



# **Gambling Premises Licensing Policy 2023-2025**

## **Statement of Principles**

### **Gambling Act 2005**

## **Forward**

Gambling is a public health issue: anyone can be vulnerable to addictive gambling.

Inherent in this health-harming addictive activity are potentially devastating consequences.

For individuals. For friends. For families. For communities.

As a small borough with high levels of deprivation and inequality, and as a council absolutely committed to making our borough safer and more equal for everyone, we approach the licensing of gambling robustly.

Harms related to gambling are manifold. They encompass financial problems, work disruption, mental health distress and relationship breakdowns. They can lead to theft, fraud, street robbery, anti-social behaviour, child neglect and domestic abuse.

And these harms reflect and amplify inequalities.

As our local area profiles indicate, the areas where we have multiple factors coalescing to place residents at risk of harm are also areas that tend to have the most gambling premises.

There is a clear correlation between deprivation and higher numbers of gambling premises. Incidents at these venues contribute to our overall levels of crime. We remain resolute in upholding the licensing objectives; resolute in being data informed; resolute in safeguarding our communities.

Each application will be considered on its merits, fully cognisant of our legal obligations, with best practice demanded as an absolute matter of course. Where a new application could result in saturation, clustering, or increased risk for vulnerable people, we will consider refusal.

Local authorities have a statutory duty to enforce the licensing objectives of the 2005 Gambling Act, which are to ensure gambling is fair and open, not associated with crime and that it does not harm the young and vulnerable.

However, while this local authority will exercise all powers at its disposal in seeking to uphold these licensing objectives, councils have no control over remote gambling.

Most gambling losses are through remote gambling rather than within gambling venues. This diminishes the already limited power of local authorities to act against gambling harm by upholding the 2005 Gambling Act licensing objectives.

This council will look to redress that balance by ensuring our voice is heard in the ongoing Gambling Act Review. In the event this does not deliver more powers to local authorities, we will work with other local authorities on a Sustainable Communities Act proposal with the aim of ensuring remote gambling is controlled and the social and economic consequences of gambling harm are mitigated.

Cllr John Woolf

Executive Member for Community Safety

Cllr Angelo Weekes

Chair of Licensing Committee

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## **PART 1 - Introduction**

Islington is one of London's smallest councils, covering just over six square miles. It is the fifty-third most deprived council in the country, and sixth 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.

### **Islington Together**

Islington is a borough of great strengths: thriving businesses; excellent transport links; outstanding services; and most importantly a rich and wonderful diversity of people, cultures, and communities. But despite these strengths too many of our people are in danger of being left behind. Poverty, mental ill-health and anxiety about the future, lack of access to good jobs, poor air quality and housing conditions, prejudice, racism, and injustice hold too many people back, depriving them of opportunities and choices and the autonomy to shape their lives in the way they want.

Our mission for the next decade is to work alongside our colleagues, partners, and communities to realise our shared goals create a more equal Islington, where everyone who lives here has an equal chance to thrive.

Our priorities for achieving a more equal future are:

- Children and young people have the best start
- Local jobs and businesses in a thriving local economy
- Everyone has a place to call home Cleaner, greener, healthier borough
- Communities feel safe, connected and inclusive

Our principles that will shape our approach are:

- Standing up to and challenging inequality
- Work in partnership with our communities
- Committing to early intervention and prevention
- Embrace change and innovation
- Driven by improving outcomes for resident

### **Purpose and Scope**

The aims of the Statement of Licensing Principles are to:

- inform licence applicants how this Authority will make licensing decisions and how licensed premises are likely to be able to operate within its area
- set out how the Authority intends to support responsible operators and take effective actions against irresponsible operators

- inform residents, business and licensed premises users, the protections afforded to the local community within the Act and by this Authority
- support the Authority in making licensing decisions

### **Licensing objectives**

The council, acting as the Licensing Authority under the Gambling Act 2005, must have regard to the following 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 gambling is conducted in fair and open way
- Protecting children and other vulnerable people from being harmed or exploited by gambling

### **Licensing Authority Functions**

The council is responsible for:

- licensing the following types of premises:
  - Casinos
  - Bingo
  - Betting Tracks
  - Betting shops
  - Adult Gaming Centres (Arcades for 18 and over)
  - Family Entertainment Centres (Arcades that permit children to enter).
- 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
- monitoring compliance and taking enforcement action when required
- publishing a statement of licensing principles

### **Role of the Gambling Commission**

The Gambling Commission is responsible for:

- issuing operating licences to organisations and individuals who provide facilities for gambling
- issuing personal licences to persons working in the gambling industry
- taking 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
- remote gambling activities such as facilities provided via the Internet, television, or radio

- issuing guidance and statutory codes of practice

## **General Approach to Applications**

The council acknowledges that licensing authorities 'shall aim to permit the use of premises for gambling', as specified in section 153 of the Gambling Act, whilst recognising that the presumption is counterbalanced 'in so far as the authority think' the application accords with relevant codes, guidance, objectives and policy. As such, when making decisions about gambling matters the authority will consider the authority's statement of licensing principles and:

- the licensing objectives
- any relevant code of practice or guidance issued by the Gambling Commission
- 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

The council will decide each application on its merits and applicants will be given the opportunity to demonstrate how their application promotes the licensing objectives and addresses the relevant sections of statement of principles.

## **Part 2 – Specific Requirements**

### **Gambling Premises Licence Applications**

When considering applications for new gambling licences, variations to existing licences and licences reviews the council will consider the matters listed below. This is not an exhaustive list and there may be other factors which may arise that could be considered relevant. The council will consider the relevance of any additional factors raised on a case-by-case basis.

- the location of the premises
- the Local Area Profile
- the Local Risk Assessment
- 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 can demonstrate high levels of management
- 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
- whether the application will create or increase the size of a cluster of gambling premises in a Gambling Vulnerability Zone

The location of the premises will be an important factor as it can impact on all three of the licensing objectives. The council will consider very carefully applications for premises licences that are near 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
- pawn brokers and cash converters
- pay day loan shops
- banks and ATMs
- fast food outlets

## **Management Standards**

The Council seeks to encourage the highest standards of management in premises used for gambling and for applicants and operators to demonstrate they have taken steps to prevent gambling from being a source of crime and disorder and to protect people from gambling related harm.

Management standards should include high-quality and regular training of all staff, the ability to recognise and address gambling harms and preventative measures targeted at all people, and not just those who are child, young or vulnerable.

Gambling premises should be adequately staffed by enough trained and competent staff who are able to serve and supervise the customers, identify, and prevent young people from gambling, prevent and address gambling related harms, deal with customers who may be consuming alcohol and prevent the premises being used as a source of crime and disorder.

In order to promote the licensing objectives and reduce the risk of staff working in gambling premises being subject to workplace violence and verbal abuse it is expected that there will be an adequate number of staff and managers on the premises to cover key points throughout the day. Applications for premises that will result in regular lone working are only likely to be approved in exceptional circumstances.

The council has produced a pool of model conditions in Appendix 2 to assist both new applicants and current operators. 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 that are expected of well managed premises.

## **Crime and Disorder**

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.

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 from Harm**

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

The measures to protect children from harm 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

For multi-occupied premises consideration should 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.

Children are only permitted to use Category D machines – low odds, coin shifters or garbbers - and in premises where other gaming machines are available and children are permitted on the premises the council will require:

- all Category C and above machines to be 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 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

### **Alcohol Licensed Premises Gaming Machine Permits**

Premises licensed to sell alcohol that have a bar and the alcohol is not ancillary to food for consumption on the premises, with more than two gaming machines, will need to apply for a Gaming Machine Permit. Premises with one or two machines must submit a notification to the council.

The council expects applicants to:

- display adequate notices and signs, advertising the relevant age restrictions
- position machines within view of the bar for staff to be able to monitor the machines for use by underage or misuse of the machines
- challenge anyone suspected of being underage and refuse access
- provide information leaflets and / or help-line numbers for organisations such as GamCare and Betknowmore UK.

### **Prize Gaming Machine Permits**

The council 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

## **Development Planning**

There is a clear and distinct difference between planning and licensing regimes, reinforced by section 210 Gambling Act 2005 which requires the council to have no regard to whether a premises is likely to be permitted under planning law when dealing with a gambling premises application.

Planning applications will be considered against relevant Local Plan policies, this includes policies which look at the concentration of such premises and their impacts. Gambling premises applications will be considered within the context of the Gambling Objectives and the Local Area Profile

Applicants for new gambling premises licences are advised to refer to the council's Local Plan:

[Retail, Leisure and Services, Culture and Visitor Accommodation \(islington.gov.uk\)](http://islington.gov.uk)

Notwithstanding this requirement the Council recommends that an applicant for a new gambling premises licence has the appropriate planning permission in place for the intended use, before making an application for a premises licence.

## **Split Premises**

The council 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 to sidestep controls on the number of machines which can be provided in a single premise. Applicants will be expected to demonstrate that there are exceptional reasons for granting the licence and the Authority will consider if the sub-division has undermined the licensing objective of protecting the vulnerable.

## **Opening Hours**

The licensing authority expects all premises licence applications to specify opening hours.

### Betting shops

The default conditions provide that betting premises are permitted to offer gambling facilities between 7am and 10pm. The council may decide to exclude the default conditions and only permit a betting premises to offer gambling facilities during reduced hours. Decisions will be made on a case-by-case basis where there is evidence to support the need for this to promote the licensing objectives.

### Adult Gaming Centres

Particular attention will be paid to the opening hours for Adult Gaming Centres which do not have opening hours specified as part of their mandatory conditions. Applicants will be expected to set opening hours that promote the licensing objectives.

## **Enforcement**

The Gambling Commission is responsible for enforcing requirements relating to Operator and Personal Licences and the manufacture, supply, or repair of gaming machines.

The Council and Police share enforcement responsibility for compliance with requirements relating to gambling in premises.

The Police will lead on significant crime and disorder issues associated with licensed premises and activities

The council will lead on general non-compliance with licence conditions, residents' complaints and issues that may involve other teams within the council associated with public safety, protecting children and vulnerable people from harm and public nuisance.

Any enforcement action will be consistent with the council's enforcement policy and the Regulators Code.

## **Illegal Gaming Machines**

The council will take a robust approach to enforcement where there is evidence of gaming machines in premises that do not comply with the legal requirements including gaming machines that are

- located in prohibited places such as takeaways and minicab offices
- provided without an appropriate permit
- uncategorised.

## **Casino Resolution**

The Gambling Act allows licensing authorities to resolve not to issue casino premises licences. The council 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.

## **Part 3 Protecting Vulnerable People From Harm**

The main opportunities to gamble in licensed premises in the borough are

- betting shops
- track betting on match days Emirates Stadium
- premises with Club gaming permits
- adult gaming centres (amusement arcades)
- pubs with permits to provide more than 2 gaming machines.

There are clusters of licenced gambling premises in Archway, Caledonian Road, Nags Head and Finsbury Park, these are all areas with high levels of multiple deprivation.

The council has serious concerns around the impact of any increase in the opportunity to gamble in the Borough and the effect it will have on its most vulnerable residents. Islington has significant numbers of residents with substance mis-use problems, poor mental health or who are living in deprivation and these groups are more vulnerable to gambling-related harm. The council recognises that the relationship between health and low income exists across almost all health indicators. Gambling harm can affect anyone and the council expects applicants to submit robust operating plans to indicate how it will prevent gambling related harm as well as early intervention measures to identify and support customers who are potentially at risk of developing gambling related harm.

A key determinant in making decisions about gambling premises applications will be the council's duty to promote the licensing objectives to protecting children and other vulnerable persons from being harmed or exploited by gambling. This is a far-reaching requirement and the council will interpret the definition of a vulnerable person to include anyone who gambles as being at risk of being harmed.

Whilst many people gamble without incurring harm. However, for some people the transition to being subject to gambling related harm can happen quickly with severe and negative impacts on themselves and people who are close to them

Vulnerable persons may include people who:

- gamble more than they want to
- who gamble beyond their means
- who may not be able to make informed or balanced decisions about gambling due to mental impairment, alcohol or drugs
- children and family members adversely impacted by the behaviour and financial loss associated with gambling
- are temporarily vulnerable due to life changing experiences, such as job loss, bereavement or relationship breakdown or moving away from home, societal and economic impacts
- are homeless

Appendix 1 brings together data relevant to creating local area profiles for the borough in particular:

- the local area profile for gambling risk
- gambling related crime and disorder

The council views that any location with a Gambling Risk Index of 20 or above is a Gambling Vulnerability Zone. Applications for new gambling premises in these areas and will expect applicants for new premises licences in this area to submit

- a comprehensive risk assessment that specifically addresses the risks
- put forward suitable and sufficient control measures, over and above what would normally be expected on a similar premises outside a Gambling Vulnerability Zone, to eliminate or mitigate those risks.

Whilst the council acknowledges that the Gambling Act 2005 expects Licensing Authorities to aim to permit premises being used for gambling activities the council will balance this requirement alongside its responsibility to protect vulnerable people from gambling related harm. As a small, densely populated borough with high levels of deprivation the council will prioritise promotion of the licensing objectives by considering the cumulative effects, especially in Gambling Vulnerability Zones. Each application will be considered on its merits but, in areas where a new application could result in saturation, the creation of gambling premises clusters or increase the risk of vulnerable people being harmed by gambling, the council will consider refusal of the application unless the applicant is able to comprehensively demonstrate, through proven evidence-based policies and procedures, that vulnerable persons will not be harmed by the proposed gambling activities.

The council will carefully weigh all the available evidence when determining applications and is aware of evolving research which supports the promotion of the licensing objectives. Whilst the council is not responsible for regulating online gambling, research on gambling related harm associated with online gambling is relevant to mitigating or eliminating the risk of gambling related harm arising from licenced gambling premises. Evidence suggests that online gaming (casino, slot, bingo) are more popular in areas of greatest deprivation and the industry derives greatest gaming yield from these areas. The Patterns of Play reports, produced by the University of Liverpool and NatCen Social Research, indicate that:

- Nearly 40% of bingo players and nearly 35% of instant win players resided in the 20% of most deprived areas.
- For slots, casino games and poker, the corresponding proportions were 31%, 28% and 26%
- In terms of Gross Gambling Yield, 39% of bingo spend originated in the 20% most deprived areas and only 6% in the 20% least deprived areas
- For the other products, the corresponding figures were: slots (25% / 14%), casino (21% / 17%), poker (19% / 22%)<sup>1</sup>

The council is also cognisant of research which suggests that online casino gambling generates a substantial proportion of expenditure from those at risk or harmed by gambling.<sup>2</sup> Furthermore, the report of the Commission on Crime and Problem Gambling, *Crime and Problem Gambling: A Research Landscape*, highlights links between disordered gambling and a wide variety of crime including theft, fraud, street robbery, domestic abuse and child neglect linked to problem and pathological gambling.<sup>3</sup>

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<sup>1</sup> [https://www.begambleaware.org/sites/default/files/2021-03/PoP\\_Interim%20Report\\_Short\\_Final.pdf](https://www.begambleaware.org/sites/default/files/2021-03/PoP_Interim%20Report_Short_Final.pdf)

<sup>2</sup> <https://www.tandfonline.com/doi/full/10.1080/14459795.2022.2088823>

<sup>3</sup> <https://howardleague.org/wp-content/uploads/2020/05/Crime-and-problem-gambling-research-landscape.pdf>

## Further Information

If you want to discuss the Statement of Principles 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](http://www.islington.gov.uk)  
Email: [licensing@islington.gov.uk](mailto:licensing@islington.gov.uk)

## References

As well as referring to the requirements of the Gambling Act 2005 and statutory guidance and codes of practice issued by the Gambling Commission the council has referred to a number of other publications to formulate its approach to fulfilling its duties under the Act, in particular the promotion of the licensing objectives. These publications include:

[Tackling gambling related harm – a whole council approach | Local Government Association](#)

[Gambling and Public Health.pdf \(londoncouncils.gov.uk\)](#)

[Retail, Leisure and Services, Culture and Visitor Accommodation \(islington.gov.uk\)](#)

[National Strategy to Reduce Gambling Harms \(gamblingcommission.gov.uk\)](#)

[A public health approach to gambling regulation: countering powerful influences - The Lancet Public Health](#)

[\(PDF\) Exploring area-based vulnerability to gambling-related harm: Developing the gambling-related harm risk index \(researchgate.net\)](#)

[Gambling regulation: problem gambling and protecting vulnerable people \(parliament.uk\)](#)

[Gambling regulation problem gambling and protecting vulnerable people \(nao.org.uk\)](#)

[LCCP Section - Gambling Commission](#)

[Reducing Gambling Harms resources - Gambling Commission](#)

[The Howard League | Crime and problem gambling: A research landscape](#)

[Gambling Risk Index|Geofutures MapCase](#)

[Mapping risk to gambling problems: a spatial analysis of two regions in England: Addiction Research & Theory: Vol 25, No 6 \(tandfonline.com\)](#)

Exploring Patterns of Play [Presentation headline here \(begambleaware.org\)](#)

[Full article: Is the economic model of gambling dependent on problem gambling? Evidence from an online survey of regular sports bettors in Britain \(tandfonline.com\)](#)

[Cost of living crisis could lead to worrying growth in gambling harms among women | BeGambleAware](#)

### Protecting children and vulnerable people from harm

The Licensing Authority recognises that gambling is increasingly recognised as a public health issue. Individuals can experience significant harm as a result of their gambling. Problem gambling is defined as gambling that is disruptive or damaging to you or your family or interferes with your daily life<sup>(1)</sup> whereas **gambling related harm** is the impact of problem gambling which may affect others as well as the person gambling.

1. The Government estimates that 0.5% of the population are considered problem gamblers, and a further 3.8% of the population are classified as at-risk gamblers
2. Gamble Aware data shows that Islington is in the quintile with the highest prevalence of problem gambling (Problem Gambling Severity Index of 8 or more out of 10) in the country, but in the third lowest quintile for relative demand and usage of support mechanisms such as counselling CBT, support groups or residential rehabilitation)
3. Harmful gambling has a different activity profile to general gambling. It includes low National Lottery participation and high participation in online gambling (including online slots), casino and bingo games, electronic gambling machines in bookmakers, sports and other event betting, betting exchanges and dog racing. Harmful gamblers are far more likely to participate in 7 or more gambling activities.
4. Around 7% of the population of Great Britain (adults and children) were found to be negatively affected by someone else's gambling.
5. 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:
6. **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.
7. **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.
8. **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.
9. **School/college/work harms:** poor school, college or work performance; increased absenteeism; expulsion or dismissal.



10. 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.
11. The map on the next page shows the Gambling Risk Index for Islington and the location of betting shops and gaming premises.

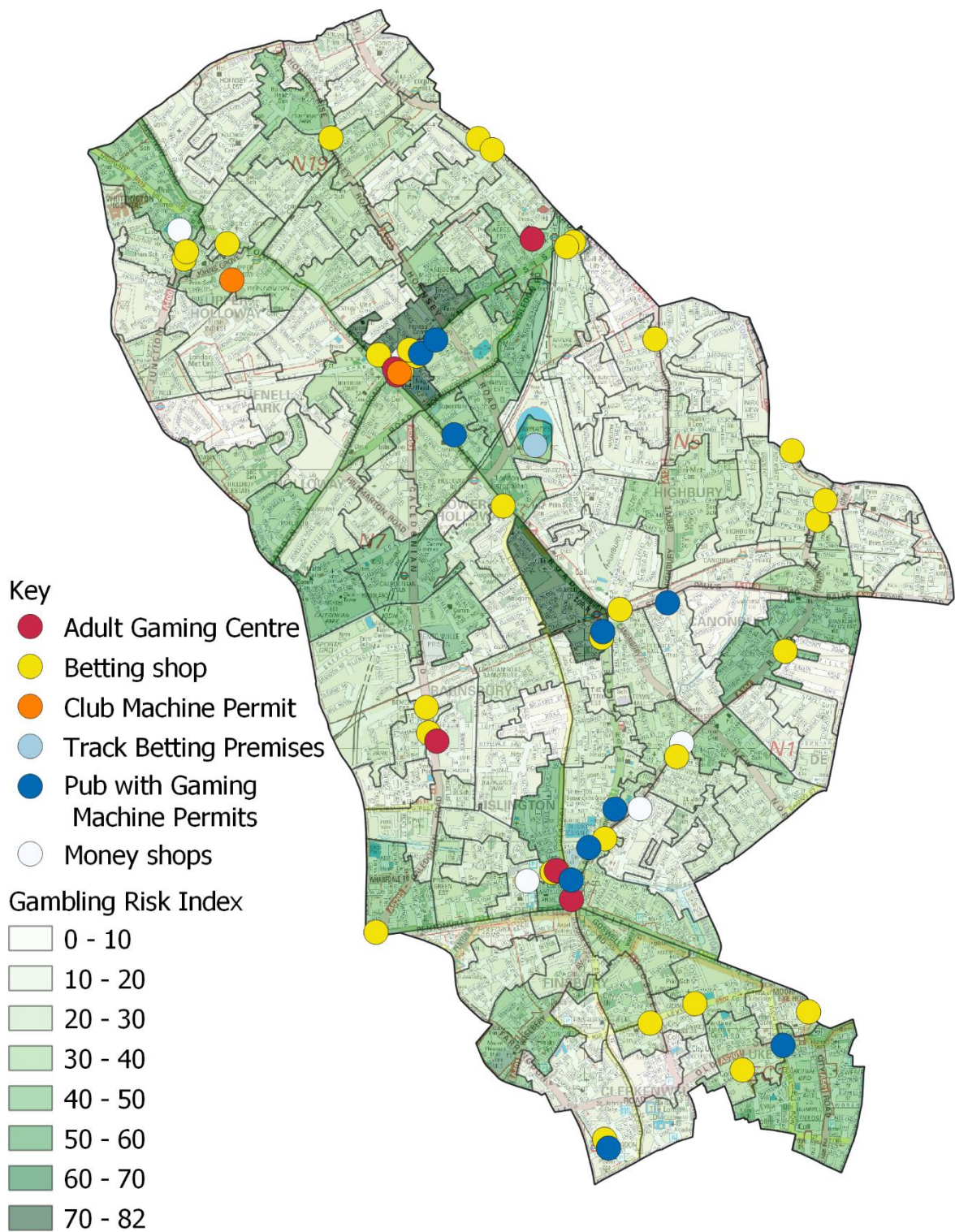
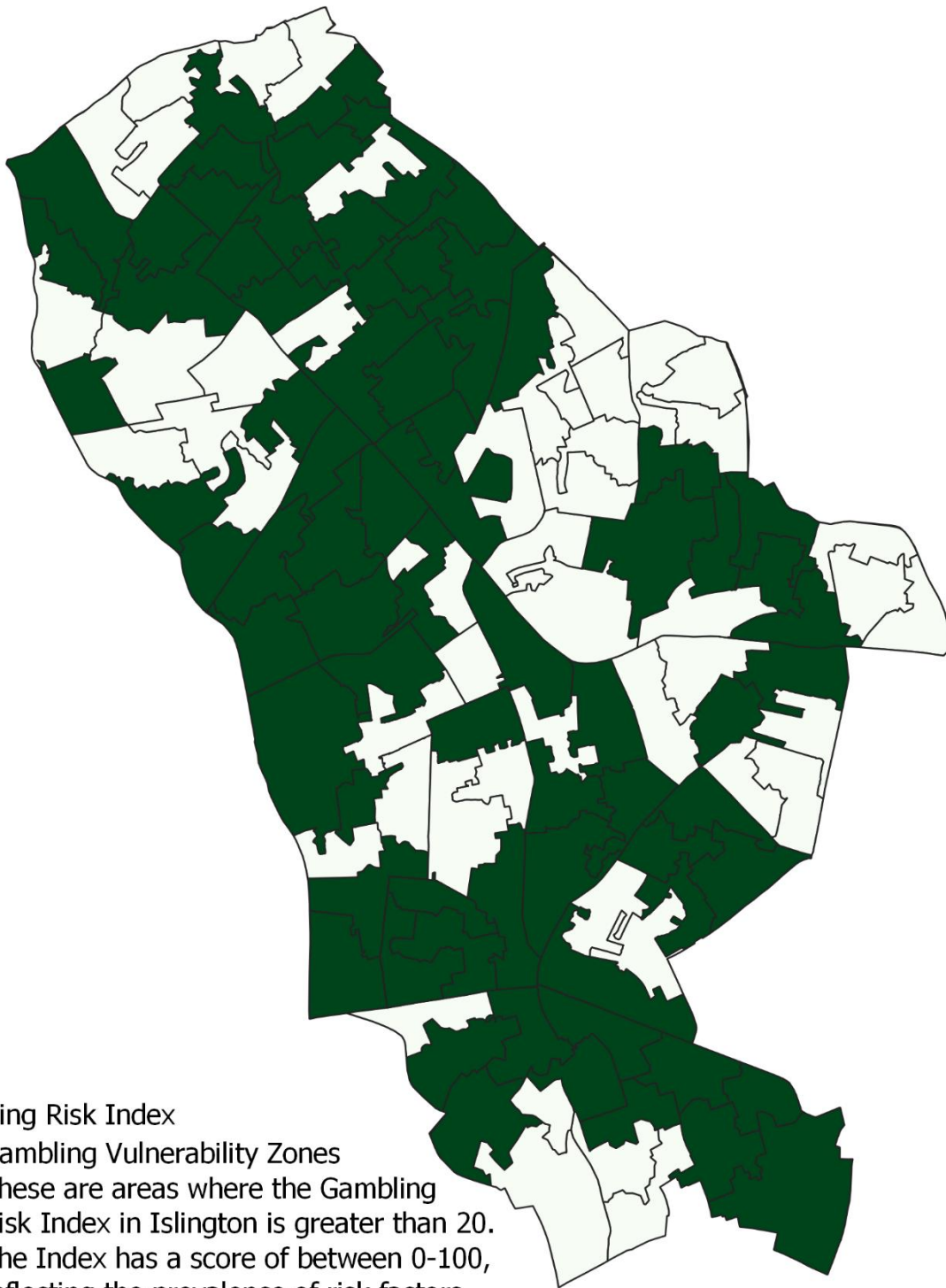


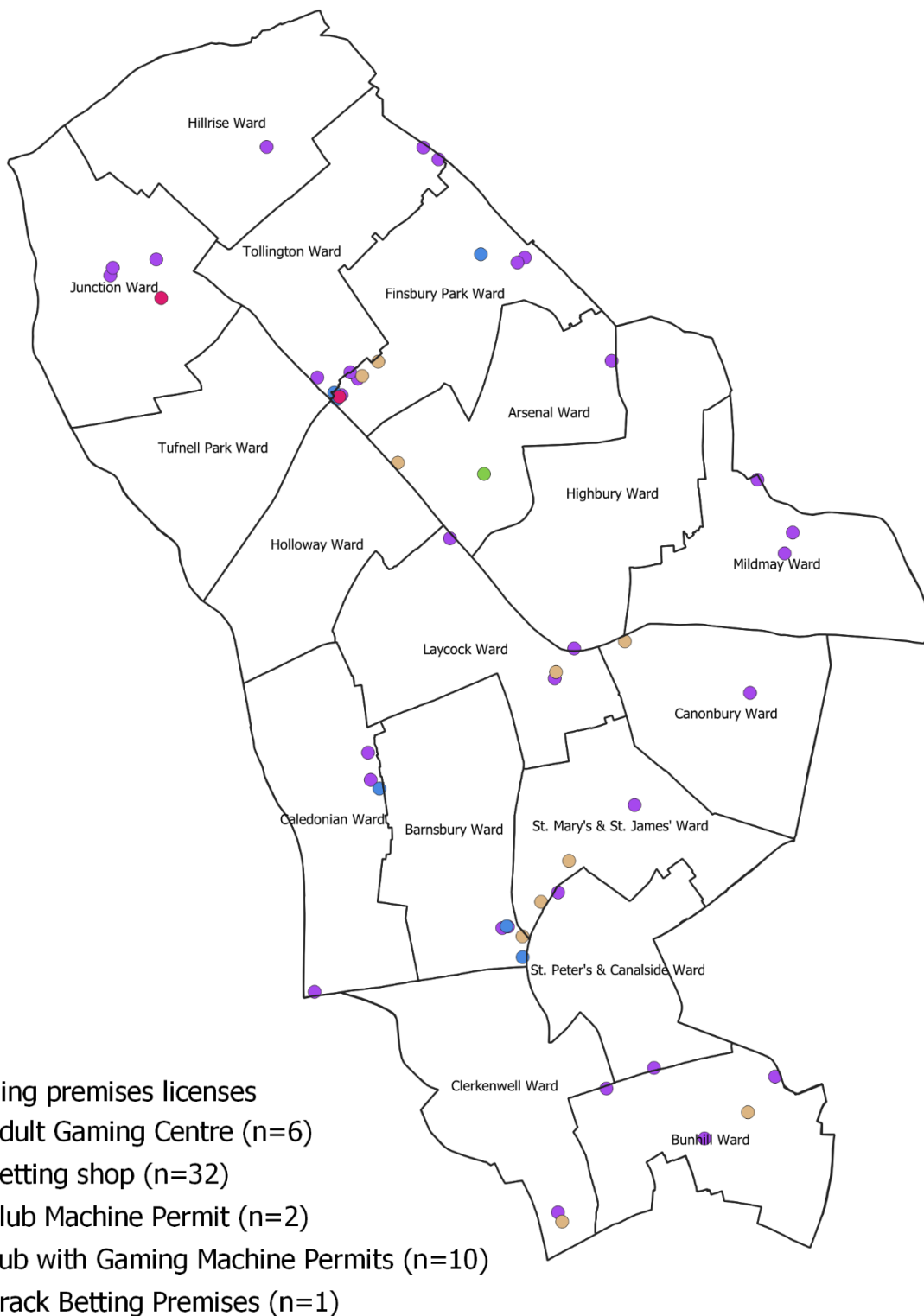
Diagram 1 – Gambling Risk Index with an overlay showing the location of gambling premises and money shops



**Gambling Risk Index**

■ **Gambling Vulnerability Zones**  
These are areas where the Gambling Risk Index in Islington is greater than 20. The Index has a score of between 0-100, reflecting the prevalence of risk factors that make people vulnerable to gambling harm.

Diagram 2 – Gambling Vulnerability Zones



**Diagram 3 Diagram showing cluster location of gambling premises by ward**

## Crime and disorder

12. The crime and disorder data analysed in this section, based on reported crime and disorder, provide an indication of patterns and hotspots. The number of actual crimes and incidents of anti-social behaviour in and around gambling premises maybe higher than those reported.
13. The Police crime data in the table below was taken from a CRIS Business Intelligence tool search using location type as 'betting shop' or amusement arcade'. Due to inconsistent recording, the address was also searched for the main betting shops as well. The data included offences where the address was recorded as outside of the premises.
14. Analysis is based on a 36-month period between 1 January 2019 and 31 December 2021
15. Based on a borough comparison of total betting shop crime over the most recent 12-month period, Islington was ranked 11<sup>th</sup> out of 32 London Boroughs (excludes City of London).
16. Table A below shows there has been reductions in crime attached to betting shops over the past three years, across all major crime categories. This can be mainly attributed to Covid lockdowns where crime nationally reduced and betting shops had periods of closure. There has also been a reduction in betting shops in Islington.

Reported Crime by Year	2019	2020	2021
Criminal Damage	39	10	7
Robbery	7	8	3
Theft and Handling	32	17	6
Violence Against the Person	49	35	29
Other Crime Type	13	6	4
<b>Total</b>	<b>140</b>	<b>76</b>	<b>49</b>

17. The next table shows that over the past three years, the most common crime type was 'harassment', accounting for 22% of all offences. This is mainly in relation to public order offences and customers threatening staff and other customers. This is followed by 'other criminal damage' – damaging equipment in the betting shop (accounting for 18% of all offences). The third highest crime type is 'Common Assault', accounting for 14% of all offences.

Table B Total Crime 2019-2021	Number	Percentage
<b>Criminal Damage</b>	<b>56</b>	<b>21%</b>
Other Criminal Damage Categories	7	3%
Other Criminal Damage	49	18%
<b>Robbery</b>	<b>18</b>	<b>7%</b>
Business Property	2	1%
Personal Property	16	6%
<b>Theft and Handling</b>	<b>55</b>	<b>21%</b>
Other Theft categories	12	5%
Other Theft	25	9%
Other Theft Person	18	7%
<b>Violence Against the Person</b>	<b>113</b>	<b>43%</b>
Assault with Injury	9	3%
Common Assault	37	14%
Harassment	57	22%
Other Violence Categories	5	2%
Serious Wounding	5	2%
<b>Other Crime Type</b>	<b>23</b>	<b>9%</b>
<b>Total</b>	<b>265</b>	<b>100%</b>

18. Offences were predominantly recorded between 9am and 22:59pm, peaking slightly at lunchtime and after 1700pm.

### Betting Shop Area Crime Map

19. The map below shows all betting shops across the Borough over the past 3 years, with the circle showing the number of offences at each point. Hot spots are also highlighted. The areas with the highest proportion of crime are the **Nags Head, Finsbury Park, Seven Sisters Road** and **Angel**.

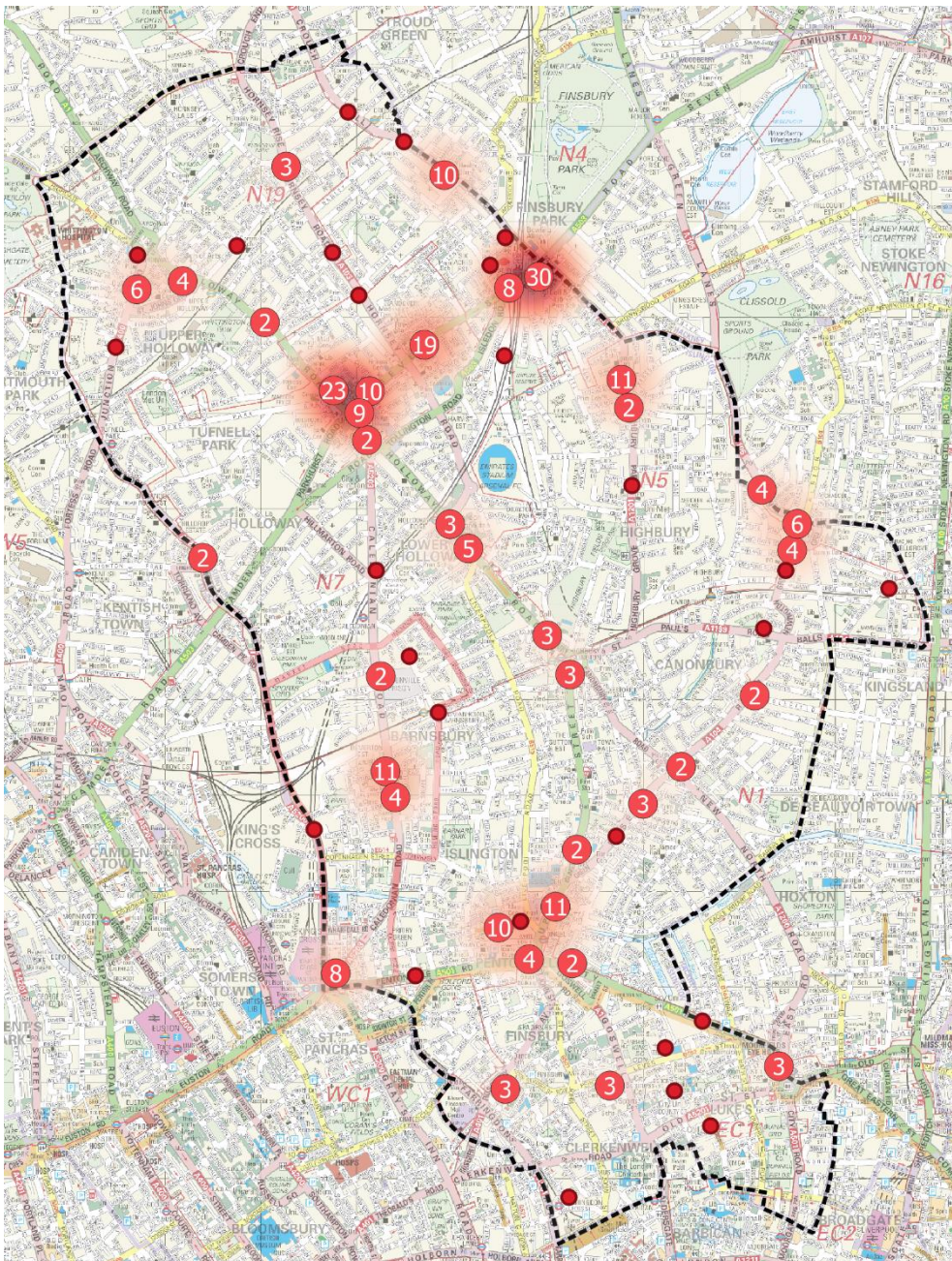


Diagram 2 – Showing the location of Betting Shops and the location of offences.

20. The following map shows street based anti-social behaviour (ASB) in close proximity to each betting shop. This excludes noise complaints. The darker reds show a higher level of street based ASB.

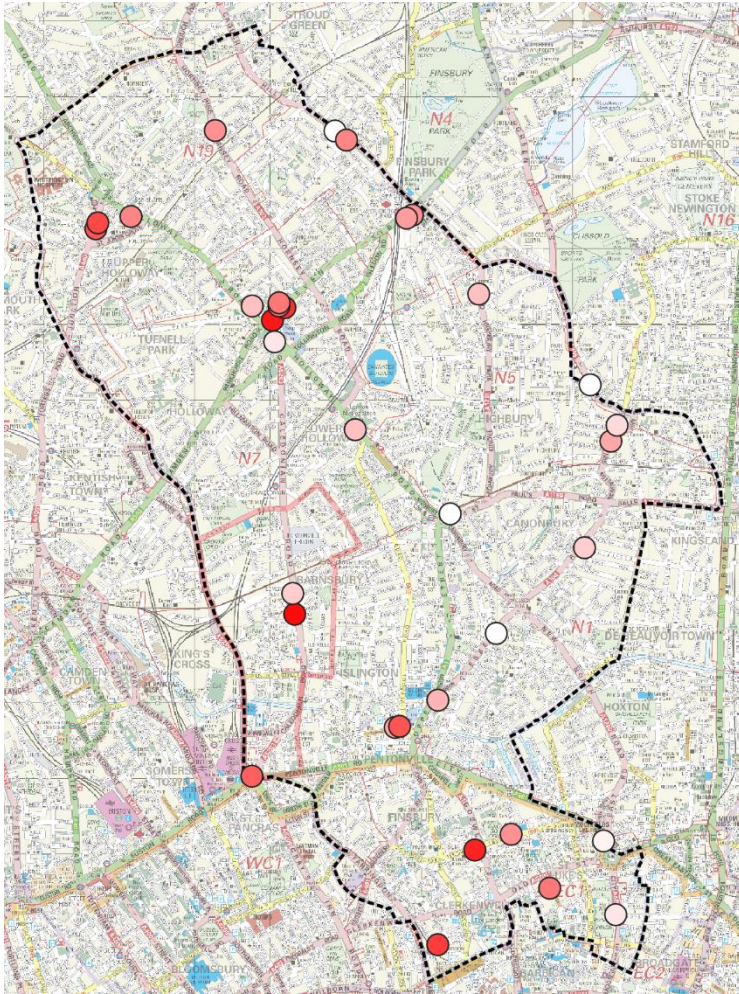


Diagram 3 Street based antisocial behaviour near betting shops.

21. The highest volume of ASB in close proximity to a betting shop was on Caledonian Road, linked to ASB on the Bemerton Estate. This was followed by Seven Sisters Road and in proximity to the betting shops at the Nags Head.



### Model premises licence conditions

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

This appendix contains model licence to assist applicants selecting the most appropriate control measures arising from risk assessment.

#### 1. SECURITY AND SAFETY

- 1.1. There shall be always at least 2 floor staff on duty at the premises when the premises are open.
- 1.2. In addition to the 2 floor staff the need for an SIA door supervisor to be on duty at the premises shall form part of a risk assessment on a quarterly basis. Written records of the risk assessments shall be retained and shall be made available to an authorised Council officer immediately upon request.
- 1.3. An incident log shall be kept at the premises and made available on request to an authorised officer of the Council or the Met Police. It must be completed within 24 hours of the incident and will record the following:
  - all crimes reported to the venue
  - all ejections of patrons
  - any complaints received concerning crime and disorder
  - any incidents of crime, disorder, abuse or threats to staff
  - any faults in the CCTV system
  - any visit by a relevant authority or emergency service
- 1.4. The premises will have an intruder alarm and a panic button.
- 1.5. Maglock or similar systems are employed and access controlled.
- 1.6. Full height security screens to be installed.
- 1.7. A requirement for 50 per cent of the shop frontage to be clear of advertising so that staff have a clear view and can monitor the exterior of the premises.
- 1.8. Staff on the premises shall have a clear view of all customers and machines on the premises.
- 1.9. The premise shall maintain a 'safe haven' to the rear of the counter.

## **2. PROTECTION OF VULNERABLE PERSONS**

- 2.1. Prominent GamCare, Bet No More and other Gambling charity documentation will be displayed at the premises.
- 2.2. There shall be no cash point or ATM facilities on the premises.
- 2.3. All notices regarding gambling advice or support information must be translated into other languages appropriate for the area.
- 2.4. The Licensee shall train staff on specific issues related to the local area and shall conduct periodic refresher training. Participation in the training shall be formally recorded and the records produced to the police or licensing authority upon request.

## **3. UNDERAGE CONTROLS**

- 3.1. Customers under 21 will have to provide ID
- 3.2. The premises will operate a 'Think 21' Refusals policy and prominent signage and notices will be displayed showing the operation of such policy.
- 3.3. The Licensee shall maintain a bound and paginated 'Think 21 Refusals' register at the premises. The register shall be produced to the police or licensing authority forthwith on request.
- 3.4. Staff will receive training and refresher training every six months on the care and procedures for dealing with vulnerable and young persons.
- 3.5. The premises will operate a 'challenge 25' policy and prominent signage and notices will be displayed showing the operation of such policy.
- 3.6. Compulsory third party test purchasing on a twice yearly external system and the results to be reported to the Local Authority and police. In the first twelve months two additional internal test purchase operations to be carried out.

## **4. CCTV**

- 4.1. The premises shall ensure that CCTV cameras and recorders are installed at the premises, that provide clear images of all key customer facing locations within the building.
- 4.2. The system shall be maintained in good working order and at all times the premises is open to the public, be fully operational covering both internal and external areas of the premises to which the public have access.
- 4.3. The CCTV camera views are not to be obstructed.
- 4.4. At least one CCTV camera is to be placed no more than seven feet above floor level; near to the entrance/exit to capture clear facial images of all persons entering or leaving the premises.
- 4.5. The medium on which CCTV images are recorded shall be of evidential quality; stored securely; shall be retained for a period of 31 days; and be available for inspection by the Police or Local Authority upon request.
- 4.6. At all times when the premises are open for the purposes of licensable activities, a suitably trained member of staff shall be available to assist the Police or an authorised officer in obtaining the CCTV footage.

- 4.7. Copies shall be made available within 48 hours to the Police or Local Authority, upon request.
- 4.8. The facility to transfer the images to a compatible, removable format, shall be held on the premises.
- 4.9. Signs must be displayed in the customer areas to advise that CCTV is in operation.
- 4.10. If the CCTV is inoperative or not installed and working to good working order, immediate repair should be sourced with reasonable timescale. The premises shall comply with all reasonable requests from the Police.
- 4.11. A monitor shall be placed inside the premises above the front door showing CCTV images of customers entering the premises.

## **5. ANTI-SOCIAL BEHAVIOUR**

- 5.1. No persons carrying visibly open or sealed alcohol vessels shall be admitted to the premises at any time that the premises are open for any licensable activity.
- 5.2. The Licensee shall take all reasonable steps to prevent street drinking of alcohol directly outside the premises and to ban from the premises those who do so.
- 5.3. The Licensee shall place and maintain a sign at the entrance which states that 'only refreshments purchased on the premises may be consumed on the premises'
- 5.4. Prior to opening the Licensee shall meet with the Crime Prevention Officer to discuss any additional measures to reduce crime and disorder.
- 5.5. The Licensee shall install and maintain an ultraviolet lighting system in the customer toilet.
- 5.6. The Licensee shall install and maintain a magnetic door locking system for the customer toilet operated by staff from behind the counter.
- 5.7. The Licensee shall implement a policy of banning any customers who engage in crime or disorder within or outside the premises.
- 5.8. 4 Notices indicating that CCTV is in use at the premises shall be placed at or near the entrance to the premises and within the premises.
- 5.9. The Licensee shall develop and agree a protocol with the police as to incident reporting, including the type and level of incident and mode of communication, to enable the police to monitor any issues arising at or in relation to the premises.
- 5.10. The Licensee shall place a notice visible from the exterior of the premises stating that drinking alcohol outside the premises is forbidden and that those who do so will be banned from the premises

## **6. STAFF TRAINING**

- 6.1. The Licensee shall ensure that all customer facing staff and managers complete a comprehensive staff training programme to have sufficient knowledge and training to tackle risks associated with gambling and know how to promote safer gambling
- 6.2. Conduct refresher training at least every six months.
- 6.3. The training shall, as a minimum, cover:
  - 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](http://www.betknowmoreuk.org) which is based in Islington, 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 vulnerable persons and the procedures for recognising and assisting those who gamble more than they can afford, giving help and advice on self-exclusion and how to seek help
- dealing with problem gamblers: exclusion (mandatory and voluntary) and escalating for advice/treatment
- refusal of entry (alcohol and drugs)
- the law relating to underage gambling and the procedure where a person who appears to be underage enters, or attempts to enter, the Premises
- age verification procedures and need to return stakes/withdraw winnings if underage persons found gambling
- importance and enforcement of time/spend limits
- the conditions of the licence
- 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.
  - Anti-Money Laundering and the Proceeds of Crime Act 2002;
  - Conflict management: managing violent, drunk, or intoxicated customers
  - Recording and reporting procedures.
  - Health and safety at work
  - Disciplinary procedures
  - Operation of the premises CCTV system

6.4. Participation in the training shall be mandatory and all staff training shall be formally recorded. Those records shall be made available for inspection by the Police or Licensing Authority on request.

## **7. Record Keeping Information**

7.1. Maintain an incident log and share this and other information with the Licensing Service upon request.

7.2. 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 underage in a calendar month along with short description of incident and action
- attempts to enter by those underage in the company of adults in a calendar month along with short description of incident and action
- attempts to enter by those underage 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.

## 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: [CNMailbox-.IslingtonPoliceLicensingTeam@met.police.uk](mailto:CNMailbox-.IslingtonPoliceLicensingTeam@met.police.uk)

**Gambling Commission** Gambling Commission  
Victoria Square House  
Victoria Square  
Birmingham  
B2 4BP  
Tel: 0121 230 6666  
Email: [info@gamblingcommission.gov.uk](mailto: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](mailto: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](mailto: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](mailto:licensing@islington.gov.uk)

**Islington Safeguarding and Quality Assurance Team** Children Services  
222 Upper Street  
London N1 1XR  
Tel: 020 7527 2000  
Email: [S&QA@islington.gov.uk](mailto:S&QA@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](mailto:enquiries.est@gmrc.gsi.gov.uk)