

GAMBLING POLICY: 2019-2022



Gambling Act 2005

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PART 1 - Background

Islington in context

1. Islington is one of London's most distinctive areas, offering arts, crafts, entertainment, good eating and drinking, a huge variety of specialist shops, lively street markets and a rich and fascinating history. The community feel around Islington is one of the things that make this relatively small London borough unique.
2. Islington is in the process of rapid change and is likely to continue to change over the coming years. The latest GLA Mid 2016 Housing Led Population Projection for Islington shows that 233,200 people were living in the borough, which is an increase of 23,000 from the 2011 census. Islington is a youthful population with a very large number of young adults. There are more 25-29s than any other five-year age group and fewer than one in ten residents is over 65.
3. Islington is London's smallest borough, covering just over six square miles. It is the twenty-fourth most deprived borough in the Country, and fifth most deprived in London. Islington also ranks the third highest authority in the country for the proportion of children living in household's dependent on benefits and 35% of children under the age of 16 live in low income households. The general unemployment rate and the proportion of Islington residents on out-of-work benefits is significantly higher than the national average.
4. Housing demand has been, and is being met by fast paced redevelopment of old factories and business premises for residential use. This has turned many parts of the borough, which were previously exclusively commercial into mixed-use hubs, incorporating commercial and residential premises in very close proximity.

Local Area Profile – Saturation and Gambling Related Harm

1. Islington is London's smallest Borough with multiple factors of deprivation.
2. As reported by the Responsible Gambling Strategy Board, there is evidence that some groups in the population may be more vulnerable to gambling-related harm. This includes some BME groups as well as people with low incomes. Children and young people may be particularly susceptible, as their youth and limited life experience may make them more inclined to risk-taking behaviour and less able to manage the consequences of these decisions.

3. Recent report by the Gambling Commission indicates that gambling is more prevalent amongst children and young people than under-age drinking, smoking and use of illegal drugs.
4. In Islington the main opportunities to gamble in licensed premises arise from betting shops, Adult Gaming Centres (Amusement Arcades) and gaming machines in pubs and clubs.
5. Islington has serious concerns around the impact a further increase in the opportunity to gamble in the Borough will have on its most vulnerable residents. Islington has significant numbers of residents with substance misuse problems, poor mental health or who are living in deprivation and these groups are more vulnerable to gambling-related harm. Islington recognises that the relationship between health and low income exists across almost all health indicators.
6. As a consequence, the Licensing Authority will seek to limit facilities for gambling in areas where it feels its vulnerable residents will be put at potential risk of harm. Operators will be expected to take into consideration the **health and crime concerns in Appendix 1**. However, each case will be decided on its merits and applicants will be given the opportunity to demonstrate how they might overcome Licensing Authority concerns prior to determination of their application.

Local Risk Assessments

1. It is a requirement of the Gambling Commission's Licence Conditions and Codes of Practice (LCCP), under Section 10, for licensees to assess the local risks to the licensing objectives posed by the provisions of gambling facilities at each of their premises, and have policies, procedures and control measure to mitigate those risks. In undertaking their risk assessments, they must take into account relevant matters identified in this policy statement.

The LCCP say that licensees must undertake a local risk assessment when applying for a new premises license and review their local risk assessments:

- to take account of significant changes in local circumstances, including those identified in this policy statement
- when there are significant changes at a licensee's premises that may affect their mitigation of local risks
- when applying for a variation of a premises licence; and

The Licensing Authority expect the local risk assessment to consider as a minimum:

- the Local Area Profile
- the location of services for children

- leisure/community centers and other areas where children will gather;
- the demographics of the area in relation to vulnerable groups;
- whether the premises are in an area subject to high levels of crime and/or disorder.

Local risk assessments should show how vulnerable people, including people with gambling dependencies are protected.

This policy does not preclude any application being made and each application will be decided on its merits, with the onus upon the applicant showing how potential concerns can be overcome.

More advice on Local Risk Assessments can be found at www.gamblingcommission.gov.uk/for-gambling-businesses/Compliance/General-compliance/Social-responsibility/Local-area-risk-assessments

Part 2 - Gambling in Islington

1. The Gambling Policy sets out how Islington Council, acting as the Licensing Authority for gambling, intends to exercise its functions under the Gambling Act 2005 for the next three years. The policy, which incorporates the 'statement of principles' as required by the Act, has been prepared having regard to the licensing objectives of the Gambling Act 2005, the guidance issued by the Gambling Commission and stakeholders' comments.
2. The ability of the council to regulate gambling activities in the borough provides an opportunity for the council and its partners to have more direct influence on the determination of licence applications. Residents who are, or who could be, affected by the premises providing gambling will have an opportunity to influence decisions and the council will be able to work with others to protect children and vulnerable people from being harmed or exploited by gambling activities.
3. Gambling is defined in the Act as either gaming, betting or taking part in a lottery:
 - 'Gaming' means playing a game for the chance to win a prize.
 - 'Betting' means making or accepting a bet on:
 - the outcome of a race, competition or other event
 - the likelihood of anything occurring or not occurring
 - whether anything is true or not.
 - A 'Lottery' is where participants are involved in an arrangement where prizes are allocated wholly by a process of chance.

4. The responsibility for regulating gambling is shared between the Gambling Commission and local authorities. The Gambling Commission is responsible for issuing operating licences to organisations and individuals who provide facilities for gambling and personal licences to persons working in the gambling industry. The Commission takes the lead role on ensuring that gambling is conducted in a fair and open way through the administration and enforcement of operating and personal licence requirements. The Commission is also responsible for remote gambling activities such as facilities provided via the Internet, television or radio.
5. The main functions covered by licensing authorities are:
 - ensuring compliance with gambling authorisations issued by the authority
 - licensing premises for gambling activities
 - considering notices for the temporary use of premises for gambling
 - granting permits for gaming and gaming machines in clubs
 - regulating gaming and gaming machines in alcohol licensed premises
 - granting permits for family entertainment centres with lower stake gaming machines
 - granting permits for prize gaming
 - considering occasional use notices for betting at tracks
 - registering small lotteries
 - tackling illegal gambling activity
 - taking enforcement action when required
6. There are currently 56 licensed betting offices in Islington, there is one track betting licence held by Arsenal FC for match day betting, 2 premises with Club gaming machine permits and 5 Adult Gaming centres (amusement arcades) and 22 pubs that have permits to provide more than 2 gaming machines. There are clusters of premises in Archway, Caledonian Road, Holloway Road / Nags Head and Finsbury Park. These are all areas with high levels of multiple deprivation.

Development Planning

7. Concerns have been expressed about Islington as the local planning authorities' ability to control the number of betting shops. The rules on permitted development were changed in April 2015, as a range of high street uses could be changed to a betting shop without planning permission. Change of use to a betting shop now requires planning permission. Concerns remain that clusters of betting shops particularly in deprived areas, affect high street vitality.
8. The Licensing Authority recommends applicants for a new gambling premises licence to have been granted planning permission for the intended use, before making an application for a premises licence.

9. A licence to use premises for gambling will only be issued in relation to premises that the licensing authority can be satisfied are going to be ready to be used for gambling in the reasonably near future.
10. When dealing with a premises licence application, the licensing authority will not take into account whether the applicant has to comply with the necessary planning or building consents. These matters will be dealt with under relevant planning control and building regulations, and will not form part of the consideration for the premises licence.
11. The grant of a gambling premises licence does not prejudice or prevent any action that may be appropriate under the law relating to planning or building.

Casino Resolution

12. The Gambling Act allows licensing authorities to resolve not to issue casino premises licences. The licensing authority has consulted with residents and businesses to seek their views before deciding whether to make such a resolution. As a result of the consultation the council has resolved not to issue casino premises licences.

The Licensing Objectives

13. The gambling policy aims to promote the following three licensing objectives:
 - Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.
 - Ensuring that gambling is conducted in a fair and open way.
 - Protecting children and other vulnerable persons from being harmed or exploited by gambling.
14. The Gambling Act defines 'children' as those persons under 16 years of age and 'young persons' as those persons aged 16 or 17 years of age. The term 'vulnerable persons' is not defined; however, the Gambling Commission does offer some guidance:
 - People who gamble more than they want to.
 - People who gamble beyond their means.
 - People who may not be able to make informed or balanced decisions about gambling due to a mental impairment, alcohol or drugs.
15. Islington believes that 'vulnerable persons' include the above persons but this list is not exhaustive and we will consider what constitutes vulnerable persons on a case-by-case basis. Similarly, we will consider what constitutes 'harmed or exploited' on a case-by-case basis.

16. The licensing authority aims to permit the use of premises for gambling in accordance with the requirements of the Act.
17. In making decisions about gambling matters the licensing authority shall take into account:
 - the licensing objectives
 - any relevant code of practice or guidance issued by the Gambling Commission
 - the authority's statement of licensing principles
 - the need to avoid duplicating other regulatory regimes
 - the right of any person to make an application under the Act
 - the Local Area Profile
 - the premises own Local Risk Assessment
 - Each application will be decided on its own merits and will depend upon the type of gambling that is proposed and the applicant's ability to demonstrate the highest standards of management.

Responsible Authorities

18. The following public bodies are identified in the Gambling Act as responsible authorities who have to be notified when applications are made, can make representations about the application and can call for a review of existing licences:
 - the Licensing Authority
 - the Gambling Commission
 - the Metropolitan Police
 - the London Fire and Emergency and Planning Authority
 - the council's Planning Service
 - the council's Environmental Health Service
 - Islington's Safeguarding Children Board
 - HM Revenue and Customs
 - a neighbouring authority if a premises straddles their borough boundary
19. The licensing authority has designated the Safeguarding Children Board as the body that is competent to advise it about the protection of children from harm. The principles that have been used in making this designation is that the board is:
 - responsible for the whole of the licensing authority's area
 - answerable to democratically elected persons

Interested Parties

20. Residents, businesses and other organisations or groups are entitled to make representations about premises licence applications and to apply for reviews of existing licences. To be an 'interested party' you must meet one of the following criteria:
- live close to the premises and likely to be affected by the gambling activities
 - have business interests that might be affected by the gambling activities
 - represent persons in either of these two groups for example residents' and tenants' associations, trade unions and trade associations, partnerships, charities, faith groups, medical practices, Assembly Members, Ward Councillors, MPs or MEPs. Our Licensing Service will be able to provide further advice on this matter.
21. When considering whether a person lives close to the premises, the licensing authority will take into account:
- the size
 - the nature
 - the distance of the premises from the location of the person making the representation
 - the potential impact of the premises, for example the number of customers and routes likely to be taken by those visiting the establishment
 - the circumstances of the complainant
22. Having a 'business interest' will be given the widest possible interpretation and include community and voluntary groups, schools, charities, faith groups and medical practices. The licensing authority will consider the following factors relevant when determining whether a person's business interests may be affected:
- the size
 - the catchment area of the premises, for example how far people travel to visit the premises
 - whether the person making the representation has business interests in the affected catchment area
23. The licensing authority will not take into account representations that are:
- repetitive, vexatious or frivolous
 - from a rival gambling business where the basis of the representation is unwanted competition
 - moral objections to gambling
 - concerned with expected demand for gambling
 - anonymous

24. Details of applications and representations referred to a licensing sub-Committee for determination will be published in reports that are made publicly available and placed on the council's website in accordance with the Local Government Act 1972 and the Freedom of Information Act 2000. Personal details will however be removed from representations in the final website version of reports
25. Names and addresses of people making representations will be disclosed to applicants and only be withheld from publication on the grounds of personal safety where the licensing authority is specifically asked to do so.

Exchange of Information

26. The licensing authority will act in accordance with the provisions of the Act in its exchange of information with the Gambling Commission, which includes the provision that the Data Protection Act 2018 and the General Data Protection Regulation (GDPR) will not be contravened.
27. The licensing authority will exchange relevant information with other persons and bodies, having regard to guidance issued by the Gambling Commission and in accordance with any relevant regulations issued by the Secretary of State.
28. The licensing authority's approach to data protection and freedom of information is set out in Islington Council's Access to information Policy. The objectives of this policy are to promote greater openness and increased transparency of decision-making, build the trust and confidence of the public and stakeholders; and provide clarity on the way in which the Council will meet its duties under access to information legislation, guidance and best practice. Copies of the policy are available via www.islington.gov.uk.

Enforcement

29. The main enforcement and compliance role for the licensing authority in terms of the Gambling Act 2005 is to ensure compliance with premises licences and other permissions that it authorises. The Gambling Commission is the enforcement body for operating and personal licences and issues relating to the manufacture, supply or repair of gaming machines.
30. Enforcing the requirements of the Gambling Act 2005 is shared between the Police and the Licensing Authority with both organisations employing dedicated Licensing Officers who are co-located in Islington Council's offices in Upper St. The Police and Local Authority Licensing Officers are charged with the responsibility of ensuring compliance with licensing requirements and working with the gambling industry, other responsible authorities and council

services to promote the licensing objectives.

31. The licensing authority has regard to the Regulatory Code which applies to a range of regulatory functions and promotes proportionate, consistent and targeted regulatory activity, which includes taking appropriate action where non-compliance is identified. Enforcement action will be taken in accordance with these principles and the Enforcement Policy for Public Protection.
32. The Police and Council Licensing Officers will take a robust approach to enforcement by:
 - Sharing information and intelligence
 - targeting inspection and monitoring resources toward agreed problem areas and high risk premises,
 - joint problem solving and taskings
 - follow up enforcement action.
33. Police Licensing Officers lead on significant crime and disorder issues associated with licensed premises and activities that involve other specialist officers within the Metropolitan Police.
34. Licensing Authority Licensing Officers lead on general non-compliance with licence conditions, residents' complaints, issues that may involve other teams within the council associated with public safety, protecting children and vulnerable people from harm and public nuisance.
35. Where there is evidence of a premises failing to comply with licence conditions or undermining the licensing objectives, the premises licence holder may be invited to attend an Officer Panel to agree an action plan to prevent recurrence or be reviewed by the Licensing Sub-Committee. The Officer Panel, organised by the Licensing Authority, involves both the Police and Licensing Authority with representatives from other responsible authorities attending as and when required.
36. Where appropriate, the licensing authority will work with other responsible authorities to promote the licensing objectives through enforcement. It will adopt a risk-based approach to inspections targeting high-risk premises for more frequent inspections and providing a light touch inspection regime for low risk premises.
37. The criteria that will be used to determine the frequency of inspection will include:
 - the type and location of premises
 - the local risk assessments
 - the confidence in management
 - the track record of the premises operator

- intelligence from responsible authorities
- history of complaints
- the arrangements in place to prevent children and vulnerable people from being harmed or exploited
- the arrangements in place to prevent the premises from being a source of crime and disorder or being used to support crime

Illegal Gaming Machines

38. The Licensing Authority has particular concerns about illegally sited 'gaming machines'. The provision of these machines may be illegal because they are:
- provided in prohibited places such as takeaways and minicab offices
 - provided without an appropriate permit
 - the gaming machines provided are uncategorised.
39. There are a variety of reasons why the provision of gaming machines may be illegal and operators are advised to seek the advice of either the Licensing Authority or the Gambling Commission before making gaming machines available.
40. In circumstances where illegal machines are being provided the Licensing Authority will use its full range of enforcement powers.

Standards of Management

41. The Licensing Authority seeks to encourage the highest standards of management in premises which provide facilities for gambling in Islington and to demonstrate they have taken steps to prevent gambling from being a source of crime and disorder and to protect children and vulnerable persons from harm, particularly where premises are near to schools. The Licensing Authority has produced a "Gambling Best Practice" document as a guide to assist both new applicants and current operators. (See Appendix 2).
42. The list of measures in the document is not exhaustive but it does give an indication of some of the suitable measures and procedures that we expect to see in well managed premises.
43. Staff in licensed gambling premises are recognised as being subject to risk in the workplace from violence and verbal abuse, especially if working alone. In addition, lone workers may not be able to sufficiently serve and supervise the customers, identify and prevent young people from gambling, protect vulnerable persons, deal with customers who may be consuming alcohol and prevent the premises being used as a source of crime or supporting crime.

44. We expect premises management to recognise and address this as part of their management arrangements, especially at times where it has been identified that there is a spike in crimes around betting shops.
45. We expect there to be an adequate number of staff and managers on the premises to cover key points throughout the day, especially where premises are close to schools/colleges/universities, pubs, bars, shopping centres and the Emirates Stadium.

Split Premises

46. The Licensing Authority will always give the closest consideration to whether a sub-division has created separate premises meriting a separate machine entitlement. The Authority will not automatically grant a licence for sub-divided premises even if the mandatory conditions are met, particularly where the Authority considers that this has been done in order to sidestep controls on the number of machines which can be provided in a single premise. The Authority will consider if the sub-division has harmed the licensing objective of protecting the vulnerable. The Authority may also take into account other relevant factors as they arise on a case-by-case basis.

Premises Licences

47. In considering applications for new gambling licences, variations to existing licences and licence reviews the licensing authority will take into account the following matters:
 - the location of the premises
 - the Local Area Profile
 - the Local Risk Assessment (LRA)
 - the views of responsible authorities
 - the views of interested parties
 - compliance history of current management
 - the hours of operation
 - the type of premises
 - whether the applicant is able to demonstrate high levels of management (see appendix 3 'Best Practice')
 - the physical suitability of the premises
 - the levels of crime and disorder in the area
 - the level of deprivation and ill health in the area

The Licensing Authority believes that this list is not exhaustive and there may be other factors which may arise that could be considered relevant. The Licensing Authority will consider the relevance of any additional factors raised on a case-by-case basis.

48. The location of the premises will be an important factor as it can impact on all three of the licensing objectives. The licensing authority will consider very carefully applications for premises licences that are located in close proximity to sensitive premises such as:

- schools
- parks
- stations, other transport hubs and places where large numbers of school children might be expected
- other premises licensed for gambling
- premises licensed for alcohol
- children's and vulnerable persons' centres and accommodation
- youth and community centres
- health and treatment centres
- leisure centres used for sporting and similar activities by young persons and/or vulnerable persons
- religious centres and public places of worship

The Licensing Authority expects each premises to produce and keep on the premises a local risk assessment, covering the areas set out in this policy.

The following paragraphs indicate the physical and management factors that the licensing authority may take into account when considering applications for new, varied licence applications and reviews. These are not mandatory requirements but should be used as a guide to applicants and licensees as to the sort of arrangements that it should have in place. Where an applicant or licensee can demonstrate that these factors are not relevant, or alternative arrangements are more appropriate, the licensing authority will take these into account.

Crime and Disorder

49. Licensees and applicants will be expected to demonstrate that they have given careful consideration to preventing gambling from being a source of crime and disorder, being associated with crime or disorder or being used to support crime.

50. No ATM machines shall be allowed on the premises.

51. The measures to be considered should include:

- the arrangements in place to control access
- the opening hours
- the provision of registered door supervisors
- the provision of CCTV
- the number of staff on duty and effective staff training, especially in relation to lone working

- the provision of toilet facilities
- prevention of antisocial behaviour associated with the premises, such as street drinking, litter, activity outside the premises including the management of clients leaving the premises

Protecting Children and Vulnerable Persons

52. Licensees and applicants will be expected to demonstrate that they have given careful consideration to protecting children and vulnerable persons from harm and have adequate arrangements for preventing underage gambling on their premises.
53. The measures that should be considered where appropriate are:
- the provision of CCTV
 - location of entrances
 - supervision of entrances
 - controlled access to the premises by children under the age of 18
 - dealing with pupils who are truanting
 - design layout/lighting/fit out to not attract children or vulnerable persons
 - having a nationally recognised proof of age scheme – Think 21
 - the provision of registered door supervisors
 - clear segregation between gaming and non-gaming areas in premises frequented by children
 - the provision of adequate signage and notices
 - supervision of machine areas in premises to which children are admitted
 - controlled opening hours
 - effective self-barring schemes
 - the provision of materials for GamCare, Betknowmore UK or similar, Citizens Advice Bureau information, local public and mental health and housing/homeless associations, printed in languages appropriate to the customer base.
 - an effective staff training policy covering safeguarding
54. For multi-occupied premises consideration should be also be given to the arrangements for controlling access to children and the compatibility of the activities of the occupants. In many cases separate and identifiable entrances may be required so that people do not drift inadvertently into a gambling area.
55. Children are not permitted to use Category C or above machines and in premises where these machines are available and children are permitted on the premises the licensing authority will require:
- all Category C and above machines to be located in an area of the premises which is separated from the remainder of the premises by a

physical barrier to prevent access other than through a designated entrance

- adults only admitted to the area where these machines are located
- adequate supervised access to the area where the machines are located
- the area where these machines are located is arranged so that it can be observed by the staff or the licence holder
- prominent notices displayed at the entrance to, and inside, any such areas there indicating that access to the area is prohibited to persons under 18

Betting Premises

56. Licensed betting premises are only permitted to offer gambling facilities between 7am and 10pm, unless the licensing authority has granted a variation application to extend these hours. The licensing authority is concerned that later opening hours will attract the more vulnerable, such as those who are intoxicated or who have gambling addictions. The licensing authority also has concerns that licensed betting premises operators may seek to extend the permitted hours for the primary purpose of making gaming machines available to customers for longer. As a consequence, the licensing authority is unlikely to grant variation of hours' applications unless applicants can demonstrate that robust measures will be in place to protect the vulnerable and the additional hours are not being sought to take advantage of the gaming machine entitlement.
57. The licensing authority will use their power to restrict the number of betting machines (bet receipt terminals), their nature and the circumstances in which they are available for use when appropriate by way of conditions. When considering imposing conditions, the licensing authority will take into account, among other factors:
- the size and physical layout of the premises
 - the number of counter positions and staff on the premises
 - the ability of staff to monitor the use of machines by children, young persons under the age of 18 or vulnerable people

PART 3 - Policies Relating to Gaming Machine Permits

58. The licensing authority can issue the following types of permits:
- family entertainment centre gaming machine permits – none in Islington
 - club gaming machine permits and club machine permits
 - alcohol licensed premises gaming machine permits
 - prize gaming permits

Permits cannot be obtained for other types of businesses such as take away food shops, taxi offices and guest houses. The provision of gaming machines in these premises is not allowed.

Alcohol Licensed Premises Gaming Machine Permits

59. Premises licensed to sell alcohol that have a bar and the alcohol is not ancillary to food for consumption on the premises, having more than two gaming machines, will need to apply for a permit and must also notify the Licensing Authority if they have one or two machines. In considering whether to grant a permit, the licensing authority will have regard to the licensing objectives, guidance issued by the Gambling Commission and any other relevant matters. Permits will not be granted to licensees who have failed to demonstrate compliance with the Gambling Commission's Code of Practice.
60. In addition to the mandatory and proposed requirements of the Gambling Commission's Code of Practice, the Licensing Authority expects applicants to:
- display adequate notices and signs, advertising the relevant age restrictions
 - position machines within view of the bar in order for staff to be able to monitor the machines for use by under age or misuse of the machines
 - Challenge anyone suspected of being under age and refuse access
 - provide information leaflets and / or help-line numbers for organisations such as GamCare and Betknowmore UK.

Prize Gaming Machine Permits

61. The licensing authority expects applicants to set out the types of gaming machines that they intend to offer and be able to demonstrate that:
- they understand the limits to stakes and prizes that are set out in regulations
 - that the gaming offered is within the law

The Gambling Commission website gives advice on types of permits, conditions, stakes and prizes. See <https://www.gamblingcommission.gov.uk>

Contact

If you want to discuss this policy or if you want any further advice about regulating gambling in Islington please contact:

Licensing Service

Public Protection Division

Islington Council

222 Upper Street

London N1 1XR

Tel: 020 7527 3031

Web:www.islington.gov.uk

Email: licensing@islington.gov.uk

Local Area Profile

1. Public Health Implications

2. The Licensing Authority recognises that when gambling becomes harmful it becomes a public health issue. Whilst gambling is a leisure activity enjoyed harmlessly by many, some individuals experience significant harm as a result of their gambling. Problem gambling is defined as gambling that disrupts or damages personal, family or recreational pursuits. About 9 people in every 1,000 experience problem gambling, however, a further 70 people out of every 1,000 gamble at risky levels that can become a problem in the future. Certain people are more vulnerable to gambling-related harm, including those with substance misuse problems, poor mental health, those living in deprived areas, and children and young people. Problem gamblers are more likely than other people to experience the following harms:
3. **Financial harms:** overdue utility bills; borrowing from family friends and loan sharks; debts; pawning or selling possessions; eviction or repossession; defaults; committing illegal acts like fraud, theft, embezzlement to finance gambling; bankruptcy; etc.
4. **Family harms:** preoccupied with gambling so normal family life becomes difficult; increased arguments over money and debts; emotional and physical abuse, neglect and violence towards spouse/partner and/or children; relationship problems and separation/divorce.
5. **Health harms:** low self-esteem; stress-related disorders; anxious, worried or mood swings; poor sleep and appetite; substance misuse; depression, suicidal ideas and attempts; etc.
6. **School/college/work harms:** poor school, college or work performance; increased absenteeism; expulsion or dismissal.
7. The risk of harm from gambling varies across Islington. The Gambling Risk Index is a model that includes local data on evidence-based risk factors for problem gambling. The model includes the numbers of young people, those from minority ethnic groups, the unemployed, residents with certain mental health diagnoses, the location of substance misuse treatment centres, food banks, homelessness shelters, educational establishments and payday loan shops. The model was created by Heather Wardle and colleagues at Geofutures.

- The map below shows the Gambling risk index for Islington and the location of betting shops and adult gaming centres.

2. Local Area Profile - Policing and crime and disorder implications:

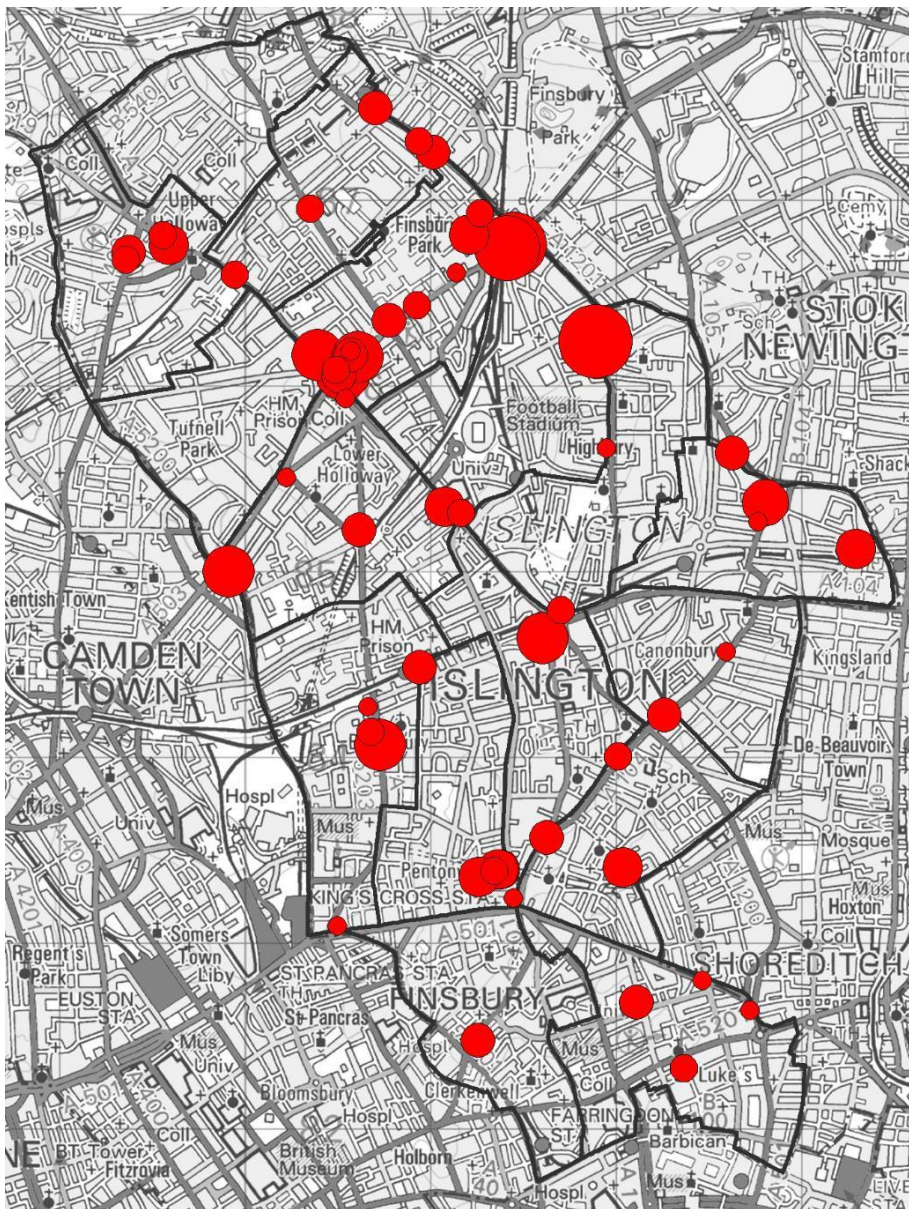
- The Police crime data in the table below was taken from CRIS.Search using location type as 'betting shop' or amusement arcade' and Council ASB data
- Analysis is based on a 24-month period between 1 October 2016 and 30 September 2018 and Council ASB data (1 October 2017 –30 September 2018).
- Based on a borough comparison of total betting shop crime over a 24-month period, Islington was ranked 11th out of 32 London Boroughs, with a total of 186 crimes. Crimes peaked between 1800 and 2100 hours at 33% and have remained static.
- This is comparable with figures produced for the 2016-2019 policy where there were a total of 184 crimes between 1 April 2014 and 31 March 2016. Islington was ranked 9th out of 32 London Boroughs.
- The most common crime type was 'other criminal damage' mostly related to customers damaging equipment, followed by 'harassment' and 'other theft'. In 2017/18 there was 16 offences classified as 'other accepted crime'. These offences related to 'dyed stained money'.

Crime Category	Betting Shop Crime	Betting Shop Crime	Total Betting Shop Crime
	1 Oct 2016 - 30 Sep 2017	1 Oct 2017 - 30 Sep 2018	1 Oct 2016 - 30 Sep 2018
Other Criminal Damage	26	28	54
Harassment	20	13	33
Other Theft	15	12	27
Others - Other Accepted	0	16	16
Common Assault	7	7	14
Criminal Damage To Other	8	3	11

Business Property	4	2	6
Burglary in Other Buildings	4	2	6
All Other Offences	10	9	19
Total Betting Shop Crime	94	92	186

Betting Shop Area Crime Map

The map below shows all betting shops across the Borough, with the circle size representing total crime over two years (larger dots mean more crime). The areas with the highest proportion of crime are Blackstock Road, Finsbury Park and Nags Head. Finsbury Park Ward has the most betting shops.



Best Practice

Holding Information

Keeping track of the incidence and handling of problem gambling in Islington is a key part of promoting the licensing objectives. We expect all Islington-based gambling premises to maintain a log and share this and other information with the Licensing service upon request.

Data that we consider should be recorded and shared includes (but is not exclusive to):

- number of interventions in a calendar month along with a short description of the cause and effect
- number of cases in a calendar month where persons who have decided to voluntarily exclude themselves from the premises have tried to gain entry
- number of mandatory exclusions needing enforcement in a calendar month along with a short description of the cause and effect
- attempts to enter by those under age in a calendar month along with short description of incident and action
- attempts to enter by those under age in the company of adults in a calendar month along with short description of incident and action
- attempts to enter by those under age with complicit adults in a calendar month along with short description of incident and action
- incidents of 'at risk behaviour' in a calendar month along with short description of incident and action
- Incidents of 'behaviour requiring immediate intervention' in a calendar month along with short description of incident and action.

Informed Businesses

We expect all customer-facing and management staff in premises licensed under the Gambling Act 2005 to have sufficient knowledge and training to tackle risks associated with gambling and know how to promote responsible gambling.

Amongst other elements, staff knowledge should include (where appropriate):

- the importance of social responsibility (Premises may wish to seek an audit from GamCare in order to obtain a certificate of Social Responsibility)
- Betknowmore UK, www.betknowmoreuk.org providing advice to businesses and support and mentoring to customers who self-refer
- causes and consequences of problem gambling
- identifying and communicating with vulnerable persons: primary intervention and escalation

- dealing with problem gamblers: exclusion (mandatory and voluntary) and escalating for advice/treatment
- refusal of entry (alcohol and drugs)
- age verification procedures and need to return stakes/withdraw winnings if under age persons found gambling
- consider in house test purchasing and forming a local partnership scheme such as Betwatch
- importance and enforcement of time/spend limits
- the conditions of the licence
- to have knowledge of the Local Area Profile
- have access to and understand the local risk assessment
- maintaining an incident log
- offences under the Gambling Act
- categories of gaming machines and the stakes and odds associated with each machine
- types of gaming and the stakes and odds associated with each
- staff exclusion from gambling at the premises where they are employed and reasons for restriction
- the 'no tipping' rule
- staff safety procedures
- ability to signpost customers to support services with respect to problem gambling, financial management, debt advice etc.
- safe cash-handling/payment of winnings
- identify forged ID and bar those using forged ID from the premises
- knowledge of a problem gambling helpline number (for their own use as well as that of customers)
- the importance of not encouraging customers to:
 - increase the amount of money they have decided to gamble
 - enter into continuous gambling for a prolonged period
 - continue gambling when they have expressed a wish to stop
 - regamble winnings
 - chase losses.

Above and beyond this we expect managers to have an in-depth knowledge of all of the above and be able to support staff in ensuring the highest standards with regard to protecting children and other vulnerable persons from being harmed or exploited by gambling and not expect staff to work alone, as they themselves could be vulnerable and possibly unable to meet the highest standards of supervision and customer care.

Managing Clients

We expect all premises to operate a voluntary exclusion scheme. This means that wherever customers request to be excluded from the premises, they are excluded for an agreed time. A self-exclusion process should be in place and supported by a written agreement drawn up in accordance with the relevant code of practice and trade association advice. The premises must take responsibility for ensuring the

person who requests voluntary exclusion is not readmitted during the agreed period.

Managing crime and risk of harm

Applicants will be expected to have consulted a local Crime Reduction Officer and to have regular security reviews.

The licensing authority will have specific regard for the need to protect children and vulnerable persons from harm, or being exploited, by gambling and will expect the applicant to satisfy the authority. This will include implementing monitoring measures to ensure that under-18s do not have access to adult-only gaming machine areas.

The Council will expect applicants to offer their own measures to meet the licensing objectives. However appropriate measures / licence conditions may cover issues such as:

- CCTV
- supervision of entrances / machine areas
- physical separation of areas
- location of entry
- notices / signage
- specific opening hours
- self-barring schemes
- measures / training for staff on how to deal with suspected truant school children on the premises.
- provision of information leaflets/helpline numbers for organisations such as GamCare and Betknowmore UK

Additional recommendations

Where Fixed Odds Betting Terminals (FOBT's) are provided, these gaming machines shall be in direct sight of the supervised counter. Leaflets and posters aimed at customers and their families/friends, which will include how to identify signs of problem gambling and pathways to advice and assistance e.g. helpline number and online counseling facility, shall be provided in close proximity to the location of any FOBT's.

The Authority has the power to restrict the number of betting machines, their nature and the circumstances in which they are made available (as per S181). This may be done by attaching a licence condition to a betting premises licence.

Prize gaming premises will appeal to children and young persons and weight will be given to child protection issues. Therefore, the licensing authority will expect the applicant to demonstrate that they are suitable to hold a permit (i.e. if the

applicant has any convictions which would make them unsuitable to operate prize gaming) and the suitability of the premises.

Appendix 3

Responsible Authority's Contact Details

Chief Officer of Police	Metropolitan Police Islington Licensing Police C/O Public Protection Division 222 Upper Street London N1 1RE Email: LicensingPolice@islington.gov.uk
Gambling Commission	Gambling Commission Victoria Square House Victoria Square Birmingham B2 4BP Tel: 0121 230 6666 Email: info@gamblingcommission.gov.uk
London Fire Brigade	Fire Safety Regulation: North East Area 2 London Fire Brigade 169 Union Street London SE1 0LL Tel: 020 8555 1200 Email: FSR-AdminSupport@london-fire.gov.uk
Planning and Development Islington Council	Town Hall Upper Street London N1 2UD Tel: 020 7527 2000 Email: Planning@islington.gov.uk
Licensing Service Public Protection Division, Islington Council	222 Upper Street London, N1 1XR Tel: 020 7527 3031 Email: licensing@islington.gov.uk
Islington Safeguarding Children Board	Children Services (CSPU Team) 222 Upper Street London N1 1XR Tel: 020 7527 2000 Email: CSPUteam@islington.gov.uk
HM Revenues & Customs	Alexander House 21 Victoria Avenue Southend-On-Sea Essex SS99 1BD

	Tel: 0845010 9000 Email enquiries.est@gmrc.gsi.gov.uk
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