

LOCAL GAMBLING RISK ASSESSMENT

Premises: 574 High Road Wembley HA0 2AA

Operator: 312 Investments Ltd

Operating Licence: 067529-N-341548-001

Prepared by: 7th April 2026

Date: M Davitt

Introduction

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

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

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

The assessment will be reviewed:

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

Licensing Objectives

The Gambling Act 2005 sets out three licensing objectives:

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

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

Requirement to Comply

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

Social responsibility code provision 10.1.1

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

Ordinary code provision 10.1.2

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

Premises

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

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

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

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

Suitability of the Premises

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

The proposed operation as an Adult Gaming Centre:

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

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

Local Authority Policy Context

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

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

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

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

Demographics

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

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

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

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

Vulnerability Considerations

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

The operator has taken this into account by implementing:

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

Cultural Considerations

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

To ensure accessibility and protection:

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

Wembley Central

Population

2024

18,558

people

58,620,101 people in England

Source: ONS - Mid-year estimates

Small area: Output area

Number of households

2021

4,930

households

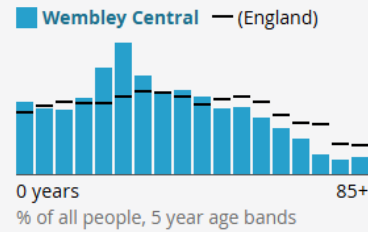
23,436,085 households in England

Source: ONS - Census 2021

Small area: Output area

Age profile

2024

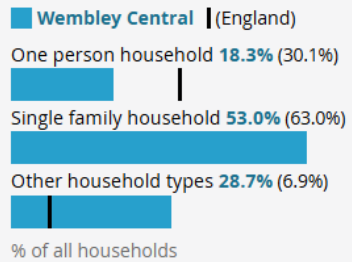


Source: ONS - Mid-year estimates

Small area: Output area

Household composition

2021

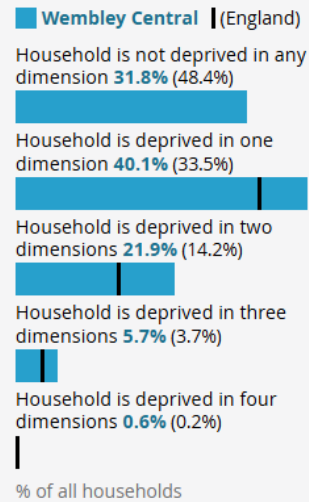


Source: ONS - Census 2021

Small area: Output area

Household deprivation

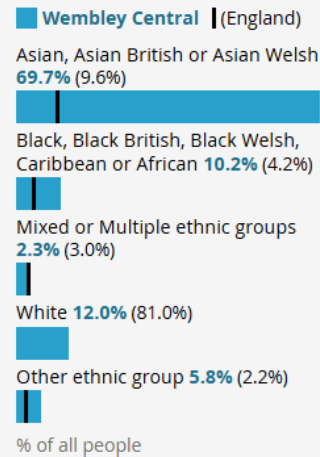
2021



Source: ONS - Census 2021

Ethnic group

2021



Source: ONS - Census 2021

Small area: Output area

General health

2021

Wembley Central (England)

Very good health **53.7%** (48.5%)

Good health **32.9%** (33.7%)

Fair health **9.6%** (12.7%)

Bad health **2.7%** (4.0%)

Very bad health **1.0%** (1.2%)

% of all people

Source: ONS - Census 2021

Small area: Output area

Disability

2021

Wembley Central (England)

Disabled under the Equality Act **9.9%** (17.3%)

Not disabled under the Equality Act **90.1%** (82.7%)

% of all people

Source: ONS - Census 2021

Small area: Output area

Proficiency in English

2021

Wembley Central (England)

Main language is English (English or Welsh in Wales) **51.6%** (90.8%)

Can speak English very well **16.2%** (4.0%)

Can speak English well **18.0%** (3.3%)

Cannot speak English well **10.8%** (1.6%)

Cannot speak English **3.5%** (0.3%)

% of people aged three years and over

Source: ONS - Census 2021

Small area: Output area

Accommodation type

2021

Wembley Central (England)

Whole house or bungalow **51.9%** (77.4%)

Flat, maisonette or apartment **48.0%** (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

Tenure of household

2021

Wembley Central (England)

Owns outright **22.2%** (32.5%)

Owns with a mortgage or loan or shared ownership **19.8%** (29.8%)

Social rented **16.8%** (17.1%)

Private rented or lives rent free **41.2%** (20.6%)

% of all households

Source: ONS - Census 2021

Small area: Output area

Economic activity status

2021

Wembley Central (England)

Economically active: In employment **58.7%** (57.4%)

Economically active: Unemployed **4.9%** (3.5%)

Economically inactive **36.5%** (39.1%)

% of people aged 16 years and over

Source: ONS - Census 2021

Small area: Output area

Employment history

2021

Wembley Central (England)

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



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



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



% of people aged 16 years and over not in employment

Source: ONS - Census 2021

Small area: Output area

Socio-economic Classification (NS-SeC)

2021

Wembley Central (England)

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



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



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



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



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



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



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



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



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



% of people aged 16 years and over

Source: ONS - Census 2021

Small area: Output area

Highest level of qualification

2021

Wembley Central (England)

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



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



Apprenticeship **3.3%** (5.3%)



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



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



% of people aged 16 years and over

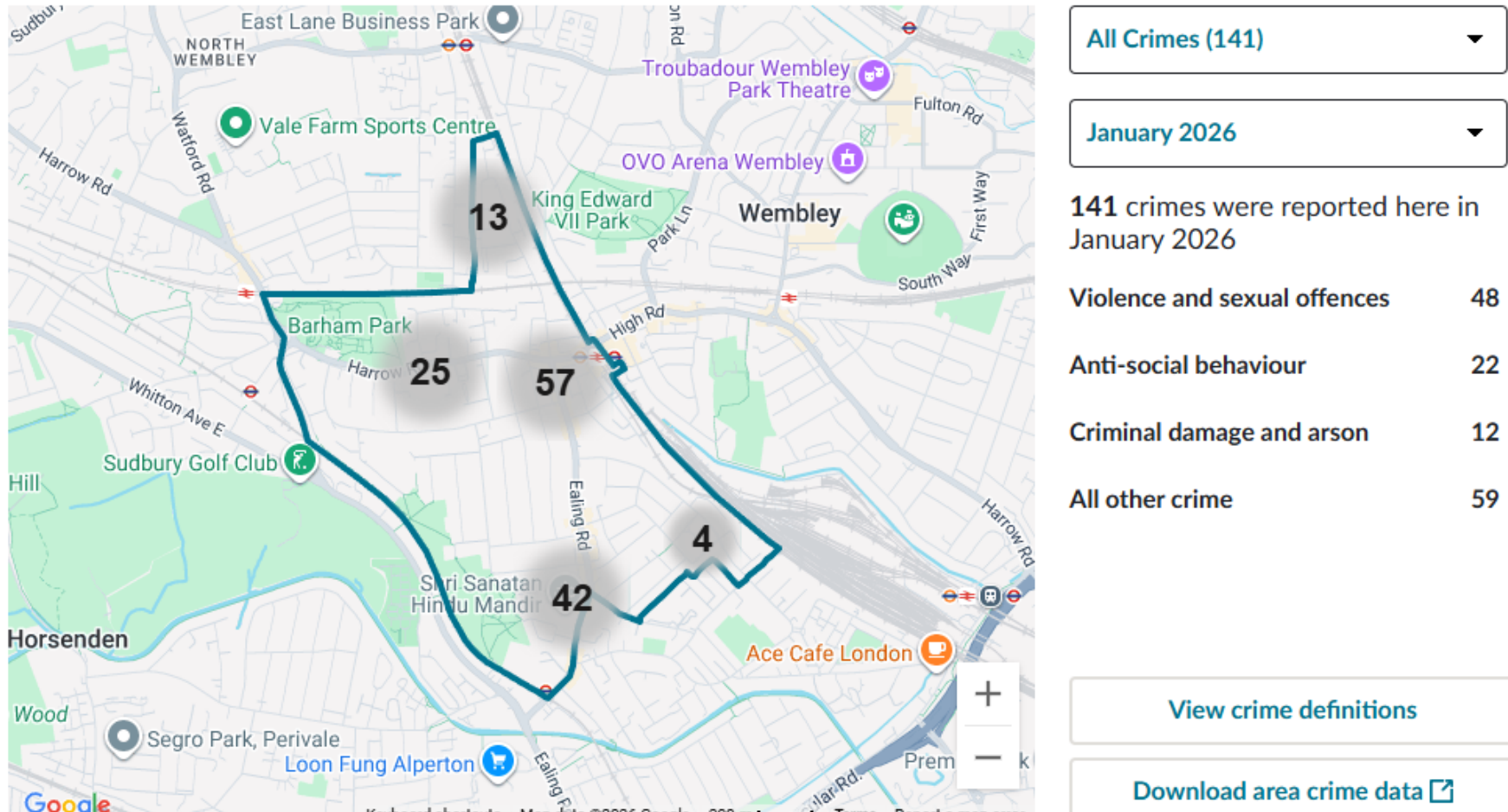
Source: ONS - Census 2021

Small area: Output area

Crime

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

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



Crime Assessment Summary

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

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

Brent has a Boroughwide restrictions including

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

Risk Interpretation

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

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

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

RISKS	RISK LOCATION	EXISTING CONTROL MEASURES	FURTHER CONTROLS ADOPTED								
Children entering the site unnoticed or unchallenged particularly after school	<p>Primary Schools:</p> <table border="0"> <tr> <td>Park Lane Primary School</td> <td>0.6 miles</td> </tr> <tr> <td>Elsley Primary School</td> <td>0.9 miles</td> </tr> <tr> <td>Sudbury Primary School</td> <td>1.0 miles</td> </tr> <tr> <td>Lyon Park Primary School)</td> <td>1.0 miles</td> </tr> </table>	Park Lane Primary School	0.6 miles	Elsley Primary School	0.9 miles	Sudbury Primary School	1.0 miles	Lyon Park Primary School)	1.0 miles	The latest gambling participation survey (2024) reports the most common types of gambling activity that young people participated in were legal such as penny pushers or claw grab machines (20%), 4% played on fruit or slot machines and did not feature age restricted products.	All staff shall receive documented training in gambling harm awareness, vulnerability identification, customer interaction and intervention, prior to being permitted to work unsupervised.
Park Lane Primary School	0.6 miles										
Elsley Primary School	0.9 miles										
Sudbury Primary School	1.0 miles										
Lyon Park Primary School)	1.0 miles										

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

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

Paddy Power	0.3 miles		
Silvertime Casino Slots	0.3 miles		
Ladbrokes	0.6 miles		
Ladbrokes	1.0 miles		
William Hill	1.0 miles		
Coral	1.2 miles		
Betfred	1.2 miles		
William Hill	1.2 miles		
William Hill	1.8 miles		
Bus stops and other transport links			
<u>Bus Stops:</u>			
Park Lane (Stop CL)	0.2 miles		
Ark Elvin Academy/Park Lane	0.3 miles		
Ark Elvin Academy/Park Lane	0.3 miles		
Cecil Avenue (Stop SP)	0.4 miles		
Cecil Avenue (Stop SE)	0.4 miles		
Wembley Triangle (Stop SM)	0.5 miles		
Wembley Triangle (Stop SC)	0.5 miles		
Wembley Stadium (Stop SA)	0.7 miles		
Waverley Avenue	0.7 miles		
Waverley Avenue	0.7 miles		
<u>Train Stations:</u>			
Wembley Central	0.2 miles		
Wembley Stadium	0.6 miles		
Sudbury Town	0.8 miles		
Sudbury & Harrow Road	0.8 miles		
North Wembley	0.9 miles		
Alpertion	0.9 miles		
			Staff maintain awareness of periods where customers may be more vulnerable to financial harm and apply appropriate interaction where indicators of risk are observed.

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

	<p>Ipanema Restaurant & Bar 0.6 miles Bombay Chow 0.6 miles Panthers 0.7 miles Sixty Six Bar & Grill 0.7 miles TGI Fridays – Wembley 0.9 miles The Swan 0.9 miles The White House, Wembley 1.0 miles The Parish Bar 1.1 miles Feed the Yak Wembley Park! 1.1 miles</p> <p>Pawnbrokers and Pay day loan shops:</p> <p>Alsayed H&T Pawnbrokers 0.1 miles Cash 22 0.1 miles iTalk Gold 0.1 miles Muthoot Pawnbrokers 0.1 miles Thrower & Co 0.1 miles Albemarle & Bond 0.2 miles Fast Credit Pawnbrokers 0.3 miles Lupra Pawnbrokers 0.3 miles</p> <p>Banks/ATM</p> <p>Lloyds Bank 0.1 miles Ria Money Exchange 0.1 miles Santander 0.1 miles Barclays Bank 0.1 miles Tesco Bank (GREATER) 0.2 miles Halifax 0.2 miles Sainsbury's (ATM) 1.2 miles Tesco Bank ATM 2.0 miles</p>		<p>licence conditions and operational controls.</p> <p>Operational controls shall be reviewed regularly. Records shall be retained and made available to the Council upon request.</p> <p>Increased staffing levels during peak periods and event days to ensure effective supervision.</p> <p>Active monitoring of the entrance area to prevent loitering or congregation.</p> <p>Regular liaison with the Metropolitan Police and participation in local crime reduction initiatives where appropriate.</p> <p>Dynamic risk assessment during major events to adapt staffing and operational controls.</p> <p>Enhanced staff training in recognising indicators of criminal behaviour, including suspicious financial activity. Strict refusal of entry or service to individuals displaying anti-social or suspicious behaviour.</p> <p>Clear signage stating that CCTV is in operation and that anti-social behaviour will not be tolerated.</p>
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	<p>Gambling premises</p> <p>Paddy Power >0.1 miles</p> <p>Coral 0.1 miles</p> <p>GR8ODDS Betting 0.1 miles</p> <p>Silvertime Casino Slots 0.1 miles</p> <p>Silvertime Casino Lounge 0.1 miles</p> <p>MERKUR Slots - 0.2 miles</p> <p>Jennings Bet 0.2 miles</p> <p>Betfred 0.2 miles</p> <p>Paddy Power 0.3 miles</p> <p>Silvertime Casino Slots 0.3 miles</p> <p>Ladbrokes 0.6 miles</p> <p>Ladbrokes 1.0 miles</p> <p>William Hill 1.0 miles</p> <p>Coral 1.2 miles</p> <p>Betfred 1.2 miles</p> <p>William Hill 1.2 miles</p> <p>William Hill 1.8 miles</p>		<p>Regular internal audits of incident logs and CCTV coverage to ensure ongoing effectiveness of controls.</p> <p>Shift handover procedures to ensure continuity of awareness regarding any ongoing concerns.</p>
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<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>The Operator has a robust customer interaction policy & procedure</p> <p>Staff receive training on induction and at least annually on how to identify customers who are or may be at risk of harm from gambling and how to interact with them.</p> <p>Customers are offered a number of self-help tools including timers, time outs and self-exclusion.</p> <p>Customer interactions are reviewed and assessed weekly for effectiveness. Where appropriate further and alternative interactions are used if no change in behaviour is seen. Operator led exclusions are used as a last resort where a customer displaying problems refuses to engage in customer interactions and continues to display signs of extreme problem gambling</p> <p>The site is designed to have effective monitoring of all customers at all times</p> <p>The results of all customer interactions are recorded on SmartEXCLUSION tablet and reported to the Gambling Commission</p> <p>Marketing and advertising complies with the LCCPs, the CAP and BCAP standards</p>	<p>Advanced staff training focused on recognising subtle behavioural indicators, including changes in play patterns, emotional distress, or repeated high-intensity play.</p> <p>Structured customer interaction logs, reviewed regularly by management to identify patterns and repeat behaviours.</p> <p>Proactive engagement with customers displaying extended or intensive play, including encouragement of breaks and awareness of time spent.</p> <p>A multi-stage intervention process, including escalation from informal engagement to formal intervention and, where necessary, refusal of service. Active promotion and enforcement of self-exclusion schemes, ensuring vulnerable customers are supported and prevented from re-entry.</p> <p>Use of CCTV to support staff in monitoring behaviour across the premises.</p> <p>Formal handover procedures between staff shifts to ensure continuity in monitoring vulnerable individuals.</p>
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			<p>Clear and accessible signposting to support services, including BeGambleAware.</p> <p>Consideration of local demographic factors, including language barriers and cultural differences, with staff adapting interactions accordingly.</p>
<p>Failure to provide information on responsible gambling to players</p>		<p>The Operator has stay in control posters displayed prominently</p> <p>The Cat B gaming machines display safer gambling messages and are programmed with reality checks</p> <p>Stay in control leaflets are made available in racks & discreet locations</p> <p>Regular audit of poster & leaflets to maintain stock levels</p> <p>All machines have Gamcare information and contact details embedded in their screens</p>	<p>Management oversight on a daily and weekly basis to ensure ample information is available to customers who wish to obtain further advice or guidance for problem gambling.</p>
<p>Failure to properly administer the self-exclusion process & maintain its effectiveness, including breaches & reinstatement</p>		<p>Site layout permits effective monitoring of customers entering premises</p> <p>CCTV at entrance to aid identification of known excluders</p> <p>Use of on-site & SmartEXCLUSION self-exclusion schemes</p> <p>Staff review the self-exclusion data before starting each shift</p>	<p>CCTV systems are in place at entry points to support staff in identifying individuals, including those who may be self-excluded. Staff are trained to monitor and manage entry effectively.</p>

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

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

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

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

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

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

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

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

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

Enhanced Safeguarding Measures

The operator has implemented the following key controls:

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

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

Risk Rating Key

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

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

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

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

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

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

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

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

Potential exposure to children

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

Potential exposure to vulnerable persons

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

Gambling Cluster

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

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

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

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

Operator Summary

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

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

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

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

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

Conclusion

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

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

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