

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

Premises Licence Number:

TBC

Company Details:

Chongie Entertainment Limited,

3-5 Wardour St, London

Operating Licence Number:

000-057549-N-333196-001

Date Assessment:

June 2021

Assessor:

[REDACTED]

Sources Utilised:

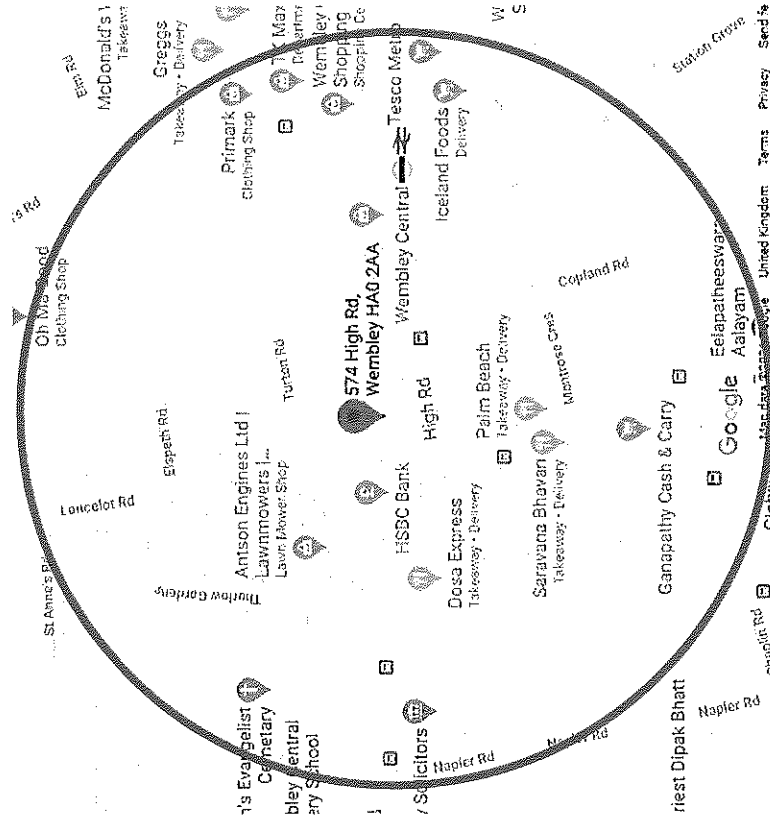
Brent Statement of Gambling Policy, Brent Local
Area Profile Maps, Police Crime Mapping, relevant
guidance from the Gambling Commission, Open
source

Area Profile:

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

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

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



Local Area			
Licensing Objective	Risks	Existing Control Measures	Level of Risk of Occurrence / Manageability
1.1 Protecting children and other vulnerable persons from being harmed or exploited by gambling	LOCALITY - Brent Teaching Primary Care Trust Chaplin Rd, Wembley HA0 4UZ - Regal International College 542 High Rd, Wembley HA0 2AA <u>OTHER:</u> <u>Student accommodation:</u> There is no student accommodation within a 200m radius of the premises <u>Family Services</u> There are no family services within a 200m radius of the premises <u>Job / Recruitment Agencies</u> - James Brooklyn Job Centre 553 High Rd, Wembley HA0 2DW - Recruitment Agency Wembley Ealing Rd, Wembley HA0 4TL <u>Council Housing Offices</u> There are no council housing offices within 200m <u>Community centres</u> There are no community centres within a 200m	The Premises: - Signage & window display not to attract under 18s, and advice under 18's access is prohibited. - Regular patrols of the premises, to identify any vulnerable and children - Posters, 'Stay in Control' leaflets and GamCare leaflets will be on display (near toilets as well as in the main trading area) - Staff will ensure a stock of leaflets (stay in control, self-exclusion & Gamcare) through weekly checks of stock - GamCare notices with contact number clearly displayed on machines - Self-exclusion system in place provided by BACTA - Photo equipment available for self-exclusions - CCTV coverage of all public areas, all entry and exit points to and from the premises enabling frontal identification of every person entering under any light conditions with ability for management to review remotely online. - Premises laid out to avoid blind spots - Entrance readily visible from throughout the premises to allow customer	High of Occurrence Initially / Low of not Managing

	radius of the premises <u>Youth Centres</u> - Sway Project St John the Evangelist, 3 Crawford Ave, Wembley HA0 2HX <u>Fast food</u> - Chickenland Pound City, 556 High Rd, Wembley HA0 2AA - Sams Chicken 538 High Rd, Wembley HA0 2AA - Bombay Vadapar 529 High Rd, Wembley HA0 2DH - Kebabish 40 Ealing Rd, Wembley HA0 4TL <u>Cafes</u> - Ealing Internet Cafe 14A Ealing Rd, Wembley HA0 4TL - Costa Coffee Unit 4 - Wembley Central Station, London HA9 7AJ - Creams Wembley Central Shopping Centre, 455 High Rd, Wembley HA9 7FA <u>Banks/Building Society</u> - HSBC 584 High Rd, Wembley HA0 2DB - Lloyds 564-568 High Rd, Wembley HA0 2AB - Natwest Middlesex, 520 High Rd, Wembley HA9 7BZ - Santander 514 High Rd, Wembley HA9 7BT - Bank of Baroda 2 Ealing Rd, Wembley	monitoring - Monitoring customers as they leave the premises - Machines to be properly labelled The Operation: - Staff will patrol and supervise the whole of the premises, with particular care in identifying vulnerable - Regular Test Purchasing "Know Your Customer" in place, developing customer interaction policies & procedures (importance of behaviour, time and spend limits) - Staff monitors customer activity and behaviour to interact early to recognise customer with potential gambling issues. This includes, for example, gambling trends such as pay day or benefits payments. - Staff to be aware of the importance of social responsibility, the causes and consequences of gambling - Adequate staffing levels to be maintained at all times - Return the stake/retain the prize - Staff will review self-excluded data to ensure continued exclusion - Sharing of information by staff regarding
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	HAO 4TL <u>Post Office</u> There are no post offices within a 200m radius <u>Leisure, Sports Centres, cinemas, bowling alleys</u> There are no cinemas or bowling alleys within a 200m radius <u>Care Homes:</u> - Beechwood Court Care home Napier Rd, Wembley HAO 4UA <u>Hospitals</u> There are no hospitals within a 200m radius <u>GP/Medical Centres</u> - Lancelot Medical Centre 19 Lancelot Rd, Wembley HAO 2AL - Central Dental Care 555 High Rd, Wembley HAO 2DW <u>Mental Health:</u> There are no mental health centres within a 200m radius <u>Addiction/Recovery Centres</u>	concerns about customers - Mystery shopper tests by BACTA Age Verification procedures: - Implementation of the BACTA Toolkit Policies & Procedures including Think / Challenge 25 - Anyone reluctant in providing identification or demonstrating suspicious behaviour will trigger further investigation. Incident to be logged and customer removed from the area. - Age verification incident report (log) maintained on licensed premises and reviewed on regular basis by team staff members & Compliance Manager Staff Training: - Training of staff with 6 monthly refreshers/ local area profile/licence conditions - Training and guidance is provided to staff members regarding customer interaction and the implementation of the ID verification procedure. - Staff to be trained in Safeguarding Policy	
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	There are no addiction or recovery centres within a 200m radius <u>Hostels/Shelters</u> There are no hostels/shelters within a 200m radius <u>Food banks</u> There are no food banks within a 200m radius <u>Loan Shops, Pawn Brokers</u> • Fast Credit Pawnbrokers 12 Ealing Rd, London HA0 4TL • H&T Pawnbrokers 544 High Rd, Wembley HA0 2AA • Italk Gold 499 High Rd, Wembley HA0 2DH <u>Parks/Playgrounds</u> There are no parks or playgrounds with a 200m radius <u>Religious buildings</u> • St Johns Church 3 Crawford Ave, Wembley HA0 2HX • Spiritualist Church 1 Elm Rd, Wembley HA9 7JA • Wembley Central Mosque 35-37 Ealing Rd, Wembley HA0 4AE • London Nadarajar Temple 3C Ranelagh Rd, Wembley HA0 4TW • Inner Space 528 High Rd, Wembley HA9	• Staff to be aware of refusing customers entry due to alcohol or drugs • Staff to be trained on Anti Money Laundering, Proceeds of Crime and Suspicious Behavior • Staff to be trained to look out for signs of aggressive behaviour or problem play	
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		<u>New Development or Shopping centres</u> There does not appear to be any new developments in the area. Wembley Central Shopping Centre Plaza Control Room, High Rd, London HA9 7AF		
1.2	Preventing Gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime	LOCALITY There are 4 betting shops within 200m: - Coral 576, Middlesex, 582 High Rd, Wembley HA0 2AA - Paddy Power 554 Wembley High Street, Middlesex HA0 2AA - Gr8odds 558 High Rd, Wembley HA0 2AA - Paddy Power 10 Ealing Rd, Wembley HA0 4TL There are 2 AGCs within 200 metres: - Silvertime Amusements 527 High Rd HA0 2DH - Bet George 509 High Rd HA0 2DH There are 0 casinos within 200 metres. There are several premises licensed under the Licensing Act 2003 within distance, including: - Masti 572-582 High Rd, Wembley HA0 2AA - Masala 529 High Rd, Wembley HA0 2DH - Savannah Lounge Lancelot Parade, 4 Lancelot Rd, Wembley HA0 2AJ	The Premises - CCTV coverage of all public areas, all entry and exit points to and from the premises enabling frontal identification of every person entering under any light conditions with ability for management to review remotely online. - Toughened/laminated glass to front window The Operation - Machine door opening keys only available to management - Log visits by Police, Local Authority and Gambling Commission officers - Review unusual patterns of play (as per PoCA), 'non-regular' players and consider exclusion/reporting - Exclude badly behaved customers and	Medium of Occurrence Initially / Low of not Managing

	- Flannerys Bar 610-612 High Rd, Wembley HA0 2AF - Palm Beach 17 Ealing Rd, Wembley HA0 4AA - Saravana 22, 22A Ealing Rd, Wembley HA0 4TL - Zam Zam Ealing Rd, Wembley HA0 4AA - VIP Lounge 546 High Rd, London HA0 2AA - Gana Restaurant 24 Ealing Rd, Wembley HA0 4TL - Fairprice London 559 High Rd, Wembley HA0 2DW - Costcutter 537A High Rd, Wembley HA0 2DJ - Tesco Unit 14, 15 Central Square, Wembley HA9 7AJ Several premises are not operating at the time of this risk assessment due to Covid-19. LOCAL AREA PROFILE Population 319,000 - Brent's population is a young one with 40% of residents being under the age of 30 and 25% under 19 years of age Deprivation 11,067 out of 32,844 LSOAs. - Amongst 40% most deprived areas in the country. - Brent ranked 49 out 317 local authorities in 2019 - Ranked 3rd in the Income Decile	look out for problem behaviour or aggression - Maintain contact with local traders and Police, including working with police to combat local issues - Limited staff floats - CCTV coverage over all cash transactions - Full machine audit on all machines on a weekly basis – ad hoc spot-check in case of any suspicion - Gaming machines are supplied and maintained by businesses licensed by the Gambling Commission - Company registered to receive crime bulletins from BACTA. Staff Training - Social Responsibility training and incident recording logs available to all staff. - Staff trained to look out for unusual/dyed notes - Staff & management to be alert to customers exchanging large volumes of paper notes for alternative denominations - Staff to be alert to customer redeeming stake with little or no play - Staff trained about AML basics, strange transaction behaviour	
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	(Index of Multiple Deprivation 2015) - Ranked 3rd in the Crime Decile (Index of Multiple Deprivation 2015) Unemployment - Ranked 5th in the Employment decile (Index of Multiple Deprivation 2015) Crime - Most commonly reported crimes during Feb 2021 - Violent and Sexual Offences 48 - Anti- Social Behaviour 41 - Other theft 20 - Shoplifting 16 TRANSPORT & CAR PARK FACILITIES The premises are on transport routes. High Road has a number of bus stops along it and the Wembley tube station is nearby.	- Extra Training and guidance is provided to staff members regarding Anti-Social Behaviour - Staff fully trained how to deal with homeless people seeking refuge - Staff to be trained on local area risk assessment Customer Interaction and Monitoring - Suspicious activity to be written down in the log - Customer interaction may provide knowledge of criminal background and/or association leading to closer security and monitoring of such a customer. - Customers are efficiently monitored throughout the time they are on the premises to ensure prevention of machine related crime (money laundering). - Knowledge activity to be handed over to Nominated Officer who will then report to NCA	
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1.3	Ensuring that gambling is conducted in a fair and open way	EQUIPMENT - Information must be clearly displayed - Maintenance to reduce potential issues - Compliance PREMISES - Promotions - Advertising CUSTOMERS - Treatment of customers - Complaints	Equipment - Machines only obtained from licensed suppliers - Machines to be properly labelled - Implementation of the BACTA Toolkit policies - Machines to be maintained/serviced regularly / turned off if a fault occurs - Procedure for making refunds - Details of machine operation and winning combinations to be clearly shown on machines Premises - Clear terms & conditions provided within the licensed premises. - Any promotions or advertising to be ASA and LCCP compliant Staff Training - Training of staff with 6 monthly refreshers - Staff to have full understanding of stakes and prizes, and odds associated with each machine. Customers - Review advertising material and promotions for compliance with LCCP - Complaints policy visibly displayed for	Low / Low
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			customer information. All complaints to be fully investigated in accordance with policy and referred to nominated ADR 3rd party as required	
			• Suitable public liability Insurance • Council conditions openly displayed • Regular Compliance Audits	

Gambling Operation and Physical Design (Internal and External)				
Licensing Objective	Risks	Existing Control Measures	Level of Risk of Occurrence / Manageability	
2.1 Protecting children and other vulnerable persons from being harmed or exploited by gambling	CUSTOMERS • U18s entering • Problem Gambling • Providing Information • Administering self-exclusion • Signage	Equipment and Operation • Machines to be properly labelled • Staffing levels will be risk assessed to ensure they reflect any risk to staff, customers and promotion of the licensing objectives • There would be no advertising locally. As part of the Licence Conditions and Codes of Practice issued by the Gambling Commission - Any Media displayed on the premises will comply with LCCP: Social responsibility code 5.1.6 (Compliance with advertising codes) The advertising of gambling products and services must be undertaken in a socially responsible manner and we must comply with the UK Advertising Codes issued by the Committees of Advertising Practice (CAP)	Low/Low considering design features	
	PREMISES • Consider 'blind spots' • Visibility of the entrance • Signage • Presentation of premises (signage/window display)			

			and administered by the Advertising Standards Authority (ASA). Advertising on the premises will not differ from that of any other Adult Gaming Centre premises in Wembley. Premises • CCTV coverage of all public areas, all entry and exit points to and from the premises enabling frontal identification of every person entering under any light conditions with ability for management to review remotely online. • Premises laid out to avoid blind spots • Ensure entrance readily visible from throughout the premises • Signage & window display not to attract under 18s, and advise under 18's access is prohibited. • The entrance layout to enable staff to monitor those entering the premises	
2.2	Preventing Gambling from being a source of crime or disorder, being	CUSTOMERS Customer behaviour PREMISES	Staff Training Full Staff training on Money Laundering and the Proceeds of Crime Act as well as customer behaviour, particularly suspicious or aggressive customers	

	associated with crime or disorder or being used to support crime	Layout to be considered: • Consider 'blind spots' • Visibility of the entrance • Design out crime STAFF • Personal protection • Security • Staff behaviour Money Laundering - Customer behaviour - Staff monitoring	Premises and Operation • CCTV coverage of all public areas, all entry and exit points to and from the premises enabling frontal identification of every person entering under any light conditions with ability for management to review remotely online. • Regular patrols of the premises, including external areas to identify any vulnerable and children • Monitoring of customers as they leave the premises • Design out crime to be implemented • Toughened/laminated glass to front window • Mag Lock on front door • Intruder alarm installed and regularly serviced • Panic Button linked to Police	Low/Low considering design features
2.3	Ensuring that gambling is conducted in a fair and open way	PREMISES • Promotions • Advertising EQUIPMENT • Information clearly displayed • Maintenance • Compliance	Premises • CCTV coverage of all public areas, office, frontage and rear door with recording device and ability for management to review remotely online • Clear terms & conditions provided within the licensed premises.	

		Equipment • Machines only obtained from licensed suppliers • Machines to be properly labelled • Implementation of the BACTA Toolkit policies • Machines to be maintained/serviced regularly • Machines to be turned off should a fault occur • Procedure for making refunds • Details of machine operation and winning combinations to be clearly shown on machines Customers • Complaints policy visibly displayed for customer information. All complaints to be fully investigated in accordance with policy and referred to nominated ADR 3rd party as required • Suitable public liability Insurance • Council conditions openly displayed • Regular Compliance Audits	Low / Low
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