

**Premises**

Premises Name:	Leisureland Casino Slots
Premises Address:	17a Parkway, Couby Newham, Middlesbrough
Premises Post Code:	TS8 0TJ
Premises Licence/Permit Number:	Details pending
Category of Premises:	Adult Gaming Centre
	<input type="checkbox"/>

**Company Applicant**

Operating Company: (the "Company")	Cleveland Leisure Centres Limited
Operating Licence Reference Number:	000-002512-N-102126-008
Registered Office Address:	36-38 Kings Road, North Ormsby, Middlesbrough, TS3 6NF

**Assessment Completion**

Original Assessment completed by (Signature):		
Original Assessment completed by (Print):	S Catterall	
Position within the Company:	Solicitor	
Date of completion of Original Assessment:		

**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

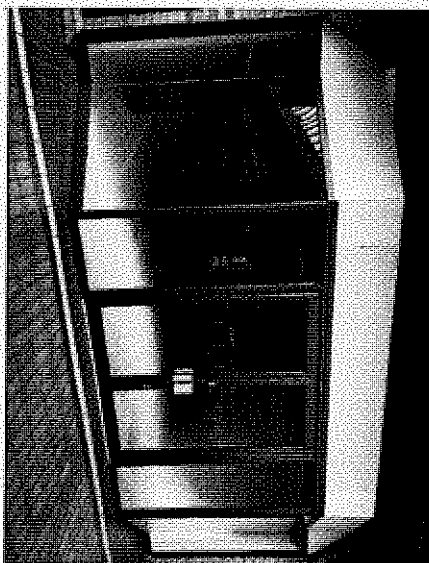
1. Licensees must assess the local risks to the licensing objectives posed by the provision of gambling facilities at **each of their premises**, and have policies, procedures and control measures to mitigate those risks. In making risk assessments, licensees must take into account relevant matters identified 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**
- a. 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**

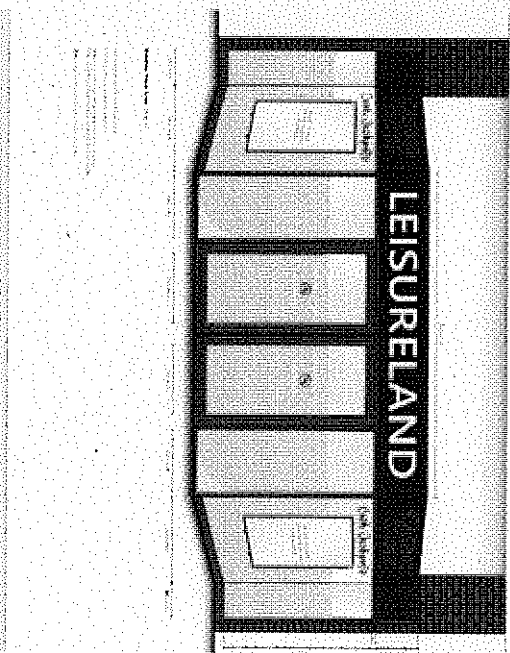
The projected Adult Gaming Centre is situated in *The Parkway*, *Coulby Newham*, *Middlesbrough*, a primary shopping area with retail outlets including *Tesco*, *Boots*, *Iceland*, *Superdrug*, *Card Factory*, *Specsavers*, *Poundland*, *Greggs* and *Burger King* as well as some independent units. To one side of the unit is *Age UK Charity shop*, and a homeware store *All things under one roof*. Immediately adjacent to the unit is *Pep & Co* and a *Poundland* store..

The venue is rectangular in shape internally. No auxiliary activities will be offered other than *Cat B3's*, *Cat C's* and *Cat D machines*

Current frontage of property



Proposed frontage



## LOCAL AREA RISK ASSESSMENT

The following relevant establishments are nearby:

**Police Stations:** Coulby Newham Police Station (open 247) is in walking distance from the proposed AGC,

**Betting Shops** – William Hill, Coral.

**Adult Gaming Centres** No other adult gaming centre within Coulby Newham

**Pawn Shops** – Ramsdens

**Public Houses** – The Lingfield Farm is the only nearby public house. There are no others within reasonable walking distance of the proposed AGC.

**Markets** – No markets in the Parkway

**Post Office** – Coulby Newham Post Office is very close by.

**Banks and ATM cashpoints** – There are no banks in the vicinity. There are at least 3 ATMs in reasonable walking distance.

Some of the above commercial units could be associated with persons susceptible to gambling related harm in that they provide gambling services or access to funds to gamble such as ATMs. The Lingfield Farm (the only public house in the vicinity) poses a notional risk that intoxicated customers might not be able to control their gambling. The presence of Coulby Newham Police Station a few hundred yards from the premises is a positive.

Cleveland Leisure Centres Limited operate an inhouse training program and inhouse procedures to ensure that any customers demonstrating signs of problem related or excessive gambling are quickly identified, and the appropriate action taken.

## **Schools**

Primary schools – St Augustine’s RC Primary School, St Gerard’s RC Primary School, Lingfield Primary School, Rose Wood Primary School and Sunnyside Academy are located in the greater Coulby Newham area, however none of them are close to the intended AGC.

Sixth Form Colleges: The Kings Academy is in the vicinity.

While *Parkway* is a commercial zone, it is recognized that passing football will include children and young adults. To address this, the applicant will ensure there is no visible or audible indication of gambling through the unit window or entrance and will adhere to a strict admission procedure more clearly defined later in this Assessment.

## **Other areas of potential interest to children and young persons:**

The Rainbow Centre in the Parkway complex includes a gym, swimming pool, library and fitness centre is a short walk from the premises.

## **Centres for vulnerable people**

Coulby Newham Community Fire Station Bickley Way Middlesbrough TS8 9NW

Coulby Newham Police Station Bickley Way, Coulby Newham, Middlesbrough TS8 9NN

## **Residents Associations and other groups**

Cleveland Leisure Centres Limited are aware of and will work with local groups including Coulby Newham Community Council and Coulby Newham Neighborhood Forum.

Cleveland Leisure Centres Limited propose and identify the following specific procedures and physical approaches to identify and address those people at risk and prevent access to gaming.

## LOCAL AREA RISK ASSESSMENT

- (i) **Staff Training.** Any perceived risk will be mitigated by the applicant's comprehensive levels of staff training through the use of SmartHub. This combined with continual training and regular appraisals will equip staff to the highest level to immediately spot and manage those customers displaying any signs of gambling related problems.
- (ii) **CCTV systems.** CCTV system specification is detailed in Appendix 1. Our CCTV policy/coverage will be regularly reviewed, and additional cameras/equipment will be installed as and when required.
- (iii) **Door Control** The applicants can draw on extensive experience of operating AGC's (the applicant has 3 AGC's, 1 in Thornaby, 1 in Middlesbrough and 1 in Leicestershire & has worked in the industry all of his life) and propose the following door controls
  - (a) Door and frontage design will ensure that children will not be able to see gambling taking place whether on the pavement or travelling by car or bus.
  - (b) The Door/Window glass is etched so that there is no visibility into the premises. There is also an internal partition inside the doorway to block any view into the premises when the door is opened for entry/exit.
- (iv) Customer Signage will be prominent and regularly reviewed.
- (v) **Toilet facilities.** Standard male/female and disabled toilet facilities are designed to deter and prevent customers from attempting to ingest, inhale or inject drugs on the premises – Controls include the following:
  - Access strictly controlled and supervised by staff
  - Toilets inspected after every use to identify those individuals potentially involved in drug or alcohol abuse
  - Zero tolerance to drug or alcohol abuse with appropriate signage
  - Toilet facilities designed so that no areas are accessible to hide drugs, syringes or alcohol.

**Ethnic and Religious Demographics**

Religious demographics from the 2021 census show that 96.7% of the Coulby Newham population were born in England with the remainder comprised of small numbers of people from other nations across the world. The census also showed that vast majority spoke English.

In terms of religious demographics, the same census showed that 55% of the Coulby Newham population are of Christian religion followed by some 41% who claimed to have no religion and then 1% who are Muslim.

**LOCAL AREA RISK ASSESSMENT**

Although there is not a strongly population within Coulby Newham, the applicants will endeavour through recruitment that local staff are engaged with a comprehensive understanding of the religious and ethnic population and their attitudes toward gambling.



**LOCAL AREA RISK ASSESSMENT**

**Gambling Act 2005 – The Licensing Objectives**

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

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

<b>Risk Assessment</b>	<b>LO</b>	<b>Level of Risk</b>	<b>Impact</b>	<b>Control System</b>	<b>Risk Management</b>	<b>Reviewed</b>
Children entering site unnoticed/unchallenged	1	Low	Severe to Business Severe to Child	Interior and Exterior Design	<ul style="list-style-type: none"> <li><input type="checkbox"/> Constant and effective monitoring of the main entrances by Managers/Staff/Security at all times.</li> <li><input type="checkbox"/> Staff have unrestricted visibility of all gaming machines at all</li> </ul>	December 2023
				Exterior Design	<ul style="list-style-type: none"> <li>  Front of the Venue is designed not to be attractive to children and challenge 25 posters clearly visible from street.</li> <li>  Frontage and doors designed so that children cannot see gambling taking place from the footpath or passing vehicles</li> </ul>	December 2023
				Physical	<ul style="list-style-type: none"> <li>  Think 25 Policies in place and implemented</li> <li>  Regular independent (by Check Policy) age verification testing</li> <li>  Regular staff training in-house and through e learning with 6 monthly refresher courses</li> <li>  The City Gaming Limited/Game Nation policies and procedures relating to the LCCP</li> <li>  the E Learning program</li> </ul>	December 2023



**LOCAL AREA RISK ASSESSMENT**

					<ul style="list-style-type: none"> <li>  Clear &amp; Prominent premises signage and machine labelling</li> <li>  Thank 25 material displayed</li> <li>  Regulatory Return data collected through IHL tablet process and reviewed weekly with weekly reporting up to CEO level by Commercial team</li> <li>  Policy of preventing the wearing of hoods</li> <li>  Health and Safety Policies &amp; procedures in place</li> </ul>	
Failure to deal with Consumers making complaints about the outcome of Gambling	2	Moderate	Moderate to Business Severe to vulnerable customer	Physical	<ul style="list-style-type: none"> <li>  Machine maintenance carried out by qualified engineer</li> <li>  Machine turned off immediately should fault be identified</li> <li>  Machine only acquired from licensed suppliers.</li> </ul>	December 2023
				Systems	<ul style="list-style-type: none"> <li>  Complaints Procedure &amp; Forms available on premises</li> <li>  Staff training through BACTA annually</li> <li>  Registered with ADR Entity – CEDR. Centre for Effective Dispute Resolution</li> <li>  Compliant with Company Procedures</li> </ul>	December 2023
Failure to provide information to players on responsible gambling.	3	Low	Severe to Business Severe to Customers	Physical	<ul style="list-style-type: none"> <li>  Sufficient quantity of posters and leaflets. "Playing the machines" posters displayed prominently (with QR code)</li> <li>  All machines labelled displaying National Gambling Helpline number and website address.</li> </ul>	December 2023
				Systems	<ul style="list-style-type: none"> <li>  Stock control system in place for leaflets and is monitored daily.</li> <li>  Adhere to Company Procedures and Policies Regular audit to ensure system is in place</li> </ul>	

**LOCAL AREA RISK ASSESSMENT**

Failure to recognise signs associated with problem gambling or substantial changes in gambling style.	3	Moderate	Severe to Business Sever to Customers	Interior design	<ul style="list-style-type: none"> <li>Players behaviour and positions are closely and effectively monitored. Clear lines of sight to all machines and effective CCTV systems</li> </ul>	December 2023
Staff lacking awareness and unsure how to recognise or respond to a vulnerable person who may be at risk	4	Moderate	Severe to Business Sever to Customers	Training	<ul style="list-style-type: none"> <li>Safeguarding Adults Policy and Training</li> </ul>	December 2023
Failure to properly administer the self-exclusion process and maintain its effectiveness thereafter, including breaches and reinstatements.	3	Low	Severe to Business Sever to Customers	Physical	<ul style="list-style-type: none"> <li>CCTV effectively positioned at entrance to benefit identification of knowns excluders.</li> <li>Use of Smarthub (can log on at any time &amp; view photo ID of those excluded from any AGC in the area).</li> </ul>	December 2023
				Interior Design	<ul style="list-style-type: none"> <li>Consideration given to internal layout so as to ensure effective monitoring of customers entering the premises and those that might enter in order to gamble on behalf of self-excluder.</li> </ul>	

**LOCAL AREA RISK ASSESSMENT**

				System	<ul style="list-style-type: none"> <li>  IHL Multi Operator Self Exclusion System in place</li> <li>  All exclusion and breach data subject to weekly review by Commercial team and reported to senior management.</li> <li>  IHL tablet always available to ensure that customers wishing to exclude can do so</li> <li>  Details of Self Excluded customers distributed to other sites and operators via IHL/Bacta MOSES systems</li> </ul>	
Failure to identify attempts to launder money on the premises (e.g. dye stained notes) and to follow correct reporting procedure.	1	Low	Sever to business Low to customers	Interior Design	<ul style="list-style-type: none"> <li>  Effective monitoring of customers' behaviour by good lines of sight from floor staff and Managers, and well positioned CCTV cameras.</li> </ul>	
				Physical	<ul style="list-style-type: none"> <li>  Where machines operate TITO, tickets cannot be transferred or used in any other premises. Suspicious tickets are automatically flagged and staff interaction is then required</li> <li>  The majority of larger wins are paid by hand which forces interaction with staff</li> </ul>	
				Training	<ul style="list-style-type: none"> <li>  Red Flag indicators trained.</li> <li>  For example – Increased spend inconsistent with the customer's normal profile, unknown customers staking large amounts, customers with no known means of income staking large amounts etc</li> </ul>	
				System	<ul style="list-style-type: none"> <li>  The Company has Policies and Procedures in place which are reviewed regularly, implemented and monitored in respect of Money Laundering and any</li> </ul>	

**LOCAL AREA RISK ASSESSMENT**

Poor security increasing vulnerability to crime	1	Low	Sever to business Sever to customers	Physical	<ul style="list-style-type: none"> <li>  suspicious transactions including a Disclosure Procedure for use by staff and reporting to the National Crime Agency using SARs.</li> <li>  Panic Alarms that connect to the owner who has full remote access on CCTV</li> <li>  Intruder alarm installed and regularly serviced</li> <li>  Effective CCTV coverage with data stored for a minimum of 30 days</li> <li>  Toughed glass windows and door to limit criminal damage</li> <li>  Outdoor CCTV with full coverage of all entrances</li> </ul>	
				Exterior Design	<ul style="list-style-type: none"> <li>  Limited cash desk and personal floats</li> <li>  Regular liaison with local law enforcement agencies</li> <li>  Log maintained should Police be called to assist. All incidents reviewed weekly by Commercial Team and reported to senior management</li> <li>  Keep abreast of local crime trends</li> </ul>	
				Systems		
Awareness of heightened local crime in the local area.	1			Systems		
Awareness of students learning facilities (schools & colleges) in the local area	3			Systems	<ul style="list-style-type: none"> <li><input type="checkbox"/> Local research identified schools as listed earlier in the assessment</li> <li><input type="checkbox"/> Challenge 25 process and systems</li> <li><input type="checkbox"/> No gaming visible to children or your persons from outside of the venue</li> </ul>	
Awareness of residential facilities for the vulnerable in the local area	3			Systems	<ul style="list-style-type: none"> <li><input type="checkbox"/> Care homes as listed earlier in the assessment</li> <li><input type="checkbox"/> Door controls, CCTV and training in place</li> </ul>	

The applicant is acutely aware of the importance of engaging with only rational, grounded customers and everything from the venue layout to staff training is designed for their comfort, protection, physical and mental health.

We also recognise the importance of identifying any problems at source thereby protecting those at risk of engaging in criminality or harm.

Our mission statement is to provide our customers with a superior but controlled licenced AGC premises providing an environment that is safe, enjoyable, friendly and inclusive.

**Examples of our operations include**

**CCTV**

**4K High Definition CCTV System**

We will be provided High Definition cameras throughout the building with "spotter" screens visible on entry with live images from across the venue providing reassurance we are a safe environment.

3 x 4K Cameras. Specifically focused on the exterior. One on each corner of the premises and the third focused over the doorway. We will also install a large "spotter Screen" inside the entrance showing the live CCTV Images in conjunction with the external Camera's.

Circa 9 X 4K High Definition cameras covering all the key locations within the location. All camera feeds will be recorded on a 12 Tb Hard Drive. All recorded Images to be made available for Police inspection in accordance with Middlesbrough Borough Council Licensing and Policing Policy.

All CCTV cameras shall record onto a system and be retained for 30 days. The system will be made available to the Police and licensing authority to inspect or recover required Images / Videos.

**Door Entry Controls**

In the event a member of staff feels threatened or vulnerable to attack, they can press the panic alarm button fob or keyring which immediately alerts Management. The front entrance door will be locked between 19.00-0900 daily as we will be closed during these hours. Access to the premises between those hours is not available.

**Recruitment**

We have a senior member of the proposed management team who has worked locally to our venue and will head the complete day to day running of our operation. The manager has previously managed the Company's North Ormesby and Thornaby sites, and understands the local environment and the extra due diligence required to deliver a safe, enjoyable environment.

**Training**

We utilize the training portal British Amusement Catering Trade Association (BACTA) to deliver the best training a) to ensure our teams are highly proficient with all the local authority compliance. b) to ensure we deal with real life situations therefore an example of the training we issue for Conflict Management and resolution. Dealing with the ability to defuse negative experiences.

*Simon Catterall*

Jacksons Law Firm

30 November 2023