

Premises

Premises Name:	Silvertime
Premises Address:	5-6, Park Parade, Harlesden
Premises Post Code:	NW10 4JH
Premises Licence Number:	
Category of Premises:	Bingo with No under 18 restriction

Company

Operating Company:	Silvertime Amusements Ltd
Operating Licence Number:	000-002913-N-103141-00

Assessment Writer

Name of Person Writing this Assessment:	Phil Wheeler
Position within Company or Name of Authorised Agent:	Operations Director
Date that Original Assessment was Written	30th September 2020

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

Effective as at 6 April 2016

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.

Local Area Profile

The property is located on Park Parade at the top of Harlesden High Street near the junction of Manor Park Road. The road has pedestrian pavements either side and features double yellow lines on both sides, opposite is the Royal Oak Public House.

The venue will display approximately 60 machines of categories B3, C and D, it is square in shape with a double unit frontage, the main entrance is situated on the right hand side at the front opening on to the pavement.

The local shops are mixed types typical with urban High Streets including; Bakers, Hardware Stores, Grocers and Green Grocers, Clothing and footwear shops, a Post Office and Banks, there are also numerous takeaway food outlets.

Willersden Junction Underground Station is the closest overground and tube train station and that is within 2000 meters. Buses serving the local area travelling on Park Parade include the 187, 206 and 226 and the nearest bus stop is 200 meters away from the shop front.

The venue falls under Harlesden policing neighbourhood that is provided by the Metropolitan Police Force Service.

We are aware of a number of primary and secondary schools in the town, there are also sport centres and gyms. The population is multi-cultural with a tendency for skilled and un-skilled manual labour.

The Statement of Principals published by Brent Council for 2019-2022 recognises towns in the borough with gambling venues as crime hotspots. Point 4.2.4 on page 21 emphasises the need for careful consideration on a great deal of issues regarding crime and how Silvertime control such situations.

Silvertime management are aware of this fact and act accordingly to counter-act any such situation and this is detailed below.

Gambling Act 2005 - The Licensing Objectives (LO)

The Gambling Act 2005 sets out the three licensing objectives (LO), which are:

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

Risk Assessment	LO	Control System	Risk Management	Review Date
Poor security leading to vulnerability to crime	(A)	Physical	High Definition CCTV – Internal & External access for viewing. Recordings retained for 30days. Timer locked safes Intruder alarm Static and Mobile Panic button to Police with external siren.	
		Design	Toughened and laminated glass used for all windows. Entrance doors with porch allow controlled and selective admission. Floor layout design to maximise customer visibility by staff	
		Systems	Cash change machine installed to minimise need for cash handling by staff. Machine door opening; keys only available to management Log maintained for history of Police attendance recorded on data tablet Minimum of two uniformed staff on floor duty Option on external company door security guard	
Awareness of increased local crime in the area.	(A)	Systems	Regular inspections of websites www.met.police.co.uk/ www.streetcheck.co.uk www.crimestats.com Staff discussions (internal) and with neighbouring businesses	

Risk Assessment	LO	Control System	Risk Management	Review Date
Failure to identify attempts to launder money on the premises (e.g. dye stained notes) and to follow correct reporting procedure.	(A)	Design	HD CCTV Internal & External monitored and recorded, data stored for 30 days accessed locally or remotely.	
		Physical	Monitoring customers behaviour by static and mobile staff	
		Systems	Fully compliant with LCCP requirements. Comply with Bacta's Policy & Procedures guidance.	
Failure to manage acts of aggression from customers	(A)	Design	HD CCTV Internal & External monitored and recorded, data stored for 30 days accessed locally or remotely. Warning Posters (Non tolerance of aggression) displayed	
		Physical	Monitoring customers behaviour by static and mobile staff Mobile and Static alarms with direct contact to Police	
		Sytems	Staff trained on company policy & procedure Contact our contracted security company or police	

Failure to deal with Customers making complaints about the outcome of Gambling.	(B)	Physical	All machines purchased from licensed manufactures/suppliers Machines maintained by qualified engineer Machines turned off should a fault occur	
		Systems	Complaints procedure & forms available on premises. Regular staff training on company policy. Registered with ADR Entity – Bacta ADR Service. Compliant with Bacta Policies & Procedures Complaint captured and recorded on data tablet	
Provision of information to players on responsible gambling.	(C)	Design	Self Exclusion programme operated. Data captured recorded onto Data Hub for distribution.	
		Physical	Stay in control leaflets displayed and discretely available Posters displayed Extra displays close to ATM and toilets Gambling Helpline contact displayed	
		Systems	Adhere to Bacta Procedure & Policy monitoring customers Stock control for leaflets	
Risk Assessment	LO	Control System	Risk Management	Review Date
Failure to recognise signs associated with problem gambling or substantial changes in gambling style.	(C)	Design	Players' positions and behaviour effectively monitored by mobile and static staff	

		Systems	Staffed trained in customer interaction in line with Bacta's guidance. Policy to record interaction and level of staff that are authorised to intervene.	
		Physical	CCTV positioned at entrance to enhance ease of recognition of excluded customers Regular staff employed to help build customer relationships.	
Risk Assessment	LO	Control System	Risk Management	Review Date
Failure to properly administer and maintain the self-exclusion process.	(C)	Systems	Data regularly reviewed SE forms always available Photographic equipment available for customers wishing to self-exclude Self-Excluded customer file kept on premises on data tablet	
Age Verification	(C)	Design	Strictly No Under 18's posters displayed	
	(C)	Physical	Following the virus outbreak customers must wear a protective mask. Customers must be asked to remove mask for AV purposes before being allowed in.	
	(C)	Systems	Independent company AV testing on staff	
Awareness of schools in the local area.	(C)	Systems	Reference local education authority	

				Local Schools located within 1 mile of the venue as follows; 1) Harlesden Primary School 2) John Keble Church of England 3) Convent of Jesus and Mary College 4) Newman Catholic College	
Risk Assessment	LO	Control System	Risk Management	Review Date	
Awareness of residential facilities for the vulnerable in the local area.	(C)	Systems	There are care homes or other residential facilities for the vulnerable in the vicinity. Within 1 mile there are; 1) Homefield Court Care Home 2) Fortune Gate 3) Tower House Residential Home 4) Franklyn Lodge http://www.carehome.co.uk		
Awareness of gambling care agencies in the local area.	(C)	Systems	No specific facilities for problem gambling in the vicinity. www.gamcare.org.uk www.gordonmoody.org.uk www.gamblersanonymous.co.uk		