

## Adult Gaming Centre Local Risk Assessment

### Premises

Premises Name:	<b>Admiral Walsall</b>
Premises Address:	<b>7-11 Park Street, Walsall</b>
Premises Post Code:	<b>WS1 1LY</b>
Premises Licence Number:	<b>TBC On Application</b>
Category of Premises:	<b>AGC</b>

### Company

Operating Company:	<b>Luxury Leisure</b>
Operating Licence Number:	<b>1876</b>

### Assessment Writer

Name of Person Writing this Assessment:	<b>Will Powell</b>
Position within Company or Name of Authorised Agent:	<b>Area Manager</b>
Date of this Assessment	<b>March 2023</b>
Date that Original Assessment was Written	<b>August 2022</b>

## **Gambling Act 2005 – The Licensing Objectives**

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

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

This document seeks to assess the risk to these objectives that our operation may pose and where necessary what measures we have put in place to mitigate that risk.

## **Independent Accreditation**

Luxury Leisure Talarius have attained the prestigious Global Gaming Guidance Group (G4) accreditation. This is only awarded after a rigorous audit of the company's responsible gambling measures. Furthermore, the company have to be reassessed every 2 years in order for it to be maintained.

### **Local Area and Site Profile**

The local authority gambling policy 2019 in relation to the Gambling Act 2005 has been considered in the completion of this assessment. The statement does not offer specific guidance on the geographic extent to be considered when completing this assessment and contains a local area profile.

The SOP recognises the significant requirements of the LCCP placed on operators to promote safer gambling and to prevent harm by supporting customers through implementing mandatory measures such as self-exclusion and signposting to sources of help. It also sets out its expectations with regards Local Risk Assessments which is detailed and has been considered in the completion of this assessment.

The AGC is an adult only venue located on the main high street in Walsall and sits amongst other national high street retailers as well as some local shops. There are high street banks nearby which have ATM facilities. There are four licensed betting offices on or around the high street, with two being in the immediate vicinity. There is one AGC and one bingo premises operated by competitors and LLT in the town. There are a number of premises licensed for the sale and consumption of alcohol within the 500-metre radius used in the compilation of this assessment but only one in the immediate vicinity of the premises. No alcohol will be supplied on the premises.

There are no known incidents of crime and disorder associated with the premises licensed as an AGC. To further discourage any crime, disorder, antisocial behaviour, or public nuisance the premises are fitted with 14 internal and 2 external CCTV cameras covering the under passage. The CCTV can be accessed by local council and police authorities to support any local investigations when requested. The premises will be illuminated night and day all internal areas, entrance lobby, window and external lighting.

In December 2022, there were 162 reported crimes or incidents of Anti-Social Behaviour within a quarter mile radius of the premises. The three biggest crime types were Violent 48, Shoplifting 27, and Public Order 25.

Our regulatory return data in our existing venue in Walsall town centre locations does not reflect any specific problems associated with consumer complaints, the need to call police for assistance or attempts by vulnerable or children and young persons to enter the premises.

The rota for the Venue always includes a minimum of two fully trained staff on every shift to include a Duty Manager, Assistant Manager or Venue Manager.

There are 12 staff employed to work at the venue.

Luxury Leisure Talarius contracts with a reputable national security company to supply all venues with licenced security personnel as and when required.

A 'live-monitored' hold-up alarm system is used so that monitoring station staff can communicate with and support shop staff through CCTV and two-way audio using mics and speakers mounted in the ceiling.

All staff have personal attack 'hold-up' alarms and there are some strategically placed static alarms also.

There are three schools for children of secondary school age nearby, Emmanuel School, The Ladder School and Blue Coat Academy, and two junior schools in the area, Blue Coat C of E and Emmanuel School, as well as several nursery schools.

There are 3 churches within a 500m radius of the venue - St. Pauls Church, The Potters House Christian Centre, and Walsall Community Church. There are no other places of worship within the immediate vicinity.

The main town bus stop is within 200m of the venue at the bottom of the street which is delivery access only. The mainline train station is within the 300 metre radius and is a 5-minute walk from the premises.

There are 3 centres nearby called CGL – The Beacon, T3 Young Person's Substance Abuse and Seasons Rehabilitation Centre operating within 500m of the vicinity of the AGC. The centres all offer support for those suffering from drug and substance misuse. There is also accommodation nearby for people with poor mental health, at JNHG which is 500m from the venue.

The venue has a single entrance/exit at street level to the front, a double doorway leading directly into the gaming area which is rectangular in shape. The meet and greet station is located prominently towards the front of the store giving a clear line of sight and command of the entrance. The Venue will offer machines of category D, C and B3 with stakes ranging from 10p to a maximum £2. The venue does not offer VIP or loyalty schemes.

The venue trades 7 days per week 24 hours per day. Night trading has the additional support of an access control system (mag Lock mechanism) which is fitted to the doorway.

As a business we are aware of vulnerable people, those who sleep rough or are homeless can present a unique challenge and that there are instances of rough sleeping in the area. We will be actively working with local support agencies and police to identify and support or report individuals who fall within this category.

We operate a strict policy across all of our venues to exclude those who we are aware or suspect of being vulnerable, begging, sleeping rough or being homeless and anyone staff suspect is under the influence of drugs/alcohol or known to us as drug or alcohol misuser. We do not in practice have issues with such individuals trying to access our venues but we will also be monitoring our external shop front and use CCTV and extensive lighting. We will take appropriate steps to move on individuals or wet down areas and report illegal activities to the police.

Our venue colleagues are trained in all aspects of Social Responsibility on Induction and through refresher courses on our own online academy, these topics include Think 25, Customer Interaction, Self-Exclusion, Responsible Gambling.

The Gambling Act requires that we safeguard the interests of vulnerable people as well as the young from being harmed by gambling. Vulnerable people are not defined by the Act or the LCCP however both the Gambling Commission and Local Authority state "it will for regulatory purposes assume that this group includes people who gamble more than they want to; people who gamble beyond their means; and people who may not be able to make informed or balanced decisions about gambling due to a mental impairment, alcohol or drugs".

Furthermore, the Local Authority consider that a range of people could fall into a category of vulnerability including:

- People affected by substance misuse
- People with learning disabilities
- People with mental illness
- People on low income
- People who may be in debt

When completing this Local Risk Assessment, we take the above definitions into account and in addition, we believe the term must be interpreted in its widest everyday meaning.

For example, someone could be vulnerable in the following ways:

1. Suffered a recent bereavement
2. Mental health problems
3. Long-term or terminal illness
4. Dementia or brain injury
5. Difficulty in communicating, for example reading or speaking on the phone
6. Learning disability
7. Relationship breakdown
8. Addiction
9. People who gamble more than they want to and/or beyond their means
10. Homelessness

This list is not exhaustive, and we are conscious that there are other reasons why someone could be vulnerable. For example, we train staff to be aware of those suffering from mental illness, recently bereaved, suffering from long-term or terminal illness, difficulty communicating, learning disability, substance misuse or addiction, breakdown of close personal relationship.

Walsall is listed as an area of high poverty within the West Midlands, comparable with West Bromwich where Luxury Leisure Talarius also operate.

Risk Identification	LO	Level of Risk	Impact	Risk Management	Reviewed
<b>Children entering site unnoticed.</b>	<b>C</b>	<b>Low</b>	<b>Severe to business. Severe to child.</b>	<ul style="list-style-type: none"> <li>- Layout of premises considered in staff numbers and deployment. Breaks and shift changes are planned to take account of school closing times to ensure there is always supervision of the gaming area. Breaks and shift changes ensure there is always supervision of the gaming area.</li> </ul>	<b>March 2023</b>
<b>Children enter site with adult.</b>	<b>C</b>	<b>Low</b>	<b>Severe to business. Moderate to child.</b>	<ul style="list-style-type: none"> <li>- Two members of staff will be rostered on at all times.</li> <li>- Staff deployed to specific zones for which they have responsibility.</li> <li>- Machine layout takes into consideration lines of site to the entrance.</li> <li>- Clear 'Over 18' signage is displayed, visible from outside and also in the entrance to the arcade.</li> </ul>	<b>March 2023</b>
<b>Children enter site and play before being noticed.</b>	<b>C</b>	<b>Low</b>	<b>Severe to business. Severe to child.</b>	<ul style="list-style-type: none"> <li>- There is a lobby area beyond the doorway from the street ensuring that those who enter cannot simply inadvertently walk in without passing through a further door and past clear Over 18 signage.</li> </ul>	<b>March 2023</b>
<b>Children enter site and play where age is misjudged.</b>	<b>C</b>	<b>Low</b>	<b>Severe to business. Severe to child.</b>	<ul style="list-style-type: none"> <li>- Venue Welcome Board contains Challenge 25 notice showing acceptable ID - UK Photo driving licence, Passport and Proof of age cards bearing the "Pass" hologram symbol.</li> <li>- The meet and great station is positioned to give line of sight to the entrance.</li> </ul>	<b>March 2023</b>
<b>Age verification is not sought.</b>	<b>C</b>	<b>Low</b>	<b>Severe to business. Severe to child.</b>	<ul style="list-style-type: none"> <li>- CCTV cameras positioned to cover all parts of the premises but specifically the entrance and secluded parts of the premises.</li> <li>- All staff are trained in social responsibility as part of their induction and are provided with regular refresher training.</li> </ul>	<b>March 2023</b>
<b>Children knowingly allowed to play.</b>	<b>C</b>	<b>Low</b>	<b>Severe to business. Severe to child.</b>	<ul style="list-style-type: none"> <li>- Posters and displays of acceptable identification on site for staff.</li> </ul>	<b>March 2023</b>

				<ul style="list-style-type: none"> <li>- The company operate a 'Think 25' policy in which all staff are trained at induction and they receive regular refresh training.</li> <li>- Staff log all attempts to enter by young persons on the appropriate log.</li> <li>- The company use independent test purchasing operations to test adherence to the Think 25 policy. All venues are tested at least twice in a rolling 12-month period.</li> <li>- Stringent disciplinary procedures for failures identified through age verification testing.</li> <li>- Social Responsibility returns data reviewed through submissions from Area Managers to National Compliance Manager.</li> <li>- All social responsibility returns data subject to a quarterly compliance review.</li> </ul>	
<b>Young person wearing face covering is not challenged for verification of age.</b>	<b>C</b>	<b>Low</b>	<b>Severe to business. Severe to child.</b>	<ul style="list-style-type: none"> <li>- Staff have been trained to ask a customer to lower a face covering if necessary, this has the effect of allowing staff to adjudge the apparent age of all customers and if necessary challenge for verification by the presentation of ID.</li> </ul>	<b>March 2023</b>
<b>Those considered to be vulnerable, having access to gambling</b>	<b>C</b>	<b>Low</b>	<b>Severe to business, severe to customer</b>	<ul style="list-style-type: none"> <li>- Staff are trained to identify vulnerable customers as outlined on page 4 and 5 above.</li> <li>- Staff are trained to interact with customers who they have identified as being vulnerable and monitor their play.</li> </ul>	<b>March 2023</b>
<b>Those made vulnerable through abuse of drugs and/or alcohol having access to gambling</b>	<b>C</b>	<b>Low</b>	<b>Severe to business, severe to customer</b>	<ul style="list-style-type: none"> <li>- Staff are trained to refuse entry and service to anyone who has been observed begging outside the venue or local area or we are aware is homeless.</li> <li>- Staff are trained to refuse entry and service to anyone who they feel is under the influence of alcohol or drugs</li> </ul>	<b>March 2023</b>
<b>Those who may be considered vulnerable through abuse of drugs and/or alcohol having access to gambling.</b>	<b>C</b>	<b>Low</b>	<b>Severe to business, severe to customer</b>	<ul style="list-style-type: none"> <li>- Staff are trained to identify customers whose play is out of control and interact if a customer displays these behaviours.</li> <li>- The venue is installed with iBeacon technology able to work with the 'Gamblewise' app which is free for our</li> </ul>	<b>March 2023</b>



				<p>customers to download and use to assist them manage their time spent gambling.</p> <ul style="list-style-type: none"> <li>- All interactions are logged and staff are trained to review logs daily to familiarise themselves with any customer who is regularly interacted with so they can continue to monitor and follow up previous interactions.</li> <li>- Where customer gambling continues to be out of control, we may make the decision to perform a company exclusion. This essentially bans them from the premises for their own protection.</li> </ul>	
<p><b>Child sexual exploitation (CSE) - Sexual abuse where a child or young person is forced or manipulated into inappropriate sexual activities, often in exchange for alcohol, drugs, gifts or attention. Although children and young persons are not permitted into AGC premises, it is possible that a customer could target or be targeted by nearby children or young persons as they enter or leave our venue.</b></p>	<b>C</b>	<b>Low</b>	<p><b>Severe to business. Severe to child or young person.</b></p>	<ul style="list-style-type: none"> <li>- Our staff are trained to look for the signs of CSE using a CSE training module on our Admiral Academy training platform.</li> </ul>	<b>March 2023</b>
<p><b>Failure to provide information to players on responsible gambling.</b></p>	<b>C</b>	<b>Low</b>	<p><b>Severe to business Severe to customer</b></p>	<ul style="list-style-type: none"> <li>- A responsible Gambling message is displayed at all positions where gaming is possible through posters, leaflets and stickers on machines.</li> <li>- Poster/Leaflet designs to incorporate QR codes for GAMCARE, Gambleaware contact information.</li> </ul>	<b>March 2023</b>



<b>Failure to provide information in a suitable format.</b>	<b>C</b>	<b>Low</b>	<b>Severe to business. Severe to customer.</b>	<ul style="list-style-type: none"> <li>- Responsible Gambling information stickers on all machines.</li> <li>- Compliance Audit function performed by Area Manager and also through regional field auditors and security managers.</li> <li>- Luxury Leisure Talarius have attained the Global Gaming Guidance Group (G4) accreditation for our responsible gambling measures.</li> </ul>	<b>March 2023</b>
<b>Failure to recognise signs of problem gambling.</b>	<b>C</b>	<b>Low</b>	<b>Severe to business Severe to customer</b>	<ul style="list-style-type: none"> <li>- Additional aspects to training incorporating guidance on identifying problem gambling, procedure for interaction and sources of help.</li> <li>- Clear policy to detail the procedure for interaction and level of staff that can 'intervene'.</li> </ul>	<b>March 2023</b>
<b>Failure to interact with customer displaying signs of problem gambling.</b>	<b>C</b>	<b>Low</b>	<b>Severe to business. Severe to customer.</b>	<ul style="list-style-type: none"> <li>- 'Stay in control leaflets' with QR codes directing customers to GAMCARE and Gambleaware.</li> </ul>	<b>March 2023</b>
<b>Failure to sign-post customer to help and support.</b>	<b>C</b>	<b>Low</b>	<b>Severe to business. Severe to customer.</b>	<ul style="list-style-type: none"> <li>- All recorded SR data subject to a quarterly compliance review by senior management.</li> </ul>	<b>March 2023</b>
<b>Failure to properly administer self-exclusion.</b>	<b>C</b>	<b>Low</b>	<b>Severe to business. Severe to customer.</b>	<ul style="list-style-type: none"> <li>- Staff training incorporates policy and procedure for self-exclusion.</li> </ul>	<b>March 2023</b>
<b>Failure to impose exclusion in locality and in same types of establishments.</b>	<b>C</b>	<b>Low</b>	<b>Severe to business. Severe to customer.</b>	<ul style="list-style-type: none"> <li>- Since May 2016 Luxury Leisure/Talarius have operated one or both of the AGC national multi-operator self-exclusion schemes (MOSES), offered through BACTA Portal and IHL.</li> <li>- Staff have been trained to ask a customer to lower a face covering if necessary This has the effect of allowing staff to adjudge the apparent age of all customers and if necessary challenge for verification by the presentation of ID and also to identify if a customer attempting to enter is self-excluded.</li> </ul>	<b>March 2023</b>
<b>Customer breaches of self-exclusion.</b>	<b>C</b>	<b>Low</b>	<b>Severe to business. Severe to customer.</b>	<ul style="list-style-type: none"> <li>- Tablet devices are provided at all sites to take an image of customers wishing to self-exclude so that the exclusion can be effectively enforced.</li> </ul>	<b>March 2023</b>

<b>Customer breaches self-exclusion by using another to gamble on their behalf.</b>	<b>C</b>	<b>Unknown</b>	<b>Moderate to business. Severe to customer.</b>	<ul style="list-style-type: none"> <li>- The location of the site in relation to the customer's home address and any regular routes to work for example will be considered if the customer requests a wider exclusion.</li> <li>- All SR returns data subject to a quarterly compliance review.</li> <li>- All staff trained to regularly check the Bacta Portal gallery relating to their venue to ensure information shared from other local operators relating to self-excluded customers is monitored.</li> </ul>	<b>March 2023</b>
<b>Money Laundering (Dye stained notes and Criminal spend).</b>	<b>A</b>	<b>Low</b>	<b>Low – Severe</b>	<ul style="list-style-type: none"> <li>- The company have a Money Laundering Reporting Officer (MLRO).</li> <li>- Staff training at induction and refresh training.</li> <li>- Luxury Leisure/Talarius have a corporate AML Risk Assessment and policies and procedures relating to AML.</li> <li>- £1000 limit on automated transactions using TITO. Any greater amounts require the intervention of a staff member.</li> <li>- Technical parameters on note acceptors designed to reject poor quality notes. (Often notes obtained by way of robbery are perished).</li> <li>- Manufacturer activity alerts from machines on independent networks (primarily SG and Storm).</li> <li>- TITO tickets not transferable between sites.</li> <li>- Slim change machines set up so that notes cannot be changed 'up'.</li> <li>- Comprehensive CCTV coverage in all sites.</li> <li>- Partnerships with local police where appropriate to identify and discourage criminal spend.</li> </ul>	<b>March 2023</b>
<b>Commission of criminal offences to fund problem gambling</b>	<b>A</b>	<b>Low</b>	<b>Low – Severe</b>	<ul style="list-style-type: none"> <li>- Stringent policy and procedures in place to identify and intervene with customers who may be vulnerable to harm through problem gambling. See above under Information to players, Customer Interaction and Self-Exclusion.</li> </ul>	<b>March 2023</b>

<p><b>Anti-social behaviour associated with late night operation</b></p>	<p><b>A</b></p>	<p><b>Low</b></p>	<p><b>Low – Severe</b></p>	<ul style="list-style-type: none"> <li>- Access control measures either through door supervision or physical controls, utilised at night where appropriate.</li> <li>- Policy of non-players refused entry or asked to leave.</li> <li>- Refreshments offered only to players and known customers.</li> <li>- Venue is connected to a remote monitoring station which staff can communicate with if support is required. Monitoring centre has two-way communication and can communicate directly with customers through ceiling mounted mics and speakers if required.</li> </ul>	<p><b>March 2023</b></p>
<p><b>Poor security increasing vulnerability to robbery or theft.</b></p>	<p><b>A</b></p>	<p><b>Low</b></p>	<p><b>Low – Severe</b></p>	<ul style="list-style-type: none"> <li>- A 'live-monitored' hold-up alarm system is used so that monitoring station staff can communicate with and support shop staff through CCTV and two way audio using mics and speakers mounted in the ceiling.</li> <li>- All staff have personal attack 'hold-up' alarms and there are some strategically placed static alarms also.</li> <li>- The premises are fitted with an intruder alarm which can also be live monitored from the monitoring station, meaning alarm activations are verified, using sight and sound, by the monitoring station thus reducing the number of false alarms to police.</li> <li>- Extensive CCTV coverage with recording 31 days with date and time stamp.</li> <li>- Strict key storage procedure.</li> <li>- Time lock and/or time delay safes utilised.</li> <li>- Drop safe used for banking.</li> <li>- Staff personal floats limited to £100.</li> <li>- Door Supervisor employed where appropriate</li> <li>- Toughened glass for window front.</li> </ul>	<p><b>March 2023</b></p>
<p><b>The premises being subject to the misuse of drugs including use of, possession of or drug dealing</b></p>	<p><b>A</b></p>	<p><b>Low</b></p>	<p><b>Low – Severe</b></p>	<ul style="list-style-type: none"> <li>- Signage in place at entrance that we have a zero tolerance policy in relation to the misuse of drugs on the premises.</li> <li>- Any person identified or suspected of being in possession of unlawful drugs will be removed from the premises</li> </ul>	<p><b>March 2023</b></p>

				<ul style="list-style-type: none"> <li>- Where individuals are suspected of being involved in drug dealing but no evidence is available, best efforts will be made to identify the individual and intelligence will be passed to the police</li> <li>- Any drugs recovered will be logged and stored in compliance with local police policy</li> </ul>	
<b>Advertising Standards and Marketing</b>	<b>A</b>	<b>Low</b>	<b>Low – Moderate</b>	<ul style="list-style-type: none"> <li>- All advertising and marketing by the Company complies with standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP). We ensure that our marketing communications, advertisements, and invitations to purchase (within the meaning of the Consumer Protection from Unfair Trading Regulations 2008), including 'free bet' offers, do not amount to or involve misleading actions or misleading omissions within the meaning of those regulations. We adopt the general principles that our advertising is: <ul style="list-style-type: none"> <li>- legal, decent, honest and truthful</li> <li>- Prepared with a sense of responsibility to consumers and to society</li> <li>- Respectful to the principles of fair competition generally accepted in business</li> <li>- Not intended to bring advertising into disrepute.</li> </ul> </li> </ul> <p>Specifically we ensure that:</p> <ul style="list-style-type: none"> <li>- Advertising contains nothing that is likely to lead people to adopt styles of gambling that are unwise</li> <li>- Advertisements and promotions are socially responsible and do not encourage excessive gambling</li> <li>- Care is taken not to exploit the young, the immature or those who are mentally or socially vulnerable</li> <li>- Advertising is not directed at people under the age of 18 years through the selection of media, style of presentation, content or context in which they appear. No</li> </ul>	<b>March 2023</b>

				<p>medium is used to advertise gambling if more than 20% of its audience is under 18 years old</p> <ul style="list-style-type: none"> <li>- Persons shown gambling are not, nor do they appear to be, under 25 years of age</li> <li>- There is honesty at all times with regard to the chances of winning, the likelihood of a big win, and the odds or payout ratio that applies to the gambling on offer</li> <li>- Advertising and promotional material carries a reference for the need to keep gambling under control</li> <li>- It is never suggested or implied that gambling is a means of getting out of financial difficulty.</li> <li>- Advertising and marketing material should not appear on any primary web page/screen or micro-site that provides advice or information on responsible gambling.</li> <li>- Marketing decisions are controlled by the central marketing department and a system is in place for local managers to apply for marketing initiatives that are approved by the Head of Marketing to ensure they are legal, honest and compliant with the Gambling Act/License Conditions &amp; Codes of Practice.</li> <li>-</li> </ul>	
<b>Failure to display Terms and Conditions</b>	<b>B</b>	<b>Low</b>	<b>Low – Moderate</b>	<ul style="list-style-type: none"> <li>- Terms and Conditions displayed prominently within the premises.</li> </ul>	<b>March 2023</b>
<b>Failure to deal with customers making complaints about the outcome of gambling</b>	<b>B</b>	<b>Low</b>	<b>Low – Moderate</b>	<ul style="list-style-type: none"> <li>- Machines only acquired from licensed suppliers.</li> <li>- Additional machine compliance checks completed by a technician when installing new machines.</li> <li>- Machine maintenance carried out by qualified technician.</li> <li>- Clear service complaint protocol to deal with machine or game performance related customer complaints.</li> <li>- Customer complaints policy and procedure.</li> <li>- Complaints policy and procedure are available for customers to take away in each site.</li> <li>- Complaint forms available at each site.</li> <li>- Luxury Leisure head office complaints telephone line.</li> <li>- Novomatic UK group complaints channel.</li> </ul>	<b>March 2023</b>

<p><b>Insufficiently trained or inexperienced staff</b></p>	<p><b>A/ B/ C</b></p>	<p><b>Low</b></p>	<p><b>Low - severe</b></p>	<ul style="list-style-type: none"> <li>- Registered with an ADR entity – BACTA.</li> <li>- All staff are trained in on the three licensing objectives as part of their induction and are provided with refresher training every 6 months throughout their employment.</li> <li>- All training is recorded on our Admiral Academy training system that is accessible within the venue.</li> <li>- All training is centrally monitored to ensure completion</li> <li>- All staff are trained on the specific local risks to the licensing objectives that have been identified for these premises as part of the staff induction training programme.</li> <li>- All social responsibility returns data subject to a quarterly compliance review. Any non-compliance with our policies and procedures is identified and corrected.</li> </ul>	
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### **Requirement to Comply**

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

Effective as at 6 April 2016

Social responsibility code provision 10.1.1

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

### **Ordinary code provision 10.1.2**

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