02074317984) 1.1 miles
- West Hampstead Primary School (02074358646) 1.2 miles
- St Mary's School, Hampstead (02074351868) 1.4 miles

Secondary Schools/Universities/Colleges:

- ICPM | London, Kilburn (02073280222) 0.4 miles
- Regenboogschool (07702099734) 0.6 miles
- St Augustine's CE High School (02073283434) 0.6 miles
- St George's School (02073280904) 0.6 miles
- IRIS-School (02073728051) 0.7 miles
- ICPM | London, Queen's Park (02073280222) 0.7 miles
- Alexandra College (02076446850) 0.7 miles

- Capital City College Alexandra centre (02078325000) 0.7 miles
- Islamia Girls School (02073723472) 0.8 miles
- Iqbal House (07828481704) 0.8 miles
- Brondesbury College (02088304522) 0.9 miles
- St Marylebone CE Bridge School (02036934752) 0.9 miles
- Maide Vale School (02045116000) 1.0 miles
- Harris Academy St John's Wood (02077228141) 1.0 miles
- South Hampstead High School (02074352899) 1.1 miles
- City of Westminster College, Maida Vale Campus (02077238826) 1.1 miles
- The Hall School (Senior School) (02077221700) 1.3 miles
- QPCS (02077228141) 1.3 miles
- University College School Senior School (02074352215) 1.3 miles
- Paddington Academy (02074793900) 1.3 miles
- Hampstead School (02077948133) 1.4 miles

Care Homes:

- Hampstead Court Care Home (02038220040) 0.8 miles
- Loveday Abbey Road (02045304990) 0.8 miles
- MHA Lawnfield Court – Retirement Living (02039622016) 1.0 miles
- MHA Lawnfield Court – Residential Dementia Care Home (02038577750) 1.0 miles
- Spring Grove Care Home (02077944455) 1.2 miles
- Beachcroft House Care Home (02081871040) 1.2 miles
- Compton Lodge (02077221280) 1.3 miles
- Juniper House (02072452000) 1.4 miles

Pubs & Bars:

- The Juniper Brasserie & Bar >0.1 miles
- Imperial Restaurant & Bar 0.1 miles
- The Coopers Arms 0.1 miles
- Kilburn Bridge 0.2 miles

- McGlynns Bar (Sports Bar) 0.3 miles
- Sir Collin Campbell 0.3 miles
- The Black Lion Pub & Boutique Guesthouse 0.3 miles
- The Priory Tavern 0.3 miles
- The Old Bell 0.3 miles
- Queens Arms London 0.4 miles
- Prince of Wales 0.4 miles
- The Kilburn Arms 0.5 miles
- Wolfpack Queens Park 0.5 miles
- Brondes Age 0.5 miles
- The North London Tavern 0.5 miles
- Alice House Queen's Park 0.6 miles
- ONE75 – Cocktail Bar and Cicchetti 0.6 miles
- The Gallery 0.6 miles
- The Ivy St John's Wood 1.5 miles
- The Pembroke Castle 1.9 miles

Pawn Shops/Jewellers:

- H&T Pawnbrokers >0.1 miles
- Sazin Jewellery >0.1 miles
- Naval's Jewellers 0.2 miles
- Azad Jewellers 0.2 miles
- H&T Pawnbrokers 0.2 miles
- H&T Pawnbrokers 0.3 miles
- Sam Jewellery 0.3 miles
- Amir Jewellery 0.4 miles
- Cash Converters 0.4 miles
- Sundries Watch & Jewellery Repairs 0.6 miles
- Ishtar Jewellery Ltd 0.7 miles
- Bijoux De Chagall 1.3 miles

- Lane’s Jewellery 1.3 miles
- Broadway Jewellers – Pawnbrokers London 1.4 miles
- H&T Pawnbrokers 1.5 miles
- Tiba Jewellery 1.5 miles
- Barkad Jewellery 1.5 miles
- Facets Diamond Jewellers 1.6 miles
- Melika Jewellery 1.6 miles
- Reem Jewellery 1.6 miles
- Yardna Jewellery 1.6 miles
- Bianca Jones Jewellery 1.6 miles
- H&T Pawnbrokers 1.7 miles
- Sutton & Robertsons Pawnbrokers & Jewellers 1.9 miles

Banks & ATMs:

- Halifax >0.1 miles
- Sainsbury’s Bank ATM >0.1 miles
- Lloyds Bank >0.1 miles
- Sainsbury's Bank ATM 0.1 miles
- Sainsbury's Bank ATM 0.1 miles
- Tesco Bank ATM 0.3 miles
- Tesco Bank ATM 0.4 miles
- Sainsbury's Bank ATM 0.5 miles
- Sainsbury's Bank ATM 0.5 miles
- ATM (389 Kilburn High Road) 0.5 miles
- Tesco Bank ATM 0.6 miles
- Euronet ATM 0.6 miles
- ATM (Post Office) 0.6 miles
- ATM (Post Office) 0.7 miles
- Sainsbury’s Bank ATM 0.7 miles
- Cashpoint 0.8 miles

- Tesco Bank ATM 0.8 miles
- Sainsbury's Bank ATM 0.8 miles
- Santander 1.4 miles

Transport:

Trains:

- Brondesbury 0.5 miles
- West Hampstead 0.6 miles
- Queen's Park 0.6 miles
- West Hampstead 0.7 miles
- West Hampstead Thameslink 0.7 miles
- Brondesbury Park 0.8 miles
- Kensal Rise 1.3 miles
- Willesden Green 1.5 miles
- Cricklewood 1.6 miles

Buses:

- Kilburn High Road Station (Stop T) 0.3 miles
- Kilburn High Road Station (Stop U) 0.3 miles
- Priors Terrace (Stop N) 0.4 miles
- Priors Terrace (Stop X) 0.4 miles
- Priors Road South Hampstead (Stop H) 0.4 miles
- Belsize Road South Hampstead (Stop P) 0.4 miles
- Abbey Road South Hampstead (Stop M) 0.5 miles
- Belsize Road South Hampstead (Stop G) 0.5 miles
- Boundary Road South Hampstead (Stop R) 0.6 miles
- Boundary Road South Hampstead (Stop F) 0.6 miles

Religious Sites:

- Quex Road Methodist Church >0.1 miles

• Sacred Heart Church, West Hampstead	0.1 miles
• Rauch City Church – Kilburn	0.1 miles
• Potters House Christian Church Kilburn	0.2 miles
• St Mary with All Souls, Kilburn	0.3 miles
• Kilburn Christian Fellowship (Kilburn Evangelical Free Church)	0.3 miles
• Church at South Hampstead	0.5 miles
• Divine Healing Church of Christ	0.5 miles
• New Life Bible – Presbyterian Church	0.5 miles
• Crosspoint Church London	0.6 miles
• St James’ Church, West Hampstead	0.6 miles
• St Augustine’s Church, Kilburn	0.6 miles
• St Anne with Holy Trinity, Brondesbury	0.8 miles
• West Kilburn Baptist Church	0.8 miles
• Immaculate Heart of Mary R C Church	0.8 miles
• St Mark’s Church, Hamilton Terrace	0.9 miles
• St Cuthbert’s Church, West Hampstead	0.9 miles
• Emmanuel Church, West Hampstead	1.0 miles
• Hampstead Synagogue – West Hampstead	1.0 miles
• Shree Swaminarayan Temple – Willesden	1.1 miles
• Lighthouse London (Holy Trinity, Swiss Cottage)	1.6 miles
• Dissenters’ Chapel	1.7 miles
• Rosslyn Hill Chapel	2.0 miles

Other Gambling Sites:

• Betfred	>0.1 miles
• MERKUR Slots – Kilburn	>0.1 miles
• Game Nation	>0.1 miles
• Game Nation	0.2 miles
• Ladbrokes	0.2 miles
• Betfred	1.0 miles

- Premium Casino Fun, Casino Hire 1.0 miles
- Ladbrokes 1.1 miles
- Coral 1.3 miles
- Paddy Power 1.3 miles
- Star Sports 1.5 miles
- Royal Casino Slots 1.5 miles
- William Hill 2.0 miles
- William Hill 2.0 miles

Medical Centres:

- Brondesbury Medical Centre 0.3 miles
- Belsize Priory Medical Practice 0.5 miles
- Lonsdale Medical Centre 0.5 miles
- The Abbey Medical Centre 0.6 miles
- Kilburn Park Medical Centre 0.7 miles
- Blessing Medical Centre 0.7 miles
- Third Floor [Lanark] Medical Centre 0.8 miles
- West Hampstead Medical Centre (GP Surgery) 0.8 miles
- Queens Park Health Centre 1.0 miles
- Mapesbury Medical Group GP NHS Doctor 1.0 miles
- St John's Wood Medical Practice 1.3 miles
- Golborne Medical West Ten GPs 1.6 miles
- Willesden Medical Centre 1.9 miles

Vulnerable People:

- Shop From Crisis, Kilburn >0.1 miles
- Kilburn Streets Kitchen 0.1 miles
- Integrated Camden Drug Service 0.1 miles
- UCKG HelpCentre Kilburn 0.2 miles
- Advice for Renters 0.3 miles

- St Mungo's: Chichester Road, Brent 0.5 miles
- Doorstep Homeless Families Project 1.0 miles
- Housing Solutions Service Family Centre 1.1 miles
- St Mungo's Shirland Road 1.4 miles
- Turning Point Acorn Hill 1.6 miles
- Barnet Foyer 1.8 miles
- Steps 2 Recovery 2.0 miles
- Marylebone Project 2.0 miles

Areas of Interest to Children:

- Kilburn Grange Park Children's Play Area 0.4 miles
- Iverson Road Open Space Childrens Play Area 0.8 miles
- Queen's Park Children's Farm 0.8 miles
- Queen's Park 0.8 miles
- Children's Playground 0.8 miles
- Lymington Road Estate Natural Play Area 0.9 miles
- Broadhurst Gardens Childrens Play Area 1.0 miles
- Freud Museum London 1.2 miles
- Primrose Hill Playground 2.0 miles

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	LEVEL	IMPACT	RISK MANAGEMENT	DATE REVIEWED
<p>Children entering the site unnoticed or unchallenged particularly after school and during school holidays</p>	<p>Low</p>	<p>Severe to Business Severe to Child</p>	<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</p> <p>The site is strictly 18+ and the Operator has a Think 25 policy in place.</p> <p>Staff age verification training is delivered, with staff receiving training on induction and at least annually. Additional/remedial training is given when considered necessary.</p> <p>There is only one entrance/exit from Kilburn High Road which is effectively monitored by staff at all times from the customer service desk.</p> <p>The site frontage is designed to obscure the interior so as not to be attractive to children</p> <p>Over 18s notices are clearly displayed at entrance to the Premises</p> <p>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.</p> <p>States are returned to anyone who has played a machine and unable to verify their age</p> <p>Age test purchasing is undertaken at least annually 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</p> <p>Clear and prominent premises signage and machine labelling</p>	<p>16/4/2026</p>

<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>Low</p>	<p>Moderate to business Severe to Vulnerable people</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.</p> <p>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>16/4/2026</p>
<p>Failure to provide information on responsible gambling to players</p>	<p>Low</p>	<p>Severe to business Severe to customers</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>16/4/2026</p>

<p>Failure to properly administer the self-exclusion process & maintain its effectiveness, including breaches & reinstatements</p>	<p>Low</p>	<p>Severe to business Severe to customer</p>	<p>Site layout permits effective monitoring of customers entering premises CCTV at entrance to aid identification of known excluders Use of on-site & SmartEXCLUSION self-exclusion schemes Staff review the self-exclusion data before starting each shift Use of group WhatsApp to notify staff of customers attempting to, or actual breaches of self exclusions</p>	<p>16/4/2026</p>
<p>Failure to deal with customers making complaints about the gaming machines</p>	<p>Moderate</p>	<p>Moderate to business Severe to customers</p>	<p>All gaming machines are sourced from licensed suppliers only All gaming machines are regularly maintained and switched off immediately where the outcome of a gambling fault is identified. Terms and conditions displayed at premises provide details of how to make a complaint Paper copies of complaints procedure and complaints form are available Staff are trained on induction on how to deal with customer disputes, including referrals to IBAS the ADR provider</p>	<p>16/04/2026</p>
<p>Failure to identify attempts by third parties to launder money through the business</p>	<p>Low</p>	<p>Severe to business Low to customers</p>	<p>There are a number of pawn shops identified in the local vicinity Effective monitoring of customers' behaviour by good line of sight from customer service desk and CCTV Staff are regularly trained to identify counterfeit money Change machines & note takers regularly inspected</p>	<p>16/4/2026</p>

			Incidents of concern including money lending are reported through the SmartEXCLUSION system and to the MLRO	
Poor security increasing vulnerability to crime	Low	Severe to business Severe to customers	Liaison with local police teams as appropriate Effective CCTV with data stored for 30 days Toughened glass windows and doors with mag-lock fitted and in operation during quiet hours Safe on site for cash and keys All incidents recorded in incident log and reported to the Gambling Commission Intruder alarm installed and regularly serviced	16/4/2026
-social behaviour outside the premises	Low	Moderate to business Low to customers	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. Staff are trained to monitor the external area around the entrance for any anti-social behaviour and to take appropriate steps to discourage people from congregating outside the premises. Where an incident appears to be escalating the staff with use the mag-lock and engage with local partnerships to minimise the risk	16/4/2026

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GOLDEN SLOTS (SOUTHERN) LIMITED
POLICIES & PROCEDURES

Version	Date	Drafted/Reviewed by
1	Feb 2018	Debbie Bollard
2	May 2025	Debbie Bollard

GAMBLING REGULATORY COMPLIANCE

Introduction

The Company is licensed to operate Bingo and AGC premises and supply, repair and maintain gaming machines.

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

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

Licensing Objectives

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

Licensing Conditions and Codes of Practice

The latest version of the LCCPs can be found online at

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

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

Ordinary Code Provisions do not have the status of Operator Licence conditions but set out good practice. The Company can adopt alternative approaches provides it considers the ordinary code provision and can demonstrate that an alternative approach is reasonable in the circumstances; or that by taking an alternative approach it is acting in a similarly effective manner. Ordinary codes of practice are admissible in evidence in criminal or civil proceedings and must be taken into account in any case in which the court or tribunal think them relevant, and by the Commission in the exercise of its functions; any departure from ordinary code provisions by the Company may be taken into account by the Commission on a licence review but cannot lead to imposition of a financial penalty.

REPORTING REQUIREMENTS

The Company will disclose to the Commission anything that is likely to have a material impact on its business or ability to conduct licensed activities compliantly. In particular it will report any of the Key Events listed in the Licence Condition 15.2.

A key event is an event that could have a significant impact on the nature or structure of an Operator's business. Operators are required to notify the Commission of the occurrence of key events as soon as reasonably practicable and in any event within five working days of becoming aware of the event's occurrence.

Operators must as soon as reasonably practicable, provide the Commission with any information that they know relates to or suspects may relate to the commission of an offence under the Gambling Act 2005, including any breaches of the Licence Conditions and Codes of Practice.

Full details of notifiable key events can be found in the Licence Conditions and Codes of Practice at condition 15.2 and include the following:

- The Company becoming insolvent;
- Any change in key personnel;
- Any disciplinary sanction, including dismissal, against the holder of a personal licence;
- Submission of a suspicious activity report (SAR) to the NCA pursuant to the Proceeds of Crime Act 2002 or Terrorism act 2000;
- Any breach of the Company's information security that adversely affects the confidentiality of customer data; and
- Any change of the Company's alternative dispute resolution (ADR) provider

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

RESPONSIBILITY FOR THIRD PARTIES

The Company will be responsible for any third parties that it contracts with relating to the operation of its premises or the supply of gaming machines and will require any third party to act in accordance with the LCCPs. It will require any third party to provide any information that it may need to comply with its information reporting and other obligations to the Gambling Commission. Any contract with such a third party will include a provision to terminate the contract if in the Company's opinion the third party is in breach of its obligations.

ACCESS TO PREMISES

The Company acknowledges its obligation to ensure that staff co-operate with the Gambling Commission's Enforcement Officers, the Police and the Authorised Officers of the Local Authority 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 (S.303 to S.326) of the Gambling Act 2005 (refer to page 2 of this policy) and that:

- The Company must provide the Gambling Commission or Police with any information that it suspects may relate to the commission of an offence under the Gambling Act 2005, including an offence resulting from a breach of an operating licence condition or a code of practice provision having the effect of a licence condition.
- The Company must provide the Gambling Commission with such information as the Commission may require from time to time including the range of gambling activities provided by the licensee and the licensee's policies in relation to, and experience of, problem gambling.
- The Company 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, complies with the Consumer Rights Act 2015.
- Staff will co-operate with Enforcement Officers and Police in the proper performance of their compliance functions; senior management will ask the visiting officer for a written report of the inspection.

Staff are trained on induction and during refresher training on this policy and the rights of entry to premises by the Gambling Commission's Enforcement Officers, the Police or an Authorised Officer of the Local Authority.

- Suspected Offence - 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.
- Inspection of Gambling - A constable, enforcement officer or authorised person may enter premises if they reasonable suspect that unlawful facilities for gambling (other than private and non-commercial gaming) or better may be being provided, may be about to be provided or have been provided.
- Inspection of Operating Licence Condition Compliance - A constable or enforcement officer may enter premises that they reasonably believe to be used by the holder of an operating licence in connection with licensable activities, to determine whether the licensed activities are being carried out in accordance with the conditions of the operating licence.
- Licensed Premises - A constable, enforcement officer or authorised person may enter a premises where an application for a premises licence has been made to assess the likely effects of activity carried on under a premises licence.

ANTI-MONEY LAUNDERING RISK ASSESSMENT POLICY & PROCEDURES

LICENCE REQUIREMENTS

Under LCCP 12.1.1 in order to prevent money laundering and terrorist financing, licensees must:

- Conduct an assessment of the risks of their business being used for money laundering or terrorist financing;
- Review the risk assessment at least annually;
- Have appropriate policies, procedures and controls in place to prevent money laundering; and
- Implement those policies effectively taking into account learning or guidelines published by the Gambling Commission.

The appropriate guidance from the Gambling Commission can be found at:

<https://www.gamblingcommission.gov.uk/manual/duties-and-responsibilities-under-the-proceeds-of-crime-act-2002>

The Company is licensed for non-remote Bingo, AGC and the supply maintenance and repair of gaming machines and is therefore not within the regulated sector under the Money Laundering (Information on the Payer) Regulations 2017 (as amended). However, the Company must comply with its obligations to prevent commission of offences under the Proceeds of Crime Act 2002 (POCA) and also comply with the LCCP.

MONEY LAUNDERING

Money laundering is a term referring to offences involving the proceeds of crime or terrorism funds. Criminals attempt to launder money by disguising the source and/or changing the form of the funds or moving them to a place where they are less likely to attract attention.

The following are acts of money laundering:

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

ANTI-MONEY LAUNDERING

Anti-money laundering (AML) is a term used to describe the legal controls that require financial institutions and other regulated entities to prevent, detect, and report money laundering activities.

An effective AML program requires:

- The criminalisation of money laundering with powers given to regulators and the police to investigate and prosecute;
- Financial institutions to identify their customers, establish risk-based controls, keep records and report suspicious activities;
- The ability to share information with other jurisdictions as appropriate.

REGULATION

Employees working in the gambling industry are required to make a report in respect of any information that comes to them in the course of their business:

- when they know
- when they suspect
- when they have reasonable grounds for knowing or suspecting that a person is engaged in money laundering or terrorist financing, including criminal spend.

These obligations are collectively referred to as grounds for knowledge or suspicion. The Company must be able to demonstrate, with supporting evidence, that a risk assessment is and has been undertaken prior to entering into business relationships with customers and that adequate customer due diligence is conducted in order to ensure that customers' transactions are consistent with the level of risk presented.

The Company must also be able to demonstrate the extent of ongoing monitoring which is conducted on a risk-sensitive basis and retained any records necessary to reflect this, with risk profiles being properly maintained. This policy identifies additional measures that will be applied to carry out risk monitoring and when it will be necessary to obtain a declaration as to the source of funds from customers in situations which present a high risk with the potential for money laundering.

The Company and its Directors are committed to ensuring that compliance is embedded in all aspects of the business.

AML RISK ASSESSMENT

COUNTRY/GEOGRAPHIC RISK

Risks

- Residents of some countries can pose an inherently elevated risk of money laundering; the Financial Action Task Force has identified several High-Risk Jurisdictions on their Black List and a number of countries that are under increased monitoring on their Grey List <https://www.fatf-gafi.org/en/countries/black-and-grey-lists.html>
- Customers can present a higher risk as a result of their citizenship, business or residency.

Risk assessment

- There is a possibility that customers may originate from countries on the FAFT list.
- The majority of customers will be known to staff working in the premises through everyday customer interactions
- Staff are trained to be alert to any suspicious activity and to report suspicions to their line manager.
- Where the Company has suspicion that an unknown customer may come from a country on the Blacklist they will be asked to provide proof of residency and the Company will undertake further monitoring for any suspicious activity.
- Where the Company has suspicion that an unknown customer may originate from a country on the Grey List the Company may undertake further monitoring for any suspicious activity.

Risk assessment = LOW

CUSTOMER RISK**Risks**

- Unknown or anonymous customers
- High spenders
- Disproportionate spenders
- Casual or regular customers
- Forged or stolen identities,
- From jurisdictions on the Blacklist or the Grey List or on sanctions lists.

Risk assessment

- The majority of customers will be known to staff through everyday customer interactions.
- Staff are trained to be aware of any suspicious activity and to report suspicions to their line manager.
- Where there is any doubt about the identity of a customer, they will be asked to verify their identity against their passport or driving licence photo.

Risk assessment = LOW

TRANSACTION RISK (INCLUDING MEANS OF PAYMENT)**Risks**

- Money used to bet/gamble may be the proceeds of crime.
- Cash may be used that is difficult to trace and is associated with criminal activity.
- Customers may deposit criminal proceeds into gaming machines and then withdraw the funds with no gambling activity.

Risk assessment

- Staff are trained to be aware of any suspicious activity and to report suspicions to their line manager.
- The maximum stake on gaming machines is £2.
- Wins over £300 in value are paid out from the counter where no TITO so staff can interact with the customer and identify any suspicious activity.

Risk assessment = LOW

PRODUCT RISK**Risks**

- Some gambling products such as gaming machines, and automated ticket redemption machines can pose a higher risk of money laundering.

Risk assessment

- The Company offers low-stake gaming machines with a maximum stake of £2 and maximum prize of £500.
- Wins over £300 in value are paid out from the counter where no TITO so staff can interact with the customer and identify any suspicious activity.

Risk assessment = MED.

RISK ASSESSMENT - OVERALL

- The Company has assessed its risk of being used to launder criminal proceeds to be **LOW/MED** overall.
- Its business is offering low stake gaming machines and bingo with a limit of £2 maximum stake.

- Winnings of over £300 are paid out by staff where no TITO instead of from the gaming machine to help identify suspicious activity
- Any stakes credited to a machine and then withdrawn with no gambling activity are flagged as suspicious to the MLRO.

The Company assesses that its risk of money laundering is LOW.

The Company acknowledges that higher value gambling activity carries a higher risk of money laundering and staff are trained to be alert to any such activity and to report it to their line manager.

Updated May 2025

CRIME & DISORDER AND AML POLICY

This policy is based on the following principles and practises:

- The development of systems and controls that are appropriate for the business and comply with all legal and regulatory requirements;
- The assessment of any money laundering risks to the business at least annually and the adoption a risk-based approach that is flexible, effective, proportionate and cost effective;
- A commitment from, and responsibility resting with, the senior management;
- Regular assessment of the systems and controls in place;
- The maintenance of transactions records that meet the needs of law enforcement investigations tackling money laundering and terrorist financing;
- Initial and ongoing training for all relevant employees;
- Providing the nominated Money Laundering Reporting Officer (MLRO) with the resources and authority to operate objectively and independently.

RISK MANAGEMENT

The Company has a policy and procedures in place in relation to risk assessment and management, as required under the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 (the Regulations). This risk-based approach involves a number of discrete steps in assessing the most proportionate way to manage and mitigate the money laundering and terrorist financing risks:

- Identifying any money laundering and terrorist financing risks that are relevant to its business;
- Designing and implementing policies and procedures to manage and mitigate these assessed risks;
- Monitoring and improving the effective operation of these controls; and
- Recording what has been done, and why.

This risk-based approach focuses the effort where it is most needed and will have most impact. It requires the full commitment and support of senior management, and the active co-operation of all employees. The Company has conducted an assessment of its risk exposure to money laundering, which considers the threat, and its impact.

MLRO

The designated Money Laundering Reporting Officer (Harpreet Chattha) takes responsibility for SARs in respect of the prevention and detection of money laundering, counter terrorism financing and the Company's obligations under the Proceeds of Crime Act 2000

The MLRO has responsibility for:

- Deciding whether to establish or continue a business relationship with a customer;
- Suspending or terminating a business relationship;
- Deciding whether the Company has any knowledge or suspicion of money laundering in relation to a customer's betting activity; and
- Submitting a Suspicious Activity Report (SAR) to the National Crime Agency (NCA) using www.nationalcrimeagency.gov.uk.
- Seeking a defence (where appropriate); and
- Keeping a record of the decision-making process and all SARs submitted to the NCA.

The MLRO has the authority to act independently in carrying out their responsibilities and has access to sufficient resources to carry out their duties.

SUSPICIOUS ACTIVITY

Suspicious activity includes any suspicious transactions, extreme customer profiles, and where deposits contradict the circumstances. Where the Company identifies a customer that requires additional risk monitoring it will conduct enhanced due diligence checks and may ask them to provide the following as evidence of identity:

- Passport or ID card.
- Utility bill.
- Bank statement.
- Other proof of identity.

Enhanced Due Diligence Checks are based on a customers' profile and the risk they pose to the Company's business. Where it is determined that a customer may be a risk the Company will conduct risk monitoring which will include checks of where the customer lives and works, and the value of their home and whether its comparable to the level of customer spending.

SUSPICIOUS ACTIVITY REPORTS (SARS)

The law imposes a duty on businesses to make a Suspicious Activity Report (SAR) about any actual or suspected money laundering or terrorist funding. Any employee who has any information that comes to them in the course of working for the Company that they know, suspect, or have reasonable grounds to know or suspect a money laundering activity is occurring should report their suspicions promptly to the MLRO using the form below. Any employee failing to do so, will be subject to disciplinary action and is liable to criminal prosecution.

No further enquiries should be made about the suspected money laundering after reporting to the MLRO and no further steps in any transaction relating to the suspected money laundering should be made without authorisation from the MLRO.

An employee must not, under any circumstances, disclose or discuss any AML concern with the person or persons subject to an investigation, or any other person for that matter. Disclosure (also known as "tipping off") is strictly prohibited and carries with it serious legal penalties.

Furthermore, and in order to keep ourselves protected as much as possible, no remark should ever be left on an account that would give any indication that money laundering is suspected, a customer being

entitled, at any point in time, to request the full notes/remarks on their account.

EMPLOYEES

The Directors are fully committed to and responsible for the implementation of this policy. They understand their individual personal liability for consenting to or contributing to the commission of offences under the Regulations, or where such offence is attributable to any neglect on their part.

Staff training

All staff will receive training on their obligations to report any knowledge or suspicions of money laundering to the MLRO and are aware of the procedures in place for doing so. Relevant employees will receive training on how to follow Company procedures for:

- Client due diligence (CDD), including enhanced requirements for high-risk clients,
- reporting suspicious activity to the MLRO and seeking appropriate consent to payout winnings where applicable.

RECORD KEEPING

The Company will ensure that there is an audit trail to assist in any financial investigation by a law enforcement body. Its record keeping policy and procedure covers records in the following areas:

- Details of how compliance has been monitored by the MLRO;
- Delegation of AML tasks by the MLRO;
- MLRO reports to senior management;
- Information not acted upon by the MLRO including an explanation as to why no further action was taken;
- Customer identification and verification information;
- Supporting records in respect of business relationships or occasional transactions;
- Employee training records;
- Internal and external SARs;
- Contact between the MLRO and police or the NCA, including records connected to appropriate consent.

OFFENCES

All employees are made aware of their risk of committing the following related offences.

- Failing to report suspicious activity under POCA and the Terrorism Act
- Failing to make a disclosure to the MLRO as soon as they are in receipt of information giving rise to the knowledge or suspicion.
- Failing, as the MLRO to make a disclosure to NCA of information giving rise to the knowledge or suspicion.
- Disclosing information that a SAR has been submitted and that is likely to prejudice an investigation,
- Disclosing information that an investigation into allegations that an offence under POCA or the Terrorism Act has been committed, and that is likely to prejudice the investigation.
- Falsifying, concealing, destroying, or disposing of any documents that re relevant to an investigation into an offence under POCA or the Terrorism Act

VETTING PROCEDURES FOR NEW EMPLOYEES

The Company undertakes a number of vetting procedures when staff are employed through proper identification checks and verifies the identity and credentials of employees using at least two independent references. It will also seek to verify any further personal information or background information.

PROTECTING EQUIPMENT FROM INTERNAL CRIME AND CRIMINAL MISUSE

The Company understands that a keyway to combat fraud is to first identify where its most valuable assets are. Processes and controls have been built into the routine business of the Company to minimise the risk of any of the gaming machines being misused.

ENSURING OTHER COMPANIES ARE TRUSTWORTHY AND REPUTABLE

The Company is committed to promoting strong principles of business and professional ethics at every level.

All new suppliers will be subject to a rigorous approvals process and all information supplied by them will be verified and assessed to consider the risks associated with the supplier. The company also ensures that any third parties it contracts with understand the compliance obligations under the relevant customer jurisdictions.

RESPONSIBILITIES UNDER THE PROCEEDS OF CRIME ACT (POCA)

The Company is fully aware of its obligations set out in the Proceeds of Crime Act 2002 and has appropriate policies and procedures in place.

INTERNAL RECORD KEEPING

- Records of all customer transactions will be retained for a minimum of 6 years after the transaction has taken place.
- Records of customer details, regardless of their value state or open/blocked status, will be kept for a minimum of 6 years after the relationship with the customer was terminated.
- Records of money laundering investigations and suspicious activity reports will be kept for 6 years after the investigation was completed.

FURTHER INFORMATION

Further information can be obtained from the following sources:

- National Crime Agency (NCA) <https://www.nationalcrimeagency.gov.uk/>
- National Crime Agency (NCA) - Suspicious Activity Reports (SARs): <https://sarsreporting.nationalcrimeagency.gov.uk>
- National Crime Agency (NCA) - Guidance on submitting better quality Suspicious Activity Reports (SARs) <https://www.nationalcrimeagency.gov.uk/who-we-are/publications/650-guidance-on-submitting-better-quality-suspicious-activity-reports-sars-v9-0/file>
- Money Laundering Regulations: report suspicious activities: <https://www.gov.uk/guidance/money-laundering-regulations-report-suspicious-activities>

Gambling Commission - Anti-money laundering hub:

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

For completion by the employee suspicious of activity

CONFIDENTIAL

From: _____

[insert name of employee]

Details of suspected offence:

Names(s) and address(es) of person(s) involved:
[if a company/public body please include details of nature of business]

Nature, value and timing of activity involved:
[Please include full details e.g., what, when, where, how. Continue on a separate sheet if necessary]

Nature of suspicions regarding such activity:
[Please continue on a separate sheet if necessary]

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

Yes No

If yes, please include details below:

Have you discussed your suspicions with anyone else?

(Please tick the relevant box) Yes No

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

Signed: _____ **Dated:** _____

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

For completion by the Money Laundering Reporting Officer (MLRO)

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

Date report received: _____

Date receipt of report acknowledged: _____

CONSIDERATION OF DISCLOSURE:

Action plan:

OUTCOME OF CONSIDERATION OF DISCLOSURE:

Are there reasonable grounds for suspecting money laundering activity?

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

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

Details of liaison with NCA regarding the report:

Notice period: _____ to _____

Moratorium Period: _____ to _____

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

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

Date consent received from NCA: _____

Date consent given by you to employee: _____

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

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

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

Other relevant information:

Signed: _____

Dated: _____

THIS REPORT TO BE RETAINED FOR AT LEAST FIVE YEARS

PROTECTION OF BUSINESS FROM BEING A SOURCE OF CRIME OR DISORDER

CASH HANDLING POLICY

Licensing Requirements

- LCCP Condition 5.1.1 requires Operators to implement appropriate policies and procedures concerning the usage of cash and cash equivalents (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.
- LCCP Condition 15.3.1 requires Operators to report their gross gambling yield from each category of gaming machine within 28 days of the end of each quarterly period.

The Company acknowledges that there is a risk of internal and external crime including the theft of monies from its premises and the use of the business to launder money and/ or finance terrorism. The Company has there put in place the following cash handling policy for all its premises.

Principles:

- The receipt of money from gaming machines must be properly accounted for in all circumstances.
- Any concerns about money laundering should be immediately reported to senior management and the Money Laundering Reporting Officer and documented.
- All cash collections must be carried out by appropriately trained individuals.
- All cash collected must be securely stored and banked.
- Full records of all gaming machine collections must be maintained, including
 - the meter readings for each machine;
 - the category of gaming machine;
 - the location of the gaming machine.

Procedures:

- Gaming machines are emptied by the senior management and meter readings are recorded.
- All money is immediately taken to the site office where it is counted and the details together with the meter readings are recorded electronically to ensure that the same correspond.
- The Directors and senior managers are solely responsible for issuing refloats after the machines have been emptied and all floats are recorded and signed for at the time.
- The Directors and senior managers are responsible for banking;
- Any cash is kept stored securely in the safe in the site office until it is banked

Credit & Money lending

The Company does not permit the use of credit cards for gambling in its premises whatsoever.

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

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

Internal crime

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

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

The Company is authorised under its Gaming Machine Technical Supplier Operating Licence to supply the following gaming machines:-

- Cat B2 - max stake £2 max prize £500 to Casinos & Betting shops
- Cat B3 – max stake £2 max prize £500 to the above Bingo sites and AGCs
- Cat B3A – max stake £2 max prize £500 to members clubs etc
- Cat B4 – max stake £2 max prize £400 to all the above
- Cat C – max stake £1 max prize £100 to all the above FECs, pubs and commercial clubs
- Cat D AWP – max stake 10p max prize £5 to all above & uFECs
- Cat D non-money - max stake 30p max prize value £8 to all above
- Cat D Prize – max stake £1 max prize value £50 to all above
- Cat D crane – max stake 10p max prize £8 to all above
- Cat D combined money & non-money max stake 20p max prize £20 to all above
- Cat D coin pushers and penny falls to all of the above

The Company can make the following gaming machines available for use in its Bingo and AGC Premises:-

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

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

External Crime

The Company maintains an asset register recording:

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

The Company ensures that all gaming machines operated and supplied by the Company have:

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

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

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

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

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

ENSURING THAT GAMBLING IS CONDUCTED IN A FAIR AND OPEN WAY

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

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

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

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

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

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

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

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

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

GOLDEN SLOTS (SOUTHERN) LIMITED - TERMS AND CONDITIONS

Who we are and our contractual relationship

1. These Premises are operated by Golden Slots (Southern) Limited)(“us” or “we”) under the authority of an AGC/Bingo Operating Licence (43695) granted by the Gambling Commission.
2. When you use the gambling facilities on our premises you are entering into a legal contract with us, the terms of which are set out here (the “Terms”). As soon as we provide or display amended Terms then the amended Terms will apply from that point onwards unless we make any material changes in which case, we will display a notice in our premises informing customers of the changes to Terms before they come into effect.
3. When you are on our premises, we expect you to treat our staff and other customers with courtesy. We may ask you to leave if, in our opinion, your behaviour is rude, threatening, or abusive; or you are under the influence of alcohol or other substances. We may refuse admission to our premises at any time without giving reasons.

Underage gambling

4. Entry to our Premises is only for those aged 18 years and older. Our staff are required to check your age if you appear to be under the age of 25. You may be asked to show ID proving your age.
5. We will only accept a valid, legible, and current form of ID that is an original not a copy and which contains a photograph capable of identifying you and which must also state your date of birth. Any ID’s which show signs of tampering will be rejected. Acceptable forms of ID 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.
6. We may refuse you entry and/or remove you from our Premises if you appear to be under-age and cannot or will not produce an acceptable form of ID.
7. If we discover that a child (under 16 years) or young person (16 or 17 years) has gambled on any gaming machine (other than a Category D (i.e. stake of no more than 10p and maximum prize of £5 cash), then we will return the payment to play, and no prize winnings will be paid out.
8. If you are over 18 and are accompanied by a person who is under the age of 18 then we will refuse both of you entry to our Premises. If you enter or try to enter more than once when accompanied by a person who is under the age of 18 years, then we may exclude you from our premises permanently (even if not accompanied by a child or young person).

Responsible gambling and self-exclusion

9. You agree that we may approach and speak to you where we believe you may have an issue with your gambling and that we may refer you to sources of help with problem gambling. We may record those discussions with you and may also give details of our concern to the Gambling Commission – this will be in general terms and no personal data will be shared with the Gambling Commission. You may want to contact GAMCARE which provides information, advice and counselling to individuals, their family and friends who have concerns about problem gambling. The Helpline number for GamCare is 0808 802 0133. We are a member of the Boomerang SmartEXCLUSION national self-exclusion scheme.
10. This means that you may exclude yourself from gambling with us and from other participating premises for an initial minimum period of between 6 and 12 months. Please inform a member of staff if you wish to discuss self-exclusion. Where possible we will try to discuss this with you in private.
11. In order to self-exclude, you will be expected to sign a paper or digital self-exclusion form accepting the terms and conditions of your self-exclusion and provide us with personal information such as your name, address and contact details, as well as photo identification and any other personal details we reasonably consider necessary to implement this self-exclusion. You do not have to enter our premises to do this and may communicate with us in writing. You agree that we may share the information you provide and the fact of your self-exclusion with IHL who operate the self-exclusion scheme and other local AGC and Bingo premises. More details will be provided by our staff if you choose to self-exclude.
12. If you have self-excluded yourself from our venue, then we will try to make sure that you are not allowed to enter our premises. If we find you inside our premises, then we will ensure that you leave as quickly as possible. **However, if you still manage to gamble during a period of self-exclusion then we will not be responsible for your gambling losses, nor will we have to refund any monies lost.** We will record any attempt by you to breach your self-exclusion agreement.
13. At the end of the period chosen by you, the self-exclusion will remain in place for a further 6 months unless you take positive action in order to gamble again by requesting a member of staff to allow you to do so. If you reinstate yourself to gambling in this way you will not be able to gamble for a further 24 hours – this is called a cooling off period and is required by Gambling Commission Regulations. You may also request a renewal of the self-exclusion when it expires by contacting a member of our staff.
14. If you do not renew your self-exclusion, nor request to be re-instated to gambling then your self-exclusion

will automatically continue for a further six months. After this time, you will no longer be self-excluded.

15. We reserve the right to exclude you from the premises without your consent if you we consider that you are unable to control your gambling or are abusive to staff, are disruptive or fail to comply with any other terms of entry.

Credit and loans

16. We do not permit the use of credit cards in our Premises

17. We do not provide any form of credit in connection with gambling.

17. We do not permit any loans or other arrangements on our premises where credit is given to another person for any gambling activities. We will ask anyone to leave our premises and will exclude from entry in the future anyone who we discover is making loans on our premises on a commercial or organised basis.

Promotions and reward schemes

18. Any promotions, loyalty, or other reward schemes we offer will be subject to separate terms and conditions.

Refunds

19. If any gaming or other machine fails to work or work properly then, at the discretion of the venue, you will be entitled to is a refund of the stake you wagered. If we believe a machine is operating incorrectly, we may stop any further play on it. Any wins from a faulty machine will be void and you will not be entitled to collect any winnings accrued on a faulty machine.

Complaints and disputes

20. In this section, a "complaint" means a complaint about any aspect of our operation of our licensed gaming activities. A "dispute" is any complaint which is not resolved at the first stage of our complaints process. A copy of our complaints and disputes procedure is available on request.

21. If you have any complaints about any of the facilities for gambling that we provide, you should raise it as soon as possible with the Manager. If your complaint is not resolved to your satisfaction by the Manager, please put your complaint in writing, setting out the circumstances and send with any supporting information to Harpreet Chattha, Golden Slots (Southern) Limited, 15-17 Upper George Street Luton LU1 2RD within 21 days.

22. We aim to respond in writing to your complaint within 14 days of receiving your written complaint.

23. If your complaint remains unresolved after receiving a written response from us, then we treat it as a dispute, and you have the option to refer it to the independent alternative dispute resolution ("ADR") entity that we use. This entity is called CEDR and can be contacted via its website <https://www.cedr.com>

4. There is no charge or cost to you in referring your complaint to CEDR, but it will not deal with your complaint until you have been through our complaint's procedure. In referring a dispute to ADR, you accept that any determination is binding on you and us.

Cheating and advantage play

25. If you are found cheating or if it is determined by us that you have employed or made use of a system (including any apparatus) designed to gain an advantage over the random operation of any gaming machine, you will not be paid out any prizes and will be barred from entering the premises in the future.

Data protection and privacy

26. We operate CCTV facilities at our premises for the purposes of detection and prevention of crime, and to ensure that our staff are able to work in a safe environment. CCTV recordings may be disclosed to the police or used in dealing with any complaints.

27. If you have opted into the self-exclusion scheme then your personal data will be made available to our staff, and the Boomerang as well as other participating AGC and Bingo sites.

28. In order to fulfil our regulatory obligations, we may undertake various checks of your identity, residence, income and wealth and may require you to supply us with information or documents in this regard.

TECHNICAL STANDARDS

GAMING MACHINE TECHNICAL STANDARDS

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

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

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

The Company acknowledges that its Operating Licence permits it to supply the following gaming machines to customers:-

- Cat B2 - max stake £2 max prize £500 to Casinos & Betting shops
- Cat B3 – max stake £2 max prize £500 to the above Bingo sites and AGCs
- Cat B3A – max stake 32 max prize £500 to members clubs etc
- Cat B4 – max stake £2 max prize £400 to all the above
- Cat C – max stake £1 max prize £100 to all the above FECs, pubs and commercial clubs
- Cat D AWP – max stake 10p max prize £5 to all above & uFECs
- Cat D non-money - max stake 30p max prize value £8 to all above
- Cat D Prize – max stake £1 max prize value £50 to all above
- Cat D crane – max stake 10p max prize £8 to all above
- Cat D combined money & non-money max stake 20p max prize £20 to all above
- Cat D coin pushers and penny falls to all of the above

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

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

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

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

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

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

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

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

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

BINGO TECHNICAL STANDARDS

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

Definitions

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

Prize Information:

Information to be displayed for main stage games:

The Company will ensure that the prize information board always displays the following information during the game session and will ensure that most players have a clear and unobstructed view of the board during play:

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

Information to be displayed for interval bingo games:

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

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

Display of information on players' Game devices

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

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

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

Random Number generation

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

Electronic device and server-based system requirements

The Company will ensure that:

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

The Company will take all reasonable steps to ensure that:

- its policies for dealing with service interruptions are fair and do not systematically disadvantage customers;
- the system is not adversely affected by the simultaneous or sequential activation of any inputs and outputs, such as 'play buttons', which might, whether intentionally or not, cause malfunctions or invalid results;
- where a note acceptor or printer is in use during a power failure it will on resumption of the power either: -

- complete or restart the task successfully; or
- display an error message indicating that such a fault has occurred, and which will remain until the fault has been resolved. Furthermore, the metering or audit controls will identify any accounting anomalies for dispute resolution purposes.

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

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

Cashless play

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

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

Printers

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

Printed tickets will include the following information:

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

Ticket validation

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

Error Conditions and alert requirements

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

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

Wireless network systems

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

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

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

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

Power level display requirements

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

Audit requirements

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

Bingo Tickets

The Company will ensure that:

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

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

MARKETING POLICY

In accordance with Social Responsibility Code 5.1, where the Company offers any customer or potential customer an incentive or reward it will ensure that the scheme makes clear:

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

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

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

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

COMPLAINTS AND PLAYER DISPUTE RESOLUTION

Under SR Code provision 6.1.1 licensees must:

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

POLICY AND PROCEDURE FOR INVESTIGATING A CUSTOMER COMPLAINT

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

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

The Company will ensure that:

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

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

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

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

How to make a complaint

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

What happens next?

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

If you are not satisfied with our response

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

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

CEDR's ADR Service contact details are as follows:

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

It is recommended that you visit CEDR's website so that you are fully aware of the procedural rules and other related information

Complaint Form - CUSTOMER

Name:

Address:

.....

Postcode

Daytime Telephone No.....

E-mail address:

Signature: Date:

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

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

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Date of Incident:

Time of Incident:

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

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Please use continuation sheet(s) if required.

Signed..... (Complainant)

Date:

For Office Use Only

Director dealing with complaint:

Complaint Acknowledged (Y/N): Date:

Details of action to resolve taken by Company:

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.....

If complaint still unresolved by Company

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

.....

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

PROTECTION OF CHILDREN AND VULNERABLE PEOPLE POLICY

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

Access To Gambling by Children and Young Persons

Licence Requirements

- Under s.46 Gambling Act 2005 it is an offence to permit a person under 18 to gamble.
- Under SR Code 3.2.5 licensees must:
 - Have and put into effect policies and procedures designed to prevent underage gambling.
 - Policies must include verifying the age of a customer.
 - Warn customers that underage gambling is an offence.
- Under SR Code provision 3.2.5 policies must also include:
 - checking the age of apparently underage customers
 - refusing entry to an adult only area to anyone unable to produce an acceptable form of identification.
 - taking action when there are unlawful attempts to enter the adult-only areas.

POLICY AND PROCEDURE TO PREVENT UNDERAGE GAMBLING

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

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

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

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

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

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

If a person under 18 repeatedly attempts to gamble at Company premises staff will offer that person information on problem gambling and issue an oral warning that further attempts will be reported to the police. If the said person continues to try to enter the premises for the purpose of gambling the

incident will be reported to the police, recorded in the incident log, and recorded in the Company's annual regulatory return.

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

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

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

Employment of children and young people

Employment of children and young people

- Under s.51 of the Gambling Act 2005 it is an offence to employ anyone under 18 to provide facilities for gambling
- Under s.54 of the Gambling Act 2005 it is an offence to employ anyone under 18 to work on gaming machines that are sited in gambling premises
- Under s.55 it is an offence to employ anyone under 18 in an AGC unless closed
- Under Ordinary Code Provision 3.6.2 Licensees should have policies and procedures in effect designed to ensure that
 - Children and young people are not asked to provide facilities for gambling.
 - All staff are instructed on the laws relating to access to gambling by children and young people.

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

SOCIAL RESPONSIBILITY POLICY AND PROCEDURES

Licence Requirements

- Under SR Code 3.1.1 licensees must:
 - Have and put into effect policies and procedures to promote socially responsible gambling;
 - Make an annual financial contribution to organisations to prevent and treat gambling related harms.
- Under SR Code 3.3.1 licensees must:
 - Make information readily available to customers on how to gamble responsibly and how to access information about problem gambling (e.g., monitoring or controlling gambling by duration or money spent, timers, self-exclusion options or further advice or information)
- Under SR Code 3.4.1 licensees must:
 - Interact with customers by (a) identifying customers who may be at risk or experiencing gambling harm (b) interacting with those customers and (c) understanding the impact of the interaction;
 - Take into account the Commission's guidance on customer interaction <https://www.gamblingcommission.gov.uk/licensees-and-businesses/guide/customer-interaction-formal-guidance-for-premises-based-operators?msckid=8e1bb2c1b4f411ec9bf242e2b502fe58>
- Under SR Code 3.5.1 licensees must:
 - Have and put into effect procedures for self-exclusion and take all reasonable steps to refuse service or to otherwise prevent an individual who has entered a self-exclusion agreement from participating in gambling.
 - Signpost individuals that self-exclude to counselling and support services.
- Under SR Code 3.5.6 licensees must:
 - Offer customers entering into a self-exclusion agreement at their Premises the ability to self-exclude from other similar local Premises operated by other licensees, by participating in a multi-operator self-exclusion schemes.

SR Triggers

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

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

SR Procedures

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

an annual basis.

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

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

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

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

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

Record Keeping

The Company will maintain records of all customer interactions through its paper/electronic logs, including details of when an interaction was considered and ruled out and if an interaction took

place later. Details will include: -

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

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

Training

Staff will receive training on the Company's Social Responsibility Policy and Procedures on induction and then at least annually on how to identify customers at risk, how to interact with customers, depending on the circumstances and to evaluate whether the interaction has been effective. Training will either be provided in-house by senior management.

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

Responsible Gambling Information

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

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

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

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

Self-exclusion

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

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

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

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

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

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

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

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

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

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

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

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

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

Assessment of Social Responsibility Policy and Procedure

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

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

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

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

Staff Gambling Policy

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

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

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

Local Area Risk Assessment

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

IMPLEMENTING, REVIEWING AND ASSESSING POLICIES AND PROCEDURES

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

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

Training includes information on the contents of these policies including:

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

Existing staff are required to review and re-familiarise themselves with the current policies and procedures at least once every six months. Staff will be constantly monitored to ensure they have understood the training. Further individual training is given if there has been a breach of any policy and/or when felt necessary to ensure staff are kept up to date with legislation and regulatory requirements.

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

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

To: Brent Licensing Authority

Re: Representation objecting to application for Bingo Club Premises Licence under the Gambling Act 2005

Applicant: Golden Slots (Southern) Limited

Premises: Macau Casino Slots, 131 – 135 Kilburn High Road, London. Brent, NW6 7HS

Link: [Brent | MyPortal | Licence Register | 38032](#)

We write to object to the application by Golden Slots (Southern) Limited for a new Bingo Club premises licence at 131-135 Kilburn High Road. This representation is made on the basis of 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 gambling venue could compound this. Brent's Joint Strategic Needs Assessment (JSNA) on Gambling (2023) highlights that Brent has one of the highest numbers of gambling premises across London and England and 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 in Brent 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 Kilburn High Road, an area identified as a hotspot for crime by both the applicant's Local Area Risk Assessment (LARA) and Brent's existing licensing evidence. The applicant's LARA cites Kilburn's low crime safety score of 38/100, pointing out that the most common crimes in Kilburn are violence and sexual offences. It also highlights that Kilburn's crime risk score and crime rates are higher than average compared with the rest of the borough as well as London and nationally. Figures from the Metropolitan Police Service in 2023 also show that Kilburn had one of the highest rates of burglaries, robberies and thefts in the borough.

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 the way crimes are recorded 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.

While the applicant's LARA acknowledges these risks, it doesn't acknowledge how gambling can contribute to 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

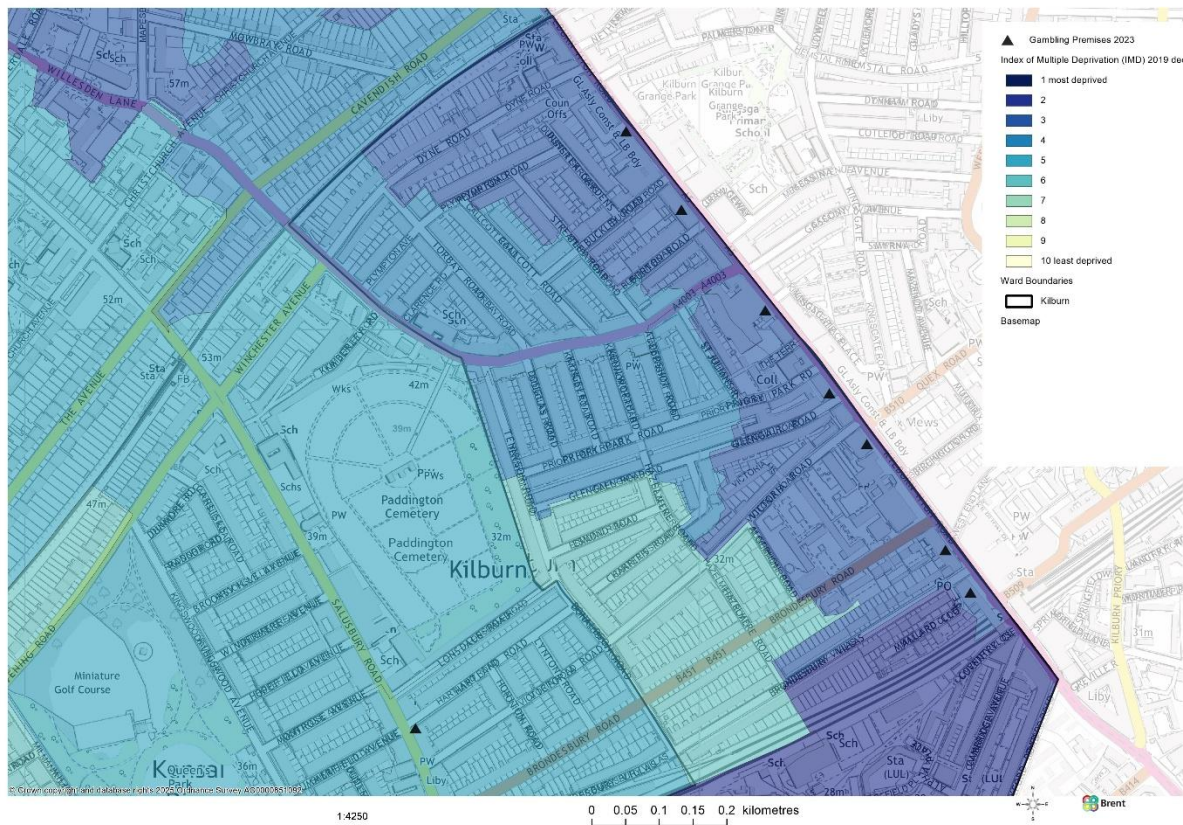
The licensing objective of ensuring that gambling is conducted in a fair and open way is concerned not only with the technical operation of gaming machines, but also with whether customers can reasonably understand the nature of the gambling on offer, the risks involved, and the terms on which they are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

The proposed premise at 131-135 Kilburn High Road is within the Kilburn ward which already hosts 7 gambling premises. In this area, it is easier to gamble than it is to visit a GP, go to the bank, or even shop at a major supermarket chain.

Six of the 7 gambling premises in Kilburn are within a 0.6 miles stretch of each other (or a 13 minutes walk apart according to Google Maps). The proposed Bingo Club would be adding a seventh gambling venue within this same stretch, making two venues around 100 feet away from each other. Concerningly, the applicant's LARA misses 3 of those venues in its assessment, although it does highlight the many other gambling venues nearby that sit outside of the ward's boundaries, including one that would be opposite the proposed venue.

As the map shows, gambling premises (indicated by the black triangle) in the Kilburn area are concentrated within the most deprived parts, indicated by the purple colour as opposed to blue or light green. The 6 premises in the ward within the 0.6 mile stretch from top right to bottom are as follows, with the 3 missed by the applicant bolded. Not listed is one further triangle in the stretch representing a premise that appears to have recently closed.

- **William Hill, NW6 7JR**
- **Paddy Power, NW6 7JN**
- **Ladbrokes, NW6 7HY**
- Betfred, NW6 6JL
- Game Nation, NW6 6JE
- Ladbrokes, NW6 6HY



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 LARA identifies that the local population is highly diverse. However, though the application notes the offer of multilingual resources, there is little information on how these resources are offered or that they have 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. We also know from census data that Kilburn has a younger-than-average area. Brent's JSNA highlights that young people and ethnic minority groups are some of the worst affected by gambling harms, even though they tend to participate less overall – a common paradox across those who experience gambling harms. The application does not indicate any targeted support for groups such as these.

Additionally, the applicant's policies 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.

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 a Bingo Club 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 gambling venue 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 Kilburn 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, and hostels, 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.

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 place to gamble 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 gambling premises 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

Arisa Kimaram
Senior Insight Analyst

Public Health
Brent Civic Centre
Wembley
HA9 0FJ

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From: Krupesh Hirani <Krupesh.Hirani@london.gov.uk>
Sent: 23 April 2026 11:34
To: Business Licence <business.licence@brent.gov.uk>
Subject: Formal Objection – Application for a New Bingo Premises Licence: 131-135 Kilburn High Road, NW6 7HS (Golden Slots Southern Limited / Macau Casino Slots)

Dear Sir / Madam,

As the London Assembly Member for Brent and Harrow, I am writing to formally submit my objection to the application for a new bingo premises licence at 131-135 Kilburn High Road.

The proposal seeks to operate a gambling facility—trading under the name ‘Macau Casino Slots’—on the ground floor of a residential building, with proposed opening hours from 08:00 to 23:00 on weekdays and 09:00 to 23:00 on weekends. Despite the ‘bingo’ classification, the trading name and floorplans clearly indicate a commercial slot-machine operation.

I believe granting this licence would be entirely inconsistent with Brent’s Statement of Licensing Principles and the statutory objectives of the **Gambling Act 2005**. My concerns are outlined below:

1. Preventing Crime and Disorder

The applicant’s own Local Area Risk Assessment acknowledges that Kilburn is a high-footfall area with an elevated baseline risk for crime. In 2026 alone, there have been **915 reported offences** of violence and sexual offences in the vicinity. Furthermore, theft from the person in this area is recorded at **8.11 times the national average**.

Introducing a premises that inherently involves high volumes of cash handling and late-night activity risks attracting further disorder. The proposed safeguard of just two staff members is, in my view, insufficient to mitigate the risks of money laundering, drug-related nuisance, and anti-social behaviour already prevalent on the High Road.

2. Protecting Children and Vulnerable Persons

This is my primary concern. Kilburn High Road is not a neutral environment; it is a sensitive community hub.

- **Proximity to Education:** The site is less than 0.1 miles from Kilburn Grange School, with several other primary schools and colleges within a short walking distance.
- **Support Services:** The premises would sit near vital services for vulnerable residents, including the Integrated Camden Drug Service, Kilburn Streets Kitchen, and St Mungo's.

Brent's **Joint Strategic Needs Assessment** shows that 6.2% of our residents are already gambling at the highest level of risk—more than double the national average of 2.9%. We cannot ignore the fact that the economic cost of gambling harm in Brent has soared from £2 million in 2012 to **£14.3 million in 2022**. Adding another venue simply normalises gambling for the children who pass it daily and places further temptation in the path of those struggling with addiction.

3. High Street Over-Concentration

Kilburn High Road already hosts **eight licensed gambling premises**. Our community is reaching a breaking point. National research from the Social Market Foundation and the *More in Common* report highlights that residents would often prefer an empty shop unit over another gambling venue, which many perceive as a "blight" on the local area.

There is a clear national shift towards giving local authorities stronger powers to resist such applications through Gambling Impact Assessments. It is difficult not to view this application as an attempt to "bolt the door" before these stronger local protections are fully enacted.

Conclusion

Brent has been at the forefront of the campaign for gambling reform because our residents should not have to constantly fight to protect their high streets from over-concentration. This application does not offer a benefit to Kilburn; instead, it threatens to deepen the deprivation and crime risks already identified by the applicant's own assessment.

I strongly urge the Licensing Authority to uphold the statutory objectives and **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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OBJECTION: PREMISES LICENCE APPLICATION

131–135 KILBURN HIGH ROAD (BINGO HALL)

As the five recently elected Green Party Councillors for Kilburn in Brent and Camden, we write to formally object to the application for a new bingo hall premises licence at 131–135 Kilburn High Road.

Our objection is based on the failure of this application to promote the licensing objectives, particularly the protection of children and vulnerable persons, within the context of Kilburn's specific socio-economic challenges.

1. PROTECTION OF CHILDREN AND VULNERABLE PERSONS

Extreme Local Deprivation and Child Poverty: Kilburn is currently at the center of a public health and poverty crisis that makes the introduction of a high-frequency gambling venue inherently hazardous.

National Deprivation Context: Brent is now the **fifth most deprived** local authority in the UK for income deprivation affecting children, with **58.7% of our children** living in income-deprived households. In Camden, 69.4% of children live in income-deprived families in the Kilburn area.

Child Income Deprivation: Brent has the fifth-highest IDACI score in the country, with 58.7% of children living in income-deprived households. In Camden (kilburn), **69.4% of children** live in income-deprived families.

Housing Crisis: Brent ranks number one in England for "*Barriers to Housing and Services*," reflecting extreme overcrowding and homelessness. Brent Council receives over 2,000 new housing applications a year and there are more than 33,000 people already on the waiting list. Each week, an average of 170 households approach the council as homeless or at risk of becoming homeless, and 20 new households enter temporary accommodation.

Proximity to Crisis Services and Food Bank Dependency

The "Proximity of Need" and Gambling Risk We wish to draw the Committee's attention to the high concentration of crisis and food aid services in the immediate vicinity of the proposed venue. 131–135 Kilburn High Road sits in a "*service corridor*" for residents in acute financial distress, located just minutes from:

- **Quex Road Food Bank** (Sacred Heart Church)
- **FoodCycle Kilburn** (St. Laurence's Church)
- **The UCKG HelpCentre** (234 Kilburn High Road)

Any LARA that fails to identify the high footfall of minors or the proximity of crisis services, such as local food banks, is fundamentally flawed.

Inadequate Local Area Risk Assessment (LARA)

We hold grave concerns regarding the adequacy of the applicant's risk assessment as it relies upon out of date 2021 census data and fails to cite Deprivation in Brent data which has confirmed that deprivation and its associated challenges are intensifying in the community.

Evidence of Harm

Recent 2026 data from the **Trussell Trust** and **FoodCycle** indicates that food bank dependency in London remains 45% higher than pre-pandemic levels, with 72% of users unable to cover essential living costs.

Research published in early 2026 (Downs et al., [Gambling-Harm in a Community Foodbank Setting: Exploring the Feasibility and Utility of a Brief Non-Clinical Screening Approach](#)) identifies a significant prevalence of gambling-related harm among food bank users, with those living within 2km of a gambling establishment being significantly more likely to bet more than they can afford.

By placing a gambling venue in a location where the most financially vulnerable residents congregate to access emergency food aid, the applicant is creating a *"high-risk intersection."* For a resident struggling to afford their next meal, the presence of high-stakes gaming machines acts not as a leisure opportunity, but as a predatory trigger that directly undermines the Licensing Objective of protecting vulnerable persons from being exploited by gambling.

2. PREVENTION OF CRIME AND DISORDER

The introduction of another gambling venue on the High Road poses a significant risk to local public order. Acquisitive Crime: There is a documented link between high-frequency gambling and crimes such as theft or shoplifting, as individuals may resort to illegal acts to fund an addiction.

Kilburn High Road is currently facing a crime crisis. A recent week-long Met Police operation in this immediate vicinity resulted in [45 arrests for weapons and drug offences, and the seizure of over 1,100 stolen phones and large machetes.](#)

A new gambling hub provides a magnet for anti-social behaviour and acquisitive crime, such as shoplifting. We believe the High Road should be a place for community businesses, not a hub for gambling-related disorder.

3. Sheffield Judgment

We urge the Licensing Committee to scrutinise the applicant's corporate history and the *"Sheffield Precedent"* (Royal Amusements v Sheffield City Council [2025]). That judgment established that: The *"Aim to Permit"* does not compel an authority to grant a licence where locality-specific risks are too high.

Licensing conditions are often incapable of addressing *"invisible harms"* like debt and family breakdown that occur beyond the premises door. Furthermore, we note that similar applications have been refused elsewhere (such as the [Spelthorne refusal](#) in October 2025) based on risks to children and crime. Brent should not be a *"path of least resistance"* for predatory business models.

CONCLUSION

Kilburn is home to some of the most income-deprived children in the United Kingdom. Placing another new gambling venue in the heart of this community is an unacceptable risk to public safety and child welfare. We urge the London Borough of Brent Licensing Committee to put the safety of our residents above corporate expansion and refuse this licence.

Signed,

Cllr Suzanne Gallagher (Kilburn Ward, London Borough of Brent)

Cllr Stephen Malonga (Kilburn Ward, London Borough of Brent)

Cllr Paul Ryan (Kilburn Ward, London Borough of Brent)

Cllr Andre Lopez-Turner (Kilburn Ward, London Borough of Camden)

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Cllr Anthony Molloy

cllr.anthony.molloy@brent.gov.uk

24-04-26

This application follows the rejection of an application for a licence for an Adult Gaming Centre on these premises at the heart of Kilburn. While they want to call it a bingo hall, it will in effect be the AGC that has already been rejected : slot machines with a few iPads around which no-one will use for an impersonal, remote game of bingo. The clue is in the name of the operator - Golden Slots Ltd/Macau Casino Slots aren't interested in unluccrative bingo. If there were grounds to reject the original licence for an AGC, there must be grounds to object to this AGC in sheep's clothing.

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24-04-26

As per Policy DK1 of the Kilburn Neighbourhood Plan, we do not want casinos, gambling establishments or other exploitative practices that ruin the character of our local High Street. Policy DK1 (c) The proposals are for leisure and entertainment uses falling within Use Class 'Sui Generis', with the exception that gambling-related uses including betting shops/bookmakers, adult gaming centres and casinos will not be supported."

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24-04-26

I VERY strongly oppose this application. This application was made previously - albeit in a different form - and rejected. This simply appears to be a re-hashed application to open yet another outlet in Kilburn High Road which is essentially used for gambling. Kilburn High Road is a deprived area, with poverty and hardship being plain to see. Gambling outlets are well known to attract people on low incomes desperate for the faint chance of making a fortune - which rarely if ever will happen. It just encourages people to waste and lose what little money they have, get into debt, and then be tempted to approach loan sharks which only increases financial difficulties as well as putting them and their families at risk of violence from debt collectors. It is appalling that Brent is even reconsidering this application. It will be very disappointing - shocking - if this 2nd application goes through. Brent should be looking after its disadvantaged residents, not putting them at risk of any kind.

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25-04-26

I object on the ground that this type of establishment is: - encourages public disorder and disturbance outside of similar establishment - therefore is a risk (and bad role modelling) for children - with lots of schools just around it: Kilburn grange school, kings gate, st Eugene de Mazenod, st Mary... - encouraging public nuisance - generally increases the risk to public safety. I strongly object.

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25-04-26

I object to another gambling venue due to the addictive nature of gambling, and how it can harm vulnerable adults and families under financial pressure. Kilburn High Road already has too many gambling venues, which makes for an unbalanced high street and normalises gambling.

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25-04-26

More gambling establishments means more under earning / unemployed citizens spending what they donot have on a chance of pennies. This breads more poverty, in an area that is already struggling. This is not a new thing - it is there for a reason, to keep those without money in the first place, poor.

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25-04-26

This proposed centre is close to schools, food banks and areas of high traffic for minors and therefore puts vulnerable people (under multiple categories; economic, age etc). The anti social behaviour that would inevitably flow from a premises like this is unacceptable.

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25-04-26

It goes against protecting children and other vulnerable people from harm or exploitation. The location is near schools and many minors are therefore in the vicinity. It is a potential source of crime or disorder, including anti-social behaviour and shoplifting. There are potential abuses of transparency in the part of the operator.

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25-04-26

Kilburn is an area that sees a wide mix of people, but what is very obvious is that level of poverty and deprivation is higher than in neighbouring areas. It is also obvious that a substantial number of people residing in Kilburn suffer from addiction: substance and/or gambling addiction. Allowing another gambling establishment would only fuel this corrosive lifestyle, fuel further addiction and deepen the levels of poverty. An establishment like this is counterproductive. It does not promote willingness to work of those who suffer from addiction, but instead it deepens their addiction, taking away their opportunities to heal and organise their lives. That space should be turned into a learning and development centre.

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25-04-26

Protecting children and vulnerable persons is a key concern of mine as it should be yours. This is a very tight knit community and the proximity to our local schools and children is unacceptable. There are high footfall of miors along this planned location. I am also very concerned about the potential impact on crime and anti social behaviour. Kilburn already suffers under this in my opinion and this will only make things worse. I'm also concerned there is a lack of transparency on the proposed operator's conduct should they open a bingo hall in Kilburn. This is now to the betterment of our community - Kilburn needs more help than a Bingo Hall - it's rather disgraceful this is even being discussed.

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25-04-26

Objection to Gambling Licence Application I am writing to formally object to the proposed gambling licence application in Kilburn. I am [REDACTED] and have lived in this area all my life. My mother has lived here since 1968, and our family has deep roots in NW6. I have seen many changes over the years, but I am deeply concerned that the area has deteriorated significantly in recent times. My objection is based on the following licensing objectives set out in the Gambling Act 2005: 1. Preventing gambling from being a source of crime or disorder There is already visible drug use in the area, along with anti social behaviour and a clear increase in street level disorder. The presence of a gambling premises risks attracting further crime and disorder, particularly in an area already struggling with these issues. High street gambling venues are often associated with loitering, disputes, and opportunistic crime. Adding another such premises is likely to worsen the situation rather than improve it. 2. Protecting children and other vulnerable persons from being harmed or exploited by gambling Kilburn currently has a high level of visible vulnerability, including extensive homelessness and individuals experiencing addiction and hardship. Introducing or expanding gambling facilities in this environment risks exploiting those who are already vulnerable. People facing financial instability or addiction are particularly at risk of harm from gambling. The proximity of such premises to vulnerable individuals raises serious concerns about safeguarding. 3. Ensuring that gambling is conducted in a fair and open way While I understand this objective is often less directly relevant to local residents, there are concerns about the transparency and social responsibility of operators in areas already under pressure. Residents need confidence that any operator will act responsibly and not contribute to further decline in community wellbeing. Additional Context The area is already facing serious environmental and social challenges. There is widespread littering, rubbish left on pavements, and a general decline in cleanliness and upkeep. These conditions contribute to a sense of neglect and make the area feel unsafe. Introducing another gambling venue risks reinforcing this negative cycle rather than helping to restore the community. Conclusion Given the existing levels of crime, disorder, vulnerability, and environmental decline in Kilburn, I strongly believe that granting this licence would be detrimental to the area and its residents. It would undermine efforts to improve community safety and wellbeing. For these reasons, I respectfully request that this application be refused.

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25-04-26

Protecting children and vulnerable people is a priority for me, and it should be for you as well. This is a close-knit community, and the proposed location's proximity to local schools and young people is deeply concerning. There is a high volume of minors passing through this area, which makes the siting inappropriate. I am also concerned about the potential for increased crime and antisocial behaviour. Kilburn already faces challenges in this regard, and this development risks exacerbating them. In addition, there appears to be a lack of transparency around the proposed operator's conduct should a bingo hall be established here.

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25-04-26

The proposed site is adjacent to a large Mc Donald's and near bus stops. These get notable levels of footfall from children leaving the schools in South Kilburn A similar gaming operation is almost directly opposite and several others are within half a mile. Anti social behaviour already centres around these locations, which appear to be gathering places for the financially precarious and may well be helping to create the epidemic of steal to sell shop lifting in the area. The proposed operator or similar has previously applied and been rejected for gaming licences at this and other nearby properties. Simply changing the stated usage does not change the fact that they only contribute to social deprivation of an area which already sees far too much street crime.

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26-04-26

I strongly object to yet another gambling venue in the Kilburn High Road. There are already 81 gambling premises. Children, vulnerable people, and those with very little money are being preyed upon. Please do not encourage it.

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26-04-26

I already objected to this site being turned into an adult gaming centre. It seems that the owner already has planning permission for Bingo and this is the license to operate. However Bingo can be a small adjunct to slot machines (to which I have already objected) and opening hours can be all night, to which I wholeheartedly object. I am opposed to the specific licensing objectives for the following reasons: 1. Prevention of crime/disorder - this kind of establishment with late night opening hours is inappropriate for a very residential area (Victoria Road). 2. public safety - Kilburn High Road already has a worryingly high rate of crime, I do not believe this licence use is appropriate in this context. As it has the potential to attract yet more criminal behaviour. 3. prevention of public nuisance - see above point 2 4. protection of children from harm - there is a nursery on the street adjacent to this location (Victoria Road). I do not believe having a licence that could be adjusted to open a late night adult gaming venue is appropriate next to a nursery. Overall, the application for this license contravenes the newly adopted Kilburn Neighbourhood plan.

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26-04-26

Object due to contradiction with Kilburn Neighbourhood plan and a children's nursery in very close proximity on Victoria Road.

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26-04-26

There are far too many betting establishments in this area, exploiting children and vulnerable people.

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27-04-26

A late-night gambling venue is likely to result in more anti-social behaviour and criminal activity. It may also put children and other vulnerable groups at risk, given its proximity to locations such as schools and foodbanks

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27-04-26

Kilburn high road is one of the most deprived areas of London, with high levels of poverty, food banks ever present, lots of schools in the area and one of the highest areas of anti-social behaviour. Local authorities must do everything to prevent more detractor facilities related to gambling which prey on the poorest in society and add net negative benefit to the areas they are present.

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27-04-26

My reason for objecting is that it would be adding another gambling venue to a high street which already has too many, creating a greater risk of harm for vulnerable adults and families under financial pressure. It also normalises gambling for children.

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From:

Sent: 29 April 2026 08:18

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

Subject: Re: New Bingo Club Premises - Macau Casino Slots, 131 - 135 Kilburn High Road, NW6 7HS - 38032

Hello,

I object to New Bingo Club Premises - Macau Casino Slots, 131 - 135 Kilburn High Road, NW6 7HS - 38032. I believe the development will encourage gambling, crime, anti-social behaviour, and further contribute to the sad decline of Kilburn.

I hope this is accepted based on the criteria you have described.

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29-04-2026

I object on the grounds of protection of the vulnerable and prevention of disorder, given the problems that already exist in this deprived area with lots of children: 1. Proximity to local schools, food banks, and high footfall of minors at this junction. 2. There's already a lot of concern in this area regarding anti-social behaviour associated with late-night high-street gambling hubs, including shoplifting, drug and alcohol consumption, erratic behaviour. 3. Is this bingo hall going to be conducted in a fair and open way? Is this operator transparent in this matter?

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01-05-2026

We don't need another gambling venue in our high street for two reasons: 1. We know that adult gambling centres are associated with increased crime and anti-social behaviour. There are already more than enough such venues on Kilburn High Road. We fear the impact of the proposed venue on crime and disorder, which should be prevented for everyone's benefit. 2. Our children and many others use Kilburn High Road and, specifically, the junction of Kilburn High Road and Victoria Road. As society and neighbourhood, we need to do more to protect children and vulnerable people, but allowing yet another gambling venue would have the exact opposite effect. Therefore, I strongly object to this proposal.

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06-05-2026

I live within a 5-minute walk of the establishment in question and it is with great dismay to learn that the applicant is submitting a proposal for a new gaming license on the Kilburn High Road. It should be noted, but it is sometimes forgotten, that both Brent and Camden Councils have been concerned with the apparent degradation of conditions on the High Road and have therefore targeted the area for serious regeneration efforts. However, regeneration has had only moderate success as the area appears to have a high rate of crime, a notable amount of litter, and an absence of business establishments that can attract shoppers and foster safe streets and nighttime attendance. Instead, one of the problems is the proliferation of gambling on the High Road. Directly across the street from the proposed licensee is a slot machine establishment which is open 24 hours per day. Due to open in the very near future right next to the Kilburn High Road Overground Station is the "Atlantic Casino." They have not yet announced their business hours. Fewer than 50 meters from the proposed licensee is a sports betting establishment and there are several sports other betting establishments in the vicinity further north on the High Road. One wonders whether instead of regeneration of the High Road for the benefit of local residents, local businesses and our cultural institutions, we will have made the Kilburn High Road into something of a mini Las Vegas with its crime, prostitution, and generation of gambling addicts. It is time we stop the proliferation of gambling and betting establishments in concentrated areas and focus on making our streets clean, safe and pleasant.

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06-05-2026

I reside in a house that is a 5 minute walk from the Kilburn High Road where I do most of my shopping at various times of day. I pass the site that the applicant is proposing a Bingo and gaming business at least 4 times per week. Both Brent and Camden Council have recently noted that the High Road is an area of concern and requires regeneration as businesses and inhabitants are suffering losses. I have noticed more homelessness, drunkenness and anti social behaviour on the street. There have been several stabbings and motor vehicle accidents as well. In addition, there is a rubbish problem and general drunkenness on the road. This is no longer considered a safe area, especially for older residents and children. Part of the problem is the growing number of gambling/gaming and sports betting establishments that are open 24/7 on either side of the Kilburn High Road. Does the Council count them on both sides of the road for the stretch from Belsize Road to Willesden Lane? In fact, a new Admiralty Casino just opened near the Kilburn High Road Overground Station that will be opened 24/7. I cannot understand, given the number of such establishments, how the Council would license another one. The Bingo Hall may follow the 80/20 rule regarding the type of machines they hold, but these machines bring in people who become addicted to gambling and create area crime. You must know the literature and the increase of people who are affected by this and in turn rob others to pay their debts. This Bingo Hall will only add to crime and decrease the mix of shops and institutions serving the local population that a neighbourhood of this size needs to thrive.

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14-05-26

My objections are made on the grounds that granting this licence would be inconsistent with the licensing objectives set out in the relevant gambling legislation and regulations:

1. **HARM TO VULNERABLE PERSONS** Bingo halls, while often presented as a form of social entertainment, carry a well-documented risk of fostering problem gambling behaviour, particularly among vulnerable members of the community including those experiencing financial hardship, loneliness, or mental health difficulties. Given the demographics of the area, I am not satisfied that the applicant's proposed social responsibility measures are sufficient to identify, protect, or appropriately exclude vulnerable persons from harm.

2. **RISK TO CHILDREN AND YOUNG PERSONS** The proposed premises are located in close proximity to services, amenities, eating establishments and shops used by young people. This raises serious concern about the ease with which under 18s may attempt to access the venue, or be exposed to normalised gambling behaviour in their immediate environment. I do not consider that the application demonstrates adequate measures to protect under 18s who may pass as older and seek to gain access to the bingo hall.

3. **CRIME AND DISORDER** I am concerned that the operation of a bingo hall at this location may contribute to increased levels of antisocial behaviour, disorder, and related criminal activity in the surrounding area. Gambling premises can attract late-night foot traffic and, in some cases, individuals engaged in associated criminal activity such as loan sharking, theft, or drug use in the vicinity.

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14-05-26

The last thing Kilburn High Road is yet another gambling facility, especially in a cost of living crisis and when our youngsters are already in dire need of third spaces. Allowing another bingo hall is predatory, anti-social, and utterly amoral. As a single woman living down the road, I don't want my street to be blighted by such an institution, and I am concerned for the families in the area.

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14-05-26

This application purports to be Bingo but is in effect adult gaming. It is inappropriate in its location due to proximity of social family housing (Kilburn Sq) and particularly the local nursery in Victoria rd, along with other schools nearby. There is also a proliferation of gambling outlets nearby including Mercur Slots opposite (on Camden side). The intensity of gaming here is too much. Plus with Macdonalds and Popeye nearby there is a high adolescent/ young adult traffic. We should not expose youngsters to this. Deprivation and crime is also at an all time high in this area (nb note recent Met operations in Kilburn High Rd) and a late opening gambling joint will simply exacerbate ASB and acquisitive crime. Please do not let Kilburn High Road deteriorate further and seek higher quality tenants and businesses here.

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14-05-26

Concerned about: Protection of children and other vulnerable persons from being harmed or exploited by gambling: this is in proximity to local schools, foodbanks and the high footfall of minors at this junction. Prevention of gambling from being a source of crime or disorder: concerned about anti-social behaviour often associated with late-night high-street gambling hubs including shoplifting.

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14-05-26

I would like to object on the following grounds: Protecting children and other vulnerable persons from being harmed or exploited by gambling: there is close proximity to local schools, foodbanks and there is a high footfall of minors at this junction. Preventing gambling from being a source of crime or disorder: significant concerns regarding anti-social behaviour associated with late-night high-street gambling hubs including shoplifting, substance abuse, fighting and violence and aggression

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14-05-26

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.

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14-05-26

To Whom It May Concern, RE: Objection to Proposed Bingo Premises Licence on Kilburn High road I am writing as a local resident to object to the application for a bingo premises licence for the above premises under the Gambling Act 2005. My objection is based on the licensing objectives set out in section 1 of the Gambling Act 2005, namely:

1. Preventing gambling from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime The proposed premises are located within a densely populated residential area of Kilburn which already experiences anti-social behaviour, noise nuisance, and late-night disturbances. I am concerned that the operation of a gambling venue, particularly during evening and late-night hours, could increase incidents of disorder, loitering, aggressive behaviour, and street nuisance in the surrounding area. There is also concern that vulnerable individuals may be targeted by criminal activity associated with cash-based gambling environments, including theft, intimidation, and illegal lending activity.
2. Ensuring that gambling is conducted in a fair and open way I am concerned that the application does not sufficiently demonstrate how the operator will ensure adequate supervision, transparency, and protection for customers using electronic gaming machines and participating in gambling activities. There appears to be insufficient detail regarding staffing levels, monitoring procedures, and safeguards to ensure gambling activities are conducted responsibly and transparently.
3. Protecting children and other vulnerable persons from being harmed or exploited by gambling This is my principal concern. The proposed premises are located close to residential housing, public transport routes, and facilities regularly used by young people and vulnerable adults. Gambling-related harm is a serious public health issue, and there is a real risk that the presence of a bingo club in this location could expose vulnerable individuals to addictive gambling behaviour and financial hardship. I am particularly concerned that:
 - The application does not adequately explain how vulnerable persons will be identified and protected;
 - There may be insufficient safeguards against underage access;
 - Increased gambling opportunities in the area may negatively affect residents suffering from addiction, mental health difficulties, or financial vulnerability.The local area already faces social and economic pressures, and approving an additional gambling premises risks exacerbating these issues rather than supporting community wellbeing. For these reasons, I respectfully request that the licensing authority refuse the application. Alternatively, if the application is approved, I request that strict conditions be imposed regarding opening hours, security staffing, CCTV coverage, supervision of gaming machines, and measures to protect vulnerable persons.

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14-05-26

I want to object on the following grounds 1. Protecting children and other vulnerable persons from being harmed or exploited by gambling: It is right next to McDonalds largely used by young people with nowhere else to go and for whom it will be a magnet. It's also a short walk from several schools and a junction where teenagers hang out. 2. Preventing gambling from being a source of crime or disorder: It will pits a high risk of anti-social behaviour associated with late-night high-street gambling hubs and will add to the risk of shoplifting which is prevalent in this area. 3. Ensuring that gambling is conducted in a fair and open way: I believe that the Bingo branding is just a cover for more addictive slot machines. And should be stopped on grounds of prevention of disorder. Submit an objection: contact licensing@brent.gov.uk quoting the application for 131-135 Kilburn High Road. the Council should use the 2025 Indices of Deprivation data, not the applicant's 2021 figures, to assess local risk.

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14-05-26

I am writing as a local resident to object to the above application for a bingo premises licence under the Gambling Act 2005. My objection is grounded solely in two licensing objectives at section 1 of the Act. 1. Protecting children and other vulnerable persons from being harmed or exploited by gambling This is my principal concern. 131-135 Kilburn High Road sits on a busy junction with high pedestrian footfall, including significant numbers of minors travelling to and from local schools. The immediate area also hosts foodbank provision serving residents in financial hardship — precisely the demographic for whom additional exposure to gambling presents the greatest risk of harm. The application does not, in my view, set out: How vulnerable individuals will be identified and protected in practice; What measures will prevent underage access at a site with such high minor footfall; How the operator will mitigate the well-evidenced link between gambling availability and harm in areas of higher deprivation. On the last point, I would specifically ask the licensing authority to assess local risk using the English Indices of Deprivation 2025, published by MHCLG on 30 October 2025 and now the official measure of relative deprivation in England, rather than any older figures relied on in the application. Brent's own open data portal already hosts the IoD 2025, and it would be inappropriate to determine this application on superseded data. 2. Preventing gambling from being a source of crime or disorder Kilburn High Road already experiences anti-social behaviour, shoplifting, and late-night disturbance. There is a recognised pattern of high-street gambling premises acting as focal points for loitering, intoxication-related disorder, and acquisitive crime — particularly during evening and late-night opening. Adding a further gambling venue to this stretch risks compounding pressures the area is already struggling with, rather than mitigating them.

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14-05-26

A premises with slot machines opposite MacDonalDs where young people congregate will put them at risk of serious harm

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14-05-26

To whom it may concern, I am writing to formally object to this proposal. I am a resident of Kilburn and frequently use the high road. Kilburn High Road already has a significant concentration of betting shops, gaming centres and gambling outlets. Adding yet another shop would not contribute positively to the diversity or long-term sustainability of the local high street. Instead, what Kilburn is increasingly lacking is variety, affordability, and community-focused retail. The recent loss of longstanding local shops, including accessible and low-cost options such as charity shops, has reduced the High Road's usefulness and appeal to residents. This proposal risks continuing a pattern where independent and community-oriented businesses are replaced with repetitive, low-diversity retail, making the High Road less attractive to a broader range of visitors and residents and eroding the character of the area over time. What is needed instead are affordable retail options such as charity shops and discount stores, as well as opportunities for a wider mix of independent businesses that reflect the diversity of the local community. These uses would help encourage daytime footfall and support a more balanced and vibrant high street. In its current form, this proposal does not meet those needs and does not represent a positive addition to Kilburn High Road. For these reasons, I strongly object to this application and urge the council to prioritise developments that enhance retail diversity, affordability, and the long-term vitality of the High Road.

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14-05-26

I object to this application. There are enough gaming shops on Kilburn High Road. This would be harmful to the young people of the area as many young people spend time at McDonalds and would be vulnerable to the bingo/gaming hall.

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14-05-26

I would like to object to this application given that I have young children who frequent the MCDonalds need the proposed site for this bingo hall and it is very clear the danger this will pose younger members of the community. We must avoid children and other vulnerable persons from being harmed or exploited by gambling. As Chair of the local resident's association I also am very focused on preventing gambling from being a source of crime or disorder there are always many concerns about an increase in anti-social behaviour associated with late-night high-street gambling hubs and possibly increase in shoplifting and begging in a site where these are already an issue. Thank you for taking this into consideration.

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14-05-26

Dear Licensing Team, I wish to formally object to the gambling licence application for the proposed bingo premises at 131–135 Kilburn High Road. My objection relates specifically to the Licensing Objectives of the Gambling Act 2005, particularly: protecting children and vulnerable persons from harm or exploitation by gambling preventing gambling from being a source of crime or disorder Kilburn High Road is an area with significant social and economic pressures, and the proposed site sits within a highly sensitive urban context characterised by a high concentration of vulnerable residents, young people, community services, and everyday public activity. The junction and surrounding area experience very high pedestrian footfall, including children and young people travelling to and from schools, local services, and public transport. The area is also close to community support infrastructures including foodbanks and other services supporting residents experiencing economic hardship. In this context, the concentration and visibility of gambling activity raises serious concerns regarding the normalisation and accessibility of gambling for vulnerable groups. I am also concerned about the cumulative impact that another gambling venue could have on anti-social behaviour and street-level disorder in an area already under pressure. High street gambling hubs operating into the evening can contribute to environments associated with loitering, conflict, theft, shoplifting, and other forms of low-level disorder that negatively affect residents, local businesses, and perceptions of safety. I would also urge the Council to ensure that any assessment of local risk and deprivation reflects the most up-to-date evidence available. In particular, I ask that the application be reviewed against the 2025 Indices of Deprivation data rather than relying solely on 2021 figures, given the substantial economic and social changes affecting communities over recent years. This objection is not based on moral opposition to gambling itself, but on concern for the wellbeing, safety, and resilience of a particularly vulnerable and already pressured local community.

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14-05-26

Objection related to the Licensing Objectives of the Gambling Act 2005. 1. Protecting children and other vulnerable persons from being harmed or exploited by gambling: NB high footfall of minors at this junction, young people in adjacent McDonald's, major bus stop for schools on KHR and Quex Road opposite 2. Preventing gambling from being a source of crime or disorder: EG concerns on increased anti-social behaviour associated with late-night high-street gambling hubs and possibly increase in shoplifting and begging in a site where these are already an issue. 3. Ensuring that gambling is conducted in a fair and open way.

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14-05-26

As a local resident, this premises would be located in an area already experiencing high levels of deprivation and vulnerability. Increasing access to gambling in such an area risks contributing to financial hardship, gambling-related harm, and wider negative impacts on community wellbeing.

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14-05-26

Sir/Madam I strongly object to the proposal for the Santander site at 131-135 Kilburn High Rd. My objection relates to the three Licensing Objectives of the Gambling Act 2005. 1. Protecting children and other vulnerable persons from being harmed or exploited by gambling: The proposed use is too near to local schools, foodbanks and the high footfall of minors at this junction. 2. Preventing gambling from being a source of crime or disorder: I am very concerned at the very high likelihood of anti-social behaviour often associated with late-night high-street gambling hubs including shoplifting. 3. Ensuring that gambling is conducted in a fair and open way: I am concerned that the Council has not secured enough transparent and guarantees that the site won't be mainly used in other ways than the 'bingo'. The Council has an obligation and duty to protect the vulnerable and seek prevention of disorder. The proposed use does neither and risks making things worse for the area. I ask that the Council uses the 2025 Indices of Deprivation data, not the applicant's 2021 figures, to assess local risk. Please send acknowledgement that this objection has been received and considered. Thank you

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14-05-26

Dear Licensing Committee, I write to formally object to the above application for a Bingo club premises licence at 131-135 Kilburn High Road, submitted by Golden Slots (Southern) Limited. My objection is made under the three Licensing Objectives of the Gambling Act 2005 as set out below.

1. PROTECTING CHILDREN AND VULNERABLE PERSONS FROM HARM OR EXPLOITATION The proposed location sits at a junction with high footfall of children and young people, in close proximity to local schools and food banks. Brent is currently the fifth most deprived local authority in the UK for income deprivation affecting children, with 58.7% of children living in income-deprived households. Siting a gambling venue at this location poses a direct risk of harm and normalisation of gambling behaviour for minors. Furthermore, I challenge the applicant's reliance on 2021 Census data to characterise the local population. This data is now five years out of date and materially misrepresents the current level of vulnerability in this area. Since 2019, deprivation in Brent has worsened significantly, with over half of the borough's small areas moving into more deprived deciles. Brent 021B is now the single most deprived Lower Super Output Area in all of London. I formally request that the Council applies the 2025 Indices of Deprivation data — not the applicant's 2021 figures — when assessing local risk under this objective.

2. PREVENTING GAMBLING FROM BEING A SOURCE OF CRIME OR DISORDER Late-night high-street gambling venues are well-documented as attractors of anti-social behaviour, including loitering, disorder, and an increase in petty crime such as shoplifting in surrounding retail premises. The Kilburn High Road already faces pressures as a busy urban corridor. Granting this licence risks compounding existing disorder issues, particularly during evening and late-night hours.

3. ENSURING GAMBLING IS CONDUCTED IN A FAIR AND OPEN WAY I raise concerns regarding the transparency of this application. A Bingo Hall licence permits a higher density of Category B3 gaming machines (with jackpots of up to £500) than would be permitted under a standard Adult Gaming Centre licence. I call on the Committee to scrutinise whether genuine bingo operations are intended, or whether this application represents a back-door route to establishing a high-density slot machine venue. The operator's transparency regarding its intended use of Category B machines should be examined in full. For the reasons above, I respectfully urge the Committee to refuse this application. At minimum, I ask that no decision is made until the 2025 Indices of Deprivation data has been formally considered as part of the local area risk assessment.

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14-05-26

It is the opposite of what this community and area needs for the below grounds. Do you want to help or hinder the future of the area, 1. Protecting children and other vulnerable persons from being harmed or exploited by gambling: NB high footfall of minors at this junction, young people in adjacent McDonald's, major bus stop for schools on KHR and Quex Road opposite 2. Preventing gambling from being a source of crime or disorder: EG concerns on increased anti-social behaviour associated with late-night high-street gambling hubs and possibly increase in shoplifting and begging in a site where these are already an issue. 3. Ensuring that gambling is conducted in a fair and open way. Note: "Moral objections to too much gambling" cannot be considered as relevant by the committee. So best to stick to the grounds of protection of the vulnerable and prevention of disorder.

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14-05-26

There is already a gambling centre on Kilburn High Road opposite the Santander premises. Young and vulnerable people hang out at the centre and at that corner where the McDonald's is. This offer on the High Street where there is already a large concentration of minors, will promote and support gambling and will attract vulnerable people to this addiction. This very busy junction has lots of people and this can become a centre or source for crime in an area where there is already a lot of crime and anti-social behaviour associated with late night high street gambling venues. There is a kindergarten opposite on Victoria Road. The street already has a number of drug addicts and people who hang around begging, there is petty crime and thefts. Really, does KHR need a place like this? Shouldn't the Council promote healthy businesses and places for the community instead of supporting gambling which enables addiction and crime? Please, let's make of Kilburn a safe area for our community and children. Thank you.

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14-05-26

Proximity to vulnerable populations, near children and residential areas, impoverished area increase with no need to push people further into debt. The building should be used for development of the area.

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14-05-26

To protect children and other vulnerable persons from being encouraged to gamble

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14-05-26

I'm writing to object to the application for a 'Bingo Hall' licence at 131–135 Kilburn High Road. Kilburn High Road is already dealing with serious issues around anti-social behaviour and public safety, especially at night. Many local residents, such as myself, already feel unsafe in the area, and I believe another gambling venue would only add to these existing problems by increasing late-night activity and attracting further disorder. I'm also concerned about the impact this could have on vulnerable people in the community. Brent is already facing high levels of deprivation and financial hardship, and there are already multiple gambling premises operating nearby. Opening another gambling venue in this location feels irresponsible and risks causing further harm to people who are already struggling financially. This part of Kilburn is also heavily used by families, children and young people throughout the day. Introducing another gambling venue in such a visible, everyday community space risks increasing children's exposure to gambling environments and normalising gambling behaviour in a way that is not appropriate for an area with high daily footfall of minors. This raises safeguarding concerns around the long-term impact of routine exposure to gambling on vulnerable groups. For these reasons, I strongly urge the Licensing Committee to refuse this application.

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14-05-26

Gambling venues, including bingo halls, are associated with well-documented risks of addiction, which can lead to financial hardship, mental health issues, and social isolation. These harms do not affect individuals alone; they extend to families and the wider community, increasing pressure on social services and contributing to social instability. There is clear evidence that gambling venues disproportionately affect more deprived areas. Vulnerable residents, already facing economic challenges, are more exposed to gambling-related harm, which deepens existing inequalities and creates cycles of debt and dependency. The presence of additional gambling venues nearby is likely to increase anti-social behaviour in an area already under pressure, including loitering, conflict, theft, shoplifting, and other forms of low-level disorder. This negatively impacts residents, local businesses, and perceptions of safety. The proposed location raises further concerns due to its proximity to schools. Increased visibility of gambling activities near young people risks normalising such behaviour and undermining efforts to promote healthy, responsible lifestyles. I also urge the Council to ensure that any assessment of local risk and deprivation reflects the most up-to-date evidence. In particular, the application should be reviewed against the 2025 Indices of Deprivation, rather than relying solely on 2021 data, given the significant economic and social changes in recent years. Bingo venues undermine community wellbeing rather than contributing to positive, long-term outcomes for local residents. Finally, the neighbourhood plan approved by residents excludes the establishment of such businesses in this area.

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14-05-26

I object strongly to this proposal for an exploitative business which has already been rejected once by the people of Kilburn and their elected representatives. It would still further worsen the quality of a declining High Street. The multiple problems which it would create have already been extensively discussed by the many others who have previously complained and object now again. I have no doubt in my involvement with the Brondesbury Residents and Tenants Association and the Kilburn Neighbourhood Planning Forum that both those organisations maintain their previous opposition to this greedy and unnecessary proposal. Logically and inevitably therefore it is necessary to point out that allowing this Casino would be absolutely inconsistent with the objectives of the latest, referendum approved, Kilburn Neighbourhood Plan which also has council blessing. It would be grossly inconsistent therefore with any project for saving and improving the quality of life along Kilburn High Road even to consider approving this unwanted , socially problematic and economically meritless moneymaking business

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From:

Subject: 131-135 kilburn high road objection

Date: 14 May 2026 at 18:35:28 BST

I object to the planning application for a gambling premises at 131 -135 Kilburn High Rd

We as local residents want to put a stop to gambling premises in our locality because of related crime and disorder incidents related to such premises

We also want to protect children and other vulnerable persons from being harmed or exploited by gambling . There are schools and food banks in the area and a high footfall of minors in the area

We question the operators transparency with this application and understand that gambling has to be conducted in a fair and open way.

We believe the high street should be a place for community and business , not a hub for gambling related disorder.

Placing gambling venues in areas of high deprivation and economic inactivity is predatory . It exploits those who can least afford to lose leading to increased pressure on our local food banks and crisis services .

Kilburn High road is currently facing a crime crisis

Gambling hubs provide a magnet for anti social behaviour and acquisitive crime such as shoplifting .

Brent is now the 5th most deprived local authority in the UK it is in crisis

Placing a gambling institution here is predatory

Census data information used is flawed and outdated and does not reflect the situation in 2026

A gambling premises here would increase hardship for everyone.

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

15 May 2026

Our Ref: 38032

Dear Debbie Bollard,

Licensing Representation to the Initial Application for the Premises Licence under the Gambling Act 2005 for a New Bingo Premises Licence - Macau Casino Slots, 131-135 Kilburn High Road, NW6 7HS

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

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

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

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

As a result of the premises licence application being received by Brent Council for a new Bingo Premises Licence, the licensing authority have examined the area of where the Bingo premises will be sited. Kilburn is a busy town centre consisting a mixture of different shops and surrounded by residential dwellings. The area attracts a high level of crime and disorder, including street drinking.

With the above taken into consideration, the Licensing Authority require the following points to be included in the operating schedule or added as conditions on the premises licence:

CCTV

1. A comprehensive CCTV system shall be installed and maintained on the premises as required by the Metropolitan Police Licensing Team. CCTV should cover the following:
 - a) All entry and exit points to and from the premises enabling frontal identification of every person entering under any light conditions

- b) The areas of the premises to which the public have access (excluding toilets)
 - c) Gaming machines and the counter area
2. The CCTV shall continue to record activities 24 hours a day for 31 days.
 3. CCTV shall be made available for the police viewing at any time with minimum delays when requested.
 4. The premises shall display notices near the entrance of the venue stating that CCTV is in operation.
 5. A monitor shall be placed inside the premises above the front door showing CCTV images of customers entering and exiting the premises.
 6. A member of staff trained in the use of the CCTV system shall be available at the premise at all times that the premises are open for trading.

Children and Young People

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

Entrances and Doors

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

Staffing levels

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

Identification of Offenders or Problem Persons

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

Alarms

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

Seating

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

Toilets

19. The licensee will ensure that customer toilets are checked every hour for evidence of drug taking. Toilet checks are to be documents stating the time and member of staff who made the checks.

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

Signage, Promotional Material and Notices

21. Signs to be displayed alerting customers to the following;

- a) No alcohol
- b) No smoking
- c) No persons under 18 Years
- d) Persons will be prosecuted for causing criminal damage
- e) Prominent GamCare documentation will be displayed at the premises

Staff Training

22. The licensee shall:

- a) provide training on the specific local risks to the licensing objectives that have been identified for these premises as part of the staff induction training programme.
- b) periodically provide refresher training to all of its staff working at these premises on the specific local risks to the licensing objectives.
- c) Participation in this training shall be formally recorded on each member of staffs training records which, if requested will be presented to the Licensing Authority as soon as practicable.

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

Homeless and Street Drinking

24. The Licensee shall take all reasonable steps to prevent street drinking of alcohol directly outside the premises and to ban from the premises those who do so.

25. The Licensee shall place a notice visible from the exterior of the premises stating that customers drinking alcohol outside the premises is not permitted and those who do so will be banned from the premises.

Recording of Incidents and Visits

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

- a) All crimes reported to the venue;
- b) Any complaints received regarding crime and disorder;
- c) Any incidents of disorder;
- d) Any faults in the CCTV system; and
- e) Any visit by a relevant authority or emergency service.
- f) Details of any person(s) banned from the premises.

Yours Sincerely,

A handwritten signature in cursive script that reads "R. Vagarwal". The signature is enclosed within a thin, hand-drawn oval border.

Rhea Vagarwal
Licensing Enforcement Officer
Regulatory Services

From: Vagarwal, Rhea
Sent: 15 May 2026 15:42
To: debbie@houghandbollard.co.uk
Cc: Esther, Chan; Business Licence; Legister, Linda
Subject: RE: CONSULT: Gambling - New Bingo Premises - Macau Casino Slots, 131-135 Kilburn High Road, NW6 7HS - 38032

Dear Debbie,

Thank you for your email.

I have reassessed the application in consideration of your comments.

For the purpose of clarification, I have attached an amended representation which omits the operational hours.

I now wish to withdraw the Licensing Authority's representation.

Kind regards

Rhea Vagarwal
Licensing Enforcement Officer
Regulatory Services

From: debbie@houghandbollard.co.uk
Sent: 12 May 2026 14:47
To: Vagarwal, Rhea
Subject: RE: CONSULT: Gambling - New Bingo Premises - Macau Casino Slots, 131-135 Kilburn High Road, NW6 7HS - 38032

Rhea

My client can agree to all the conditions except for the timings.

It is likely that in the short to medium term my client will only operate until 2300. However, if business shows that operating for longer hours is profitable then my client would want to open for longer hours and does not want to have to subsequently apply to vary a condition on opening hours.

There are other gambling premises in the locality that operate 24/7 such as Merkur so a precedent has already been set. Furthermore, account must be taken of the fact that my client is an experienced Operator with another premises within the London Borough

of Brent at Cricklewood which also operates 24/7 and there have been no issues with 24 hour opening there.

Kind regards

From: Vagarwal, Rhea
Sent: 08 May 2026 12:25
To: debbie@houghandbollard.co.uk
Cc: Esther, Chan; Legister, Linda; Business Licence
Subject: CONSULT: Gambling - New Bingo Premises - Macau Casino Slots, 131-135 Kilburn High Road, NW6 7HS - 38032

GAMBLING ACT 2005

Licence: New Bingo

Reference: 38032

Dear Sir/Madam,

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

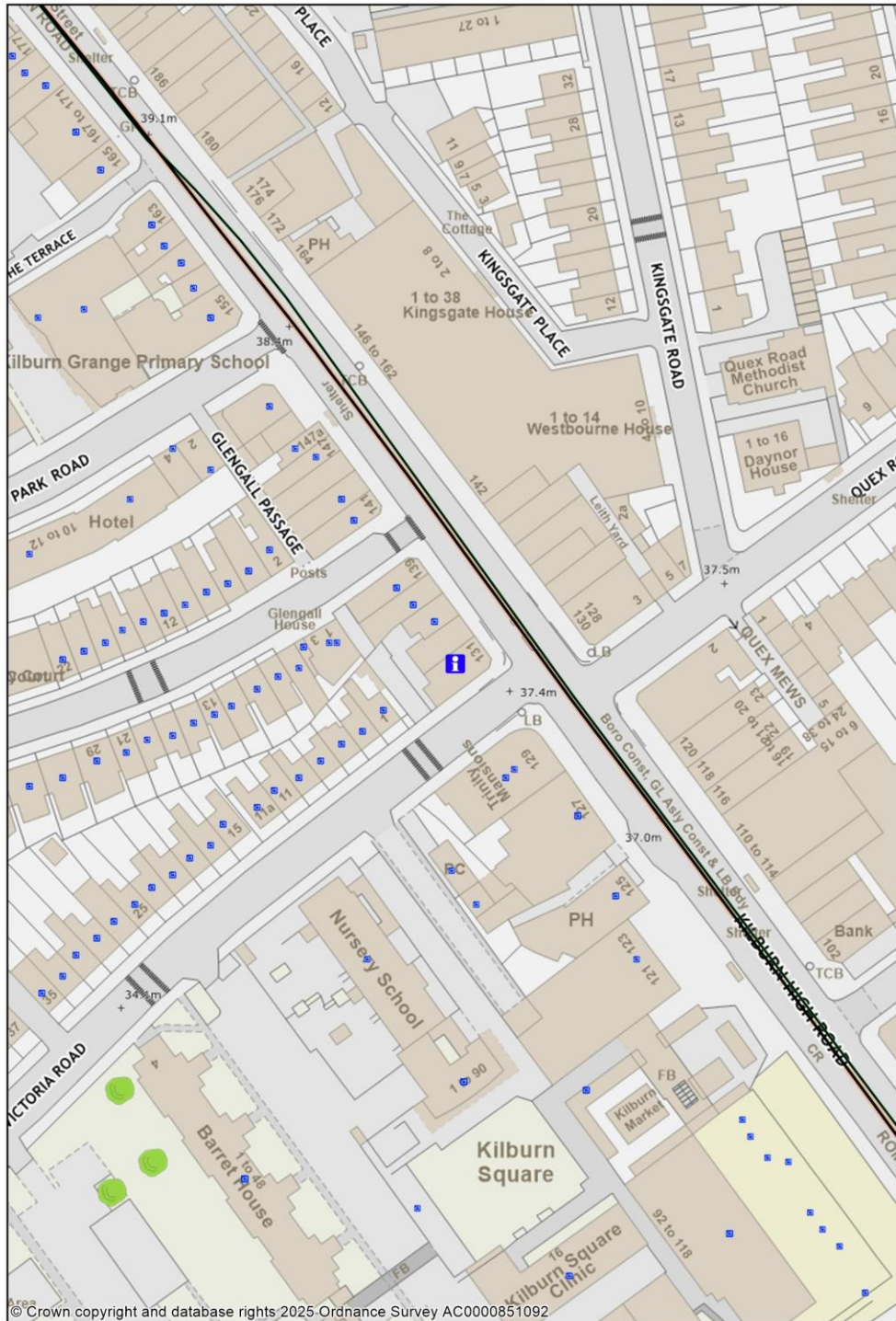
Premises: **Macau Casino Slots, 131-135 Kilburn High Road, NW6 7HS**

Please find attached representation from the Licensing Authority.

Kind regards

Rhea Vagarwal
Licensing Enforcement Officer

Basemap Map



1:1250

0 0.02 0.04 kilometres



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