

# Licensing Sub-Committee

## Supplementary Agenda

Wednesday 19 May 2021

7.00 pm

Main Hall (1st Floor) - 3 Shortlands, Hammersmith, W6 8DA

### MEMBERSHIP

<b>Administration:</b> Councillor Colin Aherne	<b>Opposition:</b> Councillor Matt Thorley
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**CONTACT OFFICER:** Amrita Gill  
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Governance and Scrutiny  
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### Public Notice

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Should exempt information need to be discussed then the committee will pass a resolution requiring members of the press and public to leave.

Speaking at Licensing meetings is restricted to those who have submitted a representation and registered to speak.

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Date Issued: 13 May 2021  
Updated 18 May  
2021

# Licensing Sub-Committee Supplementary Agenda

19 May 2021

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## SECRETS HAMMERSMITH LIMITED

Councillor Anna Carpenter  
Head of Safeguarding, Review and Quality Assurance  
145 King Street  
Hammersmith  
W6 9XY

7<sup>th</sup> May 2021

Dear Councillor Carpenter,

I write with reference to your letter of 1<sup>st</sup> April, regarding the application for renewal of the SEV licence in respect of Secrets, 62 Glenthorne Road, London, W6 0LR, reference number 2021/00175/SEV which was forwarded by LBH&F on 26<sup>th</sup> April 2021. The application before the Licensing Committee of LBH&F is for the renewal of the SEV licence for the premises. The renewal application is made on the same terms as those that currently apply and have done for many years.

We have operated from the venue since July 1997 and always to the highest of standards. We strive to be good neighbours at all times. We operate with the utmost discretion, for example the internal premises deliberately cannot be viewed externally, indeed, this is a condition of our licence. We have always operated with such constraints as required by LBH&F. Additionally, we operate with great sensitivity, for example there is limited and discreet advertising at the premises as to the nature of the venue, again in accordance with the terms of our licence. We take our responsibilities as an operator extremely seriously and scrupulously abide by the conditions of our licence, the requirements of the Licensing Authority and applicable legislation. Indeed we have done so for nearly a quarter of a century and during that time have never had a licence renewal application refused, either in Hammersmith or any other of our operating venues. We work very closely with the Authorities at LBH&F and cooperate at all times.

I note your comments regarding concerns raised by local schools. We have received and responded to a representation from Godolphin and Latymer; this is the first occasion that we have received a representation from the school in all our years of trading and since the premises have not been trading due to the Covid lockdown. We have not received any direct objections from the primary schools to this year's renewal application, or any other year since their respective establishment in 2013 and 2014 and therefore are not aware of any such objections. We have operated from the site without any complaints or issues arising from any of the schools to which you refer for nearly 25 years.


Registered Office: 62 Glenthorne Road, London, W6 0LR. Telephone: 0208 563 7974  
Company No. 11989989

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Whilst LBH&F's Licensing Policy refers to the prevailing circumstances having relevance to the issue of a new SEV licence, it would be unfair and inappropriate to penalise an existing operator who has operated professionally for many years in those prevailing circumstances and the consequent loss of up to 75 jobs should the application be refused. In view of the professional and discreet way in which the premises are managed, we do not accept the specific concerns raised in your letter regarding children and sexualisation/harmful sexual behaviours. The premises operate as a late-night venue, with the opening hours currently being advertised as commencing at 21.00 on weekdays, significantly later than when children may be in the proximity. As a concession and in the spirit of cooperation, we are prepared to amend the renewal of the SEV licence application in respect of the commencement hour of the SEV licence from 18.00 to 21.00 on weekdays i.e. Monday to Fridays and trust that you would feel able to withdraw your objection on this basis.

We therefore respectfully disagree with the matters mentioned in your letter. Should you wish to discuss any aspects of the application, I would welcome the opportunity to do so. I can be contacted on telephone number 0208 942 2501. Alternatively, should you wish to discuss matters with the owner, Stephen Less, he can also be reached on the same number.

Yours sincerely



Nicky Richards  
Technical Manager  
For and on behalf of Secrets Hammersmith Ltd

# SECRETS HAMMERSMITH LIMITED

Councillor Patricia Quigley  
Labour Councillor for Hammersmith Broadway  
Cabinet Assistant for Health and Adult Social Care  
Hammersmith & Fulham Council  
Town Hall  
King Street  
London  
W6 9JU

7<sup>th</sup> May 2021

Dear Councillor Quigley,

I write with reference to your letter of 6<sup>th</sup> April, regarding the application for renewal of the SEV licence in respect of Secrets, 62 Glenthorne Road, London, W6 0LR, reference number 2021/00175/SEV which was forwarded by LBH&F on 26<sup>th</sup> April 2021. The application before the Licensing Committee of LBH&F is for the renewal of the SEV licence for the premises. The renewal application is made on the same terms as those that currently apply and have done for many years.

Thank you again for pointing out the administrative error regarding the change of Directors. This matter has now been corrected and was done so as soon as the matter was brought to our attention and as notified to you in my email dated 30<sup>th</sup> April, sent via the Licensing Officer.

We have operated from the venue since July 1997 and always to the highest of standards. We strive to be good neighbours at all times. We operate with the utmost discretion, for example the internal premises deliberately cannot be viewed externally, indeed, this is a condition of our licence. We have always operated with such constraints as required by LBH&F. Additionally, we operate with great sensitivity, for example there is limited and discreet advertising at the premises as to the nature of the venue, again in accordance with the terms of our licence. We take our responsibilities as an operator extremely seriously and scrupulously abide by the conditions of our licence, the requirements of the Licensing Authority and applicable legislation. Indeed we have done so for nearly a quarter of a century and during that time have never had a licence renewal application refused, either in Hammersmith or any other of our operating venues.

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# SECRETS HAMMERSMITH LIMITED

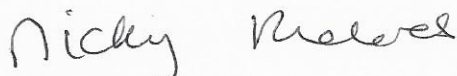
We work very closely with the Authorities at LBH&F and do not understand or accept the suggestion that the Licensing Authority does not already "go the extra mile to ensure that these places are working within the letter of the law" or that we as the operator do not seek to do "everything correctly". We have operated responsibly and professionally in the residential and mixed-use area for many years.

I note your comments regarding vulnerable members of the community not being aware of the nature of the establishment. In view of the professional manner in which the premises are operated, including minimal advertising on site and lack of visibility regarding internal activity, we have never encountered an issue such as you have outlined. For the same reasons, we do not accept the specific concerns raised in your letter regarding children and sexualisation/harmful sexual behaviours. The premises operate as a late night venue, with the opening hours currently being advertised as commencing at 21.00 on weekdays, significantly later than when children may be in the proximity.

Accordingly, we respectfully disagree that the application should be refused and a professionally managed and legitimate business be extinguished with the loss of up to 75 jobs in an extremely difficult economic environment for the hospitality industry. As a concession and in the spirit of cooperation, we are prepared to amend the renewal of the SEV licence application in respect of the commencement hour of the SEV licence from 18.00 to 21.00 on weekdays i.e. Monday to Fridays and trust that you would feel able to withdraw your objection on this basis.

Should you wish to discuss any aspects of the application, I would welcome the opportunity to do so. I can be contacted on telephone number 0208 942 2501. Alternatively, should you wish to discuss matters with the owner, Stephen Less, he can also be reached on the same number.

Yours sincerely



Nicky Richards

Technical Manager

For and on behalf of Secrets Hammersmith Ltd

# SECRETS HAMMERSMITH LIMITED

Councillor PJ Murphy  
Labour  
Mayor of Hammersmith and Fulham  
Councillor for Hammersmith Broadway Ward  
The London Borough of Hammersmith and Fulham  
The Town Hall  
King Street  
London  
W6 9JU

7<sup>th</sup> May 2021

Dear Councillor Murphy,

I write with reference to your letter of 24<sup>th</sup> March, regarding the application for renewal of the SEV licence in respect of Secrets, 62 Glenthorne Road, London, W6 0LR, reference number 2021/00175/SEV which was forwarded by LBH&F on 26<sup>th</sup> April 2021. The application before the Licensing Committee of LBH&F is for the renewal of the SEV licence for the premises. The renewal application is made on the same terms as those that currently apply and have done for many years.

We have operated from the venue since July 1997 and always to the highest of standards. We strive to be good neighbours at all times. We operate with the utmost discretion, for example the internal premises deliberately cannot be viewed externally, indeed, this is a condition of our licence and should not therefore be criticised. We have always operated with such constraints as required by LBH&F. Additionally, we operate with great sensitivity, for example there is limited and discreet advertising at the premises as to the nature of the venue, again in accordance with the terms of our licence.

The venue has operated as a business providing entertainment for customers and essential income for staff and performers for almost twenty five years and is a legitimate form of entertainment. The location of the site is in a mixed use area and Secrets has operated in that location sensitively and successfully during that time. Whilst we do not feel it is appropriate to comment on matters that suggest a moral objection, we would ask you to note that our performers inform us that they feel empowered by what they do, including enjoying economic freedom and have been informed by women walking by the venue at night that they feel safer due to the presence of security.

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# SECRETS HAMMERSMITH LIMITED

I note your comments with regard to the development of significant residential development and reference to a local primary school. The SEV licence at Secrets has been renewed several times since the development of the residential accommodation to which you refer as they were developed a few years ago and not within the last twelve months, i.e. since the last renewal. None of the residents of the blocks to which you refer have objected to the application and similarly we have not received any direct objection from any primary school.

We also note your comment that LBH&F should ban SEV licensed premises. This is clearly a political matter and has absolutely no relevance to an application for renewal of an SEV licence. This is not the correct forum for the issue to be raised and accordingly we trust that the Licensing Committee will disregard this comment as inappropriate and attach no weight to it.

Accordingly, we respectfully disagree that the application should be refused and a professionally managed and legitimate business be extinguished with the loss of up to 75 jobs in an extremely difficult economic environment for the hospitality industry. As a concession and in the spirit of cooperation, we are prepared to amend the renewal of the SEV licence application in respect of the commencement hour of the SEV licence from 18.00 to 21.00 on weekdays i.e. Mondays to Fridays and trust that you would feel able to withdraw your objection on this basis.

Should you wish to discuss any aspects of the application, I would welcome the opportunity to do so. I can be contacted on telephone number 0208 942 2501. Alternatively, should you wish to discuss matters with the owner, Stephen Less, he can also be reached on the same number.

Yours sincerely



Nicky Richards  
Technical Manager  
For and on behalf of Secrets Hammersmith Ltd



# SECRETS HAMMERSMITH LIMITED

Mr Alex Gardner  
Redmore Road  
London  
W6 0HZ

7<sup>th</sup> May 2021

Dear Mr Gardner,

I write with reference to your letter of 25<sup>th</sup> March, regarding the application for renewal of the SEV licence in respect of Secrets, 62 Glenthorne Road, London, W6 0LR, reference number 2021/00175/SEV which was forwarded by LBH&F on 26<sup>th</sup> April 2021. The application before the Licensing Committee of LBH&F is for the renewal of the SEV licence for the premises. The renewal application is made on the same terms as those that currently apply and have done for many years.

We have operated from the venue since July 1997 and always to the highest of standards. We strive to be good neighbours at all times.

Accordingly, we endeavour to address any issues giving cause for concern swiftly as and when they are brought to our attention as this ensures that we can investigate matters fully as soon as possible and address any issues at the appropriate time, not least with a view to establishing whether the matters raised are in fact related to the Secrets' venue. As you will appreciate, being located on a busy thoroughfare which provides access to many forms of public transport at Hammersmith and being close to public houses, complaints can be levelled at Secrets which upon investigation is not the source of the problem. Without reference to specific matters, we are unable to carry out such investigations. However, we have interrogated our daily operational reports in the twelve month period prior to the renewal of the SEV licence prior to closure due to the Pandemic i.e. 2019 to 2020 and can confirm that we did not receive any complaints of the type raised in your letter which related to Secrets.

You do not indicate in your letter whether you have tried to make contact with members of Management at the venue in order to ensure that matters are brought to our attention swiftly and dealt with if appropriate. We would therefore like to ensure that you have the correct details of those who will be able to assist you should you experience difficulties in the future with a view to establishing the cause of the problem.

Accordingly, the Manager's details are: Gary Nicholls, club telephone number 020 8563 7974, personal mobile number 07908 201145. He can be contacted directly if any issues occur at any time during the evening between 9pm and 4am.

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The owner of the company is: Stephen Less who can be contacted at the Head office on 020 8942 2501 between 10:30am and 6:30pm.

I note your reference to the state of repair of the building. Again, I am not clear as to the precise nature of your comment, but we utterly reject any suggestion that the building has not been properly maintained either internally or externally.

Refurbishment and maintenance of the building are undertaken regularly and as necessary, without which we would not be able to provide an attractive venue to welcome customers and retain staff.

As I have set out, we have operated from the venue for nearly twenty five years and do so professionally and with the utmost discretion. By way of example the internal premises deliberately cannot be viewed externally, indeed, this is a condition of our licence. We are happy to operate with such constraints as required by LBH&F. Additionally, we operate with great sensitivity, for example there is limited and discreet advertising at the premises as to the nature of the venue, again in accordance with the terms of our licence. We are a legitimate business operating in compliance with the conditions of our licences, requirements of LBH&F and the legislative requirements; should the application be refused there would be a consequent loss of up to 75 jobs in an extremely difficult economic environment for the hospitality industry.

Please be assured that we take the concerns outlined in your representation extremely seriously. As a concession and in the spirit of cooperation, we are prepared to amend the renewal of the SEV licence application in respect of the commencement hour of the SEV licence from 18.00 to 21.00 on weekdays i.e. Mondays to Fridays and trust that you would feel able to withdraw your objection on this basis.

Should you wish to discuss matters, please feel free to contact me on telephone number 0208 942 2501. Alternatively, should you wish to speak to the owner, Mr Stephen Less, he can also be reached on the same number. We are committed to continuing to work with our closest neighbours, many of whom we welcome as guests to the venue and look forward to hearing from you.

Yours sincerely



Nicky Richards

Technical Manager

On and on behalf of Secrets Hammersmith Ltd

# SECRETS HAMMERSMITH LIMITED

Dr Lang  
Director of Public Health  
The London Borough of Hammersmith & Fulham  
Hammersmith Town Hall  
London  
W6 9JU

11<sup>th</sup> May 2021

Dear Dr Lang,

I write with reference to your letter of objection dated 25<sup>th</sup> March in respect of the renewal of the SEV licence for Secrets, 62 Glenthorne Road, London, W6 0LR Reference 2021/00175 which was forwarded to me by the Licensing Department on 26<sup>th</sup> April 2021.

We have reviewed the contents of your letter and comment as follows:

1. We have operated at the venue for almost 24 years with the benefit of an SEV licence or equivalent and we take our responsibilities to our staff, performers, customers and neighbours extremely seriously. We devise, implement and enforce policies and procedures seeking at all times to ensure the safety and wellbeing of all those who use our premises, such policies and procedures being reviewed regularly and as necessary.
2. During these extremely difficult times such safeguarding is even more paramount. Clearly, as a business we have not been able to operate for over 13 months having been closed since 20<sup>th</sup> March 2020. However, during closure we have kept up to date with all relevant Regulations and Guidance in anticipation of the date when we can once again open our doors to the public. Up to 75 staff and performers rely on the venue operating, for their income and we want to do all that we can to support them and provide a safe environment for them so that they can continue to do so.
3. We will, of course, comply with any requirements set out by the Government on the re-commencement of trading from the venue and will ensure that all policies and procedures are updated, as appropriate. As far as the renewal application is concerned, as you will be aware, there is no requirement to provide any details regarding Covid procedures etc. as part of the application. Additionally, at the time the application was lodged, as remains the case, the date when the premises are permitted to re-open had not been absolutely confirmed and remains subject to satisfactory outcomes regarding Covid status. Nevertheless, we produced a Risk Assessment which takes into account current recommendations, a copy of which I attach for your information. The Risk Assessment will be reviewed and updated

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Company No. 11989989

# SECRETS HAMMERSMITH LIMITED

should any changes arise regarding the Regulations and/or Guidance and as necessary immediately prior to opening.

4. In addition we have taken on board recommendations contained in your letter and updated the appropriate documents which I also attach for your information.
5. We would welcome any advice that you would be prepared to proffer with regard to the attached documents should you consider that any additional matters ought to be included.

We trust that you appreciate that although it was not a requirement of the Licensing Authority's policy to lodge the documents referred to in my letter as part of the renewal application, we wish to assure you that such policies and procedures have been devised and will be updated as necessary and implemented once trading re-commences at the venue. In the meantime, as mentioned, should you have any comments we would welcome your input.

We hope that in view of the contents of this email, you are satisfied that the appropriate measures will be in place in due course and that you will feel able to withdraw your objection to the SEV licence renewal.

Thank you for your assistance in relation to this matter.

I look forward to hearing from you.

Yours sincerely



Nicky Richards

Technical Manager

For and on behalf of Secrets Hammersmith Ltd

## Safeguarding Policy

The Secrets Group takes the health, safety and welfare of all staff and self-employed performers seriously. We believe that all people have the right to live in safety, free from abuse and neglect.

The Secrets Group have up-to-date, functional policies which are brought to our employees' attention and to the attention of all self-employed performers at their induction and periodically afterwards.

The care and support statutory guidance identifies ten types of abuse, these are:

- Physical abuse
- Domestic violence or abuse
- Sexual abuse
- Psychological or emotional abuse
- Financial or material abuse
- Modern slavery
- Discriminatory abuse
- Organisational or institutional abuse
- Neglect or acts of omission
- Self-neglect

All members of Management are trained on how to identify the different types of abuse. Some signs to look out for are listed below:

### **Physical Abuse – Signs to Look Out For**

- No explanation for injuries or inconsistency with the account of what happened.
- Injuries are inconsistent with the person's lifestyle.
- Bruising, cuts, welts, burns and/or marks on the body or loss of hair in clumps.
- Frequent injuries.
- Unexplained falls.
- Subdued or changed behaviour in the presence of a particular person.
- Signs of malnutrition.
- Failure to seek medical treatment or frequent changes of GP.

### **Domestic Violence – Signs to Look Out For**

- Low self-esteem.
- Feeling that the abuse is their fault when it is not.
- Physical evidence of violence such as bruising, cuts, broken bones.
- Verbal abuse and humiliation in front of others.
- Fear of outside intervention.
- Damage to home or property.
- Isolation – not seeing friends and family.
- Limited access to money.

### **Sexual Abuse – Signs to Look Out For**

- Bruising, particularly to the thighs, buttocks and upper arms and marks on the neck.

- Torn, stained or bloody underclothing.
- Unusual difficulty in walking or sitting.
- The uncharacteristic use of explicit sexual language or significant changes in sexual behaviour or attitude.
- Self-harming.
- Poor concentration, withdrawal, sleep disturbance.
- Excessive fear/apprehension of, or withdrawal from relationships.
- Reluctance to be alone with a particular person.

#### **Psychological / Emotional Abuse – Signs to Look Out For**

- An air of silence when a particular person is present.
- Withdrawal or change in the psychological state of the person.
- Insomnia.
- Low self-esteem.
- Uncooperative and aggressive behaviour.
- A change of appetite, weight loss/gain.
- Signs of distress: tearfulness, anger.
- Apparent false claims, by someone involved with the person, to attract unnecessary treatment.

#### **Financial / Material Abuse – Signs to Look Out For**

- Theft of money or possessions.
- Fraud, scamming.
- Preventing a person from accessing their own money, benefits or assets.
- Undue pressure, duress, threat or undue influence put on the person in connection with loans, wills, property, inheritance or financial transactions.
- Misuse of benefits or direct payments in a family home.
- Someone moving into a person's home and living rent free without agreement or under duress.
- False representation, using another person's bank account, cards or documents.
- Exploitation of a person's money or assets, e.g. unauthorised use of a car.
- Misuse of a power of attorney, deputy, appointeeship or other legal authority.
- Rogue trading – e.g. unnecessary or overpriced property repairs and failure to carry out agreed repairs or poor workmanship.

#### **Modern Day Slavery– Signs to Look Out For**

- Signs of physical or emotional abuse.
- Appearing to be malnourished, unkempt or withdrawn.
- Isolation from the community, seeming under the control or influence of others.
- Living in dirty, cramped or overcrowded accommodation and or living and working at the same address.
- Lack of personal effects or identification documents.
- Always wearing the same clothes.
- Avoidance of eye contact, appearing frightened or hesitant to talk to strangers.
- Fear of law enforcers.

Please see our Modern Slavery Policy for more details.

### **Discriminatory Abuse– Signs to Look Out For**

- The person appears withdrawn and isolated.
- Expressions of anger, frustration, fear or anxiety.
- The support on offer does not take account of the person's individual needs in terms of a protected characteristic.

### **Neglect – Signs to Look Out For**

- Poor environment – dirty or unhygienic.
- Poor physical condition and/or personal hygiene.
- Pressure sores or ulcers.
- Malnutrition or unexplained weight loss.
- Untreated injuries and medical problems.
- Inconsistent or reluctant contact with medical and social care organisations.
- Accumulation of untaken medication.
- Uncharacteristic failure to engage in social interaction.
- Inappropriate or inadequate clothing.

### **Self-Neglect – Signs to Look Out For**

- Very poor personal hygiene.
- Unkempt appearance.
- Lack of essential food, clothing or shelter.
- Malnutrition and/or dehydration.
- Living in squalid or unsanitary conditions.
- Neglecting household maintenance.
- Hoarding.
- Collecting a large number of animals in inappropriate conditions.
- Non-compliance with health or care services.
- Inability or unwillingness to take medication or treat illness or injury.

All workers are encouraged to speak to a member of Management if they are being abused or if they believe another worker is being abused. Also workers are encouraged to speak to a member of Management if they have any concerns about their mental health or the mental health of another staff member or performer.

### **Raising Safeguarding Alerts**

Management will refer concerns to the Council when required using the Safeguarding alert referral form on this link - <https://www.lbhf.gov.uk/crime/victim-support/safeguarding-adults> or to another appropriate organisation.

Management will report suspicions of Modern Slavery to the Modern Slavery Helpline confidentially on 08000 121 700. This is open 24 hours a day, 365 days a year.

If Management believe that any worker is in immediate danger or a crime has been committed, they will ring 101 or 999 immediately.

### **Services Available**

If an employee or self-employed performer would like to access help directly, the contact details for some local services are listed below:

<b>Drug &amp; Alcohol Services</b>	<p>Turning Point  The New Coach House  370-376 Uxbridge Road  London  W12 7LL</p> <p>Tel 02087406815</p>
<b>Sexual Health</b>	<p>Hammersmith Centres for Health,  Hammersmith Hospital, Du Cane Road, W12  OHS</p> <p>Tel 020 3313 4100</p>
<b>Domestic Violence Services</b>	<p>Hammersmith &amp; Fulham Police Community Safety Unit (CSU) is on 020 8246 2828. The CSU investigate hate crimes, including domestic violence, in the borough. Officers are specially trained to deal with these crimes.</p> <p>Angelou Partnership  Tel: 0808 8010660 or 0208 7417008.  Translators are available.</p> <p>National Domestic Abuse Helpline 24 hours a day on 0808 2000247.</p>



Extracts from the company safety management system. This information is given, via inductions and at periodic safety briefings to all staff and dancers within the club and is monitored by the manager and senior staff during club opening times:

### **Club Safety**

There are limited parking spaces close to the clubs which employees and performers can use on a first come basis.

All access routes via the main street access routes are well lit and maintained by the local councils and highways authorities. All door supervisors have line of sight for all pedestrians within the vicinity of the clubs. There is also CCTV covering all club entrances. All workers are escorted to their vehicles or pre-booked taxis when leaving the Club.

See risk assessment – ‘Safety of Female Employees and Self-Employed Performers’.

### **Safe ventilation**

All clubs have air conditioning which filters and recycles fresh air within the clubs – these are periodically serviced with records available at the head office.

### **Layout social distancing:**

The club layouts are mainly group seating areas with banquet type seating for up to 6 persons.

We are limiting the number of people in the Club at any one time to ensure social distancing guidelines are adhered to. See Covid RA.

### **Handwashing facilities:**

There are suitable welfare areas for both male and female and in some clubs, separate facilities for staff. Hand sanitisers will be available in all areas of the club including the reception, bar, table service staff changing rooms and managers areas.

### **Safe staff spaces:**

All clubs have safe refuges, rest and changing areas for both male and female members of staff. These are monitored (externally) by CCTV and no customers are permitted in these areas. There are also the managers areas which could also be used.

Note:

All safety measures noted above are monitored both internally by the Operation manager and the Club managers. There is also provision to review all these safety measures through our external safety consultants.

## Alcohol and Drug Abuse

Alcohol and drug abuse have serious implications for users and for their work. Workers who are under the influence of alcohol and drugs can seriously affect their judgement and abilities whilst driving or carrying out their work activities.

Workers are encouraged to seek assistance in complete confidence from a Director or Manager if they believe that they have a problem with alcohol, drugs or other substances.

Management are required to make a note of workers who show symptoms of alcohol or other intoxication when at work. These symptoms include:

- Slurred speech.
- Unusual lack of co-ordination.
- Changes in behaviour, particularly aggressiveness.

No drugs are to be consumed on the premises unless they are prescription drugs from the worker's doctor. Workers are instructed to check with their doctor or pharmacist that the prescription drugs that they are taking will not impair their driving ability.

Alcohol may only be consumed on our premises when authorised by Management.

Anyone found taking non-prescribed drugs on our premises is guilty of gross misconduct and will be disciplined accordingly.

Anyone found drinking alcohol on our premises without prior authorisation is guilty of gross misconduct and will be disciplined accordingly.

Anyone found to be intoxicated by alcohol or drugs, will be removed, deemed guilty of gross misconduct and disciplined accordingly.

## Aggressive Behaviour

It is possible that our workers will experience aggressive or violent behaviour. Such behaviour can result with injuries if not dealt with correctly. We have a duty for the safety and health of all workers. Where necessary, we will provide workers with the necessary training to manage aggressive or violent situations.

Training will involve teaching workers to understand simple warning signs or “triggers” to help avoid aggressive behaviour. The term “trigger” is used to describe a situation that causes aggression such as making a person wait for an excessive time for something.

The key is to avoid aggressive or violent behaviour however we will ensure that workers have the competence to manage such situations. Performers are instructed to seek assistance from security if a customer becomes intimidating or behaves inappropriately. Performers must never deal with situations like this themselves.

If a worker has been harmed because of aggressive behaviour this is to be reported to a Manager or a Director and recorded in the accident book.

**THE SECRETS GROUP**  
**PERFORMERS' WELFARE POLICY**

The Secrets Group provides opportunities for Performers to dance on a self-employed basis. These opportunities will be enhanced if Performers feel that they are dancing in a safe and supportive environment and are therefore able to enjoy the atmosphere and conditions in which they dance and communicate that enjoyment to customers.

With that in mind, Secrets have decided to identify in this Welfare Policy all of the various measures which have been adopted over the years to reassure Performers that they are not "on their own".

**Behaviour by Customers**

1. Customers at Secrets are required to behave in a respectful and polite manner towards Performers. No aggressive, intimidating or sexually predatory behaviour towards Performers will be tolerated by Secrets Management and Staff.
2. Customers may not touch a Performer during a performance nor may customers remove any clothing except a tie and jacket. Customers are totally forbidden to engage in masturbation or other sexual behaviour.
3. If any customer behaves in a way which breaches any of these rules, the Performer should report the matter immediately to Secrets Security or Management who will address the problem. Performers will never be expected to deal with an unruly or ill-behaved customer themselves.
4. Serious misbehaviour by a customer will result in the customer being ejected from the premises. Minor breaches of the "Customers House Rules" may only result in a warning as to the customer's future behaviour, but no Performer will ever be put under any pressure to perform or continue to perform for a customer about whom she is unhappy.
5. The expected response from Secrets Security or Management to a complaint by a Performer about customer behaviour will be to support the Performer. Only in the most exceptional circumstances will this not happen. This would only be where Secrets Security or Management genuinely believes, after investigation, that the Performer's complaint is frivolous or vexatious (not serious or petty/annoying).

**Behaviour by Other Performers and Staff**

1. The same standards of behaviour towards Performers are expected from other Performers and Secrets Staff, as are expected from customers. Any aggressive, intimidating or sexually predatory behaviour by Secrets Staff, Security or other Performers must be reported to Secrets Management or Senior Management, who will deal with the problem.

2. It is obviously important that everyone's personal property should be secure whilst Performers are at Secrets. All Performers' changing rooms have lockers which Performers may use to store personal items while performing. These lockers can be secured by a padlock. Performers are advised to bring their own padlock and key so that no-one else can have access to their locker.

### **Non-Discrimination**

1. When considering whether to offer anyone the opportunity to perform at Secrets, and in dealing with existing Performers, Secrets will not discriminate on the grounds of race, colour, sexual orientation or political or religious beliefs.

2. The criteria for being able to perform at Secrets will always be having the ability and right attitude to perform to the high standards which Secrets expect.

3. If a Performer believes that she is being discriminated against, on an unacceptable basis, this should be reported to Secrets Management or Senior Management who will deal with the problem.

### **Performers' Health and Wellbeing while at Secrets**

1. Drinking water will always be available to Performers at no cost.

2. If a Performer feels unwell whilst at Secrets she should speak to a member of Management or the Performer Co-ordinator (House Mother). A first aid kit is always available, including sanitary products and a comfortable place to rest will be made available.

3. If a Performer's medical condition warrants it, an ambulance will be called by Secrets Security or Management.

4. If a Performer has any concerns about her working environment, including any personal problems which may impact on her performing or anything else, in any way related to her time at Secrets, the Performer Co-ordinator will always do their best to help, if at all possible.

5. If talking to a Performer Co-ordinator doesn't seem right in the circumstances, the Senior management will also try to help. They are based at Secrets head office during the day and can be contacted by telephone on: 0208 942 2501.

6. All Performers are required to inform the management of their mode of transport to and from the venue that they work at. There will be limited provisions made for parking for staff and performers on a first come first served basis.

7. It is a Company Policy that all Female staff and Performers must not leave the premises alone. A member of Security must always walk all Female members of staff and performers to their mode of transport. Staff and Performers must ensure that they do not use Public

transport at the end of their shift. Only personal vehicles and pre-booked Taxis will be permitted.

8. Any female member of staff performer that feels vulnerable whilst travelling to or from their place of work and would feel safer with a Personal Rape Alarm. Please ask your venue Manager who will provide one for you on behalf of the company.

9. Sexual Health & Wellbeing. Any member of staff that requires any advice or Support in relation to any Sexual Health/ Wellbeing matters then please contact your line manager or any member of the Senior Management team that you feel comfortable in dealing with. Support and advice will be freely given and you will also if required be referred to Occupational Health.

Please do not feel hesitant in asking for help if you need it. We want to make sure that you feel comfortable and secure about performing at Secrets and want to do all that we reasonably can to make sure that happens.

CONFIDENTIAL

## **Modern Slavery Information & Reporting**

### **Introduction**

We are committed to understanding modern slavery risks and ensuring that there is no modern slavery within our organisation or within our supply chains. This extends to our suppliers, customers and any third party organisation we have dealings with. It is important that all of our employees understand what modern slavery is, understand the warning signs and know where to report suspicions of modern slavery.

### **What is modern slavery?**

It is the forced and compulsory labour of people including human trafficking. The victims are usually overseas workers or vulnerable people from the UK. Usually, the person will be forced to work unlawfully long hours, paid substantially below legal rates and will have had their passports and other personal possessions taken away from them. They are forced to work through mental and/or physical threat and abuse. They are owned and controlled by their employer, dehumanised and treated as a commodity and have a restriction on their freedom of movement and ability to leave the poor working conditions they are trapped in.

### **Warning Signs**

Below is a list of warning signs to look out for (not an exhaustive list):

- Physical appearance – signs of abuse, looking malnourished or appear withdrawn
- Isolation – Rarely working alone, seemingly under the control or influence of another and rarely interacting with others
- Poor living conditions and suspicions of them living at the same address that they work
- Few personal possessions and wearing the same clothing again and again, sometimes clothing unfit for the work they are undertaking
- Unusual and long working hours with little or no break
- Avoiding eye contact, appearing frightened etc.

### **Reporting Process**

If you suspect anyone you come into contact with during your employment with us, is subject to modern slavery by their employer, you should report this to [Insert Name]. Every instance will be taken seriously and fully investigated. You will not be victimised for your reporting of a situation and can ask to remain anonymous. You will be fully supported through your reporting of any genuine belief of modern slavery.

**Signed Managing Director:**

**Date:**

## **Security of staff and performers with the Secrets Group venues**

The manager and their staff will prepare the clubs for operating on the authorised and licenced dates and timings.

During this preparation the doors will remain secure, and no unauthorised persons will be permitted on site.

On opening the door supervisors will be in place and the receptionist will be available to greet the customers.

The following are duties of the door supervisors:

### **Door Supervisor Job Description**

The Door Supervisors will be licensed and report directly to the club manager.

#### **Main Duties**

- To supervise entry into the club and the reception area
- Through their main office – be aware of any local threats or incidents and keep the club managers up to date.
- To protect the property or premises from theft and damage.
- To protect customers, performers and staff from violence and assault.
- To report to and take directions from the club manager (Such authority as a door supervisor has, is gained through that person). This may involve assisting staff to escort customers who are asked to vacate the club
- Monitor staff, performers and customers when leaving the club.
- To refuse access to anyone whose presence at the event might render the licensee or person in charge of the event subject to prosecution for any offence.
- To report for duty punctually with a neat and tidy appearance (at least 10 minutes before contracted start time.)
- Ensure communications equipment works and understanding how to use it.
- When incidents occur note and report incidents in a daily logbook for the client and regulatory agencies including the club manager.
- Assist the club staff in any emergency situation – full briefings will be given by the club managers.
- Assisting the emergency services in whatever way they request and ensuring they are not obstructed in the execution of their duties.
- Health and Safety awareness.

#### **Club Manager**

- Comply with all company procedures relating the operations within the club.
- Comply with all H&S responsibilities as detailed within the club's safety management system.
- Monitor customers during their attendance at the club.
- Monitor the behaviours of the staff including the dancers to ensure there is no breaches in the clubs operating procedures with customers.



- Monitor the CCTV.
- Record all reported incidents.
- Maintain communications with the door supervisor.
- Maintain communications with the floor supervisor within the club.
- Maintain safe working procedures and access within the club.
- Liaise with the emergency services and enforcement officers.

	<b>The Secrets Group</b>		Increasing Likelihood	Increasing Consequences	Risk Rating
			1 – Very Unlikely	1 – Insignificant	1-2 No Action
			2 – Unlikely	2 – Minor	3-6 Monitor
			3 – Fairly Likely	3 – Moderate	8-12 Action
			4 – Likely	4 – Major	15-16 Urgent Action
			5 – Very Likely	5 – Catastrophic	20-25 Stop
Task Description	Safety of Female Employees & Self-Employed Performers Working at the Venue	People Affected	Employees, Self Employed Performers, Contractors, Members of the Public		

Hazards	Risk rating			Current Risk Controls	Additional Risk Controls	New Risk Rating		
	L	x	C = R			L	x	C = R
Intimidation / verbal abuse / physical harm by members of the public / visitors to our premises / or by other employees or by other self-employed performers	3	2	6	<ul style="list-style-type: none"> <li>We have a Performers Welfare Policy which details the arrangements the Organisation has in place to protect the welfare of all performers. We also have an Aggressive Behaviour Policy. These Policies are brought to the attention of all employees and self-employed performers.</li> <li>All new performers and employees are given an induction which includes being given information on the measures the venue has implemented to protect their health, safety and welfare and what to do if they feel threatened or intimidated.</li> <li>There is full coverage CCTV at the venue (apart from changing areas) which is monitored to protect the health and safety of employees, self-employed performers and customers.</li> <li>Employees and self-employed performers are aware to report any suspicious activity to Management / security as soon as possible.</li> <li>No aggressive, intimidating or sexual behaviour towards performers or employees by customers or other performers or employees is tolerated whatsoever. Performers and female employees are aware not to deal with unruly of</li> </ul>		3	2	6

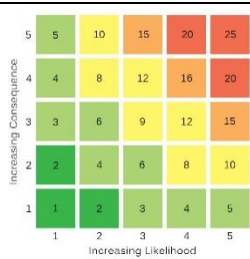
# The Secrets Group



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<b>Task Description</b>	Safety of Female Employees & Self-Employed Performers Working at the Venue	<b>People Affected</b>	Employees, Self Employed Performers, Contractors, Members of the Public
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Hazards	Risk rating			Current Risk Controls	Additional Risk Controls	New Risk Rating		
	L	x	C = R			L	x	C = R
				<p>ill behaviour themselves. Instead they know to report it to security or management.</p> <ul style="list-style-type: none"> <li>• There are always 2 licenced door supervisors on duty, a receptionist, a manager and a female performance coordinator to support the performers and female employees.</li> <li>• All performers are aware not to give customers any personal information about themselves. Performers do not tell customers their first names.</li> <li>• We have locked break areas and locked changing rooms.</li> <li>• There is some parking nearby which is used on a first come basis. If a performer or female staff member requests use of a parking space, the Club will reserve a parking space for them.</li> <li>• All female staff and performers are escorted to their vehicles / taxis. No one is to leave the premises alone. Performers and female employees are instructed not to use public transport. If using a taxi, they need to be pre booked.</li> <li>• The area outside the venue and nearby roads are well lit.</li> <li>• The door supervisors ensure that no one is loitering outside the venue.</li> </ul>				

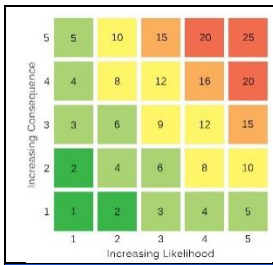


# The Secrets Group

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Hazards	Risk rating			Current Risk Controls	Additional Risk Controls	New Risk Rating		
	L	x	C = R			L	x	C = R
				<ul style="list-style-type: none"> <li>Performers and female employees are provided with rape alarms by the venue on request.</li> </ul>				
Safeguarding issues	2	3	6	<ul style="list-style-type: none"> <li>The company has a Modern Slavery Policy.</li> <li>The company has an alcohol / drug policy.</li> <li>All workers are to make Management aware if they have any concerns regarding the following or they believe another worker has issues with the following:               <ul style="list-style-type: none"> <li>- domestic violence.</li> <li>- drug &amp; alcohol misuse.</li> <li>- sexual health.</li> <li>- Mental health issues.</li> <li>- Concerns regarding any form of abuse.</li> </ul> </li> <li>The Management will refer concerns when required to the Council using the Safeguarding alert form on this link - <a href="https://www.lbhf.gov.uk/crime/victim-support/safeguarding-adults">https://www.lbhf.gov.uk/crime/victim-support/safeguarding-adults</a>.</li> <li>If Management believe that any worker is in immediate danger or a crime has been committed, they will ring 101 or 999 immediately.</li> </ul>		2	3	6



# The Secrets Group

Increasing Likelihood	Increasing Consequences	Risk Rating
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<b>Task Description</b>	Safety of Female Employees & Self-Employed Performers Working at the Venue	<b>People Affected</b>	Employees, Self Employed Performers, Contractors, Members of the Public
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<b>Assessors Name:</b>	Paul Phillpot	<b>Date of Assessment:</b>	07/05/2021
<b>Approved By:</b>	Paul Phillpot	<b>Date of Review</b>	07/05/2022 or earlier if anything changes

Additional Reviews will be completed immediately prior to re-opening or subject to changes in the Guidance or Legislation.

What are the hazards?	Who might be harmed	Controls Required	Additional Information	Action	Action by who & when?	Done Yes / No / Ongoing
Spread of Covid-19 Coronavirus	<p>The following people may be harmed and measures taken to protect them:</p> <p>Staff            Visitors and Customers to our premises            Cleaners            Contractors</p> <p>Those with existing underlying health conditions.</p>	<p><b>General – Management</b></p> <ol style="list-style-type: none"> <li>1) Information on Covid Control measure is now communicated to all staff, performers and customers.</li> <li>2) Staff (and others) will be regularly reminded of the Covid control measures in place and the need to follow all of the relevant procedures.</li> <li>3) Managers or appointed ‘Covid marshals’ shall check to ensure that appropriate procedures are being followed and that facilities provided are maintained.</li> </ol>	<p>To help reduce the spread of coronavirus (COVID-19) reminding everyone of the public health advice.</p> <p>Posters and signage is now erected in prominent locations.</p> <p>Posters, leaflets and other materials are available for display.</p> <p>Regular communications will be had including tool box talks and tem briefs to include Covid reminders.</p>	<p>Senior Management to implement signage throughout the entire venue.</p> <p>Managers and staff to ensure signage does not get removed.</p> <p>Managers and staff to ensure Covid – 19 measures are implemented with staff, customers and contractors.</p> <p>All staff to report any additional requirements to management.</p>	<p>Management</p> <p>Management</p> <p>Management &amp; Staff</p>	<p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p>

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	<p>Anyone else who physically comes in contact with you in relation to your business</p>	<p><b><u>Hand Washing</u></b></p> <ul style="list-style-type: none"> <li>• Hand washing facilities with soap and water are already in place.</li> <li>• Additional facilities are provided where necessary to allow for easy and frequent hand washing. Hand washing will be monitored by managers / Covid marshals. See hand washing guidance.</li> <li>• We will provide information to staff on hand washing.</li> <li>• We will provide materials to allow drying of hands with disposable paper towels.</li> <li>• Pedal bins or opened topped bins will be used to reduce touch points.</li> <li>• Handwashing facilities will be cleaned, bins will be emptied and soap, paper towels and hand sanitiser replenished regularly.</li> <li>• Gel sanitisers will be provided in any area where washing facilities are not readily available</li> </ul>	<p>Employees will be reminded on a regular basis to wash their hands for 20 seconds with water and soap and the importance of proper drying with disposable towels</p> <p>Staff are also reminded to catch coughs and sneezes in tissues – Follow Catch it, Bin it, Kill it and to avoid touching face, eyes, nose or mouth with unclean hands. Tissues will be made available throughout the workplace.</p> <p>Regular checks will be carried out by line managers to ensure that the necessary procedures are being followed.</p> <p>70% Alcohol based hand sanitisers are flammable and must be used and stored correctly to reduce fire risks.</p>	<p>Ensure sufficient signs will be placed throughout venue where hand washing takes place.</p> <p>Signage displayed.</p> <p>Hand sanitisers will be made available to all staff, performers and customers.</p> <p>Ensure fire risks are assessed and that alcohol based sanitisers are stored correctly.</p>	<p>Management</p> <p>Management</p> <p>Management</p> <p>Management</p>	<p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p>
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		<p><b>Cleaning</b></p> <p><b>Surfaces</b></p> <p>We will put in place cleaning regimes to make sure surfaces that are touched regularly, particularly in areas of high use such as door handles, light switches, reception area using appropriate cleaning products and methods. and frequency, level of cleaning and who should be doing it.</p> <p><b>Shared Equipment</b></p> <p>Where possible equipment (Tills/PDQ Machines / will be used by only one person. Where this is not possible, cleaning materials will be provided and must be used between each change of user.</p>	<p>Check sheets indicating when the last time each item has been cleaned will be placed adjacent to that item.</p> <p>Signs will be put on equipment to remind users to clean them before and after use.</p>	<p>Management to oversee all cleaning schedules and that they are followed regularly.</p> <p>Check sheets will be implemented/adapted.</p> <p>All staff will be trained on basic cleaning of surfaces and provided suitable cleaning equipment.</p> <p>Cleaning material will be provided and staff to be trained in what cleaning is required.</p>	<p>Management &amp; Staff</p> <p>Management</p> <p>All Staff</p>	<p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p>
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		<p><b><u>Eliminating workplace exposure:</u></b></p> <p><b>Meetings</b></p> <p>Conference calls to be used instead of face to face meetings where possible.</p> <p>Ensure any meetings with staff and performers that social distancing is maintained. If necessary hold smaller group meetings.</p> <p><b>Visitors</b></p> <p>Only necessary visitors / contractors will be permitted to the premises.</p> <p><b>Persons with positive Covid-19 tests or persons informed they are close contacts</b></p> <p>Staff and Performers to be instructed not to attend work if they have developed Covid Symptoms or have been informed that they are a close contact of a Covid Positive individual in line with PHA guidance.</p> <p>Line managers will maintain regular contact with staff members during this time.</p>	<p>Stagger meetings with Staff and Performers to reduce numbers.</p> <p>Visitors will be required to confirm they have not been in contact with a person who has tested positive for COVID 19 in the past 10 days and they do not have any symptoms.</p> <p>Where practicable a record of Visitors / Contractors contact details will be held for 10 days to allow contact tracing if required.</p>	<p>Management</p> <p>Reception Staff</p>	<p>Ongoing</p> <p>Ongoing</p>
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		<p><b><u>Persons with symptoms of Covid-19 at work</u></b></p> <p>If any member of staff, performer or contractor becomes unwell with a new continuous cough, loss of taste or smell or a high temperature in the workplace they will be sent home and advised to follow the stay at home guidance.</p> <p>We will put in place arrangements to clean if someone develops symptoms of coronavirus in work.</p> <p>If advised that a member of staff or public has developed Covid-19 and were recently on our premises (or where a member of staff has visited other work place premises or domestic premises), the management team of the venue must contact the Public Health Authority to discuss the case, identify people who have been in contact with them and will take advice on any actions or precautions that should be taken.</p>	<p>There will be regular reminders to be issued to staff on symptoms and the actions to take.</p> <p>There will be regular checks of staff and performers of their health and well-being.</p>	<p>There will regular monitoring of staff and performers to ensure that any staff or performers do not attend the premises if any symptoms.</p>	<p>All Staff</p>	<p>Ongoing</p>
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		<p><b><u>Social Distancing</u></b></p> <p>Social Distancing – we will be reducing the number of persons in any area of the venue to comply with recommendations by the Public Health Agency.</p> <p><b>Measures may include:</b></p> <p>We will be limiting the number of people in seating areas, offices, changing rooms, so that social distancing rules can be met, eg. stagger breaks, have maximum occupancy numbers for staff/performers changing rooms.</p> <p>We will be reorganising facilities in communal areas such as spacing out tables in offices staff rooms etc. so social distancing rules can be met.</p> <p>We will where possible put in place physical barriers (eg Perspex) to reduce contact in areas of high interaction.</p> <p>We will put in place one-way systems in corridors or regularly used pedestrian traffic routes to manage the flow of people moving around workplaces and to allow social distancing rules to be met.</p>	<p>Our staff will be reminded <u>on a daily basis</u> of the importance of social distancing both in the workplace and outside of it.</p> <p>Management / Covid Marshal checks will be made regularly to ensure social distancing is adhered to within the venue and in common areas.</p> <p>There will be regular reminders to staff to ensure they are clear on the rules when using common areas and workstations.</p>	<p>All Customers will be informed of the Covid measures in place that ensure a safe environment. All customers must remain seated in their designated table and must not wander around the venue.</p> <p>There are to be no customers stood at the bar instead all purchases of drinks/food/vouchers must be made via management or waiting staff.</p> <p>Perspex barriers will be installed in venue in certain areas to minimise risk of spreading risks.</p>	<p>All Staff and Managers</p> <p>All Staff and Managers</p> <p>Installed By Builders</p>	<p>Ongoing</p> <p>Ongoing</p> <p>YES</p>
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		<p>Non-fire doors will be left open to reduce the amount of contact with doors and also potentially improve workplace ventilation</p> <p>We will be taking steps to review work schedules including start &amp; finish times/shift patterns. We will reduce the number of staff on the premises at any one time and also relocating staff to other duties.</p> <p>We will be redesigning processes to ensure social distancing in place.</p> <p>We will provide individual lockers for staff and performers to keep personal belongings in so that they aren't left in the open.</p> <p>We will provide washing facilities and hand sanitiser at accessible places near to where people will have contact with high traffic communal areas, eg. sanitiser/washing facilities at the entrance/exit to the premises. ie floor markings / wall signs etc.to maintain social distancing.</p> <p>We will display signs reminding people to socially distance, wash hands and not touch their faces</p>		<p>Where possible in areas of high traffic we will leave doors open. We will not leave fire doors open.</p> <p>Individual staff lockers are already in place. Manager to ensure lockers are maintained and each night all staff, performers items are removed from lockers, premises. NO PERSONAL BELONGINGS TO BE LEFT IN LOCKERS.</p> <p>We will put Signage in place to alert everyone to this</p>	<p>Manager</p> <p>Manager</p>	<p>Ongoing</p> <p>Ongoing</p>
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		<p>Where it is impossible to maintain Social Distancing, additional controls will be implemented including:</p> <ul style="list-style-type: none"> <li>• limiting the amount of time people spend on the task</li> <li>• placing workers back-to-back or side-by-side rather than face-to-face when working</li> <li>• ‘cohorting’ work teams so they consistently work together</li> <li>• improving ventilation</li> <li>• enhanced cleaning regimes</li> <li>• increase in hand washing</li> </ul> <p>Staff will not work within 1m of each other at any time.</p> <p><b>NB: Face coverings and visors are not a sufficient measure <u>by themselves</u> to allow for working within 1m of other persons and must be supplemented by other mitigations.</b></p> <p><b><u>Cohorting</u></b></p> <p>We will Identify groups of workers who live together and group them into a work cohort</p> <p>We will Identify groups of workers who travel to work together and group them into a work cohort</p>	<p>We will discuss with workers who live and/or travel to work</p>	<p>Manager to meet staff and discuss possible lift sharing etc. to reduce exposure.</p>		
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Additional Reviews will be completed immediately prior to re-opening or subject to changes in the Guidance or Legislation.

		<p><b><u>Ventilation</u></b></p> <p>Poor ventilation increases the risk of spreading covid-19 and we will ensure that measures will be taken to ensure adequate ventilation is maintained.</p> <p>Where possible we will ensure that good ventilation is maintained using natural ‘fresh air’ ventilation (opening windows and ‘non-fire’ doors)</p> <p>If you need additional ventilation provide it, eg. Mechanical ventilation, desk fans, air movers etc . Portable fans and air handling units will be positioned to prevent air being blown from one individual towards others.</p> <p>Switch heating ventilation and air conditioning (HVAC) systems to drawing in fresh air, rather than recirculating air..</p>	<p>together to agree how to prevent the risks of spreading coronavirus.</p> <p>Where possible heating will be adjusted to facilitate enhanced ventilation.</p> <p><i>There is no increased risk for people working at home temporarily (ie expected to return to work when risk from covid is reduced) but if this arrangement becomes long term the risks should be assessed in line with legislation.</i></p>	<p>Manager to monitor ventilation throughout venue.</p> <p>Double doors in venue will be left open where possible. Upstairs windows to be opened to increase air flow.</p> <p>We will use high powered fans in venue to circulate air.</p>	<p>All Staff</p> <p>Manager</p>	<p>Ongoing</p> <p>Ongoing</p>
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		<p><b><u>Face Coverings &amp; Personal Protective Equipment</u></b></p> <p><b><u>Face Coverings</u></b></p> <p>Faced coverings will be worn in all situations designated in current Coronavirus Regulations.</p> <p>Where not specifically required by law, if face coverings do not create additional health and safety risks they may be worn in line with public health guidance.</p> <p>Face coverings are not PPE as they do not protect people from work-related hazardous substances. They may protect others, not the wearer, against coronavirus.</p> <p><b><u>Personal Protective Equipment</u></b></p> <p>Where PPE is a requirement for non- covid related risks it shall be used in line with existing risk assessments which will be reviewed in light of the risks from Covid-19)</p>		<p>Face coverings will be made available to all staff, performers. Staff must wear face coverings at all times whilst carrying out their duties. Especially so when they are in contact with customers and work colleagues.</p>	<p>Manager to ensure that all staff and performers wear face coverings.</p>	<p>Ongoing</p>
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Additional Reviews will be completed immediately prior to re-opening or subject to changes in the Guidance or Legislation.

		<p>We will train people how to put on and remove personal protective equipment (PPE) that is used for normal work hazards and how to keep it clean</p> <p><b>Use of Gloves</b></p> <p><i>(Staff will be reminded that wearing of gloves is not a substitute for good hand washing as the virus can be transferred on the surface of the glove)</i></p> <p>Where Risk Assessment identifies wearing of gloves as a requirement of the job, an adequate supply of these will be provided. Staff will be instructed on how to remove gloves carefully to reduce contamination and how to dispose of them safely.</p> <p><b><u>Mental Health</u></b></p> <p>Management will promote mental health &amp; wellbeing awareness to staff and performers during the Coronavirus outbreak and will offer whatever support they can.</p> <p><b>Additional Identified Risks:</b></p>	<p>Internal communication channels and cascading of messages through line managers will be carried out regularly to reassure and support employees in a fast changing situation.</p> <p>There will be regular communication of mental health information and open door policy for those who need additional support.</p> <p>Line managers will offer support to staff who are affected by Coronavirus or has a family member affected.</p>			
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Risk Assessment – Covid 19

Secrets Hammersmith

Assessed By: Paul Phillpot

Assessment Date: 27<sup>th</sup> April 2021

Review Date: 27<sup>th</sup> October 2021

Additional Reviews will be completed immediately prior to re-opening or subject to changes in the Guidance or Legislation.

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Client Code: [REDACTED]

Date: 17<sup>th</sup> May 2021

Stephen Less  
Managing Director  
Secrets Group  
62 Glenthorne Road  
Hammersmith  
London W6 0LR

Dear Stephen,

Please find below my comments relating to your current SEV Licence application, in particular the objection raised by Dr Lang from The London Borough of Hammersmith and Fulham Council, dated the 25th March 2021.

As you retain Wirehouse as your H&S consultants, we provide you with a comprehensive Health and Safety Management System and ensure that this system reflects any changes in legislation including COVID-19 Risk Management and protocols required for your business.

As your advisors we assist your team through regular audits and consultation on health and safety matters, to ensure your risk assessments have been regularly reviewed to maintain a safe working environment, where all employees are made aware of their roles and responsibilities and that all additional control measures that have been identified are implemented and communicated to them.

We can also provide support and guidance to ensure your COVID-19 controls and Risk Assessments are current and reviewed on a regular basis. As a Wirehouse client you also have access our online services including the COVID-19 guides, example risk assessments, checklist templates and additional access to our safety advice team.

We have been made aware of the objection raised by Dr Lang in relation to your SEV licence renewal application and your current Covid risk assessment for the Hammersmith venue.

It is important to realise that advice that any health and safety consultant can provide in respect of the Covid pandemic is dependent on government guidance which relates to the specific use of the premises in question. In effect, this means that where premises are permitted by government to be open or to be used by the public it is necessary to develop Covid protocols following a risk assessment which addresses government guidance concerning the type of premises in question.

At present in England (at stage 3 of the government's road map out of lockdown), certain premises (including bars and restaurants) are permitted to open from Monday 17 May 2021 subject to restrictions and guidance provided by government. Those restrictions and guidance inform the risk assessments and protocols which the businesses must have in place **if they want to open for business.**

However, premises operating as SEVs (and nightclubs) are not permitted to open until stage 4 of the road map out of lock down which will be the 21 June 2021 at the very earliest, dependent upon continued monitoring of the development of Covid which the government is undertaking. At that stage, the government will issue guidance which will inform any risk assessments and protocols which such premises will need to adopt if they wish to open.

It follows that Covid protocols for the use of premises as a SEV cannot be developed with any clarity until stage 4 when guidance will be provided to inform those protocols.

Once the new COVID 19 guidance is made available to us, Wirehouse will be consulting with the Secrets Group management team to assist them in developing risk assessments for the venue, which will consider all current best practices, legislation and the objection raised in item one of Dr Lang's letter dated 25th March 2021.

Yours sincerely,

**Ged Baren**  
**Health and Safety Consultant**

Email: [REDACTED]  
Advice: [REDACTED]  
Mobile: Direct [REDACTED]

St James Business Centre  
Wilderspool Causeway  
Warrington  
Cheshire, WA4 6PS

[www.wirehouse-es.com](http://www.wirehouse-es.com)

**Premises:** 141 - 143 King Street London W6 9JG

**Premises Licence Number:** TBC

**Company Details:** Chongie Entertainment Limited,  
3-5 Wardour St, London

**Operating Licence Number:** 000-057549-N-333196-001

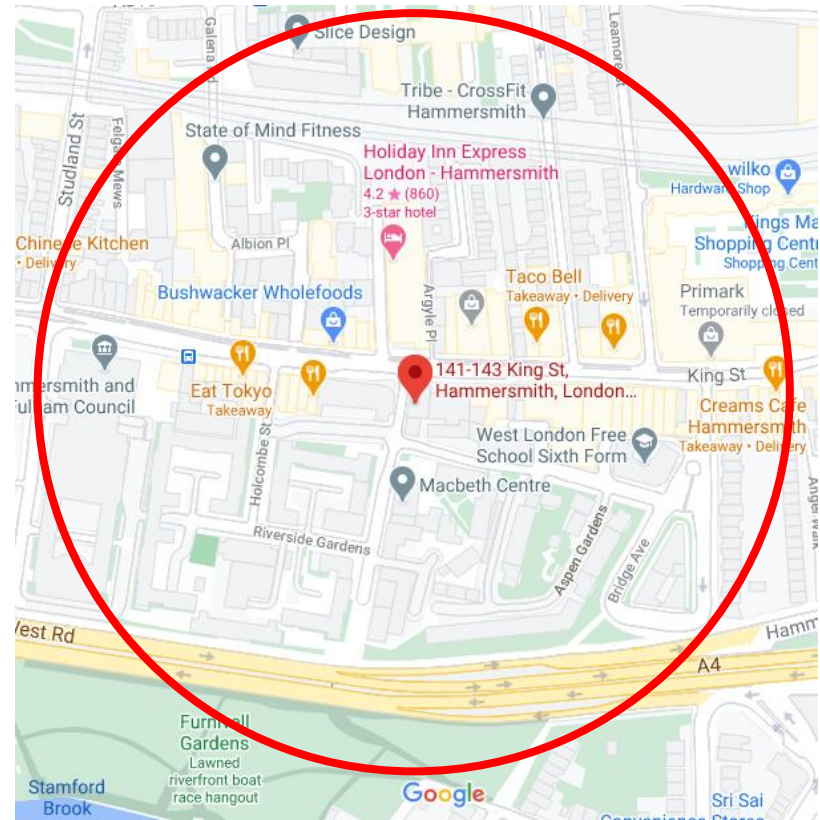
**Date Assessment:** March 2021

**Assessor:** [REDACTED]

**Sources Utilised:** Hammersmith and Fulham Statement of Gambling Policy, Hammersmith and Fulham Ward Profiles, Police Crime Mapping, relevant guidance from the Gambling Commission, Open source

**Area Profile:** These premises are situated on King Street in the Hammersmith Broadway Ward. Hammersmith and Fulham is one of 13 inner London Boroughs. It is the third smallest borough, not including the City of London. The ward is generally a very affluent area. The overall population is middle-aged and young, single, healthy and skilled.

The machine mix is to be determined and will be supplied by a company licensed by the Gambling Commission.



Local Area				
Licensing Objective		Risks	Existing Control Measures	Level of Risk of Occurrence / Manageability
1.1	<b>Protecting children and other vulnerable persons from being harmed or exploited by gambling</b>	<p><b>LOCALITY</b></p> <ul style="list-style-type: none"> <li>• West London Free School Sixth Form Franklin House, 2 Bridge Ave, Hammersmith, London W6 9JP</li> <li>• Professional Language Solutions Unit 7, King Street Cloisters, Clifton Walk, Hammersmith, London W6 0GY</li> <li>• The Stage School</li> <li>• Westside School 8-30 Galena Rd, Hammersmith, London W6 0LT</li> <li>• TLG West London Centre St Pauls' Centre, Hammersmith, London W6 9JJ</li> <li>• Montessori by Busy Bees 30-40 Dalling Rd, Hammersmith, London W6 0JD</li> <li>• Flora Gardens Hammersmith, London W6 0UD</li> <li>• Prime Tutors First Floor Rear Premises, 141-143 King Street, Hammersmith, W6 9JG, London</li> </ul> <p><b>OTHER:</b></p> <p><b>Student accommodation:</b></p> <p>There is no student accommodation within a 200m radius of the premises</p> <p><b>Family Services</b></p> <ul style="list-style-type: none"> <li>• West London Centre for Counselling</li> </ul>	<p><b>The Premises:</b></p> <ul style="list-style-type: none"> <li>• Signage &amp; window display not to attract under 18s, and advice under 18's access is prohibited.</li> <li>• Regular patrols of the premises, to identify any vulnerable and children</li> <li>• Posters, 'Stay in Control' leaflets and GamCare leaflets will be on display (near toilets as well as in the main trading area)</li> <li>• Staff will ensure a stock of leaflets (stay in control, self-exclusion &amp; Gamcare) through weekly checks of stock</li> <li>• GamCare notices with contact number clearly displayed on machines</li> <li>• Self-exclusion system in place provided by BACTA</li> <li>• Photo equipment available for self-exclusions</li> <li>• CCTV coverage of all public areas, all entry and exit points to and from the premises enabling frontal identification of every person entering under any light conditions with ability for management to review remotely online.</li> <li>• Premises laid out to avoid blind spots</li> <li>• Entrance readily visible from throughout the premises to allow customer</li> </ul>	<p>High of Occurrence Initially / Low of not Managing</p>



		<p>Glenthorne Mews, 115A Glenthorne Rd, Hammersmith, London W6 0LJ</p> <p><b><u>Job / Recruitment Agencies</u></b></p> <p>There are no job or recruitment agencies within a 200m radius of the premises</p> <p><b><u>Community centres</u></b></p> <ul style="list-style-type: none"> <li>• Adult Learning and Skills service Macbeth St, Hammersmith, London W6 9JJ</li> <li>• Irish Cultural Centre 5 Black's Rd, Hammersmith, London W6 9DT</li> </ul> <p><b><u>Youth Centres</u></b></p> <p>There are no youth centres within a 200m radius</p> <p><b><u>Fast food</u></b></p> <ul style="list-style-type: none"> <li>• Subway 126 King St, Hammersmith, London W6 0QU</li> <li>• Apettite Fish and Chips and Kebabs 171 King St, Hammersmith, London W6 9JT</li> <li>• Taco Bell 100 King St, Hammersmith, London W6 0QW</li> <li>• KFC 88-90 King St, Hammersmith, London W6 0QW</li> </ul> <p><b><u>Café</u></b></p> <ul style="list-style-type: none"> <li>• Coffee Station 167 King St, Hammersmith, London W6 9JT</li> <li>• Creams 83 King St, Hammersmith, London W6 9HW</li> <li>• Greggs 129 King St, Hammersmith, London W6 9JG</li> </ul>	<p>monitoring</p> <ul style="list-style-type: none"> <li>• Monitoring customers as they leave the premises</li> <li>• Machines to be properly labelled</li> </ul> <p><b>The Operation:</b></p> <ul style="list-style-type: none"> <li>• Staff will patrol and supervise the whole of the premises, with particular care in identifying vulnerable</li> <li>• Regular Test Purchasing</li> <li>• “Know Your Customer” in place, developing customer interaction policies &amp; procedures ( importance of behaviour, time and spend limits)</li> <li>• Staff monitors customer activity and behaviour to interact early to recognise customer with potential gambling issues.</li> <li>• Staff to be aware of the importance of social responsibility, the causes and consequences of gambling</li> <li>• Adequate staffing levels to be maintained at all times</li> <li>• Return the stake/retain the prize</li> <li>• Staff will review self-excluded data to ensure continued exclusion</li> <li>• Sharing of information by staff regarding concerns about customers</li> <li>• Mystery shopper tests by BACTA</li> </ul>	
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		<p><b><u>Banks/Building Society</u></b></p> <ul style="list-style-type: none"> <li>Nationwide 95 King St, Hammersmith, London W6 9JN</li> <li>Halifax 91/93 King St, Hammersmith, London W6 9XB</li> </ul> <p><b><u>Leisure, Sports Centres, cinemas, bowling alleys</u></b></p> <ul style="list-style-type: none"> <li>Go Mammoth Westside School, 8-30 Galena Rd, Hammersmith, London W6 0LT</li> </ul> <p>There are no cinemas or bowling alleys within a 200m radius</p> <p><b><u>Care Homes:</u></b></p> <ul style="list-style-type: none"> <li>West London Homecare service 3-4, Albion Court, Albion Pl, Galena Rd, Hammersmith, London W6 0QT</li> </ul> <p><b><u>Hospitals</u></b></p> <ul style="list-style-type: none"> <li>Avada Health 121 King St, Hammersmith, London W6 9JG</li> </ul> <p><b><u>GP/Medical Centres</u></b></p> <p>There are no GPs within a 200m radius</p>	<p><b>Age Verification procedures:</b></p> <ul style="list-style-type: none"> <li>Implementation of the BACTA Toolkit Policies &amp; Procedures including Think / Challenge 25</li> <li>Anyone reluctant in providing identification or demonstrating suspicious behaviour will trigger further investigation. Incident to be logged and customer removed from the area.</li> <li>Age verification incident report (log) maintained on licensed premises and reviewed on regular basis by team staff members &amp; Compliance Manager</li> </ul> <p><b>Staff Training:</b></p> <ul style="list-style-type: none"> <li>Training of staff with 6 monthly refreshers/ local area profile/licence conditions</li> <li>Training and guidance is provided to staff members regarding customer interaction and the implementation of the ID verification procedure.</li> <li>Staff to be trained in Safeguarding Policy</li> <li>Staff to be aware of refusing customers entry due to alcohol or drugs</li> </ul>	
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		<p><b><u>Mental Health:</u></b></p> <p>There are no mental health centres within a 200m radius</p> <p><b><u>Addiction/Recovery Centres</u></b></p> <p>There are no addiction or recovery centres within a 200m radius</p> <p><b><u>Hostels/Shelters</u></b></p> <p>Shelter 164 Riverside Gardens, Hammersmith, London W6 9LG</p> <p><b><u>Food banks</u></b></p> <p>There are no food banks within a 200m radius</p> <p><b><u>Loan Shops, Pawn Brokers</u></b></p> <ul style="list-style-type: none"> <li>• H&amp;T Pawnbroker 116 King St, Hammersmith, London W6 0QU</li> </ul> <p><b><u>Parks/Playgrounds</u></b></p> <ul style="list-style-type: none"> <li>• Furnivall Gardens 52a Rutland Grove, Hammersmith, London W6 9DG</li> </ul> <p><b><u>Religious buildings</u></b></p> <ul style="list-style-type: none"> <li>• Omega Fire Ministries Franklin House, 2 Bridge Ave, Hammersmith, London W6 9JP</li> <li>• The Living Church of God Galena house, 8-30 Galena Rd, Hammersmith, London</li> </ul>	<ul style="list-style-type: none"> <li>• Staff to be trained on Anti Money Laundering, Proceeds of Crime nad Suspicious Behavior</li> <li>• Staff to be trained to look out for signs of aggressive behaviour or problem play</li> </ul>	
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		<p>W6 OLT</p> <p><b><u>New Development or Shopping centres</u></b></p> <p>There does not appear to be any new developments in the area.</p> <ul style="list-style-type: none"> <li>• Kings Mall Shopping Centre King St, Hammersmith, London W6 9HW</li> </ul>		
<p>1.2</p>	<p><b>Preventing Gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime</b></p>	<p><b>LOCALITY</b></p> <p>There is 1 betting shops within 200m:</p> <ul style="list-style-type: none"> <li>• Paddy Power 118 King St, Hammersmith, London W6 0QP</li> </ul> <p>There are 2 AGCs within 200 metres</p> <ul style="list-style-type: none"> <li>• Admiral Casino 97-99 King St, Hammersmith, London W6 9JG</li> <li>• Merkur 86 King St, Hammersmith, London W6 0QW</li> </ul> <p>There a 0 casinos.</p> <p>There are several premises licensed under the Licensing Act 2003 within distance, including:</p> <ul style="list-style-type: none"> <li>• The Salutation and Thai Restaurant 154 King St, Hammersmith, London W6 0QU</li> <li>• The Hammersmith Ram 81 King St, Hammersmith, London W6 9HW</li> <li>• The Plough and Harrow 120-124 King St, Hammersmith, London W6 0QU</li> </ul> <p>Several premises are not operating at the time of this risk assessment due to Covid-19.</p> <p><b>LOCAL AREA PROFILE</b></p>	<p><b>The Premises</b></p> <ul style="list-style-type: none"> <li>• CCTV coverage of all public areas, all entry and exit points to and from the premises enabling frontal identification of every person entering under any light conditions with ability for management to review remotely online.</li> <li>• Toughened/laminated glass to front window</li> </ul> <p><b>The Operation</b></p> <ul style="list-style-type: none"> <li>• Machine door opening keys only available to management</li> <li>• Log visits by Police, Local Authority and Gambling Commission officers</li> <li>• Review unusual patterns of play (as per PoCA), ‘non-regular’ players and consider exclusion/reporting</li> <li>• Exclude badly behaved customers and</li> </ul>	<p>Medium of Occurrence Initially / Low of not Managing</p>

		<p><b>Population</b></p> <ul style="list-style-type: none"> <li>• In 2018 there were an estimated 12,750 people living in the ward</li> <li>• The overall population is middle-aged and young, single, healthy and skilled</li> <li>• The ward has the tenth highest proportion of households that have no people who speak English as a first language</li> </ul> <p><b>Footfall</b></p> <ul style="list-style-type: none"> <li>• King Street is considered primary retail in Hammersmith and consequently has a high footfall</li> </ul> <p><b>Deprivation</b></p> <ul style="list-style-type: none"> <li>• The ward is made up of 8 Lower Super Output Areas (LSOAs).</li> <li>• Three LSOAs are ranked in the 20% most deprived nationally. There are seven deprivation 'domains' within the IMD 2015 and the highest scores for the ward are in the Living Environment, Crime, and Barriers to Housing and Services.</li> </ul> <p><b>Unemployment</b></p> <ul style="list-style-type: none"> <li>• 63% of residents are in employment (12% are self-employed).</li> <li>• 39% of employed residents are working as managers, directors, senior officials or in professional occupations</li> </ul>	<p>look out for problem behaviour or aggression</p> <ul style="list-style-type: none"> <li>• Maintain contact with local traders and Police, including working with police to combat local issues</li> <li>• Limited staff floats</li> <li>• CCTV coverage over all cash transactions</li> <li>• Full machine audit on all machines on a weekly basis – ad hoc spot-check in case of any suspicion</li> <li>• Gaming machines are supplied and maintained by businesses licensed by the Gambling Commission</li> <li>• Company registered to receive crime bulletins from BACTA.</li> </ul> <p><b>Staff Training</b></p> <ul style="list-style-type: none"> <li>• Social Responsibility training and incident recording logs available to all staff.</li> <li>• Staff trained to look out for unusual/dyed notes</li> <li>• Staff &amp; management to be alert to customers exchanging large volumes of paper notes for alternative denominations</li> <li>• Staff to be alert to customer redeeming stake with little or no play</li> <li>• Staff trained about AML basics, strange transaction behaviour</li> </ul>	
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		<ul style="list-style-type: none"> <li>The largest source of employment is the professional, scientific and technical activities sector (16%)</li> </ul> <p><b>Crime</b></p> <ul style="list-style-type: none"> <li>Most commonly reported crimes during Dec 2020             <ul style="list-style-type: none"> <li>- Anti-Social Behaviour 86</li> <li>- Violent and Sexual Offences 35</li> <li>- Bike Theft 20</li> <li>- Other theft 20</li> </ul> </li> </ul> <p><b>TRANSPORT &amp; CAR PARK FACILITIES</b></p> <p>The premises are on transport routes. King Street has a number of bus stops along it.</p> <ul style="list-style-type: none"> <li>Hammersmith Townhall car park Hammersmith, London W6 9LA</li> </ul>	<ul style="list-style-type: none"> <li>Extra Training and guidance is provided to staff members regarding Anti-Social Behaviour</li> <li>Staff fully trained how to deal with homeless people seeking refuge</li> <li>Staff to be trained on local area risk assessment</li> </ul> <p><b>Customer Interaction and Monitoring</b></p> <ul style="list-style-type: none"> <li>Suspicious activity to be written down in the log</li> <li>Customer interaction may provide knowledge of criminal background and/or association leading to closer security and monitoring of such a customer.</li> <li>Customers are efficiently monitored throughout the time they are on the premises to ensure prevention of machine related crime (money laundering).</li> <li>Knowledge activity to be handed over to Nominated Officer who will then report to NCA</li> </ul>	
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<p><b>1.3</b></p>	<p><b>Ensuring that gambling is conducted in a fair and open way</b></p>	<p><b>EQUIPMENT</b></p> <ul style="list-style-type: none"> <li>Information must be clearly displayed</li> <li>Maintenance to reduce potential issues</li> <li>Compliance</li> </ul> <p><b>PREMISES</b></p> <ul style="list-style-type: none"> <li>Promotions</li> <li>Advertising</li> </ul> <p><b>CUSTOMERS</b></p> <ul style="list-style-type: none"> <li>Treatment of customers</li> <li>Complaints</li> </ul>	<p><b>Equipment</b></p> <ul style="list-style-type: none"> <li>Machines only obtained from licensed suppliers</li> <li>Machines to be properly labelled</li> <li>Implementation of the BACTA Toolkit policies</li> <li>Machines to be maintained/serviced regularly / turned off if a fault occurs</li> <li>Procedure for making refunds</li> <li>Details of machine operation and winning combinations to be clearly shown on machines</li> </ul> <p><b>Premises</b></p> <ul style="list-style-type: none"> <li>Clear terms &amp; conditions provided within the licensed premises.</li> <li>Any promotions or advertising to be ASA and LCCP compliant</li> </ul> <p><b>Staff Training</b></p> <ul style="list-style-type: none"> <li>Training of staff with 6 monthly refreshers</li> <li>Staff to have full understanding of stakes and prizes, and odds associated with each machine.</li> </ul> <p><b>Customers</b></p>	<p>Low / Low</p>

			<ul style="list-style-type: none"> <li>• Review advertising material and promotions for compliance with LCCP</li> <li>• Complaints policy visibly displayed for customer information. All complaints to be fully investigated in accordance with policy and referred to nominated ADR 3rd party as required</li> <li>• Suitable public liability Insurance</li> <li>• Council conditions openly displayed</li> <li>• Regular Compliance Audits</li> </ul>	
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<b>Gambling Operation and Physical Design (Internal and External)</b>				
<b>Licensing Objective</b>		<b>Risks</b>	<b>Existing Control Measures</b>	<b>Level of Risk of Occurrence / Manageability</b>
<b>2.1</b>	<b>Protecting children and other vulnerable persons from being harmed or exploited by gambling</b>	<p><b>CUSTOMERS</b></p> <ul style="list-style-type: none"> <li>• U18s entering</li> <li>• Problem Gambling</li> <li>• Providing Information</li> <li>• Administering self-exclusion</li> <li>• Signage</li> </ul> <p><b>PREMISES</b></p> <ul style="list-style-type: none"> <li>• Consider 'blind spots'</li> <li>• Visibility of the entrance</li> <li>• Signage</li> <li>• Presentation of premises</li> </ul>	<p><b>Equipment and Operation</b></p> <ul style="list-style-type: none"> <li>• Machines to be properly labelled</li> <li>• Staffing levels will be risk assessed to ensure they reflect any risk to staff, customers and promotion of the licensing objectives</li> <li>• There would be no advertising locally. As part of the Licence Conditions and Codes of Practice issued by the Gambling Commission - Any Media displayed on the premises will comply with LCCP: Social responsibility code 5.1.6 (Compliance with advertising codes) The advertising of gambling products and services must be undertaken in a socially</li> </ul>	<p>Low/Low considering design features</p>



		<p>(signage/window display)</p>	<p>responsible manner and we must comply with the UK Advertising Codes issued by the Committees of Advertising Practice (CAP) and administered by the Advertising Standards Authority (ASA). Advertising on the premises will not differ from that of any other Adult Gaming Centre premises in Hammersmith.</p> <p><b>Premises</b></p> <ul style="list-style-type: none"> <li>• CCTV coverage of all public areas, all entry and exit points to and from the premises enabling frontal identification of every person entering under any light conditions with ability for management to review remotely online.</li> <li>• Premises laid out to avoid blind spots</li> <li>• Ensure entrance readily visible from throughout the premises</li> <li>• Signage &amp; window display not to attract under 18s, and advise under 18's access is prohibited.</li> <li>• The entrance layout to enable staff to monitor those entering the premises</li> </ul>	
<p><b>2.2</b></p>	<p><b>Preventing Gambling from being a source of</b></p>	<p><b>CUSTOMERS</b> Customer behaviour</p>	<p><b>Staff Training</b> Full Staff training on Money Laundering and the</p>	

	<p><b>crime or disorder, being associated with crime or disorder or being used to support crime</b></p>	<p><b>PREMISES</b> Layout to be considered:</p> <ul style="list-style-type: none"> <li>• Consider 'blind spots'</li> <li>• Visibility of the entrance</li> <li>• Design out crime</li> </ul> <p><b>STAFF</b></p> <ul style="list-style-type: none"> <li>• Personal protection</li> <li>• Security</li> <li>• Staff behaviour</li> </ul> <p><b>Money Laundering</b></p> <ul style="list-style-type: none"> <li>- Customer behaviour</li> <li>- Staff monitoring</li> </ul>	<p>Proceeds of Crime Act as well as customer behaviour, particularly suspicious or aggressive customers</p> <p><b>Premises and Operation</b></p> <ul style="list-style-type: none"> <li>• CCTV coverage of all public areas, all entry and exit points to and from the premises enabling frontal identification of every person entering under any light conditions with ability for management to review remotely online.</li> <li>• Regular patrols of the premises, including external areas to identify any vulnerable and children</li> <li>• Monitoring of customers as they leave the premises</li> <li>• Design out crime to be implemented</li> <li>• Toughened/laminated glass to front window</li> <li>• Lock on front door</li> <li>• Intruder alarm installed and regularly serviced</li> <li>• Panic Button linked to Police</li> </ul>	<p>Low/Low considering design features</p>
<p>2.3</p>	<p><b>Ensuring that gambling is conducted in a fair and open way</b></p>	<p><b>PREMISES</b></p> <ul style="list-style-type: none"> <li>• Promotions</li> <li>• Advertising</li> </ul> <p><b>EQUIPMENT</b></p> <ul style="list-style-type: none"> <li>• Information clearly displayed</li> </ul>	<p><b>Premises</b></p> <ul style="list-style-type: none"> <li>• CCTV coverage of all public areas, office, frontage and rear door with recording device and ability for management to review remotely online</li> <li>• Clear terms &amp; conditions provided within the</li> </ul>	

		<ul style="list-style-type: none"> <li>• Maintenance</li> <li>• Compliance</li> </ul>	<p>licensed premises.</p> <p><b>Equipment</b></p> <ul style="list-style-type: none"> <li>• Machines only obtained from licensed suppliers</li> <li>• Machines to be properly labelled</li> <li>• Implementation of the BACTA Toolkit policies</li> <li>• Machines to be maintained/serviced regularly</li> <li>• Machines to be turned off should a fault occur</li> <li>• Procedure for making refunds</li> <li>• Details of machine operation and winning combinations to be clearly shown on machines</li> </ul> <p><b>Customers</b></p> <ul style="list-style-type: none"> <li>• Complaints policy visibly displayed for customer information. All complaints to be fully investigated in accordance with policy and referred to nominated ADR 3rd party as required</li> <li>• Suitable public liability Insurance</li> <li>• Council conditions openly displayed</li> <li>• Regular Compliance Audits</li> </ul>	<p style="text-align: center;">Low / Low</p>
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**CHONGIE ENTERTAINMENT LIMITED  
ADVERTISING AND MEDIA POLICY**

1. INTRODUCTION
2. UK ADVERTISING CODES
3. CHILDREN AND YOUNG PERSONS
4. IRRESPONSIBLE APPEAL
5. GAMBLING PROBLEM BEHAVIOUR
6. MISLEADINGNESS
7. SELF-EXCLUSIONS & SUBSCRIPTIONS
8. MONITORING THE POLICY



## 1. INTRODUCTION

Chongie Entertainment Limited is committed to complying with the requirements of all advertising regulations applicable within any jurisdiction it operates in and recognises the importance of honest and socially responsible marketing. It is imperative that Chongie Entertainment Limited acts responsibly and honestly when creating and executing marketing campaigns.

This Policy outlines the principles upon which Chongie Entertainment Limited will manage marketing campaigns in order to safeguard its business and to ensure the protection of young or vulnerable people.

## 2. UK ADVERTISING CODES

The Codes set out five key advertising principles which must be adhered to by Chongie Entertainment Limited in relation to the management of all advertising.

The general principles of the Codes are that advertising should be:

1. legal, decent, honest and truthful
4. prepared with a sense of responsibility to consumers and to society
5. respectful to the principles of fair competition generally accepted in business
4. not intended to bring advertising into disrepute

The Codes require all gambling advertising to be socially responsible and Chongie Entertainment Limited will ensure it respects the need to protect children, young persons and other Vulnerable Persons from being harmed or exploited by advertising that features or promotes gambling. Although 'vulnerable' person is not defined in the Gambling Act, the ASA will look at factors such as mental, social or emotional immaturity, impaired judgement, for example, because of alcohol or drug addiction, or those who are at risk of gambling more than they can afford to or want to. Nothing in Adverts should condone or encourage criminal or anti-social behaviour.

This means Chongie Entertainment Limited must:

- Be socially responsible, with particular regard to the need to protect Children, Young Persons and other Vulnerable Persons.

Chongie Entertainment Limited must not:

- Portray, condone or encourage gambling behaviour that is socially irresponsible or could lead to financial, social or emotional harm;
- Condone or encourage criminal or anti-social behaviour.

A breach of the more specific principles of the Codes will often involve a breach of the social responsibility rules. Adverts that have been investigated under the social responsibility rules have included: portraying gambling as a possible solution to financial concerns and debt; linking gambling

and alcohol consumption; and showing problem-gambling behaviours, such as solitary gambling or gambling taking priority in life.

Chongie Entertainment Limited's Policy sets out the rules and guidance for advertising and marketing. It is important that all employees, contractors, agents, consultants, partners or other parties working on behalf of Chongie Entertainment Limited are aware of and understand Chongie Entertainment Limited's Policy. Advertising or media campaigns must not be initiated without prior approval from Senior Management.

### **3 CHILDREN AND YOUNG PERSONS**

The Codes require marketing communications for gambling products to be socially responsible, with particular regard to the need to protect children, young persons and other vulnerable persons from being harmed or exploited.

This means Chongie Entertainment Limited must:

- Be socially responsible, with particular regard to the need to protect children, young persons and other vulnerable persons from being harmed or exploited.

Chongie Entertainment Limited must not:

- Exploit the susceptibilities, aspirations, credulity, inexperience or lack of knowledge of Children, Young Persons or other Vulnerable Persons;
- Suggest peer pressure to gamble or disparage abstention;
- Suggest gambling is a rite of passage;
- Create marketing or advertising likely to be of particular appeal to children or young persons, especially by reflecting or being associated with youth culture;
- Create marketing or advertising directed at those aged below 18 years through the selection of media or context in which they appear;
- Include a child or a young person in marketing or advertising. No-one who is or seems to be under-25 years old may be featured gambling. No-one may behave in an adolescent, juvenile or loutish way.

No advertising should be based around individuals who are or seem to be under 25 years old (18-24 years old).

An advertisement featuring a character that particularly appeals to children is likely to fall foul of the rules. The use of cartoons or licensed characters, such as super heroes and celebrities popular with children, must be used with a due sense of responsibility. In other words, care should be taken when using cartoon-like images; they might be acceptable if they are adult in nature but run the risk of appealing to under-18s if cartoon images are too childish in their execution; and that might be a problem when advertising gambling products. In all cases, steps should be taken to prevent under-18s from viewing ads and the likely age of the audience viewing the ad should always be considered.

#### 4 IRRESPONSIBLE APPEAL

Chongie Entertainment Limited recognises that irresponsible advertising and marketing related to gambling may appeal to Children, Young Persons or Vulnerable People and create a certain level of attractiveness to gambling. Chongie Entertainment Limited must ensure that all advertising and marketing is created responsibly and as such the below rules and codes must be applied when considering any marketing or advertising campaigns.

##### *Seduction, sexual success and enhanced attractiveness*

There must not be any direct or implied link between gambling, seduction, sexual success or enhanced attractiveness through any marketing or advertising.

The CAP & BCAP Codes state:

Marketing communications must not:

- Link gambling to seduction, sexual success or enhanced attractiveness.

It is acceptable to feature attractive people in advertising, as long as the ad as a whole does not link gambling with seduction, sexual success or enhanced attractiveness. Where characters in ads are treated with admiration by others as a result of their gambling, this can breach the Codes by linking gambling and enhanced attractiveness. References to fame, being special and VIP status are common themes in ads that the ASA has investigated under these rules.

Ads linking transformations of characters' appearance after gambling can create an implication that gambling could result in enhanced attractiveness and an improvement in self-image, thereby breaching the rules.

##### *Toughness, resilience and recklessness*

The CAP & BCAP Codes state:

Marketing communications must not:

- Portray gambling in a context of toughness or link it to resilience or recklessness.

No advert or marketing campaign should be created without considering if the context as a whole might create a link between gambling and resilience or toughness, or portraying gambling in a context of toughness.

##### *Enhancing personal qualities*

The CAP & BCAP Codes state:

Marketing communications must not:

- Suggest that gambling can enhance personal qualities, for example, that it can improve self-image or self-esteem, or is a way to gain control, superiority, recognition or admiration.

Again, it is acceptable to feature attractive or admired people in advertising, as long as the ad as a whole does not link gambling with these qualities. Where characters in ads are treated with admiration by others as a result of their gambling, this can breach the Codes by linking gambling and improved self-image or self-esteem. References to fame, being special and VIP status are common themes in ads that the ASA has investigated under these rules.

Ads linking transformations of characters' appearance after gambling can create an implication that gambling could result in an improvement in self-image, thereby breaching the rules.

#### *Cultural beliefs or traditions about gambling or luck*

The CAP & BCAP Codes state:

Marketing communications must not:

- Exploit cultural beliefs or traditions about gambling or luck.

Advertisements should avoid the use of cultural symbols and systems such as horoscopes if those symbols relate to an existing, strongly and communally held belief. These rules are not intended to prevent references to symbols or obsolete superstitions that are unlikely to be taken seriously, such as a clover leaf.

## **5 PROBLEM GAMBLING BEHAVIOUR**

### *Taking priority and solving problems*

The CAP & BCAP Codes state:

Marketing communications must not:

- Suggest that gambling can provide an escape from personal, professional or educational problems such as loneliness or depression;
- Suggest that gambling can be a solution to financial concerns, an alternative to employment or a way to achieve financial security;
- Portray gambling as indispensable or as taking priority in life; for example, over family, friends or professional or educational commitments;
- Condone or feature gambling in a working environment. An exception exists for licensed gambling premises.

No marketing activity suggesting that gambling is a solution to financial concerns should be implemented by Chongie Entertainment Limited. Chongie Entertainment Limited views this as socially irresponsible and a breach of this Policy.

Even where risks are clearly set out, care and consideration should always be given to ensure gambling is not portrayed as a viable alternative to employment, or solution to financial concerns in any given context.



References to salary or debts in gambling should also be given specific consideration when planning any marketing or advertising campaign, to ensure there is no breach of the Codes or rules outlined in this Policy.

It is generally acceptable to show gambling as being important and interesting to characters, as long as it is not to the exclusion of other activities or interactions with people.

### *Solitary gambling*

The CAP & BCAP Codes state:

Marketing communications must not:

- Suggest that solitary gambling is preferable to social gambling.

Any advertisement that features an adult losing track of time, retreating into private fantasy or engaging in secretive gambling is likely to breach the general principle of the Codes that advertisements should not portray, condone or encourage gambling behaviour that is socially irresponsible or could lead to financial, social or emotional harm.

Solitary gambling should not be shown favourably contrasting with social gambling.

## **6 MISLEADINGNESS**

All marketing communications and advertisements must state significant limitations and qualifications. Qualifications may clarify but must not contradict the claims that they qualify and should be presented clearly.

The terms “free”, “gratis”, “without charge” or similar should not be used unless the customer will not pay anything except the unavoidable cost of responding, collecting or paying for delivery of an item.

All marketing communications and advertising must make clear the extent of the commitment the consumer must make to take advantage of a “free” offer.

Chongie Entertainment Limited should ensure:

- Marketing communications or advertisements must not materially mislead or be likely to do so; and
- Marketing communications or advertisements must not mislead the consumer by omitting material information. They must not mislead by hiding material information or presenting it in an unclear, unintelligible, ambiguous or untimely manner.

Material information is information that the consumer needs in context to make informed decisions in relation to a product and to help them decide whether or how to buy a product or service. Whether the omission or presentation of material information is likely to mislead the consumer depends on the context, the medium and, if the medium of the marketing communication or advertisement is constrained by time or space, Chongie Entertainment Limited must take all measures possible to make that information available to the consumer by other means.

Marketing communications or advertisements that include a promotion and are significantly limited by time or space must include as much information about significant conditions as practicable and must direct consumers clearly to an easily accessible alternative source where all the significant conditions of the promotion are prominently stated. Participants should be able to retain those conditions or easily access them throughout the promotion.

The terms and conditions of each marketing incentive must be made available for the full duration of the promotion.

Any and all marketing and promotions must be approved by a senior manager relevant to the site and must be compliant with this policy.

## **7 SELF-EXCLUSIONS & SUBSCRIPTIONS**

Chongie Entertainment Limited is committed to complying with the requirements of the Act and LCCP, and recognises the importance of respecting our customer's rights and freedoms. Chongie Entertainment Limited therefore ensures adherence to the following:

Chongie Entertainment Limited must take steps to remove the name and details of a self-excluded individual or any customer that unsubscribes from marketing communications from any marketing databases used by Chongie Entertainment Limited or group (or otherwise flag that person as an individual to whom marketing material must not be sent), as soon as practicable after receiving relevant notification.

## **8 MONITORING THE POLICY**

To ensure that the policy continues to be fit for purpose:

Chongie Entertainment Limited are committed to carrying out an ongoing risk assessment of this Advertising and Media policy tailoring it to and any training around new products and newly identified risks as appropriate.

In the course of day to day activities and in reaction to any advertising or media cases, Chongie Entertainment Limited will continue to seek best practices and new techniques to improve the processes and procedures in place.

This policy is subject to review following any new guidance published by the Gambling Commission.



**CHONGIE ENTERTAINMENT LIMITED**  
**CCTV POLICY**



## **1. INTRODUCTION**

Chongie Entertainment Limited understands the importance of CCTV. CCTV is an essential tool in the prevention of crime and assisting in capturing those who have broken the law. Adult Gaming Centres are a business in which cash is continuously being transferred between staff, customer and machines. It is therefore extremely important that CCTV is in action.

## **2. CCTV SYSTEM**

The CCTV system must be switched on and be recording at all times. The CCTV should cover the front and rear exits, all machines and the shop floor as well as the offices and back of house. No decorations or signage should block the view of the CCTV

Any adjustments to the positioning of CCTV must only be carried out by senior management.

There will be a TV monitor positioned in the entranceway to the premises so that customers can clearly see there is CCTV in operation. Another monitor will be placed in the staff room.

## **3. MONITORING THE SYSTEM**

The CCTV must be checked daily to ensure it is in correct working order. Any faults must be communicated to senior management immediately. No information regarding the CCTV should be disclosed to third parties other than the appropriate authorities.

## **4. ACCESS**

The CCTV must be kept in a locked security cabinet, only accessible by senior management. Only senior management must have knowledge of any account passwords.

A hard copy of the CCTV will be kept in a locked cabinet in the staff room at premises, only accessible by senior management. The same will also be stored in the cloud.

## **5. DATA PROTECTION**

Chongie Entertainment Ltd will comply with all appropriate General Data Protection Regulations prevailing at the time.



**CHONGIE ENTERTAINMENT LIMITED**  
**CUSTOMER DUE DILIGENCE AND “KNOW YOUR CUSTOMER” PROCEDURES**



## 1. INTRODUCTION

All gambling businesses are subject to the Proceeds of Crime Act (POCA) and have a responsibility to keep crime, including money-laundering, out of gambling. This procedure is supplementary to the Proceeds of Crime and Anti Money Laundering Policy (POCAML) and the Compliance Pack.

## 2. POTENTIAL RISKS

There are a number of potential risks which may be posed by a customer and it is vital that staff identify whether they need to carry out a Customer Interaction (as outlined in the Compliance Pack) in order to carry out due diligence checks. This is compounded if it is known or suspected that the customer may launder money.

Suspicious behaviour is covered in the POCAML and staff must exercise caution if they are suspicious of a customer.

Possible suspicious behaviour may include the use of stained or forged bank notes; the feeding of notes into TiTo machines and cashing out before playing; feeding large numbers of notes into change machines or refusing to provide personal details such as their name.

## 3. CUSTOMER DUE DILIGENCE

Staff must approach customers on a risk based approach. This may differ between venues and will be informed by the Money Laundering Risk Assessment which is required under LCCP 12.1.1.

The basic due diligence includes:

- Name, verified with ID such as a driving licence or passport
- Address, verified with ID as above or a utility bill no older than 3 months

This must be recorded in the Customer Interaction spreadsheet.

Staff must be aware that an interaction may have already taken place with a customer which will have been recorded, for example in the Challenge 25 register.

## 4. ENHANCED DUE DILIGENCE

Staff must approach customers on a risk based approach. This may differ between venues and will be informed by the Money Laundering Risk Assessment which is required under LCCP 12.1.1.

A customer may require enhanced due diligence if they meet any of the thresholds deemed appropriate for that venue, or if a member of staff, having consulted with senior management, deems it appropriate in the circumstances.

This must be recorded in the Customer Interaction spreadsheet.

Staff must ensure they also consider the behaviour of established customers when deciding when enhanced due diligence may be appropriate.

In the event there is increasing level of suspicion of money laundering, or even actual knowledge of money laundering, senior management must be alerted immediately and a decision made on a case by case basis whether or not the customer may be allowed to continue gambling, whether the MLRO must be notified or whether any other action is to be taken. The MLRO will then decide whether a SAR is appropriate. The MLRO is [REDACTED]

## **5. RECORDING**

All customer due diligence and enhanced due diligence interactions must be recorded in the Customer Interaction spreadsheet.

Further, these interactions must be monitored and reviewed monthly in order to ensure that any patterns emerging are noticed and dealt with if appropriate. This review must be conducted by senior management.

Should the customer refuse to provide the requested documents the business relationship with the customer will be terminated.

## **6. MONITORING THIS POLICY**

To ensure that the policy continues to be fit for purpose:

Chongie Entertainment Limited are committed to carrying out an ongoing risk assessment of its Customer Due Diligence and "Know Your Customer" procedure, tailoring this procedure and training around new products and newly identified risks as appropriate.

In the course of day to day activities and in reaction to any POC or ML cases, Chongie Entertainment Limited will continue to seek best practices and new techniques to improve the processes and procedures in place.

This policy is subject to review following any new guidance published by the Gambling Commission.



**CHONGIE ENTERTAINMENT LIMITED  
MACHINE FRAUD POLICY**





## 1. INTRODUCTION

Machine fraud is an ever present threat and all staff must be aware of the ways in which fraud can take place and what to do in the event they spot a customer defrauding a machine.

## 2. MONITORING MACHINES

Management will ensure the venue floor is never left unattended and that customers who are not known, or with whom the staff are not familiar with, are given due consideration. Management will ensure photos of known fraudsters are available to all members of staff.

Staff must take special care to be aware of situations where large amounts of credit are being played with, machines are regularly going empty, suspicious activity such as large numbers of customers entering a venue trying to distract employees takes place and customers covering parts of machines.

In the event a machine is defrauded, floor staff must inform a manager immediately. Employees must take care not to endanger themselves when dealing with a fraudster.

Chongie Entertainment will subscribe to the BACTA machine fraud alerts and to those alerts provided by machine manufacturers and suppliers.

## 3. MACHINE RATIO CHECK

Due to the quantity of B3 machines permitted being limited, staff must ensure they check that this is adhered to in all premises.

A machine ratio check must be completed monthly, or in the event any machines are added or removed. This must be conducted by senior management and must be recorded.



**CHONGIE ENTERTAINMENT LIMITED**  
**PROCEEDS OF CRIME & ANTI MONEY LAUNDERING POLICY**

<b>1</b>	<b>POLICY PURPOSE</b>
<b>2</b>	<b>PROCEEDS OF CRIME (POC) &amp; MONEY LAUNDERING (ML)</b>
<b>3</b>	<b>POCA OFFENCES &amp; PENALTIES</b>
<b>4</b>	<b>KNOWLEDGE OR SUSPICION</b>
<b>5</b>	<b>RESPONSIBILITIES</b>
<b>6</b>	<b>PRODUCTS &amp; RISK MITIGATION</b>
<b>7</b>	<b>RISK TRIGGERS</b>
<b>8</b>	<b>CUSTOMER MONITORING</b>
<b>9</b>	<b>SYSTEM CONTROLS</b>
<b>10</b>	<b>PROACTIVE ANALYSIS- THRESHOLD REVIEW &amp; REPORTS</b>
<b>11</b>	<b>SUSPICIOUS ACTIVITY REPORTS (SARs)</b>
<b>12</b>	<b>SAR MONITORING AND TERMINATION OF CUSTOMER RELATIONSHIPS</b>
<b>13</b>	<b>PREJUDICING AN INVESTIGATION</b>
<b>14</b>	<b>ADVERSE INFORMATION &amp; POLICE INVOLVEMENT</b>
<b>15</b>	<b>INTERNAL RISKS</b>
<b>16</b>	<b>TRAINING AND SCREENING</b>
<b>17</b>	<b>MONITORING THE POLICY</b>



## 1 POLICY PURPOSE

The purpose of this document is to detail the responsibilities of the Company and its staff in relation to the Proceeds of Crime Act 2002 (POCA), Terrorism Act 2000 and to uphold the licensing objective of 'Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime' as outlined within the Gambling Act 2005.

In addition, the contents of the document will outline our Company's policies and procedures to prevent the Company being used in connection with money laundering or terrorist financing as well as our continued compliance with anti-money laundering, counter terrorist financing, licensing and legislative requirements.

Chongie Entertainment Limited is committed to ensuring that all necessary safeguards are in place in regard to the receipt of money in order to avoid it being used to launder money that may originate from the proceeds of crime.

## 2 PROCEEDS OF CRIME & MONEY LAUNDERING

### 2.1 *Proceeds of Crime*

The Proceeds of Crime can be broadly defined as property from which a person benefits directly or indirectly, by being party to criminal activity - i.e. stolen money, money from drug dealing, tax evasion or stolen, thieved or robbed property. It includes property that a person gains by spending the proceeds of criminal activity, for example, if a person used money gained in a bank robbery to gamble.

### 2.2 *Money Laundering*

Money Laundering is a term used to describe the practice of converting money that has been unlawfully or criminally obtained into legitimate funds, concealing and disguising the original source of the funds.

### 2.3 *Differences*

The law does not make any distinction between these two activities. The action we should take, and the penalties for not taking action are the same for both.

## 3 PROCEEDS OF CRIME ACT (POCA) OFFENCES & PENALTIES

There are 3 key offences under the POCA that are applicable to anyone who knows or suspects that property relates to the Proceeds of Crime:

- Section 327 states that a person commits an offence if they conceal, disguise, convert, or transfer criminal property in the UK.
- Section 328 provides that a person commits an offence if he or she enters into or becomes concerned in an arrangement which he or she knows or suspects facilitates, by

whatever means, the acquisition, retention, use or control of criminal property to or on behalf of another person.

- Section 329 states that a person commits an offence if he or she acquires, uses, or has possession of criminal property.

The above offences can be committed by any person, including employees who have knowledge or suspicion that a customer is using the POC. The penalty upon conviction of these sections is a maximum term of 14 years imprisonment, a fine, or both.

There is a defence available for a person to show that they made an authorised disclosure under sections 338 and 339, either for an employee to report to the Compliance Officer, and further for responsible parties in senior management to assess and report where they believe knowledge or suspicion exists to the National Crime Agency (NCA).

Once a report has been made, the Compliance Officer will consider whether they hold knowledge or suspicion based on the information provided. However, responsible parties in senior management may commit an offence under section 332 if there is a failure to report knowledge or suspicion to the NCA as soon as reasonably practicable after the information has been received. The sanction under POCA is a prison term up to 5 years, a fine, or both.

It is also an offence under section 342 to disclose knowledge of the existence of any investigation prior to or following a report which could prejudice the investigation' (this is often related to as 'tipping off' though this is not to be confused with the actual offence of tipping off which is only an offence in the regulated sector). The penalty upon conviction is a maximum of 5 years imprisonment.

#### **4 KNOWLEDGE OR SUSPICION**

Chongie Entertainment Limited and its employees have an obligation to report when we either have knowledge or suspicion that another person is using the POC or engaged in ML.

The POCA regulations do not define knowledge or suspicion, but case law has provided guidance.

Common sense provides that if, for example, a customer confirms they are laundering money or using money from a robbery, the member of staff would in fact know rather than suspect. Courts have previously gone further and also defined knowledge to include situations where the facts would be clear to an honest and reasonable person. It could also include a member of staff turning a blind eye, for example, if staff do not make normal enquiries of a customer where they believe they already know the answer and do not want to hear it.

Suspicion is subjective and may be based on picking up something unusual or where facts do not tally up. Suspicion does not need to be based on actual facts, but there needs to be some satisfaction beyond speculation that the customer is involved in the use of the POC or ML. A feeling of unease does not amount to suspicion.

#### **5 RESPONSIBILITIES**

The POCA and AML regime within Chongie Entertainment Limited is managed by the Compliance Officer and supported by senior management.

All staff have a role to play in combatting the use of criminal proceeds and ML, and are trained to pick up triggers which may lead to concern and further suspicion or knowledge.

Staff are also trained to report general concerns or otherwise knowledge or suspicion to the Compliance Officer. Where knowledge or suspicion of money laundering is believed to exist, the Compliance Officer will determine whether a Suspicious Activity Report (SAR) should be raised with the NCA.

## **6 PRODUCTS & RISK MITIGATION**

Chongie Entertainment Limited runs Adult Gaming Centre facilities in the UK.

To identify and manage the risks associated with the above products, Chongie Entertainment Limited applies controls in four broad ways.

*RISK TRIGGERS:* Training key staff to be aware of risk triggers which may be indicative of ML or the use of POC and how to report concerns.

*CUSTOMER MONITORING:* Providing facilities to allow Chongie Entertainment Limited to monitor customers, allowing staff to log consumer information, transactions and emerging concerns.

*SYSTEM CONTROLS:* Implementing controls to mitigate areas of potential risk and highlight potential irregularities.

*PROACTIVE ANALYSIS:* Carrying out proactive analysis of purchasing activity to help detect unusual activity and risk triggers. This is supported by record keeping, monitoring and customer reviews.

Each is considered in turn below. This policy is supplemented by the Customer Due Diligence and “Know Your Customer” Procedures.

## **7 RISK TRIGGERS**

Considering the above product type, there are different types of activity or customer behaviours which could lead to cause for concern leading to the possible formulation of knowledge or suspicion that an individual is participating in gambling activity with the POC or involved in ML.

These behaviours may be identified by any employee, and are most likely to be recognised by staff working in the Adult Gaming Centres. Full training is carried out on induction and at 12 monthly refreshers. All staff are therefore fully equipped with the skills they need to identify any suspicious behaviour.

## **8 CUSTOMER MONITORING**

Chongie Entertainment Limited will record any concerns they have with its customers by using the data provided for its own internal records. This is detailed in the Compliance Pack

## **9 SYSTEM CONTROLS**

General system controls exist to mitigate the risk of our products and business being used from a POC or ML perspective, and create an environment in which suspicious activity may be effectively detected.

### *Cash Handling*

Location specific operating policies and procedures will be put in place with regards to accounting practices and record keeping, in particular in respect of the following:

- Monetary stakes
- Token transactions
- Customer refunds (due to machine malfunctions)
- Money removed from machines
- Ticket in ticket out functions

This is not an exhaustive list and the risks of each location will be analysed.

The cash at each premises will be collected daily and stored in a safe. The external cash collection will take place every 7-10 days . The Operations Manager will be present for cash collections.

TiTo software will be installed in all machines.

## **10 PROACTIVE ANALYSIS**

The Compliance Officer is aware and completes pro-active analysis of the data recorded to complete the necessary checks for the purposes of POC and ML.

## **11 SUSPICIOUS ACTIVITY REPORTS (SARs)**

POCA requires SARs to be raised to the NCA in the event of knowledge or suspicion of the use of the proceeds of crime.

A SAR will be raised with the NCA by the MLRO or appropriate deputy as soon as is reasonably practicable where suspicion is held that the customer is engaged in money laundering.

## **12 SAR MONITORING AND TERMINATION OF CUSTOMER RELATIONSHIPS**

If the level of concern leading to the SAR is maintained in future transactions or has increased thereafter, then further SARs will be considered.

Chongie Entertainment Limited understands that SAR reporting and the defence of making a disclosure under section 338 of POCA is not intended to be used repeatedly in respect of the same customer.

Wherever knowledge or suspicion exists, the Compliance Officer will make an assessment with regards to the continuation of the customer relationship. This decision is made with awareness of the potential offences under POCA if transactions are allowed to continue where knowledge or suspicion exists.

In accordance with Gambling Commission guidance, advice may be sought from the NCA around the most effective approach in respect of terminating a customer relationship.

Where a relationship is terminated, steps will be taken to uphold this as effectively as possible.

### **13 PREJUDICING AN INVESTIGATION**

Staff are trained that subsequent to a report to the Compliance Officer, or a SAR being raised with the NCA, it is a criminal offence under section 342 of POCA to release information about the knowledge of the existence of an investigation that may prejudice that investigation.

The Compliance Officer will work particularly closely with customer facing staff to ensure that investigations are not disclosed when a payment is being held pending consent, or during the process of ceasing the relationship with a customer.

### **14 ADVERSE INFORMATION & POLICE INVOLVEMENT**

#### *14.1 Previous Convictions or Previous Police Involvement*

Where information is obtained which indicates previous Police interest or convictions for a financial crime or related offence, a file will be updated and steps may be taken to gather customer information from the stages above. Where concerns remain, the customer may be requested to provide proof of identity and source of funds.

#### *14.2 Current Police Investigation*

All Police requests for information are logged and a file is created in respect of customers subject to the enquiry (where a file does not already exist), and information provided.

If Police request information in respect of a financial crime enquiry, contact will be made to understand the current status of the investigation.

Provided that the following criteria are met, and there is no overriding knowledge of laundering activity, Chongie Entertainment Limited will support and formally cooperate with the Police if there is an explicit request to continue business to preserve the case and evidence.

- The Police must submit a Data Protection Act request for information;
- A formal timeframe for engagement must be established with Police;

- Assurances must be provided by Police that there is a formal investigation, and that the case will be subject to regular review dates. RIPA authority (to provide Police with investigatory and surveillance powers) must be obtained within the first 28 days of engagement;

A Disclosure will be made to the Gambling Commission to advise.

Suspicious Activity Reports will be considered by Chongie Entertainment Limited at the point of Police engagement and at each subsequent Police review date.

This cooperative approach seeks to help to ensure that crime is kept out of gambling in the longer term.

## 15 INTERNAL RISKS

The internal risks of an Adult Gaming Centre include, but are not limited to, the following:

### Money lending

Chongie Entertainment recognises the risks presented by customers who may seek to transfer money to other customers or third parties or receive funds from other customers or third parties. In order to mitigate this risk, identified transfers between customers and third parties must be assessed by senior management who must satisfy themselves that systematic, organised or commercial money lending is not taking place. Staff will be trained on identifying factors to look out for.

### Collusion

Collusion can be the agreement between people to act together secretly or illegally in order to deceive or cheat someone. Chongie Entertainment are aware of the risks collusion present to both the premises and in the context of money laundering and proceeds of crime. All staff are trained to be aware of the signs of collusion and to report such signs to management immediately.

### Fraud

Machine fraud is an ever present threat and all staff must be aware of the ways in which fraud can take place and what to do in the event they spot a customer defrauding a machine.

Management will ensure the venue floor is never left unattended and that customers who are not known, or with whom the staff are not familiar with, are given due consideration. Management will ensure photos of known fraudsters are available to all members of staff. Staff must take special care to be aware of situations where large amounts of credit are being played with, machines are regularly going empty, suspicious activity such as large numbers of customers entering a venue trying to distract employees takes place and customers covering parts of machines.

In the event a machine is defrauded, floor staff must inform a manager immediately. Employees must take care not to endanger themselves when dealing with a fraudster.



## 16 TRAINING AND SCREENING

Chongie Entertainment Limited are committed to ensuring that all key staff understand their responsibilities in respect of POCA and this policy, including internal risks, and in particular the triggers to be alert to and the requirement to report concerns, knowledge, or suspicion to the Compliance Officer immediately.

Staff are trained as follows:

All employees of Chongie Entertainment Limited are required to undertake and complete AML training and understand our policy and reporting processes.

### *Head Office*

Key customer facing head office staff, including the Compliance Officer, are required to understand and adhere to the Company's POCA & AML policy.

Training refreshers will be held every 12 months and new starters are trained upon induction.

Ad hoc training sessions may be provided to react to developing risks in particular areas.

## 17 MONITORING THE POLICY

To ensure that the policy continues to be fit for purpose:

Chongie Entertainment Limited are committed to carrying out an ongoing risk assessment of its POC & ML regime, tailoring this policy and training around new products and newly identified risks as appropriate.

In the course of day to day activities and in reaction to any POC or ML cases, Chongie Entertainment Limited will continue to seek best practices and new techniques to improve the processes and procedures in place.

This policy is subject to review following any new guidance published by the Gambling Commission.



**CHONGIE ENTERTAINMENT LIMITED  
PROCEEDS OF CRIME & ANTI MONEY LAUNDERING POLICY**

<b>1</b>	<b>POLICY PURPOSE</b>
<b>2</b>	<b>PROCEEDS OF CRIME (POC) &amp; MONEY LAUNDERING (ML)</b>
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## 1 POLICY PURPOSE

The purpose of this document is to detail the responsibilities of the Company and its staff in relation to the Proceeds of Crime Act 2002 (POCA), Terrorism Act 2000 and to uphold the licensing objective of 'Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime' as outlined within the Gambling Act 2005.

In addition, the contents of the document will outline our Company's policies and procedures to prevent the Company being used in connection with money laundering or terrorist financing as well as our continued compliance with anti-money laundering, counter terrorist financing, licensing and legislative requirements.

Chongie Entertainment Limited is committed to ensuring that all necessary safeguards are in place in regard to the receipt of money in order to avoid it being used to launder money that may originate from the proceeds of crime.

## 2 PROCEEDS OF CRIME & MONEY LAUNDERING

### 2.1 *Proceeds of Crime*

The Proceeds of Crime can be broadly defined as property from which a person benefits directly or indirectly, by being party to criminal activity - i.e. stolen money, money from drug dealing, tax evasion or stolen, thieved or robbed property. It includes property that a person gains by spending the proceeds of criminal activity, for example, if a person used money gained in a bank robbery to gamble.

### 2.2 *Money Laundering*

Money Laundering is a term used to describe the practice of converting money that has been unlawfully or criminally obtained into legitimate funds, concealing and disguising the original source of the funds.

### 2.3 *Differences*

The law does not make any distinction between these two activities. The action we should take, and the penalties for not taking action are the same for both.

## 3 PROCEEDS OF CRIME ACT (POCA) OFFENCES & PENALTIES

There are 3 key offences under the POCA that are applicable to anyone who knows or suspects that property relates to the Proceeds of Crime:

- Section 327 states that a person commits an offence if they conceal, disguise, convert, or transfer criminal property in the UK.
- Section 328 provides that a person commits an offence if he or she enters into or becomes concerned in an arrangement which he or she knows or suspects facilitates, by

whatever means, the acquisition, retention, use or control of criminal property to or on behalf of another person.

- Section 329 states that a person commits an offence if he or she acquires, uses, or has possession of criminal property.

The above offences can be committed by any person, including employees who have knowledge or suspicion that a customer is using the POC. The penalty upon conviction of these sections is a maximum term of 14 years imprisonment, a fine, or both.

There is a defence available for a person to show that they made an authorised disclosure under sections 338 and 339, either for an employee to report to the Compliance Officer, and further for responsible parties in senior management to assess and report where they believe knowledge or suspicion exists to the National Crime Agency (NCA).

Once a report has been made, the Compliance Officer will consider whether they hold knowledge or suspicion based on the information provided. However, responsible parties in senior management may commit an offence under section 332 if there is a failure to report knowledge or suspicion to the NCA as soon as reasonably practicable after the information has been received. The sanction under POCA is a prison term up to 5 years, a fine, or both.

It is also an offence under section 342 to disclose knowledge of the existence of any investigation prior to or following a report which could prejudice the investigation' (this is often related to as 'tipping off' though this is not to be confused with the actual offence of tipping off which is only an offence in the regulated sector). The penalty upon conviction is a maximum of 5 years imprisonment.

#### **4 KNOWLEDGE OR SUSPICION**

Chongie Entertainment Limited and its employees have an obligation to report when we either have knowledge or suspicion that another person is using the POC or engaged in ML.

The POCA regulations do not define knowledge or suspicion, but case law has provided guidance.

Common sense provides that if, for example, a customer confirms they are laundering money or using money from a robbery, the member of staff would in fact know rather than suspect. Courts have previously gone further and also defined knowledge to include situations where the facts would be clear to an honest and reasonable person. It could also include a member of staff turning a blind eye, for example, if staff do not make normal enquiries of a customer where they believe they already know the answer and do not want to hear it.

Suspicion is subjective and may be based on picking up something unusual or where facts do not tally up. Suspicion does not need to be based on actual facts, but there needs to be some satisfaction beyond speculation that the customer is involved in the use of the POC or ML. A feeling of unease does not amount to suspicion.

#### **5 RESPONSIBILITIES**

The POCA and AML regime within Chongie Entertainment Limited is managed by the Compliance Officer and supported by senior management.

All staff have a role to play in combatting the use of criminal proceeds and ML, and are trained to pick up triggers which may lead to concern and further suspicion or knowledge.

Staff are also trained to report general concerns or otherwise knowledge or suspicion to the Compliance Officer. Where knowledge or suspicion of money laundering is believed to exist, the Compliance Officer will determine whether a Suspicious Activity Report (SAR) should be raised with the NCA.

## **6 PRODUCTS & RISK MITIGATION**

Chongie Entertainment Limited runs Adult Gaming Centre facilities in the UK.

To identify and manage the risks associated with the above products, Chongie Entertainment Limited applies controls in four broad ways.

*RISK TRIGGERS:* Training key staff to be aware of risk triggers which may be indicative of ML or the use of POC and how to report concerns.

*CUSTOMER MONITORING:* Providing facilities to allow Chongie Entertainment Limited to monitor customers, allowing staff to log consumer information, transactions and emerging concerns.

*SYSTEM CONTROLS:* Implementing controls to mitigate areas of potential risk and highlight potential irregularities.

*PROACTIVE ANALYSIS:* Carrying out proactive analysis of purchasing activity to help detect unusual activity and risk triggers. This is supported by record keeping, monitoring and customer reviews.

Each is considered in turn below. This policy is supplemented by the Customer Due Diligence and “Know Your Customer” Procedures.

## **7 RISK TRIGGERS**

Considering the above product type, there are different types of activity or customer behaviours which could lead to cause for concern leading to the possible formulation of knowledge or suspicion that an individual is participating in gambling activity with the POC or involved in ML.

These behaviours may be identified by any employee, and are most likely to be recognised by staff working in the Adult Gaming Centres. Full training is carried out on induction and at 12 monthly refreshers. All staff are therefore fully equipped with the skills they need to identify any suspicious behaviour.

## **8 CUSTOMER MONITORING**

Chongie Entertainment Limited will record any concerns they have with its customers by using the data provided for its own internal records. This is detailed in the Compliance Pack

## **9 SYSTEM CONTROLS**

General system controls exist to mitigate the risk of our products and business being used from a POC or ML perspective, and create an environment in which suspicious activity may be effectively detected.

### *Cash Handling*

Location specific operating policies and procedures will be put in place with regards to accounting practices and record keeping, in particular in respect of the following:

- Monetary stakes
- Token transactions
- Customer refunds (due to machine malfunctions)
- Money removed from machines
- Ticket in ticket out functions

This is not an exhaustive list and the risks of each location will be analysed.

The cash at each premises will be collected daily and stored in a safe. The external cash collection will take place every 7-10 days . The Operations Manager will be present for cash collections.

TiTo software will be installed in all machines.

## **10 PROACTIVE ANALYSIS**

The Compliance Officer is aware and completes pro-active analysis of the data recorded to complete the necessary checks for the purposes of POC and ML.

## **11 SUSPICIOUS ACTIVITY REPORTS (SARs)**

POCA requires SARs to be raised to the NCA in the event of knowledge or suspicion of the use of the proceeds of crime.

A SAR will be raised with the NCA by the MLRO or appropriate deputy as soon as is reasonably practicable where suspicion is held that the customer is engaged in money laundering.

## **12 SAR MONITORING AND TERMINATION OF CUSTOMER RELATIONSHIPS**

If the level of concern leading to the SAR is maintained in future transactions or has increased thereafter, then further SARs will be considered.

Chongie Entertainment Limited understands that SAR reporting and the defence of making a disclosure under section 338 of POCA is not intended to be used repeatedly in respect of the same customer.

Wherever knowledge or suspicion exists, the Compliance Officer will make an assessment with regards to the continuation of the customer relationship. This decision is made with awareness of the potential offences under POCA if transactions are allowed to continue where knowledge or suspicion exists.

In accordance with Gambling Commission guidance, advice may be sought from the NCA around the most effective approach in respect of terminating a customer relationship.

Where a relationship is terminated, steps will be taken to uphold this as effectively as possible.

### **13 PREJUDICING AN INVESTIGATION**

Staff are trained that subsequent to a report to the Compliance Officer, or a SAR being raised with the NCA, it is a criminal offence under section 342 of POCA to release information about the knowledge of the existence of an investigation that may prejudice that investigation.

The Compliance Officer will work particularly closely with customer facing staff to ensure that investigations are not disclosed when a payment is being held pending consent, or during the process of ceasing the relationship with a customer.

### **14 ADVERSE INFORMATION & POLICE INVOLVEMENT**

#### *14.1 Previous Convictions or Previous Police Involvement*

Where information is obtained which indicates previous Police interest or convictions for a financial crime or related offence, a file will be updated and steps may be taken to gather customer information from the stages above. Where concerns remain, the customer may be requested to provide proof of identity and source of funds.

#### *14.2 Current Police Investigation*

All Police requests for information are logged and a file is created in respect of customers subject to the enquiry (where a file does not already exist), and information provided.

If Police request information in respect of a financial crime enquiry, contact will be made to understand the current status of the investigation.

Provided that the following criteria are met, and there is no overriding knowledge of laundering activity, Chongie Entertainment Limited will support and formally cooperate with the Police if there is an explicit request to continue business to preserve the case and evidence.

- The Police must submit a Data Protection Act request for information;
- A formal timeframe for engagement must be established with Police;

- Assurances must be provided by Police that there is a formal investigation, and that the case will be subject to regular review dates. RIPA authority (to provide Police with investigatory and surveillance powers) must be obtained within the first 28 days of engagement;

A Disclosure will be made to the Gambling Commission to advise.

Suspicious Activity Reports will be considered by Chongie Entertainment Limited at the point of Police engagement and at each subsequent Police review date.

This cooperative approach seeks to help to ensure that crime is kept out of gambling in the longer term.

## 15 INTERNAL RISKS

The internal risks of an Adult Gaming Centre include, but are not limited to, the following:

### Money lending

Chongie Entertainment recognises the risks presented by customers who may seek to transfer money to other customers or third parties or receive funds from other customers or third parties. In order to mitigate this risk, identified transfers between customers and third parties must be assessed by senior management who must satisfy themselves that systematic, organised or commercial money lending is not taking place. Staff will be trained on identifying factors to look out for.

### Collusion

Collusion can be the agreement between people to act together secretly or illegally in order to deceive or cheat someone. Chongie Entertainment are aware of the risks collusion present to both the premises and in the context of money laundering and proceeds of crime. All staff are trained to be aware of the signs of collusion and to report such signs to management immediately.

### Fraud

Machine fraud is an ever present threat and all staff must be aware of the ways in which fraud can take place and what to do in the event they spot a customer defrauding a machine.

Management will ensure the venue floor is never left unattended and that customers who are not known, or with whom the staff are not familiar with, are given due consideration. Management will ensure photos of known fraudsters are available to all members of staff. Staff must take special care to be aware of situations where large amounts of credit are being played with, machines are regularly going empty, suspicious activity such as large numbers of customers entering a venue trying to distract employees takes place and customers covering parts of machines.

In the event a machine is defrauded, floor staff must inform a manager immediately. Employees must take care not to endanger themselves when dealing with a fraudster.



## 16 TRAINING AND SCREENING

Chongie Entertainment Limited are committed to ensuring that all key staff understand their responsibilities in respect of POCA and this policy, including internal risks, and in particular the triggers to be alert to and the requirement to report concerns, knowledge, or suspicion to the Compliance Officer immediately.

Staff are trained as follows:

All employees of Chongie Entertainment Limited are required to undertake and complete AML training and understand our policy and reporting processes.

### *Head Office*

Key customer facing head office staff, including the Compliance Officer, are required to understand and adhere to the Company's POCA & AML policy.

Training refreshers will be held every 12 months and new starters are trained upon induction.

Ad hoc training sessions may be provided to react to developing risks in particular areas.

## 17 MONITORING THE POLICY

To ensure that the policy continues to be fit for purpose:

Chongie Entertainment Limited are committed to carrying out an ongoing risk assessment of its POC & ML regime, tailoring this policy and training around new products and newly identified risks as appropriate.

In the course of day to day activities and in reaction to any POC or ML cases, Chongie Entertainment Limited will continue to seek best practices and new techniques to improve the processes and procedures in place.

This policy is subject to review following any new guidance published by the Gambling Commission.

**LITTLE VEGAS**

**Chongie Entertainment Limited**

**Social Responsibility & Compliance Pack**

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## 1 Introduction

Chongie Entertainment Limited (“Chongie”) and all of its employees are committed to a safer gambling experience for all customers of Little Vegas.

These policies and procedures are designed to ensure that the Gambling Act 2005, the LCCP and all relevant guidance is understood and followed by all employees of Chongie.

The Social Responsibility & Compliance Pack is in addition to the following:

- The Money Laundering and Proceeds of Crime Policy
- The Customer Due Diligence and “Know Your Customer” Procedure
- The Advertising and Marketing Policy
- The Staff Guard Policy
- The CCTV Policy
- The Machine Fraud and Ratio Check Policy
- The Gambling Risk Assessment

And any other policy which Chongie may implement in order to uphold the Gambling Act 2005 and all additional guidance and legislation.

### 1.1 The Gambling Act 2005

Mandatory Licence Conditions implemented by the Gambling Act 2005 (“GA05”):

- A notice must be displayed at all entrances to AGCs stating that no person under the age of 18 years will be admitted to the premises.
- There can be no direct access between an AGC and any other premises licensed under the Act or premises with a family entertainment centre (FEC), club gaming, club machine or alcohol licensed premises gaming machine permit. (England and Wales only). There is no definition of ‘direct access’ in the Act or regulations, although licensing authorities may consider that there should be an area separating the premises concerned, such as a street or cafe, which the public go to for purposes other than gambling, for there to be no direct access.
- Any ATM made available for use on the premises shall be located in a place that requires any customer who wishes to use it to cease gambling at any gaming machine in order to do so.

- The consumption of alcohol in AGCs is prohibited at any time during which facilities for gambling are being provided on the premises. Additionally in Scotland the sale of alcohol on the premises is specifically prohibited. A notice stating this should be displayed in a prominent place at every entrance to the premises.

## 1.2 The 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 and
- Protecting children and other vulnerable person from being harmed or exploited by gambling

## 1.3 The Licensing Conditions and Codes of Practice

The Licence conditions and codes of practice (“LCCP”) set out the requirements Chongie must meet in order to hold its operating licence. All senior employees must subscribe to the Gambling Commission news updates and regularly check the website for updates.

Section 24 of the Gambling Act 2005 sets out two types of provisions:

- Social responsibility provisions

Compliance with these is a condition of licences, therefore any breach of them by an operator may lead the Commission to review the operator’s licence with a view to suspension, revocation or the imposition of a financial penalty and would also expose the operator to the risk of prosecution

- Ordinary code provisions

These do not have the status of licence conditions but are admissible in evidence in criminal or civil proceedings and must be taken into account in any case in which the court or tribunal think them relevant and by the Commission in the exercise of its functions. Any breach of ordinary code provisions by an operator may be taken into account by the Commission on a licence review, but cannot lead to the imposition of a financial penalty

These codes consist of: Financial Requirements (including Anti Money Laundering); Protection of Children & Vulnerable People; Combating Problem Gambling; Access to Gambling by children and young persons; Information on how to gamble responsibly and help for problem gamblers; Customer Interaction; Self Exclusion; Employment of Children & Young Persons; Money lending between customers; Fair & Open provisions; Marketing;

Complaints & Disputes; Gambling Licensees' staff; Information Requirements; Primary Gambling Activity

Adult Gaming Centres must comply with the relevant sections of the LCCP and all members of staff must be familiar with, and are trained on, these sections.

#### **1.4 The Powers of the Gambling Commission and others**

Members of staff are to co-operate at all times with the Commission's Compliance officers, Local Authority Licensing officers and the police in the proper performance of their compliance functions.

These individuals rights of entry to premises are contained in Part 15 of the Act which deals with inspection (Sections 303 to 326). A constable, enforcement officer or authorised person under the Act may enter premises for the purpose of assessing compliance or assessing whether an offence is being committed. A constable or enforcement officer can enter a premises if he reasonably suspects that an offence may be being committed or is about to be committed (Section 306). Entry may also be for the purpose of discovering whether facilities for gambling are being provided, to determine whether an operating licence or premises licence is held and to determine whether facilities are being provided in accordance with terms and conditions of an operating licence (Section 307).

Entry may also be made to assess the likely effects of activity when application has been made for a premises licence. A constable or enforcement officer may require the holder of an operating licence to produce, within a specified period, a copy of the authorisation (Section 316). Failure to comply without reasonable excuse to a request to produce a copy of the authorisation may result in an offence and be liable on summary conviction to a fine not exceeding level 2.

Section 317 sets out powers of the constable, enforcement office or authorised person and include inspection of any part of the premises or any machine on anything on the premises, questioning any person, access to written or electronic records, remove or retain evidence of committing an offence or breach of terms and conditions. Section 20 provides that the power of inspection must be exercised only at a reasonable time. The enforcement officer or authorised person must provide evidence of his identify and authority (Section 321). Section 323 provides that a constable, enforcement officer or authorised person may use reasonable force to enter a premises. Section 326 provides that it is an offence to obstruct a constable, enforcement officer or authorised person in carrying out their duties.

## **2 Social Responsibility**

### **2.1 Promotion of Socially Responsible Gambling**

The third objective of the Gambling Act is to protect children and other vulnerable persons from being harmed or exploited by gambling and it is conditional on our Adult Gaming Centre licence that we have appropriate controls in place. The need to prevent young and vulnerable persons from being able to access our products and services is of paramount importance to Chongie.

### **2.2 Problem Gambling and the Provision of Information**

Chongie monitors customer activity and uses a range of indicators to identify potential gambling. These include:

- Time and spend indicators: amount and frequency of time and deposits, time of day, large losses.
- Customer contact: information or hints from customers, frequent complaints, or signs of distress.
- Play indicators: chasing losses, erratic gaming patterns and product choice.
- A 'big win': high staking following a win could hide or even lead to harmful behaviour.

A player may give some signals that they have a gambling problem while communicating with members of staff. A problem gambler may display some of the following signs:

- Finding it hard to manage or stop gambling – customer may make a comment regarding this.
- Signs of agitation, distress or aggression: Customers may target aggression at customer support staff following a loss. Staff will be trained on how to deal with aggressive customers and how to diffuse situations.
- Player informs staff member that their main goal is to win a specific amount of money at which point they will leave.
- Customer contacts Chongie management regularly to express dissatisfaction with gaming outcomes and overall gameplay.

In the event that a suspected problem gambler enters an AGC and wishes to participate in gambling:

- The customer must be tactfully referred to GamCare by the appropriate member of



staff.

- The customer's details must be logged for the purposes of possible exclusion from future participation, should any similar incidents re-occur.
- All written and verbal communication between staff and suspected problem gamblers must be monitored and approved by senior management.

In the event that an existing customer is suspected of becoming a problem gambler:

- 
- The customer must be tactfully referred to GamCare, by the appropriate member of staff.
- The customer's details must be logged for the purposes of possible exclusion from future participation, should any similar incidents re-occur.
- All written and verbal communications between staff and the suspected problem gambler should be monitored and approved by senior management.

Chongie clearly displays posters and provides leaflets for customers which detail key organisations which can help, including Gamcare.

The following organisations also provide psychological help, professional advice and assistance in dealing with gambling addiction:

- Counselling Directory
- The National Council on Problem Gambling
- GamCare
- Gamblers Anonymous
- Gam-Anon UK and Ireland
- Y-Gam

### **2.3 Customer Interaction**

Chongie recognises its responsibilities and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice listed under the Social Responsibility Code 3.4.1.

Chongie follows the Identify- Interact- Evaluate framework to ensure compliance and to

protect its customers.

Chongie, where circumstances allow and subject to player confidentiality, shares experience and deliver good practice across the full range of social responsibility requirements for customer interaction with other operators.

### *Identify*

Chongie ensures that staff have access to all relevant sources of information and policies to ensure effective decision making, in order to guide and deliver effective customer interactions, including information to assist in identifying at risk customers whom;

- may not be displaying obvious signs of, or overt behaviour associated with, problem gambling
- are designated as 'high value', 'VIP' or equivalent (although Chongie do not operate a VIP scheme)
- are demonstrating signs of agitation, distress, intimidation, aggression or other behaviours that may inhibit customer interaction

Chongie Entertainment Limited recognises the importance to identify any customers where there may be problems early and pro-actively reach out and offer support.

### *Interact*

Should a staff member feel that a player's behaviour may indicate problem gambling, they should engage with the customer by asking questions such as:

- Do you feel that your gambling spends are controlled?
- Do you acknowledge that your activity may result in losses and can withstand these losses?
- When you lose, do you feel you the need to return as soon as possible to win back your losses?
- Do you ever borrow to finance your gambling?

The member of staff, if they think it necessary, will explain the various management tools in place such as self-exclusion, and will provide information on GamCare.

### *Evaluate*

Chongie understands that evaluation of customer interactions is important to understand the impact they have had and to help ensure customers are getting the right help and support.

The result of a customer interaction may be that the customer is allowed to continue, the customer self-excludes or uses a different tool, or the customer is barred.

A monthly review of customer interactions should be carried out with considerations to the following points:

- Did the customer start using gambling management tools?
- Did the customer read the responsible gambling information?
- Was there a positive change in behaviour? Did the customer's gambling seem to change after the interaction?

Chongie keeps a record of customer interactions, and where an interaction has been ruled out, the reasons for this.

A flow chart of how Customer Interaction works is at section 8.3.

## 2.4 Self-Exclusion

Self-exclusion is recognised by the gambling industry as a way for players to control their gambling. Chongie offers a self-exclusion facility to help those customers who feel that their gambling is out of control and want assistance to help them stop.

Chongie takes all reasonable steps to ensure that customers on the self-exclusion register are prevented from entering the premises. Whilst on the self-exclusion register, customers also have certain obligations contained in the terms and conditions that they acknowledge when joining the self-exclusion program.

### *What happens*

- When a customer has requested that they be refused entry to our premises, the customer and the appointed manager will formally acknowledge and document the request on a self-exclusion request form, or directly on the web-based AGC national self-exclusion scheme. This will be preceded by a meaningful discussion about the terms and conditions applicable to the scheme and will include other options available to assist a person having a gambling disorder, including being signposted to counselling and support services. A copy of the terms and conditions will be signed by the excluder as acknowledgement of understanding and consent. Customers are given the opportunity of discussing self-exclusion in private where possible.
- Photo identification and signature of the excluder is required for self-exclusion agreements except where an alternative means of identification is at least as effective. Photographs, preferably of the passport style, should be full-faced and a good likeness both initially and throughout the duration of the self-exclusion agreement.

- The Duty Manager will offer the exclusion for a minimum duration of not less than six months, nor more than twelve months; the customer thereafter may request to extend the length of the self-exclusion for one or more further periods of at least six months.
- Chongie will not allow the excluder admittance to the premises during the term of the self-exclusion agreement.
- It is made clear to the customer that they may not revoke the self-exclusion during the agreed period and that if found either in the gambling area or attempting to gamble they will be asked to leave.
- Members of staff must be alert to self-excluded individuals attempting to breach agreements and instances of them getting another person to gamble on their behalf. It is a requirement that staff regularly pay heed to self-exclusion agreement records that are currently active (particularly photographs) in order to stay alert to the identity of those excluded in the locality of the premises.
- Self-excluders have the opportunity of also excluding from other premises owned by Chongie without necessarily having to enter areas licenced for gambling. Where the self-exclusion agreement is extended to other premises we will consider any specific requests made by a customer in setting the bounds of the exclusion area.

Chongie will offer customers with whom they enter into a self-exclusion agreement in respect of facilities for any kind of gambling we offer, the ability to exclude from facilities for the same kind of gambling offered in our locality by any other holder of an operating licence to whom this provision applies, by participating in one or more available multi-operator self-exclusion schemes.

A self-exclusion log is maintained on the premises for recording detail of those currently excluded in addition to records stored digitally.

Those self-excluded are removed from any marketing databases held by Chongie within two days of receiving the completed self-exclusion form, but we will take all reasonable steps to prevent details being knowingly sent as soon as practicable.

At the end of the self-exclusion period, the exclusion will remain in place for a further six months, unless the customer takes positive action in order to gamble again. At the end of the exclusion period, the Manager and customer will, together, review the terms of agreement either by telephone or in person. The review process is recorded on a self-exclusion review form.

Where a customer chooses not to extend the self-exclusion and makes a positive request to begin gambling again, the customer is offered a 24-hour 'cooling off' period before being allowed access to the gambling facilities.

Chongie retains self-exclusion records for the length of the agreement plus a further 6

months.

### **3 Children and Vulnerable Persons**

#### **3.1 Access to Gambling**

Chongie implements age verification procedures that use various methods to try and detect and deter children and young people from entering including U18 signage.

The premises themselves have been designed to ensure staff on the floor can see who is accessing the premises and floor staff must be vigilant. Specific risks have been considered in the Local Area Risk Assessment.

#### **3.2 Challenge 25**

Chongie operates a challenge 25 policy which requires that all customers who appear to be under 25 are approached by a member of staff and their age verified by the production of the appropriate valid ID document as soon as entering the premises or as soon as possible thereafter but BEFORE gambling.

Acceptable forms of documentation include:

- Any ID carrying the PASS logo (e.g. Citizen Card, Connexions Card) Full Driving Licence with photo card.
- Provisional Driving Licence with photo card or International Passport
- Military Identification Card

The staff must check to see that the ID is acceptable and then record the interaction in the ID Record.

If suitable photographic ID cannot be produced, then the customer should be politely requested to leave the premises with the incident subsequently recorded.

Challenge 25 signage is positioned on or close to the entrance/exit door and displayed in conjunction with existing signage.

The Gambling Commission and Local Licensing Authority may conduct underage test entries to assess whether or not Chongie's Adult Gaming Centre's are allowing under- 18's to enter or gamble on the premises. BACTA also conduct age verification checks.

If at any time staff are informed that they have been the subject of an underage test by the Gambling Commission and/or the Local Licensing Authority, this is immediately reported to the Operations Manager and Compliance Officer.

All age verification test failures are fully investigated by the Operations Manager and/or the Compliance Officer. Performance is constantly monitored and further training may be given

to staff if necessary to react to developing risks in particular areas.

Chongie does not deliberately provide facilities for gambling in such a way as to appeal particularly to children or young people, for example by reflecting or being associated with youth culture.

If a person over the age of 18 knowingly allows a child under the age of 18 in to the Adult Gaming Centre that person and the child will be banned for 6 months (the names and details will be recorded on a written form which will be filed at the unit).

This should be reported to the Premises Manager for that site, who will then complete the "ban log" and report and retain for future use/inspection.

If an employee of Chongie becomes aware that a child or young person is using or has used facilities for gambling provided in reliance on the licence, they shall ensure that:

- Any money paid in respect of the use of those facilities (whether by way of fee, stake or otherwise) by the child or young person is returned as soon as is reasonably practicable; and
- Any prize must not be given to the child or young person.

This should be reported to the Premises Manager for that site, who will then complete the ban log and report to the Operations Manager in writing.

Any member of staff who knowingly allows access to a person under the age of 18 will be subject to disciplinary action.

### **3.3 Employment of Children and Young Persons**

Licencees who employ children and young persons should be aware that it is an offence: -

- a) to employ them to provide gambling facilities in an Adult Gaming Centre
- b) for their contract of employment to require them or permit them to perform functions in respect any gambling machine in an Adult Gaming Centre
- c) to employ a child to perform any function in an Adult Gaming Centre where facilities are being provided to play gaming machines

Chongie will not employ and person under the age of 18 years

## **4 Crime and Disorder**

### **4.1 Money Laundering and Proceeds of Crime**

Chongie maintains a separate ML and POCA policy which is available to all staff.

### **4.2 Suspicious Activity Reports**

All employees are aware of where the SAR forms are located, how to complete them and how to submit them to the Operations Manager.

POCA requires SARs to be raised to the NCA in the event of knowledge or suspicion of the use of the proceeds of crime.

A SAR will be raised with the NCA by the Operations Manager as soon as is reasonably practicable where suspicion is held that the customer is engaged in money laundering.

If the level of concern leading to the SAR is maintained in future transactions or has increased thereafter, then further SARs will be considered.

Wherever knowledge or suspicion exists, the Operations Manager will make an assessment with regards to the continuation of the customer relationship. This decision is made with awareness of the potential offences under POCA if transactions are allowed to continue where knowledge or suspicion exists.

In accordance with Gambling Commission guidance, advice may be sought from the NCA around the most effective approach in respect of terminating a customer relationship.

Where a relationship is terminated, steps will be taken to uphold this as effectively as possible.

Further information is contained in the ML and POCA policy.

### **4.3 Cash Handling**

All members of relevant staff are trained specifically on cash handling and in particular with regard to security, accounting practices and record keeping in respect of:

(i) Monetary stakes introduced to machines (gross takings),

(ii) Money introduced to re-float machines

(iii) Token transactions



(iv) Customer refunds due to machine malfunctions.

(v) Money removed from machines (net takings)

#### *Sign Off Keys*

No keys are to be handed to anybody without checking ID. The person who hands over the keys will be held responsible. All visiting engineers need to sign in.

#### *Cash Collection*

Cash is collected daily and stored in a safe. The external cash collection will take place every 7-10 days and the Operations Manager will be present.

#### *Empty of Machines*

The empty of machines needs to be carried out ideally when there are no customers in the unit.

Once each machine/terminal has been emptied/re-floated the keys need to be locked away again in the safe.

#### *Cash Reconciliation*

The Premises Manager is responsible for this and any discrepancies / variances will be recorded as cash losses and investigated as necessary.

All accounting procedures will be recorded by senior management.

## **4.4 Keeping Alcohol Out**

Chongie implements clear rules and guidelines on the consumption and influence of alcohol.

#### *Individuals under the influence of alcohol on entry*

- In all our sites individuals who are deemed to be under the influence of excessive alcohol should be prevented from entering any of our premises.
- When such a situation occurs the member of staff should politely refuse entry to the site on the grounds of being under the influence of alcohol and ask the individual to leave the premises.
- Should the individual resist or refrain from leaving the premises in the first instance a Premises Manager should be called. They should also request that the individual leave the premises immediately. If an individual fails to leave the premises or becomes a nuisance that cannot be dealt with by the staff on duty the police should

be called to assist.

- All incidents should be recorded fully on the premises log.

#### *Alcohol consumption on site*

- Under no circumstances should customers be served alcoholic drinks on site, nor should they bring alcoholic drinks onto the premises to be consumed.

## **4.5 Dealing with Aggressive Customers**

Violence and aggression are used to show distress and dominance. Whilst there are some individuals for whom such behaviour is normal, members of staff must be extremely cautious of treating such behaviour as normal.

Staff must be aware of any signs of aggression including, but not limited to:

- Tensed muscles or sweating
- Twitching muscles, particularly in the face
- Pacing
- Changes in voice (pitch, volume)
- Language, obscenities, threats
- Facial expression
- Withdrawn or upset
- Carrying a weapon or suspected weapon

In the event a member of staff comes across a customer displaying signs of aggression or violence they should:

- Listen to the customers views or complaints
- Try to understand what their problem is and discuss it with them
- See if they can resolve the situation by taking any actions needed

Staff should be cautious in their approach and ensure they do not adopt a confrontational approach and are aware of how they can contact another member of staff if necessary.

## 5 Fair and Open

### 5.1 General Terms and Conditions

Chongie utilise and comply with BACTAs general Terms and Conditions and all relevant sections of the LCCP

### 5.2 Complaints Procedure

*Chongie Entertainment Limited is committed to providing excellent levels of service and are constantly striving to meet the expectations of customers, and welcome feedback where services can be improved or where expectations have not been met.*

*Issues of concern can usually be resolved by discussing the matter with a member of the team within one of the Adult Gaming Centres. A database record will be completed at the time of the contact, detailing your contact details, which team member dealt with the issue, the nature of the complaint and how the complaint was resolved. A copy of this complaints procedure will be provided to customers upon request, or whenever they make a complaint.*

*However, we recognise that sometimes it may not be appropriate to contact us in this way, or you may feel your concerns have not been properly addressed internally after talking to the team. Where this is the case, we actively encourage our customers to use our Complaints Procedure so that issues and concerns can be raised with management and addressed appropriately. This document explains how the Complaints Procedure works, what you need to do and what you can expect.*

*There are two levels – Complaints Co-ordinator and Lead Contact of the Adult Gaming Centre.*

*Level 1 – Complaints Co-ordinator*

*If Chongie Entertainment Limited haven't reasonably met your expectations or you wish to make a complaint relating to services you should write or e-mail in the first instance to the Complaints Co-ordinator, who will be the General Manager of the premises*

*Please put in the subject line 'FAO: Complaints Co-ordinator'.*

*In expressing concerns it is helpful to include all relevant details such as nature of complaint, date, people contacted and the other circumstances relating to your complaint. This helps to quickly and fully understand the nature of the complaint and begin investigations. Once the Complaints Co-ordinator acknowledges receipt of your letter or email in writing within 48 hours, he will also provide a copy of this complaints policy. You can normally expect a full written response within 10 working days of this acknowledgement. His aim is to resolve the*

*complaint to your complete satisfaction at this level.*

*Level 2 - Lead contact of the Adult Gaming Centre.*

*If, after receiving our response at the 1st level you feel that your concerns have not been fully addressed you can ask for your complaint to be referred to the lead contact in relation to the services provided. Please contact [REDACTED]. You can normally expect a full written response to your complaint within 10 working days of acknowledgement of the complaint reaching the 2nd level.*

*It may be necessary for additional information to be sought from an external source. When this is necessary, it may not be possible to respond to your complaint within 10 working days and the Lead contact of the Adult Gaming Centre will contact you again. He will explain the reasons for asking for a time extension and seek your approval.*

*Chongie Entertainment Limited understand the need for ADR provisions to be in place and therefore intend to contract with a Gambling Commission approved ADR provider.*

### **5.3 Marketing and Promotional guidelines**

Chongie has an Advertising and Media Policy which is available to all staff.

Chongie's marketing team ensures that promotional material is developed in a socially responsible manner, particularly to protect young or vulnerable persons from being harmed or exploited by advertising and in accordance with the following provisions:

- The Gambling Commission's LCCP;
- Committee of Advertising Practice (CAP) code.

## 6 Recording and Reporting Requirements

### 6.1 General Reporting Requirements

Chongie acknowledges its obligation to ensure that staff openly co-operate with the Gambling Commission in the proper performance of their compliance functions and that they are made aware of those officers' rights of entry to premises contained under Part 15 of the Gambling Act 2005 and that:

- they must provide the Gambling Commission with any information that the Commission would reasonably need to be aware of in exercising its regulatory functions or suspect may relate to the commission of an offence under the Act, including an offence resulting from a breach of a licence condition or a code of practice provision having the effect of a licence condition. Changes in key circumstances must be reported within five days of their occurrence in accordance with the terms set out in the Operating Licence.
- Chongie must provide the Gambling Commission with such information as the Commission may require from time to time about the use of facilities provided such as:
  - (i) the numbers of people making use of the facilities and the frequency of such use;
  - (ii) the range of gambling activities provided by the licensee and the number of staff employed in connection with them; and
  - (iii) the licensee's policies in relation to, and experience of, problem gambling.
- Chongie must submit a Regulatory Return to the Gambling Commission containing such information as the Commission may require from time to time, and provide evidence that the terms on which gambling is offered are not unfair under the Unfair Terms in Consumer Contracts Regulations 1999 and, where applicable, meet the reasonableness test under the Unfair Contract Terms Act 1977.
- The Appointed Manager will be informed immediately a Gambling Commission Enforcement Officer properly identifies himself on the premises, and will attend to the Officer without undue delay. Staff will co-operate at all times with the Commission's Enforcement Officers.
- Members of staff are trained as part of their induction process in the understanding of, and the strict adherence to this policy, and required to sign to this effect retaining a copy for their future reference. The original is retained on the employee's personnel file.

**6.2 Challenge 25 Register**

	Name and other details	Date of Challenge	Signed	Print Name	Any other comments
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					



**6.3 Self-Exclusion Register**

	Name and other details	Date of exclusion	Expiry of Ban	Signed	Print Name	Breaches of self exclusion by self excluded member	Date of when self excluded has opted and declared to return to gambling
1							
2							
3							
4							
5							
6							
7							
8							
9							
10							



**6.4 Customer Interaction**

	Name and other details	Date	Observation	Action	Outcome	Signed	Print Name
1							
2							
3							
4							
5							
6							
7							
8							
9							
10							

Page 112





**6.5 SARS Register**

	Form Name	Date of Form	Submitted	Signed	Print Name	Any other comments
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						



**6.6 Staff Training**

	Staff Name	Date of Training	Trainer	Training covered	Signed	Print Name	Any other comments
1							
2							
3							
4							
5							
6							
7							
8							
9							
10							



**6.7 Incidents Requiring Police Attendance**

	Date of Incident	Description of Incident	Police attendance?	Signed	Print Name	Any other comments
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						

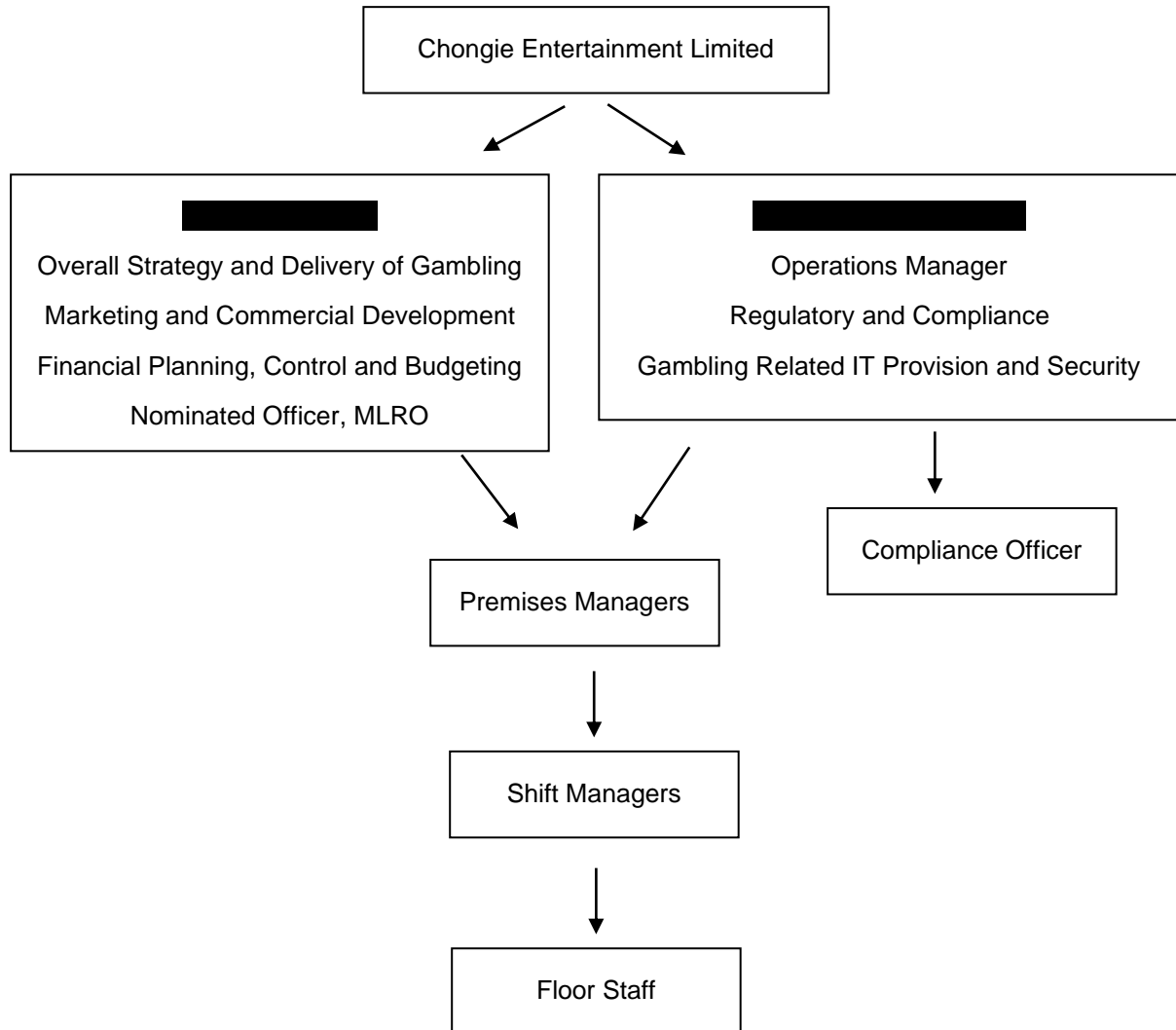


## **7 Training**

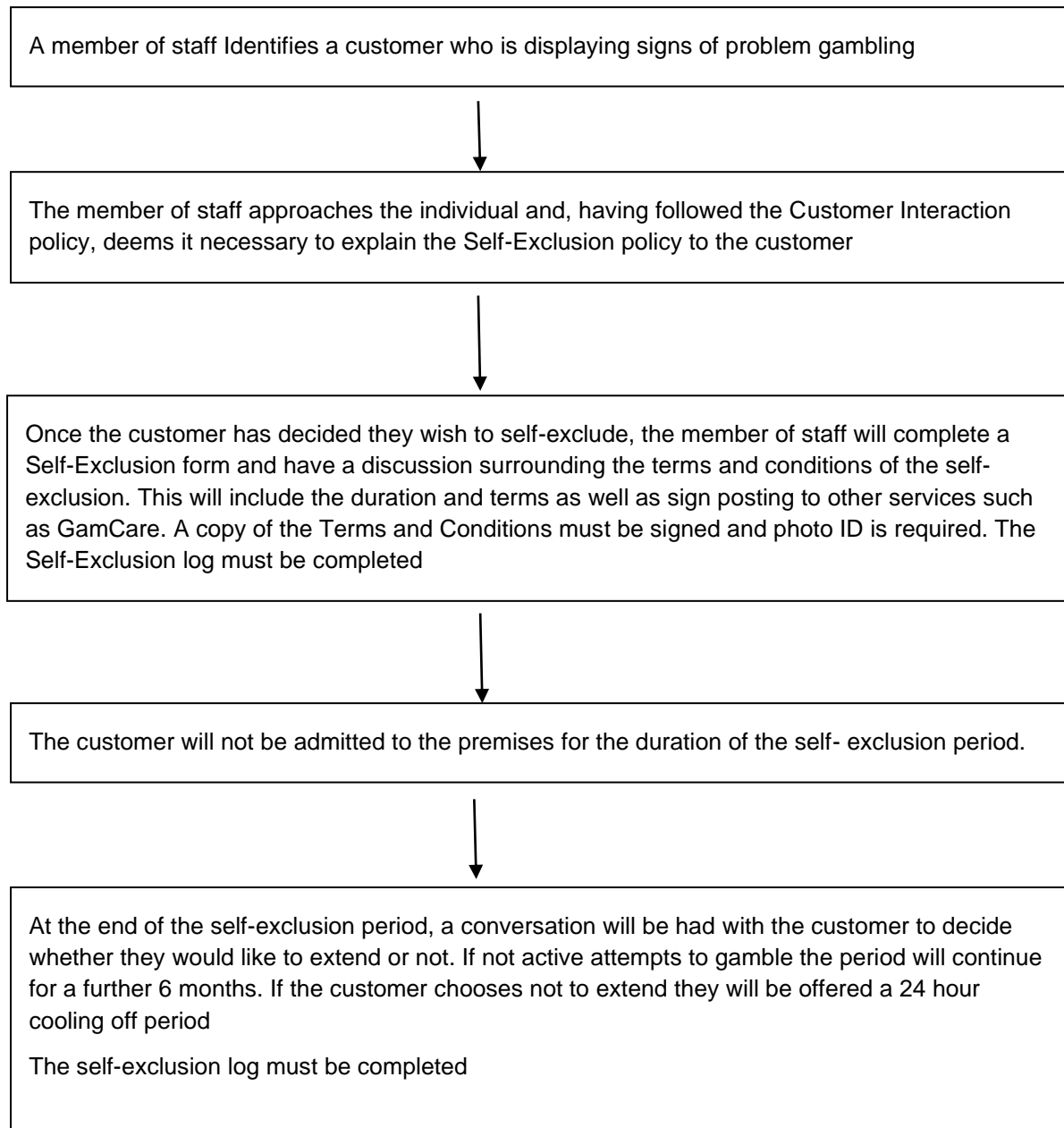
- 7.1 All members of staff receive full training on the Compliance Pack and all other Policies and Procedures of Chongie.
- 7.2 All members of staff will complete training on starting and at annual refreshers.
- 7.3 All training will be recorded in the training Record.
- 7.4 Training is carried out by the [REDACTED], Operations Manager or an external Consultant.

## 8 Appendices

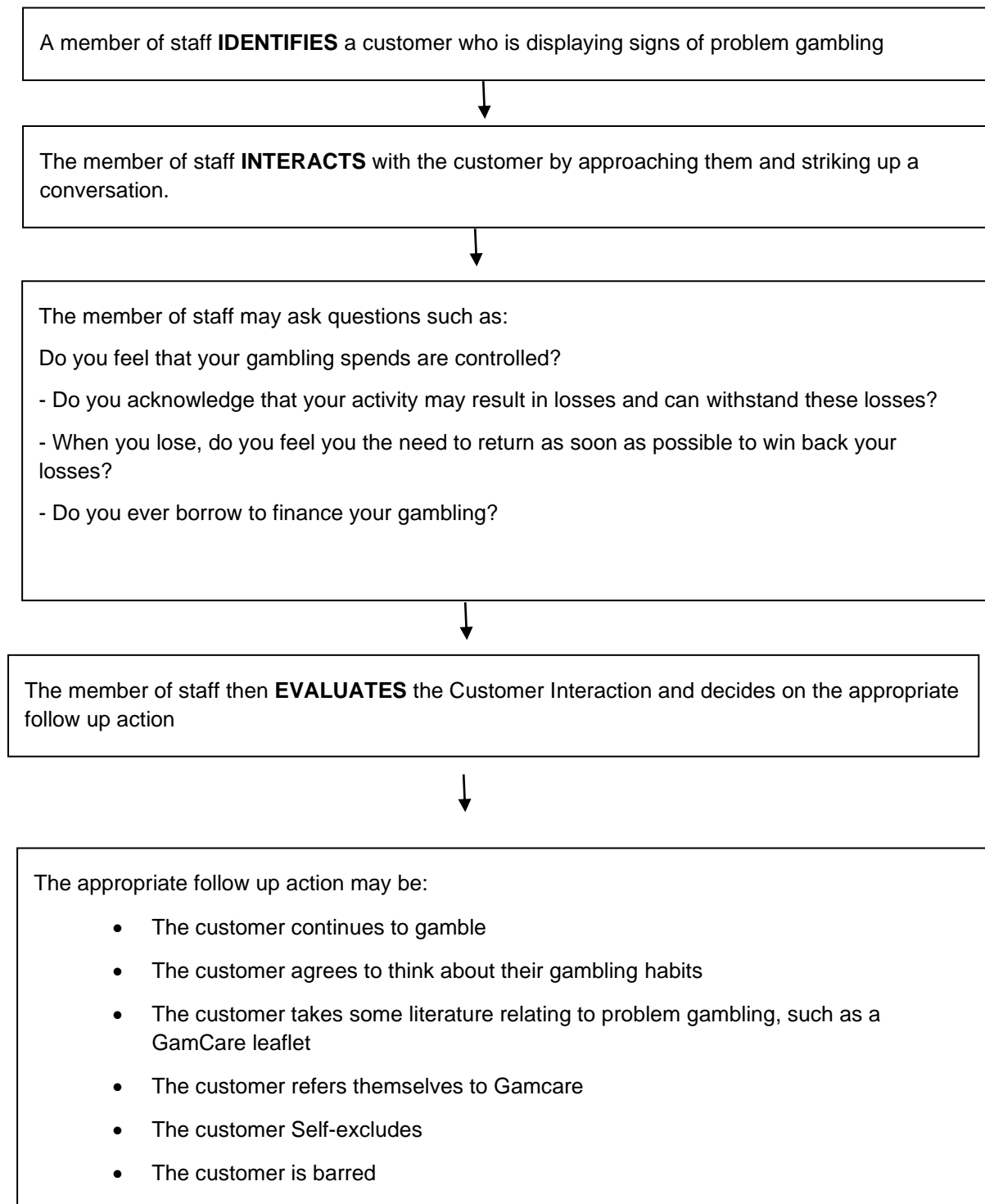
### 8.1 Management



## 8.2 Self-Exclusion Flow Chart



### 8.3 Customer Interaction Flow Chart



## 9 Monitoring

To ensure that the policies and procedures continues to be fit for purpose:

Chongie are committed to carrying out an ongoing risk assessment of its policies and procedures, tailoring them to and any training around new products and newly identified risks as appropriate.

This policy is subject to review following any new guidance published by the Gambling Commission.

<b>Reviewed By</b>	<b>Reviewed On</b>	<b>Next Review</b>





**CHONGIE ENTERTAINMENT LIMITED  
STAFF ALARM POLICY**



## **1. INTRODUCTION**

Chongie Entertainment Limited is committed to protecting its employees from any harm. All employees in the Adult Gaming Centres are therefore provided with personal alarm systems and the panic alarm system is installed. This system helps to deter aggressive or anti-social behaviour as well as provides staff with a way of getting help when they need it.

## **2. STAFF ALARM FOBS**

Staff must carry their staff alarm fobs at all times when working. This increases their security, as well as the security of customers and anyone else in the premises.

Staff can also take comfort and confidence knowing they are carrying their staff alarm fob and can call for assistance if and when needed.

The staff alarm fob notifies Senior Management of a potential or actual problem.

## **3. USING STAFF ALARM FOBS**

Staff alarm fobs should be prioritised over the panic alarm button in situations which do not require urgent police assistance. Staff alarm fobs should be activated whenever members of staff need help. Staff must be confident to use their staff alarm fobs whenever they feel it necessary, they must not be hesitant to use them.

Staff alarm fobs should only be used when it is safe to do so, members of staff must not endanger themselves.

All staff members are trained on how to use their staff alarm fob.

## **4. USING PANIC ALARMS BUTTON**

The panic alarm buttons must be used when a member of staff would usually call for police assistance, for example in the face of physical violence, the threat of physical violence or a robbery. This system is linked directly to the police and must be respected.

Panic alarm buttons should only be used when it is safe to do so, members of staff must not endanger themselves.

All staff members are trained on how to use the panic alarm button.

## **5. TESTING**

Staff alarm fobs and panic alarm buttons must be tested monthly.

All staff members are trained on how to test their alarms.

**APPLICATION FOR GAMBLING ACT 2005 PREMISES LICENCE 141 to 143 KING STREET PROPOSED**

**CONDITIONS**

General

1. The applicant will contact the local police and local councillors quarterly to discuss the operation of the premises and any issues.

CCTV

2. A comprehensive CCTV system shall be installed and maintained on the premises as required by the Metropolitan Police Licensing Team. CCTV should cover the following:
  - a) All entry and exit points to and from the premises enabling frontal identification of every person entering under any light conditions
  - b) The areas of the premises to which the public have access (excluding toilets)
  - c) Gaming machines and the counter area
3. The CCTV shall continue to record activities 24 hour a day for 31 days.
4. The premises shall display notices near the entrance of the venue stating that CCTV is in operation.
5. A 'spotter monitor' shall be placed inside the premises near the front door showing CCTV images of customers entering ,exiting and whilst on the premises.

Children and Young People

6. The Licensee shall maintain a bound and paginated 'Challenge 25 Refusals' register at the premises. The register shall be produced to the police or licensing authority forthwith on request.

7. Prominent signage and notices advertising the Challenge 25 will be displayed showing the operation of such policy.
8. Third party testing on age restricted sales systems purchasing shall take at least twice a year and the results shall be provided to the Licensing Authority upon request.
9. A Challenge 25 proof of age scheme shall be operated at the premises where the only acceptable forms of identification are recognised photographic identification cards, such as a driving licence, passport or proof of age card with the PASS Hologram.

#### Entrances and Doors

10. A magnetic locking device, commonly referred to as a Maglock will be installed and maintained on the main entrance/exit to the premises which will be operable by staff.
11. Staff will receive a notification when the front door opens.

#### Staffing levels

12. There shall be 2 members of staff present at all times between the hours of 19:00 and 06:00.

#### Identification of Offenders or Problem Persons

13. The Licensee shall implement a policy of banning any customers who engage in crime or disorder within or outside the premises.
14. The licensee will refuse entry to customers who appear to be under the influence of alcohol or drugs.

#### Alarms

15. The licensee shall install and maintain an intruder alarm on the premises.
16. The premises shall install and maintain fixed panic alarms.

#### Toilets

17. The licensee will ensure that customer toilets are checked every hour for evidence of drug taking. Toilet checks are to be documented stating the time and member of staff who made

the checks. Toilets will have a maglock installed and maintained which will be operable by the staff.

#### Signage, Promotional Material and Notices

18. Prominent GamCare documentation will be displayed at the premises and other notices promoting responsible gambling.

#### Staff Training

19. The licensee shall: provide training on the specific local risks to the licensing objectives that have been identified for these premises as part of the staff induction training programme. periodically provide refresher training to all of its staff working at these premises on the specific local risks to the licensing objectives. Participation in this training shall be formally recorded on each member of staffs training records which, if requested will be presented to the Licensing Authority as soon as practicable.

20. New and seasonal staff must attend induction training and receive refresher training every six months.

21. Staff will also undergo drug and alcohol awareness training.

#### Homeless and Street Drinking

22. 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.

23. The Licensee shall place a notice visible from the exterior of the premises stating that customers drinking alcohol outside the premises is not permitted and those who do so will be banned from the premises.

#### Recording of Incidents and Visits

24. An incident log shall be kept for the premises and made available on request to an authorised officer of the City Council or the Police which will record the following;

- a. All crimes reported to the venue;

- b. Any complaints received regarding crime and disorder;
- c. Any incidents of disorder;
- d. Any faults in the CCTV system; and
- e. Any visit by a relevant authority or emergency service.



The Licensing Authority  
Clockwork Building,  
45 Beavor Lane,  
Hammersmith, W6 9AR

Ref **2021/00201/GAGC**

Pc Tom Stewart  
Hammersmith Police Station,  
226 Shepherd's Bush Road  
W6 7NX  
Tom.stewart@met.police.uk  
www.met.police.uk

**11/05/2021**

**Adult Gaming Centre Application for Little Vegas 141 - 143 King Street London W6 9JG**

Dear LBHF Licensing Authority,

Further to my representation dated 19<sup>th</sup> April 2021, please find below and attached Appendices in relation to the MPS representation.

**Concerns in relation to the location of proposed premises**

The proposed site of the Adult Gaming Centre is 141 - 143 King Street London W6 9JG. This address is located within the Hammersmith Broadway Ward. This ward suffers from the highest levels of crime and Anti-Social Behaviour when compared with the other wards in Hammersmith and Fulham. **Appendix 1** shows the crime and Anti-Social Behaviour data from January - March 2021. You will note that the levels of total notifiable offence and incidents of Anti-Social Behaviour are the highest in the borough. Whilst there has been a reduction in crime in general across the borough due to lockdown restrictions, the levels of Anti-Social Behaviour have increased significantly (approximately 95%) when compared to the previous year. It is highly likely that the introduction of a 24 hour AGC in this area would contribute to and exacerbate the high levels of Anti-Social Behaviour and Crime in the area.

According to the 2018 Ward Profile (see appendix 3 page 8), Hammersmith Broadway ward is made up of 8 Lower Super Output Areas (LSOAs) and it has been measured as slightly more deprived than in 2010 and 2007. The most deprived area (E01001899) is among the 10% most deprived nationally. The areas E01001893, E01001894 and E01001900 are in the 10 to 30% most deprived nationally. The four remaining LSOAs rank in the 30-60% most deprived nationally. These statistics demonstrate and identify the vulnerability of a large proportion of the residents of the Hammersmith Broadway ward.

141 - 143 King Street London W6 is situated directly opposite the Hammersmith and Fulham customer service center (See appendix 2). This Council building services the residents of Hammersmith and Fulham who need assistance with Housing, benefits, childcare services as well as other services. Due to the very nature of this building, it attracts on a daily basis large numbers of vulnerable local residents. ***The presence of an AGC directly opposite could have the potential to take advantage of those vulnerable adults.*** – Notably, the risk assessment completed by the





applicant fails to identify this vulnerable site, and thus offers no mitigation in regards to this risk.

The premises is also located within 300 meters of St Mungos - The Old Theater, 229 King Street which is a homeless shelter. This shelter houses vulnerable homeless adults, many of whom also struggle with alcohol and drug addiction. The close proximity of a 24 hour AGC would likely undermine the licensing objective Protecting children and other vulnerable people from being harmed or exploited by gambling.

### **Application and conditions**

Whilst the applicant has completed a comprehensive risk assessment of the proposed operation, as required by the gambling Act 2005, there is no mention of the number of staff to be employed onsite at any given time nor if they intend to employ SIA registered security. Furthermore, whilst the applicant has offered several mitigating measures within the risk assessment, none of these have been offered as conditions on the proposed licence.

The operation of this premises 24 hours a day, 7 days a week is also a cause for concern for Police. In an area that does not have a 24 hour night-time economy, and one that is mainly residential in nature, it is highly likely that a significant number of the potential customers who will frequent the premises overnight will be vulnerable persons or those who are committing crime and Anti-Social behaviour in the local area.

The MPS would request that the Licensing Sub-Committee reject the application.

Yours sincerely

*Pc Tom Stewart 4230AW*

Central West Police Licensing Team

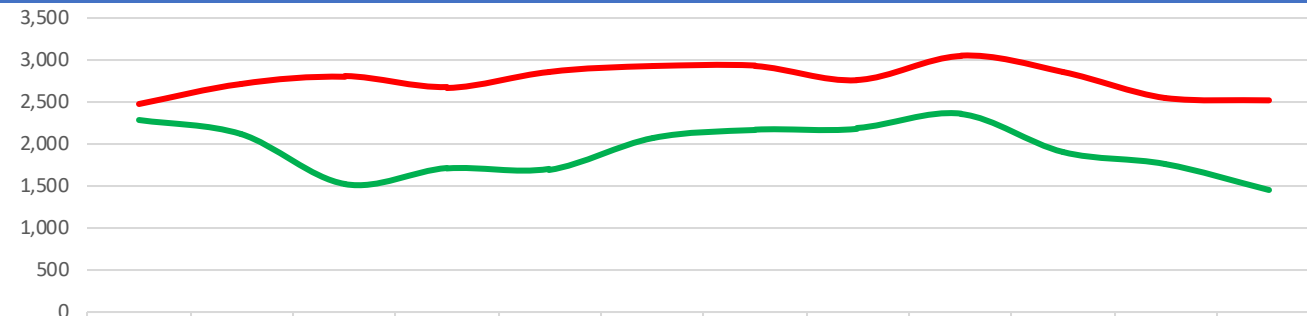
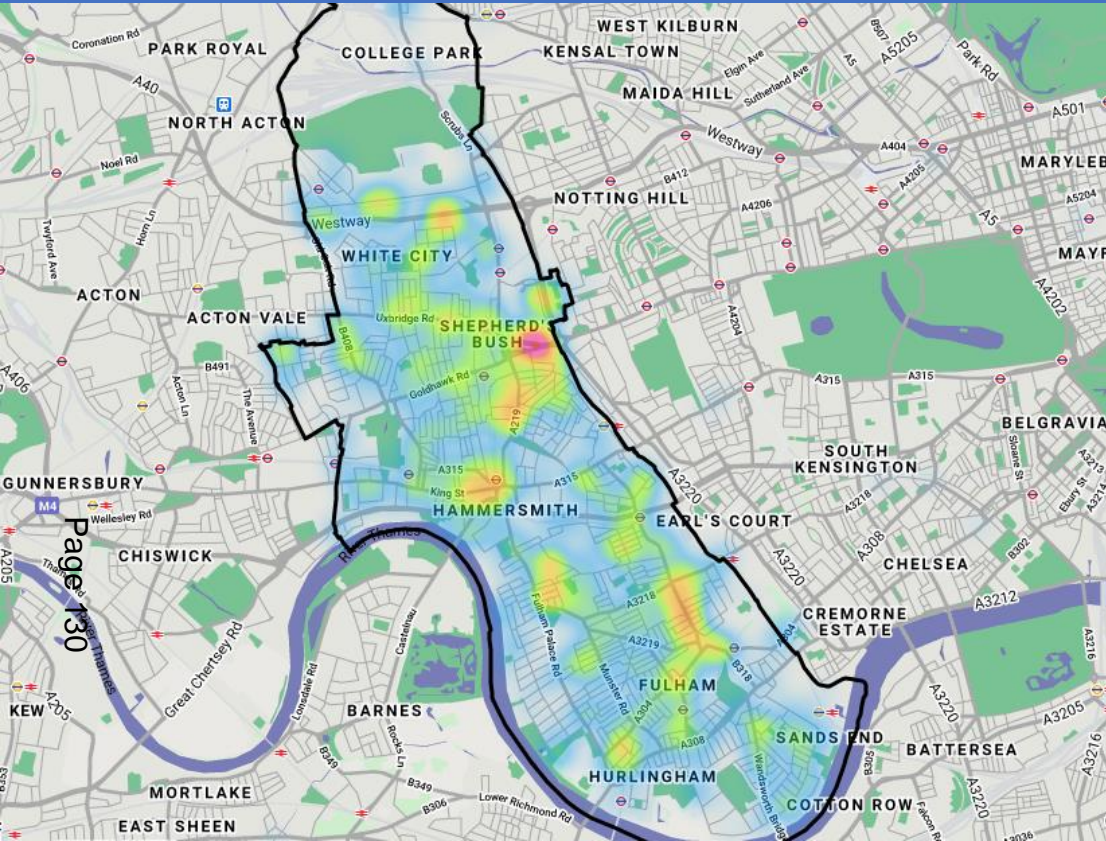




# Appendix 1- Crime and ASB data

January – March 2021

# Total Notifiable Offences – January 2021



	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan
Previous	2,479	2,722	2,796	2,673	2,860	2,916	2,924	2,756	3,049	2,866	2,556	2,522
Current	2,282	2,107	1,520	1,704	1,698	2,076	2,171	2,179	2,362	1,900	1,759	1,448

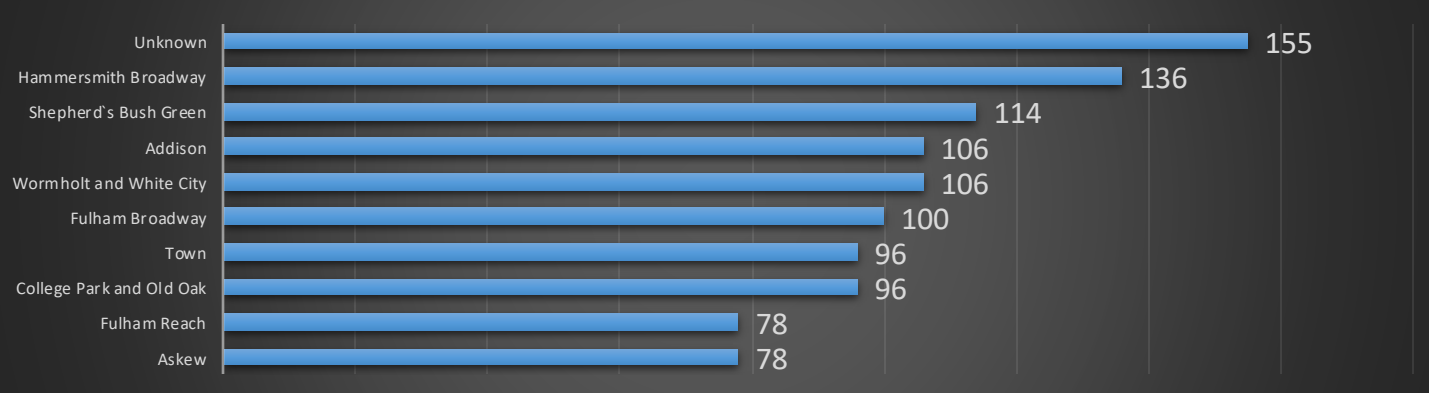
For January there were 1,448 offences, this is a decrease of 42.59% compared to last year's 2,522 offences and a decrease of 17.68% compared to December's 1,759 offences. Over previous rolling 12 months there were 23,206 offences, this is a decrease of 29.93% compared to last year's 33,119 offences.

## Peak Day & Times

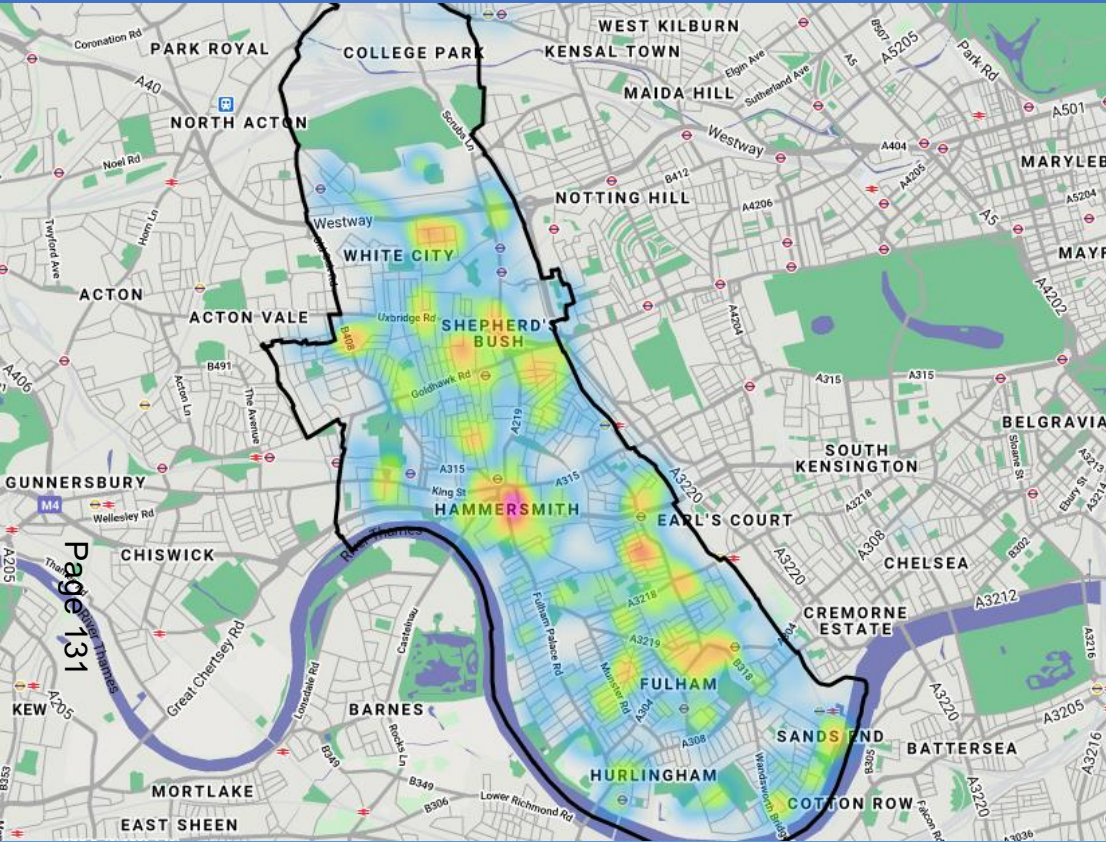
Thursday (232) between 1700-1900hrs / 1000-0100

Saturday (227) between 1800-1900hrs

Offence	Count
Other Accepted Crime - Others - Other Accepted Crime	194
Violence Against the Person - Harassment	170
Theft and Handling - Other Theft	138
Drugs - Possession Of Drugs	115
Violence Against the Person - Common Assault	110



# Anti Social Behaviour – January 2021



	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan
Previous	566	710	653	593	703	690	674	637	632	583	552	509
Current	497	678	1,516	1,576	1,309	1,202	1,044	912	999	1,091	920	996

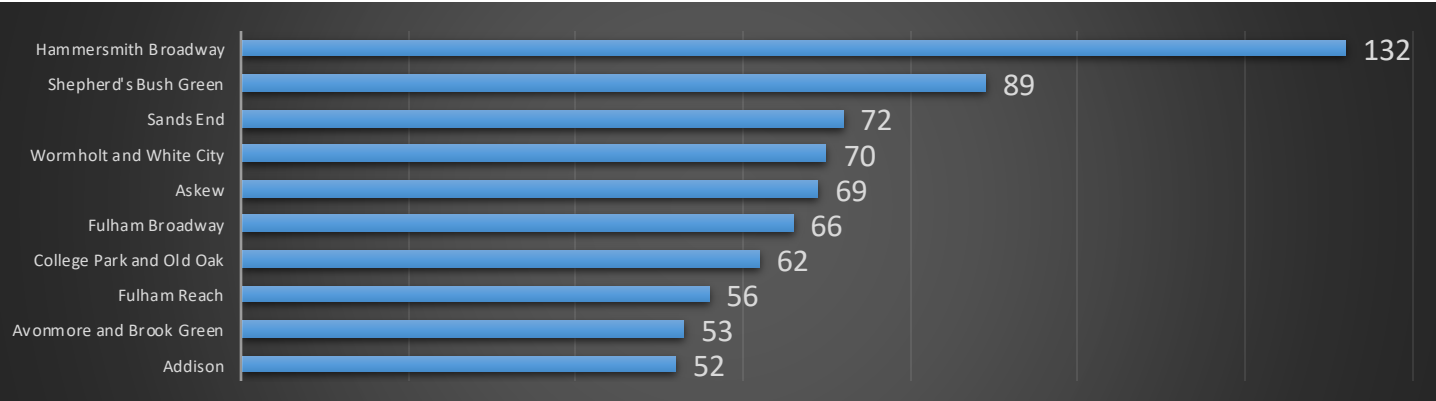
For January there were 996 reports, this is an increase of 95.68% compared to last year's 509 reports and an increase of 8.26% compared to December's 920 reports. Over previous rolling 12 months there were 12,740 reports, this is an increase of 69.82% compared to last year's 7,502 reports.

## Peak Day & Times

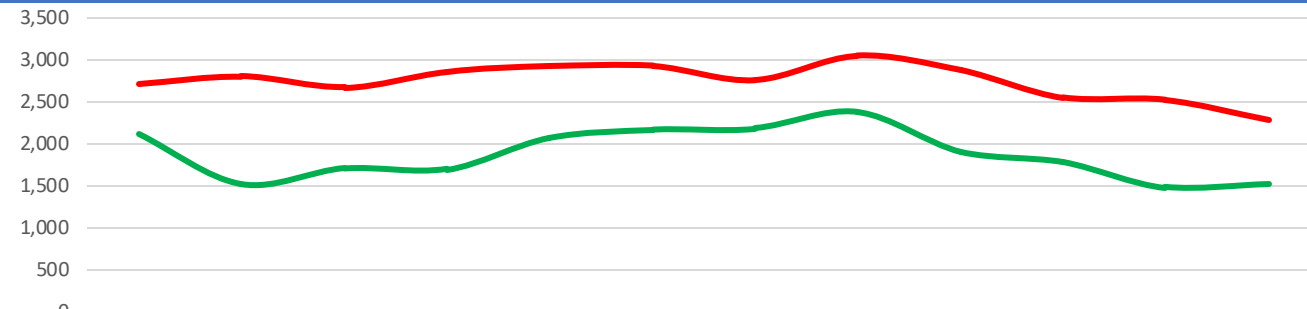
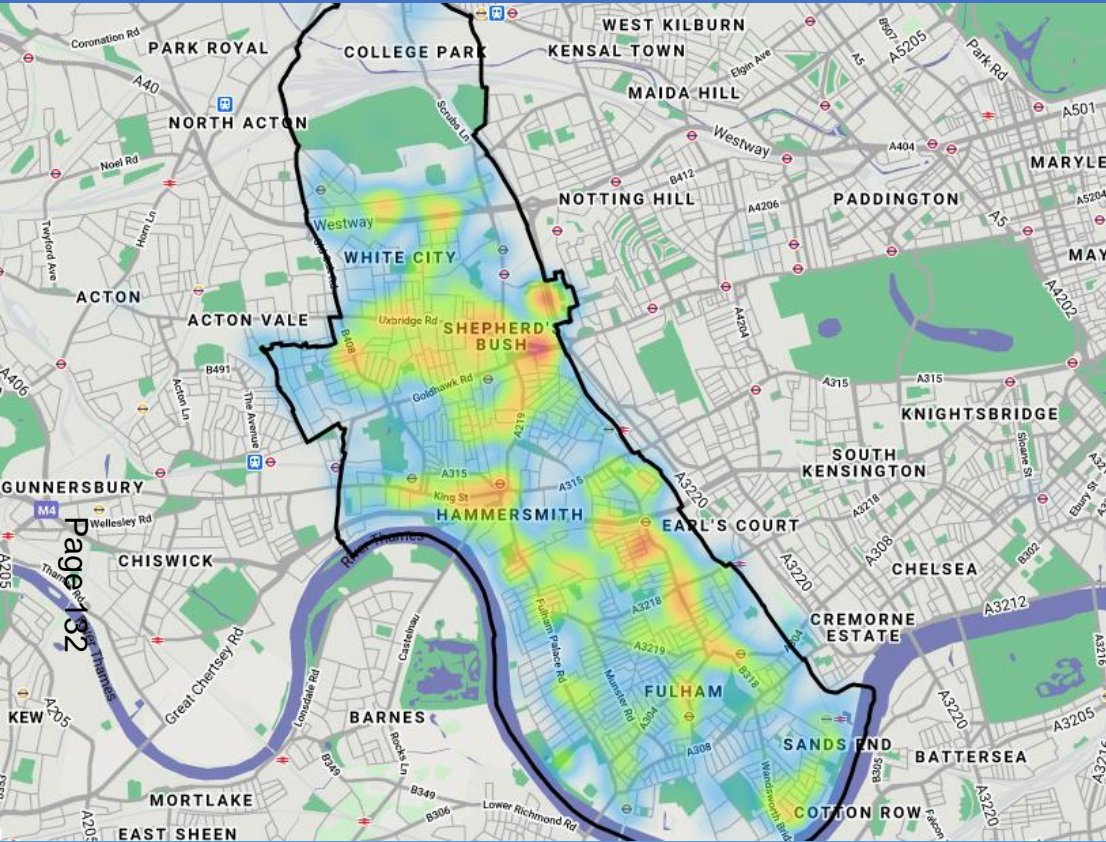
Saturday (213) between 1400-1800hrs / 2200-0400hrs

Sunday (206) between 1200-1800hrs / 2100-0300hrs

Category	Count
Environmental	58
Nuisance	860
Personal	50



# Total Notifiable Offences – February 2021



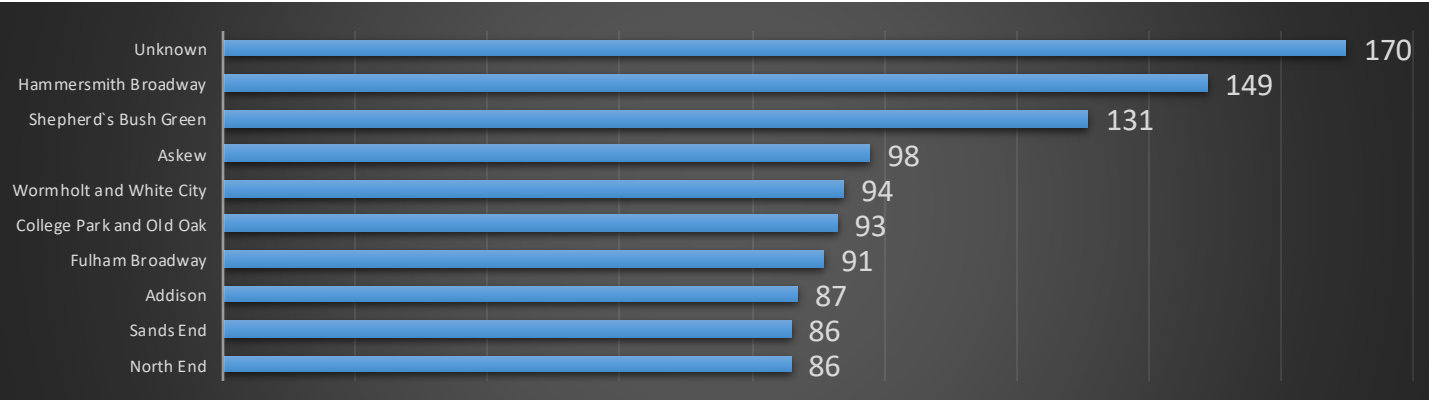
	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb
Previous	2,722	2,796	2,674	2,860	2,917	2,925	2,756	3,050	2,867	2,556	2,528	2,286
Current	2,110	1,522	1,704	1,700	2,078	2,174	2,181	2,371	1,911	1,778	1,483	1,522

For February there were 1,522 offences, this is a decrease of 33.42% compared to last year's 2,286 offences and an increase of 2.63% compared to January's 1,483 offences. Over previous rolling 12 months there were 22,534 offences, this is a decrease of 31.58% compared to last year's 32,937 offences.

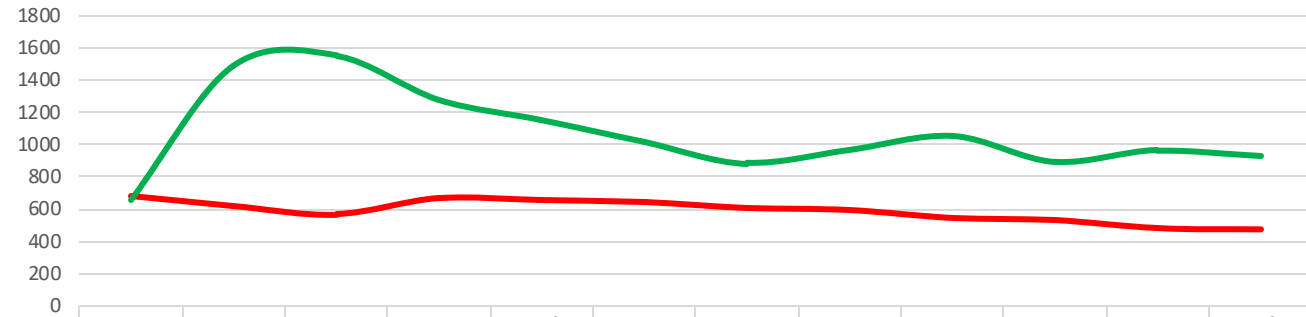
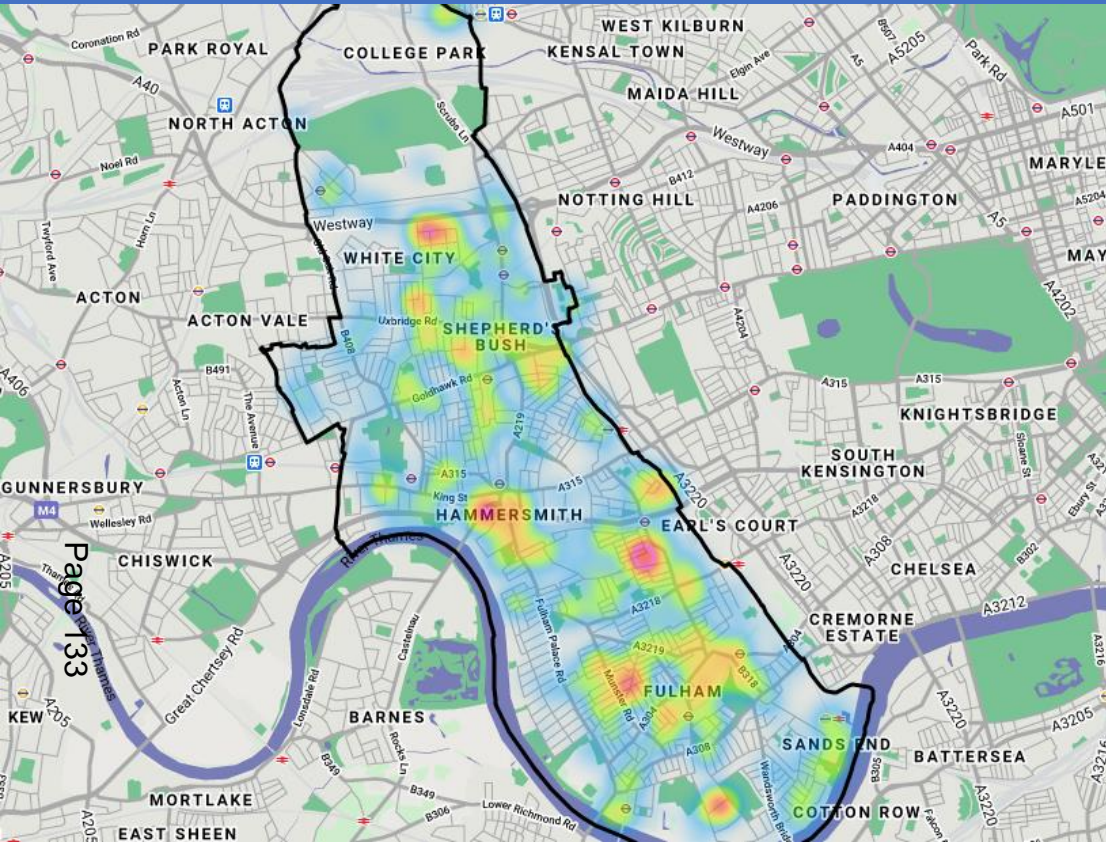
## Peak Day & Times

Monday (246) between 0000-0100hrs / 1100-1500hrs

Offence	Count
Other Accepted Crime - Others - Other Accepted Crime	223
Violence Against the Person - Harassment	170
Theft and Handling - Theft From M/V	159
Theft and Handling - Other Theft	148
Violence Against the Person - Common Assault	107



# Anti Social Behaviour – February 2021



	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb
Previous	680	622	566	669	656	640	613	599	548	529	483	477
Current	654	1,483	1,549	1,278	1,151	1,011	884	964	1,048	893	966	926

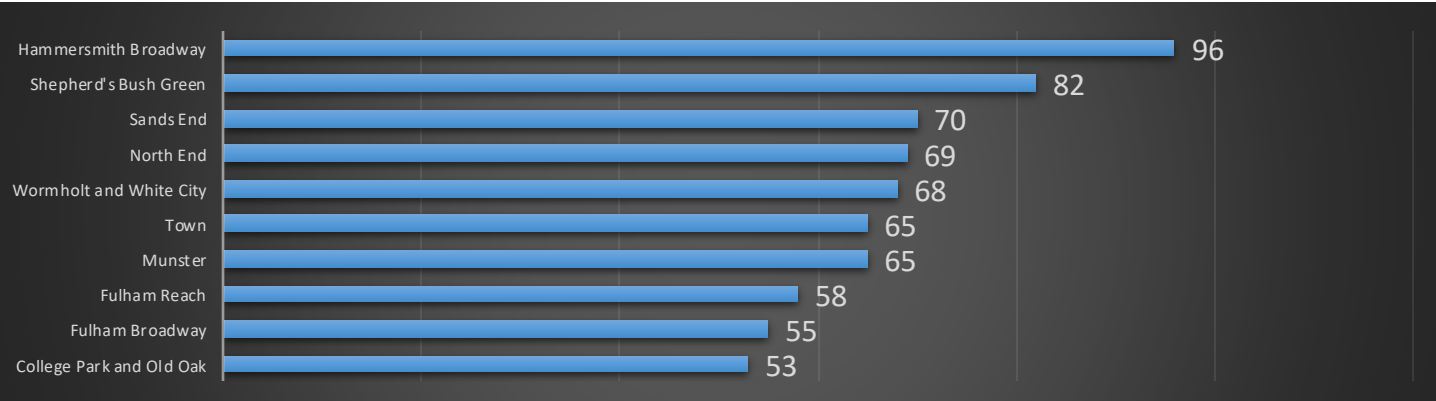
For February there were 926 reports, this is an increase of 94.13% compared to last year's 477 reports and a decrease of 4.14% compared to January's 966 reports. Over previous rolling 12 months there were 12,807 reports, this is an increase of 80.84% compared to last year's 7,082 reports.

## Peak Day & Times

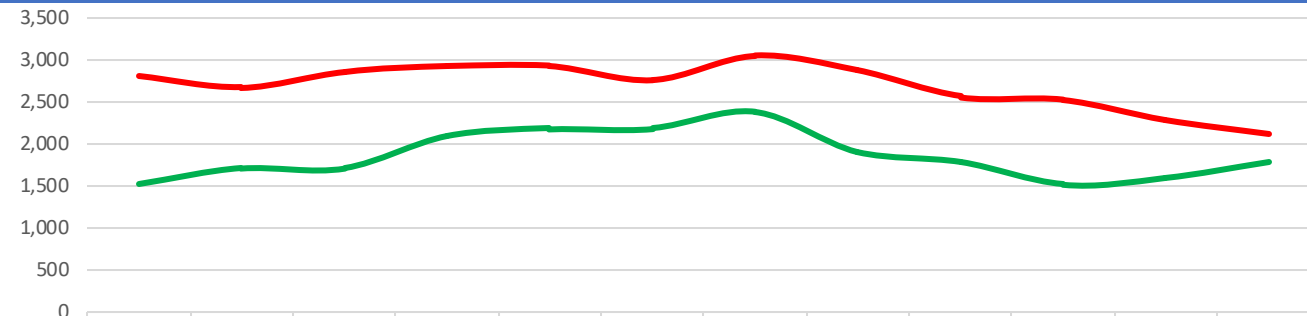
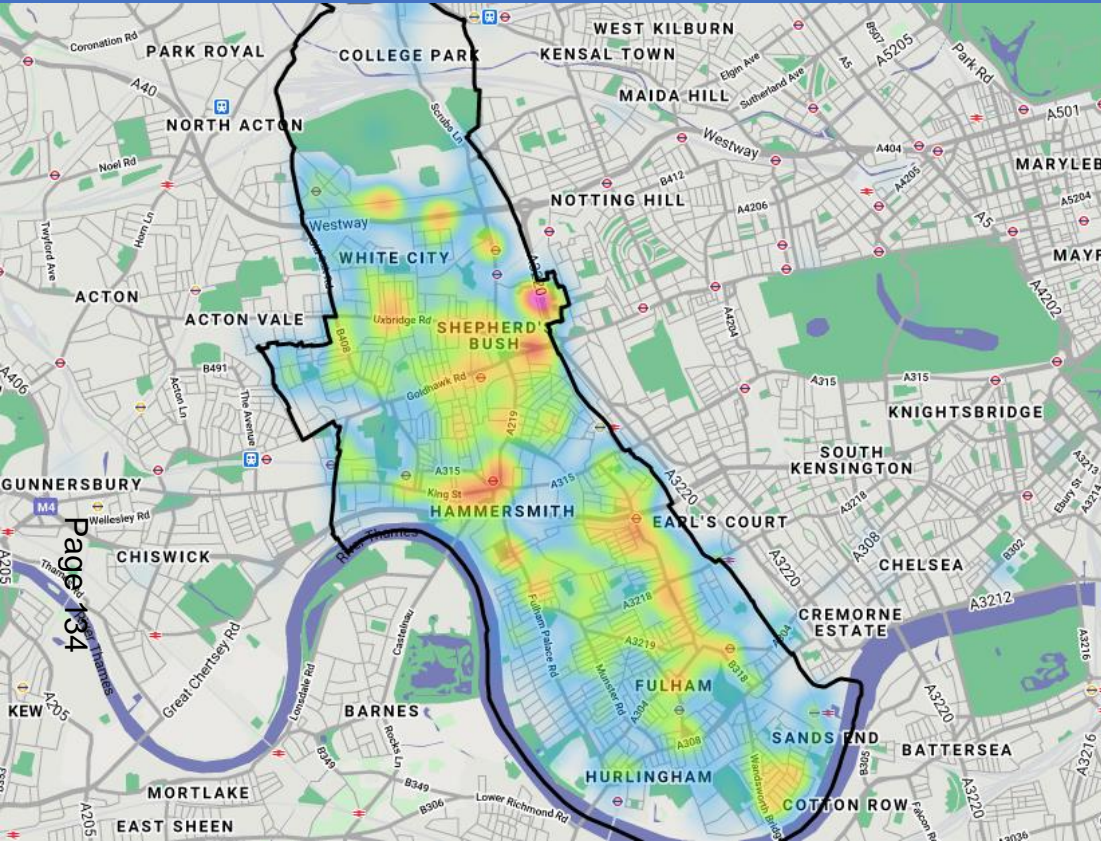
Saturday (218) between 0000-0400hrs / 1500-0000hrs

Friday (145) between 1400-0000hrs

Category	Count
Environmental	47
Nuisance	823
Personal	57



# Total Notifiable Offences March 2021



	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar
Previous	2,797	2,675	2,860	2,917	2,925	2,757	3,050	2,868	2,559	2,533	2,286	2,116
Current	1,523	1,705	1,705	2,083	2,180	2,184	2,379	1,914	1,789	1,519	1,589	1,775

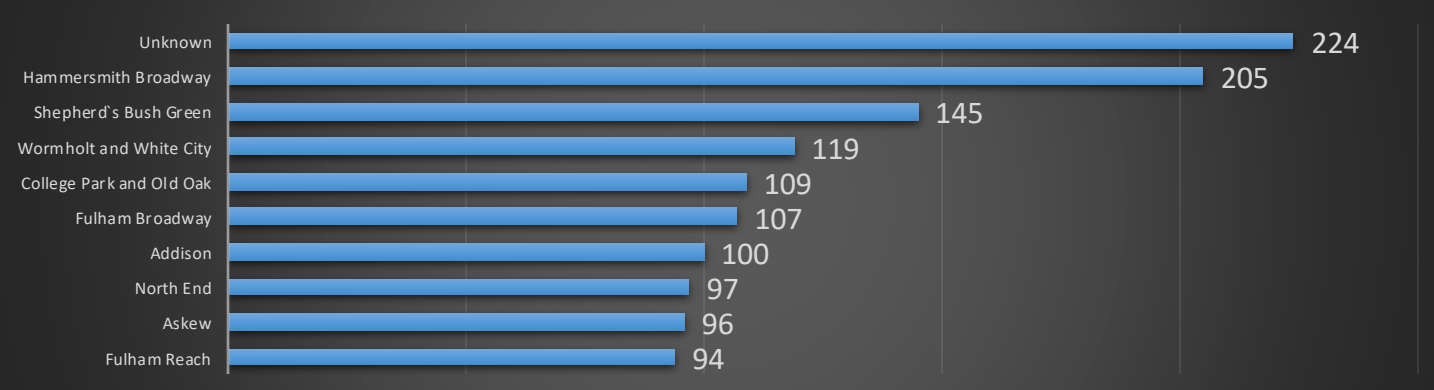
For March there were 1,775 offences, this is a decrease of 16.12% compared to last year's 2,116 offences and an increase of 11.71% compared to February's 1,589 offences. Over previous rolling 12 months there were 22,345 offences, this is a decrease of 30.91% compared to last year's 32,343 offences.

## Peak Day & Times

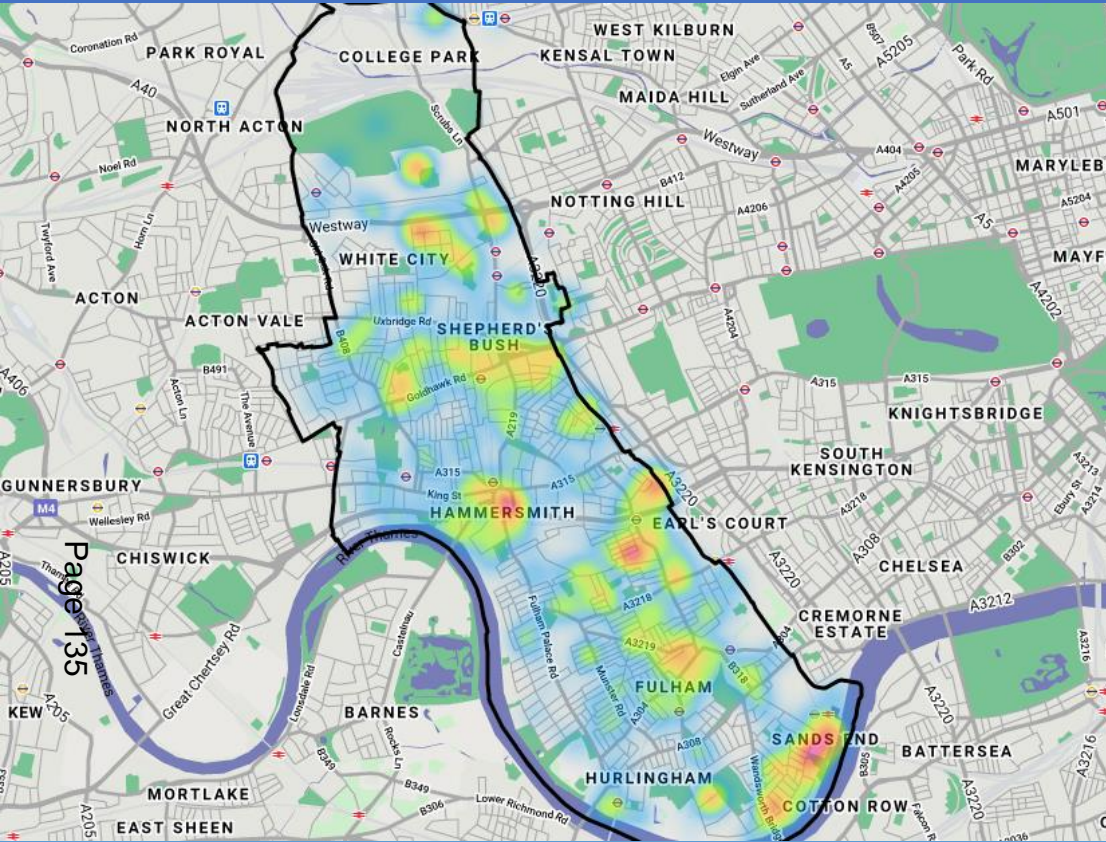
Tuesday (307) between 1400-1800hrs

Monday (298) between 1200-1700hrs / 1800-2100hrs

Offence	Count
Violence Against the Person - Harassment	197
Other Accepted Crime - Others - Other Accepted Crime	194
Theft and Handling - Other Theft	184
Theft and Handling - Theft From M/V	163
Violence Against the Person - Common Assault	132



# Anti Social Behaviour – March 2021



	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar
Previous	622	566	669	656	640	613	599	548	529	483	477	654
Current	1,483	1,549	1,278	1,151	1,011	884	964	1,048	893	966	926	1,014

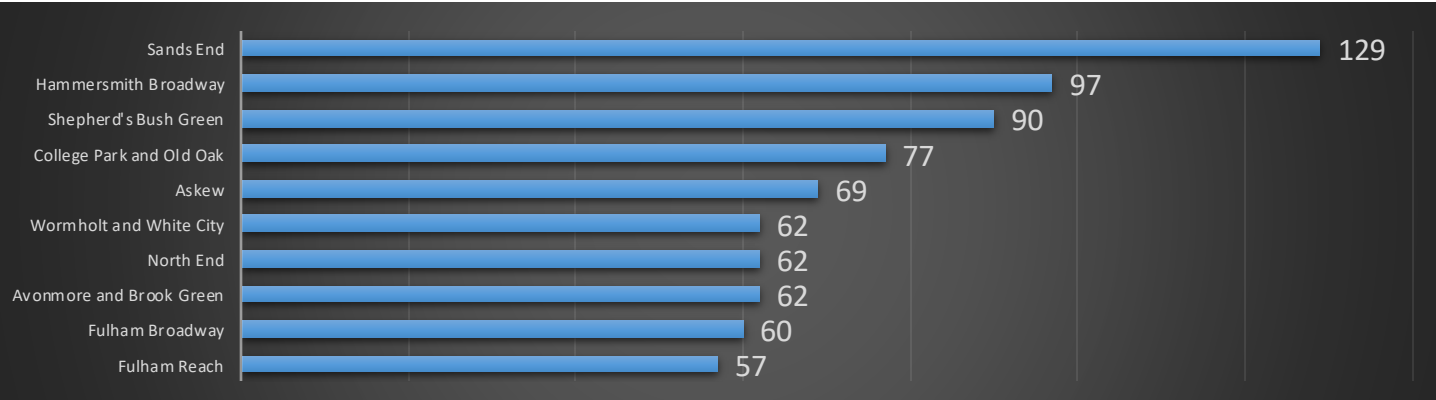
For March there were 1,014 reports, this is an increase of 55.05% compared to last year's 654 reports and an increase of 9.50% compared to February's 926 reports. Over previous rolling 12 months there were 13,167 reports, this is an increase of 86.61% compared to last year's 7,056 reports.

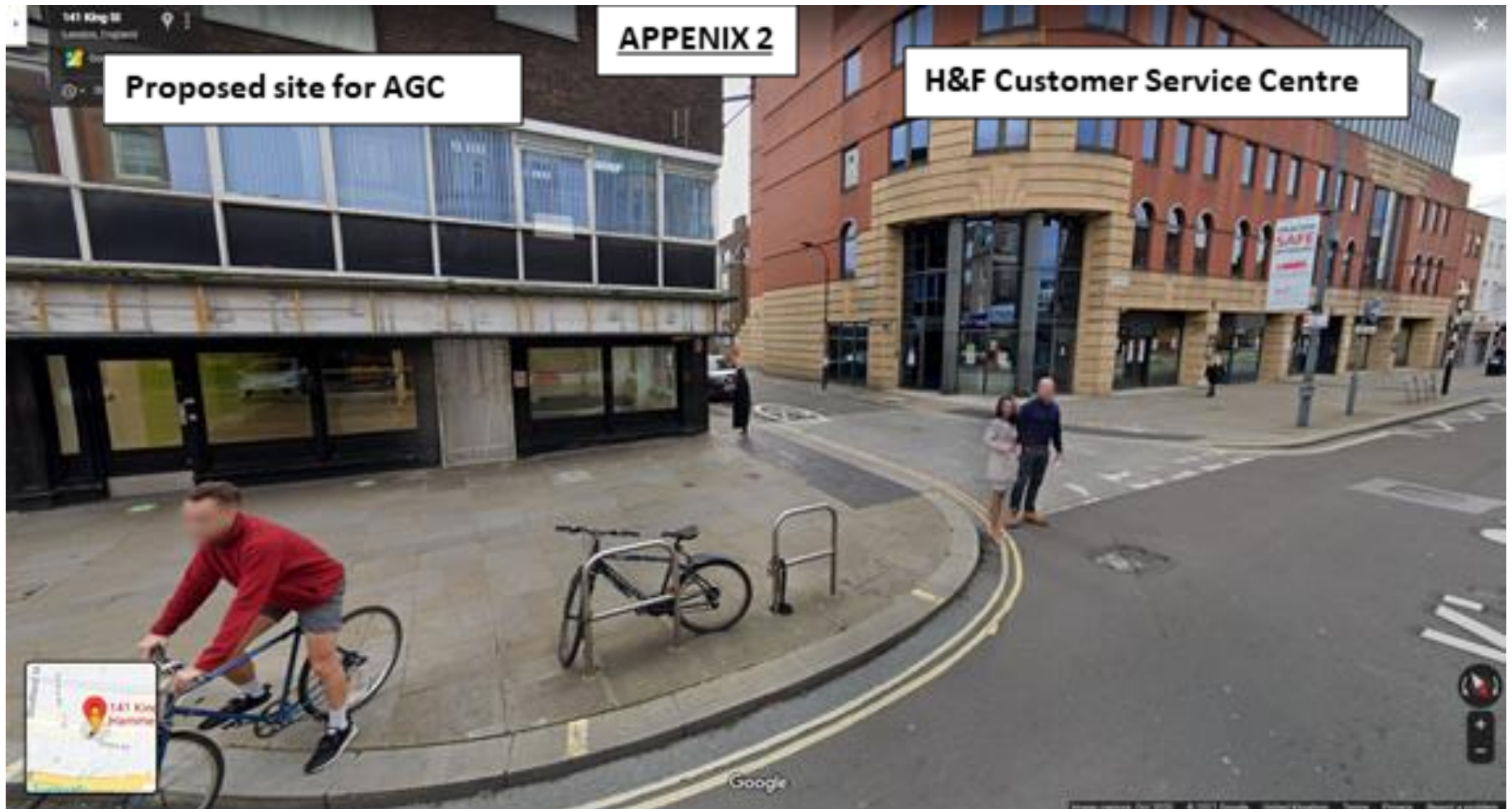
## Peak Day & Times

Saturday (195) between 0000-0200hrs / 1800-0000hrs

Friday (168) between 1700-0000hrs

Category	Count
Environmental	42
Nuisance	912
Personal	60





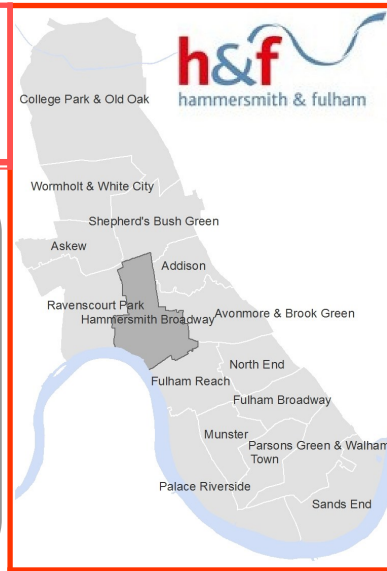
**APPENIX 2**

**Proposed site for AGC**

**H&F Customer Service Centre**



# Hammersmith Broadway Ward Profile 2018



This profile brings together some of the key data sources that help to define the characteristics of an area, the population it contains and the key issues it faces. The main themes covered are: population, health, deprivation, crime, education and qualifications, housing tenure, economic activity and local economy.

Given the breadth of data sets included in the profile, the dates of the information ranging from 2011 to 2018.

**Your Ward Councillors**

**Stephen Cowan**  
(Labour)

**PJ Murphy**  
(Labour)

**Patricia Quigley**  
(Labour)

## Affluence

The ward is generally very affluent area. The overall population is middle-aged and young, single, healthy and skilled. A high proportion of the population work in well paid professional jobs mainly in scientific and technical or information and communication activity sectors.

- 73% of residents are of working age. The structure of the population has only slightly changed over the last seven years which demonstrates that the population is as transient as over the previous two decades
- Foreign-born residents made up 40% of the ward population. A high proportion were born in Republic of Ireland, Australia, France, Somalia and Italy
- The ward has the tenth highest proportion of households that have no people who speak English as a first language
- 83% of residents declared themselves in good or very good health (86% in H&F)
- Less than two in five people aged 16+ were living as a couple; this is the ninth highest proportion in H&F
- 40% living in social housing and 31% rent privately
- The proportion of households without a use of car or a van stands at 60%; this is the sixth highest proportion in H&F
- 45% of residents have a level 4 qualification (degree level)
- 63% of residents are in employment (12% are self-employed)
- 39% of employed residents are working as managers, directors, senior officials or in professional occupations
- The largest source of employment is the professional, scientific and technical activities sector (16%)



## Pockets of Deprivation

Even though the ward is generally affluent there still exists a number of deprived areas particularly Queen Caroline estate, Ashcroft Square, Riverside Gardens and Peabody estate which suffer from multiple interlinked problems. Generally these areas are characterised by:

- Low skills
- Unemployment and worklessness
- Low incomes
- Social or council rented housing
- Low skilled occupations
- Health issues

The ward is made up of 8 Lower Super Output Areas (LSOAs). Three LSOAs are ranked in the 20% most deprived nationally. There are seven deprivation 'domains' within the IMD 2015 and the highest scores for the ward are in the Living Environment, Crime, and Barriers to Housing and Services.

# Who We Are

## Population Overview

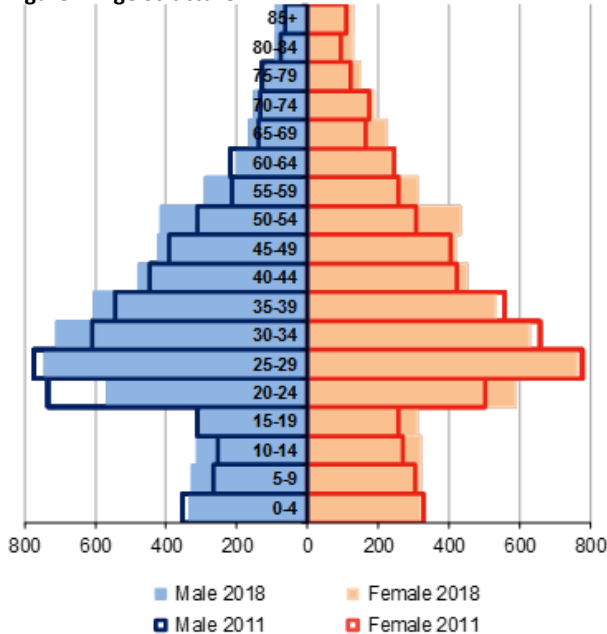
In 2018 there were an estimated **12,750** people living in the ward. Since 2011 Census, there has been an increase in the population by **6.8% (827 people)**; this is the second highest increase among H&F wards (Borough average +0.9%).

From the age / gender pyramid, it is clear that the population in the ward is relatively young for both genders with a large proportion in the age range **20-39**. Since the 2011 Census, there has been slight change in the structure of the population within the ward which indicates that the population is transient with those of working age moving into the area for work before moving out later on in life.

There are slightly more females (**50.6%**) than males (**49.4%**). The ward is the fifth least densely populated in H&F with a density of **121** people per hectare (Borough 112pph).

During the day the population increases to **27,913** people as people come to the ward for work.

Figure 2: Age Structure



Source: Population projections 2011-2018, GLA

**18.1%** of the population is under 18 (19.5% in H&F), **70.8%** are aged 18-64 (69.9% in H&F) while **11.1%** are elderly population (10.6% in H&F).

Using the SHLAA Ward population projections, the population is estimated to increase by **52% (6,633 people)** by 2035. This is mainly due to the high level of housing developments around the Hammersmith Broadway area.

## Ethnicity

The ward ranks seventh lowest on the proportion of the population describing themselves as White British (**44.5%**), and the fourth lowest on proportion of 'Other White' residents (**17.5%**).

Since 2001, there has been a **31.9%** increase in the number of residents from Black and Minority Ethnic (BME) backgrounds to **6,612** in 2011; the sixth highest number in H&F.

Figure 1: Total Population

Ward Name	2018	2011	+/-	% change
Addison	11,166	11,518	-352	-3.1
Askew	14,483	14,160	323	2.3
Avonmore & Brook Green	11,757	12,216	-459	-3.8
College Park & Old Oak	9,129	9,175	-46	-0.5
Fulham Broadway	11,744	10,996	748	6.8
Fulham Reach	11,518	11,306	212	1.9
Hammersmith Broadway	12,750	11,923	827	6.9
Munster	10,883	11,004	-121	-1.1
North End	11,096	11,589	-493	-4.3
Palace Riverside	7,321	7,483	-162	-2.2
Parsons Green & Walham	11,042	10,813	229	2.1
Ravenscourt Park	10,717	10,785	-68	-0.6
Sands End	14,199	12,760	1,439	11.3
Shepherd's Bush Green	11,925	12,175	-250	-2.1
Town	10,934	11,201	-267	-2.4
Wormholt and White City	13,385	13,389	-4	0.0
Hammersmith & Fulham	184,049	182,493	1,556	0.9
London	8,998,679	8,173,941	824,738	10.1
England*	55,268,067	53,012,456	2,255,611	4.3

Source: GLA Population projections 2018 and \*MYE population ONS 2016

## Country of Birth and National Identity

**55.9%** (6,664) of residents were born in England. Foreign-born residents made up **40.4%** of the ward population (42.7% in H&F).

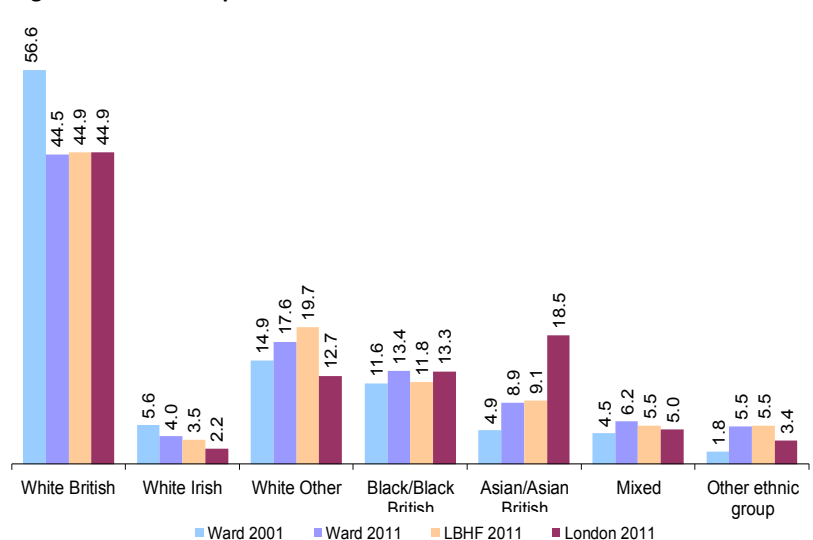
Republic of Ireland supplied most foreign-born residents (392) followed by Australia (289), France (263), Somalia (193) and Italy (192).

**14.1%** of the population were born in an EU country (the sixth lowest among all wards) compared with 14.8% in H&F and 10.3% in London as a whole.

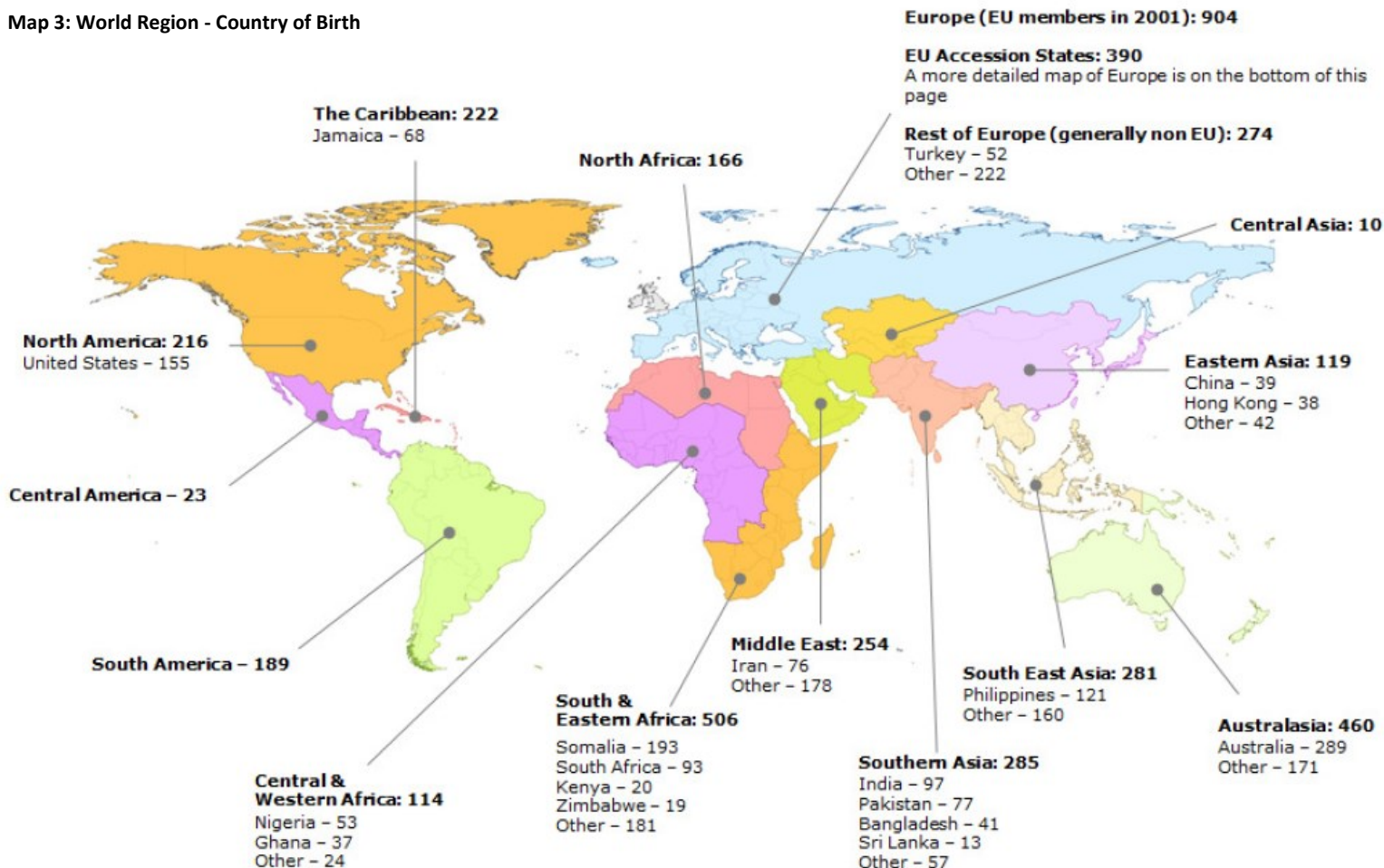
**73.3%** of residents identify themselves as a category that refers to a British national identity (e.g. English, Welsh, Scottish, Northern Irish and other categories associated with Britain); ranked the fifth highest in H&F.

**28.2%** had a 'British only' national identity (ranked fifth highest) while 'other identities only' account for **26.7%** of all categories (ranked fifth lowest in H&F).

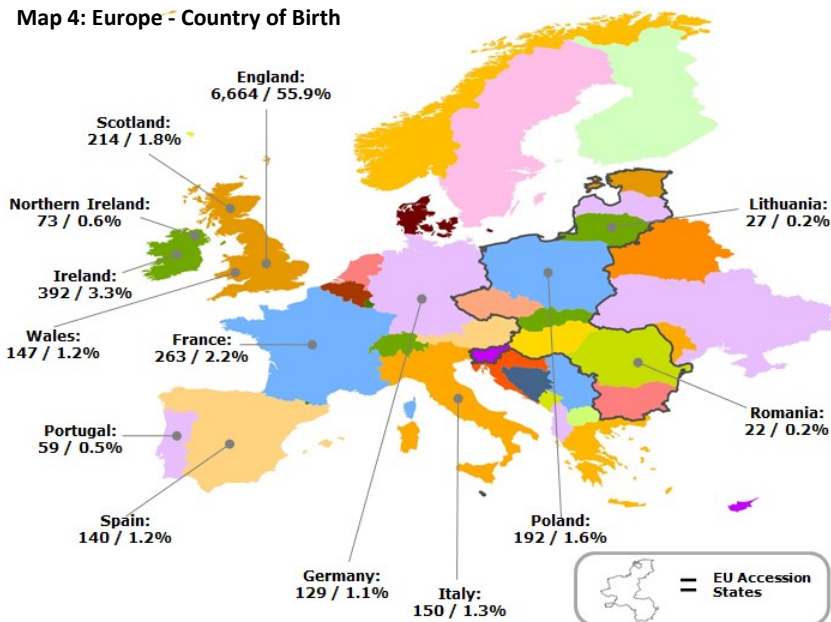
Figure 3: Ethnic Groups



Map 3: World Region - Country of Birth



Map 4: Europe - Country of Birth



**Year and Age of arrival in the UK**

The ward ranked the fourth lowest in H&F in terms of proportion of foreign born residents who have arrived in the UK since 2001 (**20.7%** of the overall population).

The ward ranked the seventh lowest in proportion of residents whose age of arrival to the UK was between 20 and 44 (**26.6%** of all age groups ) and it ranked the fifth lowest on proportion of foreign people who have resided in the UK for less than 5 years (**12.7%** of the overall population).

**15.6%** of residents in the ward hold an EU passport (the fifth lowest level among H&F wards). The ward ranked the tenth highest in terms of proportion of people that hold a passport of any of the Australasian countries as a percentage of the total population (**4.4%**), and the eighth highest in terms of proportion of people that hold a passport of any of the African countries (**1.9%**).

**Religion**

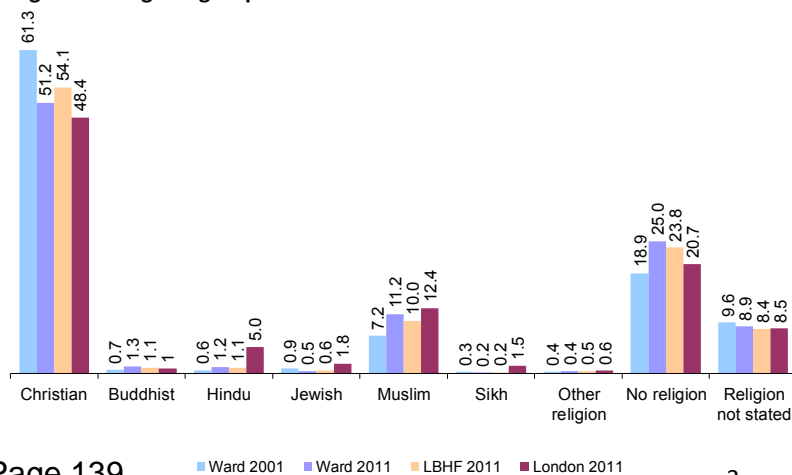
Christians remained the largest religious group in the ward with **51.2%** of residents (61.3% in 2001).

There has been a **4** percentage point increase in the Muslim population to 1,334 in 2011; the sixth highest number in H&F.

One in four (**25%**) residents stated as having no religion (ranked eighth highest), while 8.9% did not answer the question related to religion.

There are no updates available on religion by ward, but the latest data from ONS suggest that 'Any other religion' and Muslim religion have increased most since 2011 in H&F (by **2.5** percentage points).

Figure 4: Religious groups



## Household Language

**73.2%** of households in the ward contain people aged 16+ who all speak English as a main language; ranked the seventh highest among all wards (71.8% in H&F).

**13.4%** of households have no people that speak English as a main language (14.5% in H&F).

The main languages spoken in the ward are **French** (296 people), **Spanish** (214), **Arabic** (197), **Somali** (173), **Polish** (161), **Italian** (126) and **Portuguese** (115).

## Health

**83.2%** of residents assess their health as 'good' or 'very good' (85.7% in H&F).

**6.2%** rate their health as 'bad' or 'very bad' compared to 4.9% across the borough.

In the 2011 Census, **15.2%** (1,814) of residents reported to have a long term health problem or disability that limits their day-to-day activities; this is the third highest level in the borough but a decrease of 4.8% since 2001 (the tenth highest).

Life expectancy in the ward is worse for both the males and females than the borough and London averages with males expected to live **77.6** years and females expected to live **80.8** years.

**Figure 5: Life Expectancy 2012-2014**

Indicator	Ward	H&F	London
Male life expectancy	77.6	79.7	80.3
Female life expectancy	80.8	84.1	84.2

Source: ONS

In terms of childhood obesity at reception age, **10.3%** of children are estimated to be obese which is the sixth highest level in the borough (H&F 9.7% and London 10.2%). Conversely, child excess weight (overweight including obesity) at **18.5%** is below both the borough (21.9%) and London (22%) averages. In Year 6, **19%** of children are estimated to be obese which is below the borough and London averages of 22.4% and 23% respectively. The prevalence of excess weight among children in Year 6 in the ward stands at **35.8%**.

**Figure 6: Childhood Obesity and Excess Weight**

Age Group	Area	Number measured	Number obese	% obese	Number measured	Number excess weight*	% excess weight*
Reception (age 4-5 years)	Ward	167	17	10.3%	287	53	18.5%
	Hammersmith & Fulham	3,651	355	9.7%	3,887	850	21.9%
	London	269,492	27,437	10.2%	272,087	59,969	22.0%
Year 6 (age 10-11)	Ward	239	45	19.0%	239	85	35.8%
	Hammersmith & Fulham	3,365	754	22.4%	3,417	1,270	37.2%
	London	231,149	53,084	23.0%	232,078	87,531	37.7%

Source: NCMP 2016/17 \*Overweight and obese combined

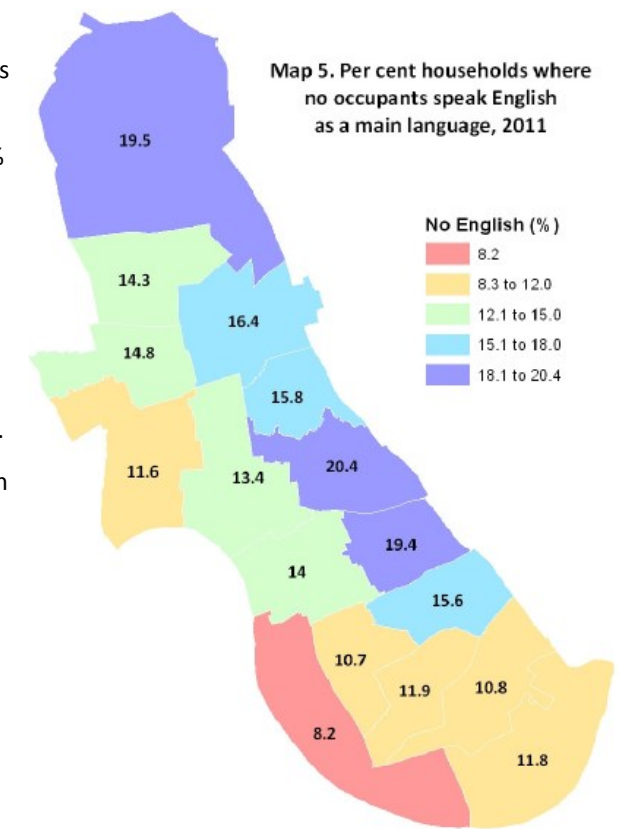
## School Census 2017

In total, there are **1,065** children who live in the ward and attend a school within the borough. This includes **166** children in nursery classes, **525** children in primary schools and **351** children in secondary schools. **23** children attend the borough's special schools. According to the 2011 Census there are a total of **1,234** school children and full-time students aged 16+ in the ward (ranked the fifth highest in H&F).

**Figure 7: School Census Statistics**

Area	FSM	SEN	EAL
Ward	28.4	16.2	40.7
Hammersmith & Fulham	22.4	15.6	46.0
London	17.5	14.4	45.0

Source: School Census, Autumn 2017



Source: ONS Census 2011

**Figure 8: First Language (EAL)**

First Language	% of pupils
Somali	6.3
Arabic	4.2
French	4.1
Polish	2.4
Italian	2.0

One of the key benefits of the school census is that it captures details on free school meals, special educational needs and the languages spoken by children. **28.4%** of pupils in the ward receive free school meals; this is above both the borough average of 22.4% and the London average of 17.5%. The percentage of pupils (**16.2%**) with special educational needs is higher than both the borough and London averages (15.6% and 14.4% respectively). In terms of the percentage of pupils who speak English as an additional language, the ward average of **40.7%** is lower than both the borough and London averages (46% and 45% respectively). In total, pupils speak an additional 52 languages other than English with **6.3** speaking Somali, **4.2%** speaking a form of Arabic, **4.1%** speaking French as a first language.

## Marital Status

The ward ranks ninth highest in proportion of residents who are single - never married (**56%**). Proportionately fewer residents are married (**28.1%**) compared to the borough average (29.6%).

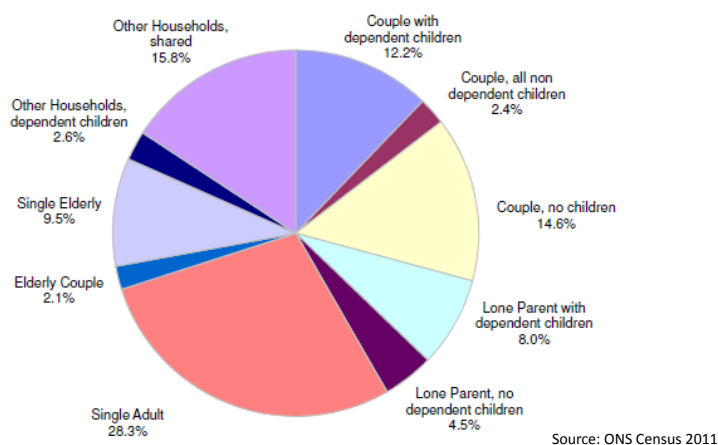
**38.9%** of people aged 16 and over were living as a couple (married, in a same-sex civil partnership, or are cohabiting with a partner of any sex); this is the ninth highest level in H&F.

## Household Composition

The average household size is **2.28** persons (2.17 in 2001); this compares to 2.26 persons in H&F.

The number of households has increased by **2.2%** since 2011 to 5,335; the eighth biggest increase among all wards (H&F +4.5%).

Figure 9: Household composition



Single adult households aged under 65 are the largest group (**28.3%**). The proportion of single elderly households has decreased by **34.7%** and elderly couple by **31.4%** over the past 10 years to a current level of **11.6%** (606) of all households.

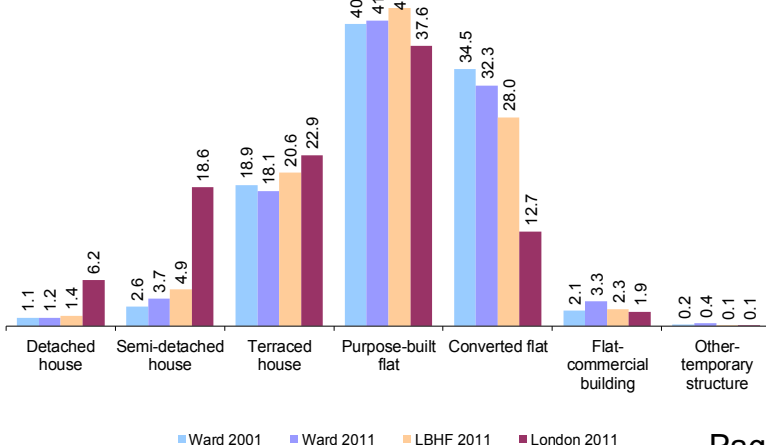
The ward ranks the fourth highest among H&F wards on the proportion of lone parent households (**12.5%**).

## Accommodation Type

In 2011 there were **5,381** dwellings in the ward, some 172 more than in 2001. Only 0.5% of dwellings were shared between two or more households (0.6% in 2001).

The housing stock is characterised by a large proportion of flats and maisonettes (**77%**); ranked the seventh highest in H&F.

Figure 10: Dwelling Type



**36.8%** of all properties are with one bedroom (ranked sixth highest) and **31.9%** are with two bedrooms (ranked twelfth highest).

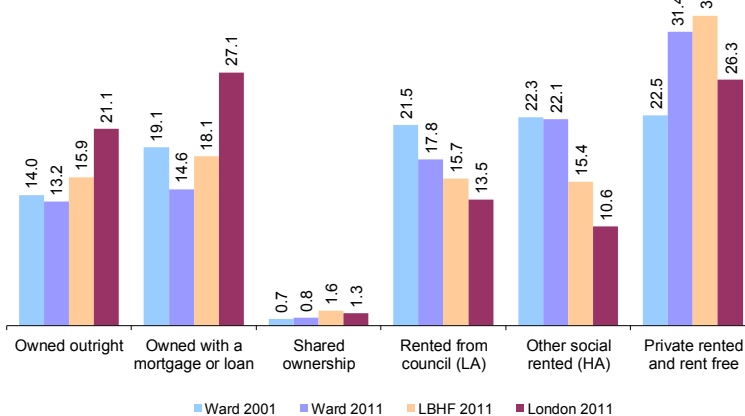
## Tenure

**28.7%** of households are owner occupiers (ranked fourth lowest); a reduction of 5 percentage points from 2001.

The private rented sector (incl. rent free) accounts for **31.4%** of households (ranked tenth) with an increase of 8.9 percentage points since 2001.

Two in five households (**39.9%**) rent their home from a social housing; **17.8%** rent from the Council (ranked fourth) and **22.1%** from Housing Associations (ranked second).

Figure 11: Tenure Mix



Source: ONS Census 2011

## Occupancy - Bedrooms

This provides a measure of whether a household's accommodation is overcrowded or under occupied.

The proportion of households that have one fewer bedroom than required was **13.7%** (ranked eighth) which is above the borough average of 12.6%.

## Housing Waiting List

There are **2,319** registered households on the housing waiting list in Hammersmith & Fulham including 662 on the transfer list (2,251 in 2017). **23%** of non-transfer homeseeker households live outside H&F.

Majority of registered households (**53%**) require two bedroom properties, followed by three bedroom properties (**28%**).

The number of households registered on the housing waiting list in the ward stands at **121** (6.8% of all households on the list).

## Property Prices

Average property prices in the borough have increased by almost **15%** over the past 5 years, but in the past year have decreased by 5%.

Average price increases have ranged from 14% for flats and maisonettes to over 20% for the sales of semi-detached properties.

The average price of dwellings in the ward is **£832,794** compared with £713k in the borough and £480k in London; this is the seventh highest level amongst all H&F wards.

# What we do

## Economic Activity

In 2011, **72.9%** of working age people aged 16-74 in the ward were economically active (working or looking for work); that was the seventh lowest rate amongst wards (74.1% in H&F). The economic activity rate for males was **75.9%** (ranked fourth lowest) and for females was **69.7%** (ranked eighth lowest).

## Employment

**63.1%** were in employment compared to 65.7% in H&F and 62.4% in London. **43.1%** of those were full-time employees (ranked fourth lowest in H&F), **7.9%** were part time employees (ranked fifth highest) and **12.1%** were self-employed (ranked tenth highest).

The top three methods of travel to work are underground (**42%**; ranked fifth), on foot (**15%**; ranked third) and bus (**11%**; ranked eleventh).

In total in 2017, there were **35,300** jobs in the ward. There has been a **28.4%** increase in the number jobs between 2011 and 2017 (+12.3% in H&F). **74.3%** of employees working in the ward work full-time (72% in H&F); this is the fourth highest proportion amongst all wards.

Figure 12: Number of Jobs, BRES

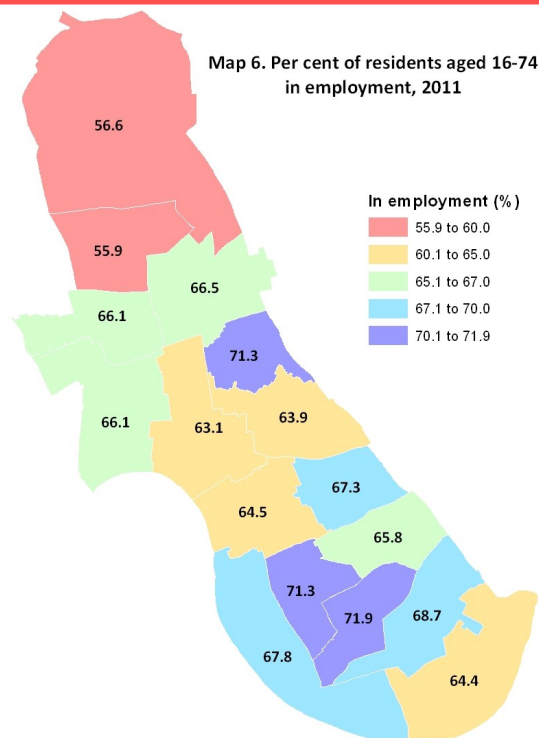
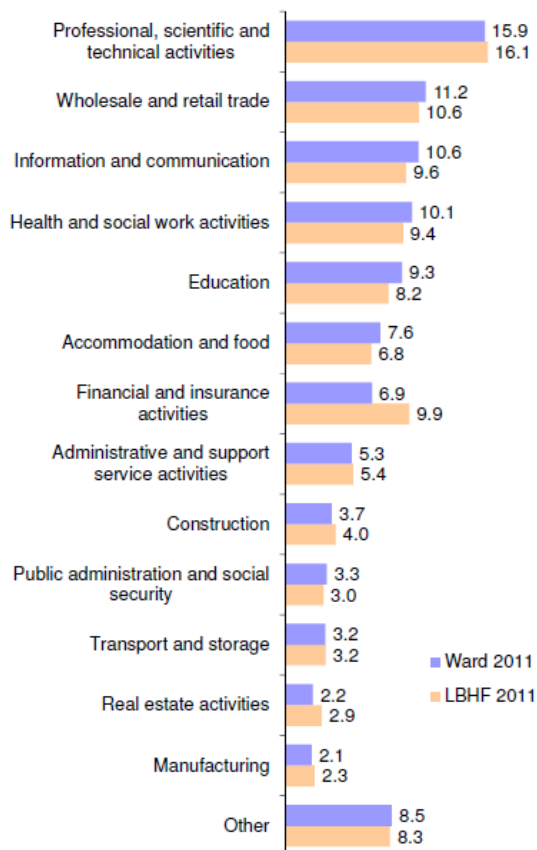
Area	2011	2012	2013	2014	2015	2016	2017	% change 2011-2017
Ward	27,500	27,800	30,500	31,000	32,500	36,250	35,300	28.4
Hammersmith & Fulham	122,450	127,000	127,500	128,000	135,500	139,500	137,500	12.3

## Industry of Employment

The professional, scientific and technical activities sector is the largest source of employment with **15.9%** (ranked tenth). This is followed by the wholesale and retail trade sector at **11.2%** (ranked fifth) and the information and communication sector at **10.6%** (ranked fifth).

The ward ranked fourth highest in terms of the population employed in the health and social work activities sector (**10.1%**).

Figure 13: Employed by industry of occupation



## Occupation

**13.1%** of the employed population were working as managers, directors and senior officials (ranked eleventh), while **26%** were working in the professional occupations (ranked eleventh).

**8%** were working in the elementary occupation; ranked fifth (6.7% in H&F), and **10.1%** were working in the administrative and secretarial occupations; ranked fifth (9.6% in H&F).

## Economic Inactivity

**27.1%** were economically inactive residents (permanently sick or disabled, looking after family/home, retired and some students); (H&F 26% and London 28.3%). **32.5%** of these economically inactive residents are students (31.5% in H&F).

## Unemployment

From the 2011 Census **5.2%** of residents aged 16-74 were unemployed and looking for work (ranked fifth highest). Unemployment in the ward has improved since the start of 2013. In March 2018, there were **6,250** Universal Credit claimants in H&F (4.5% of the working age population).

Key out-of-work benefits consist of four groups: job seekers, ESA and incapacity benefits, lone parents and others on income related benefits. In 2017, **8.3%** of the working age population in the ward were on out-of-work benefits which is above both the borough and London averages (at 7.5% and 7.2% respectively).

## Provision of Unpaid Care

**7.7%** of the population provide informal care, up from 6.8% in 2001; this is the fourth highest proportion in the borough. **64%** were giving less than 20 hours care a week (ranked tenth), **15%** provided between 20 to 49 hours (ranked eighth) and **21%** provided 50 or more hours (ranked seventh).

## Household Income

The average gross household income (including investment income and social security benefits) in the ward is **£44,954** per annum (£50.2k in H&F and £45.2k in London).

**31.7%** of households depend on less than £25,000pa compared to 28% for the borough as a whole. One in seven (**15.5%**) households in the ward have a combined annual gross income of over £75k compared to 18.8% of households across the borough.

## Qualifications and Skills for Life

**15%** of adults have no formal qualification (ranked third highest) compared to 12.8% in H&F and 17.6% in London.

**45.3%** have a level 4 qualification-degree level (ranked fourth lowest) compared to 49.6% in H&F.

In 2011 the Office of National Statistics conducted a Skills for life survey across the country and using modelling techniques they have developed local level area estimates of the number and proportion of adults living in households with defined **skill levels**. The figure 15 contains estimates of the proportion of adults who have the following skills at entry level or below. Entry level is the lowest level in the national qualification framework in England. Qualifications at this level recognise basic knowledge and skills and the ability to apply learning in everyday situations under direct guidance and supervision.

Across the different measures the proportion of adults at entry level (and below) is **above** the borough averages but below the London averages. For adults who don't speak English as a first language, the proportion is **above** the borough average.

Figure 15: Skills for life estimates

Area	Entry Level and Below					
	Literacy	Numeracy	Email	Word Processing	Spreadsheets	ESOL
Ward	16.7	44.7	38.4	56.0	61.5	22.2
Hammersmith and Fulham	15.2	42.3	36.2	54.0	59.9	21.8
London	28.2	52.7	42.2	61.2	69.8	33.9

Source: ONS Skills for life survey, 2011

## Educational Attainment

In 2016-17, **47.3%** of pupils achieved an average attainment 8 score and **58.2%** of pupils achieved 9-4 grades in English and Maths only. Both these figures are slightly below the borough averages.

Figure 16: Educational Attainment KS4 2016-17

Area	All Pupils at the End of KS4	All Pupils at the End of KS4 with average Attainment 8 Score	All Pupils at the End of KS4 % achieving 9-4 in English and Maths GCSEs only
Ward	110	46.3	58.2
Hammersmith and Fulham	1,311	46.4	62.5
London	75,472	44.3	60.1

Source: DfE

In 2016-17, the overall absence rate in schools was **4.6%** which was slightly above both the borough and London rate.

Figure 17: School Absence

Area	Enrolments in All Schools	Overall Absence in All Schools	Authorised Absence in All Schools	Unauthorised Absence in All Schools
Ward	742	4.6	3.6	1.0
Hammersmith and Fulham	10,347	4.4	3.2	1.2
London	923,360	4.5	3.3	1.2

Source: DfE

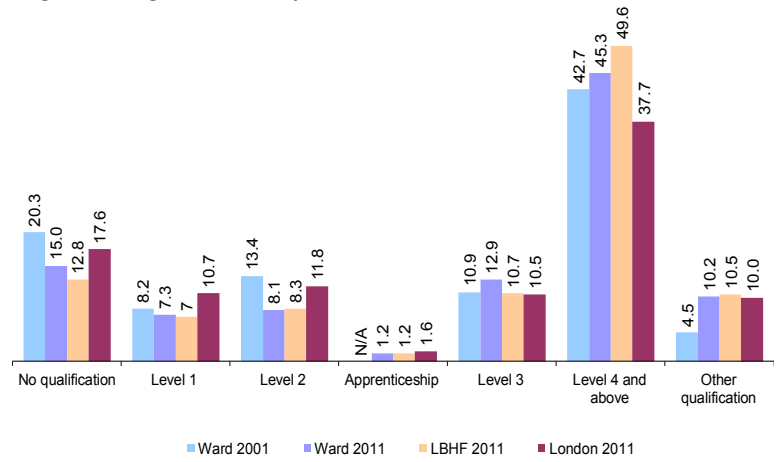
In 2016-17, the rate of the first year Higher Education (HE) enrolment in the ward was **90.7** per 1,000 18-24s which was below both the borough rate at 86.1 and the London rate at 102.2.

Figure 18: HE Enrolments

Area	Rate per 1,000 18-24s	Number HE Enrolments
Ward	66.2	92
Hammersmith and Fulham	86.1	1,483
London	102.2	78,655

Source: HESA

Figure 14: Highest level of qualification



Source: ONS Census 2011

# Where we live

## Deprivation

The index of multiple deprivation is a relative measure of deprivation which ranks small areas nationally by different deprivation dimensions. The ward is made up of 8 Lower Super Output Areas (LSOAs) and it has been measured as slightly **more deprived** than in 2010 and 2007.

The most deprived area (E01001899) is among the **10% most deprived** nationally. The areas E01001893, E01001894 and E01001900 are in the 10 to 30% most deprived nationally. The four remaining LSOAs rank in the 30-60% most deprived nationally.

Figure 19: IMD National Banding - most deprived

Ward LSOAs	Overall IMD Banding	Income Deprivation Affecting Children Index (IDACI)	Income Deprivation Affecting Older People Index (IDAOP)
E01001899	0-10%	0-10%	10-20%
E01001893	10-20%	0-10%	10-20%
E01001894	10-20%	0-10%	0-10%
E01001900	20-30%	20-30%	20-30%
E01001896	30-40%	20-30%	10-20%
E01001898	30-40%	50-60%	20-30%
E01001895	40-50%	40-50%	20-30%
E01001897	50-60%	70-80%	30-40%

Within the Index there are seven 'domains' and the highest scores for the ward are in the **Living Environment**, **Crime** and **Barriers to Housing and Services** domains, in that order. 3 out of 8 LSOAs fall within the worst 10% deprived nationally on Income Deprivation Affecting Children (IDACI) domain, and 4 out of 8 LSOAs fall within the worst 20% nationally on Income Deprivation Affecting Older People (IDAOP) domain.

## Digital Inclusion

H&F residents use the internet more compared to the national average. More households in H&F Council homes have a tablet computer compared to the national average. **10%** of residents in the ward that **don't use internet** which is higher than the borough average of 8.5%. This ranges from **1.5%** for 16-34 age group, to **43%** for 65+.

## Customer Segmentation

The complexity of the demographics of the ward can easily be seen in the following map that displays the Mosaic customer segmentation dataset. Segmentation work suggests that the two predominant customer segmentations in the ward are: **Mixed Inner City Urban—Modest Means** (32%) - displayed in dark brown on the map and **Deprived Families in Public Housing** (25% in H&F) which is displayed in red on the map. This segment is clustered around several location in the ward; with the area covering Queen Caroline estate, Ashcroft Square, Riverside Gardens and Peabody estate.

Around 16% of residents are classified as coming from **Mobile Single Young Professionals** - displayed in dark blue on the map.

## Green Space

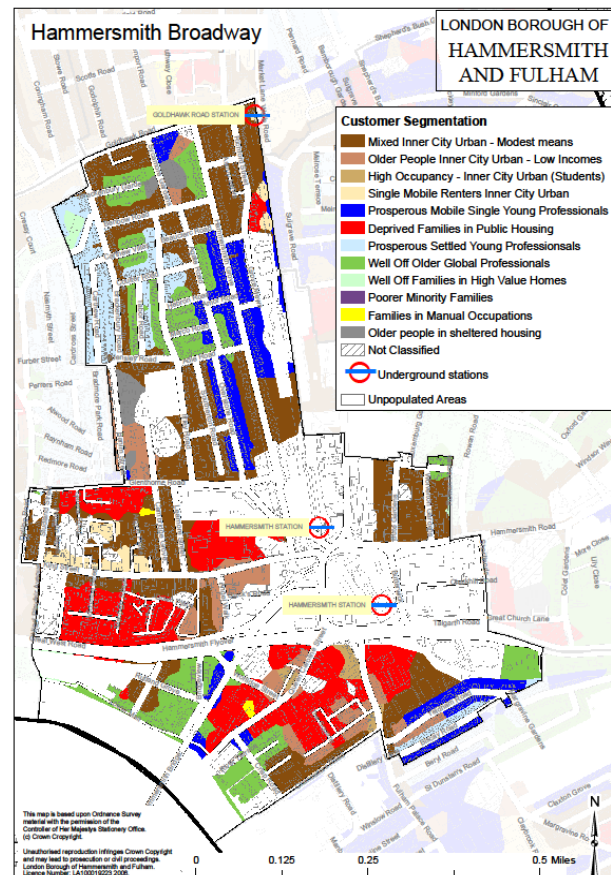
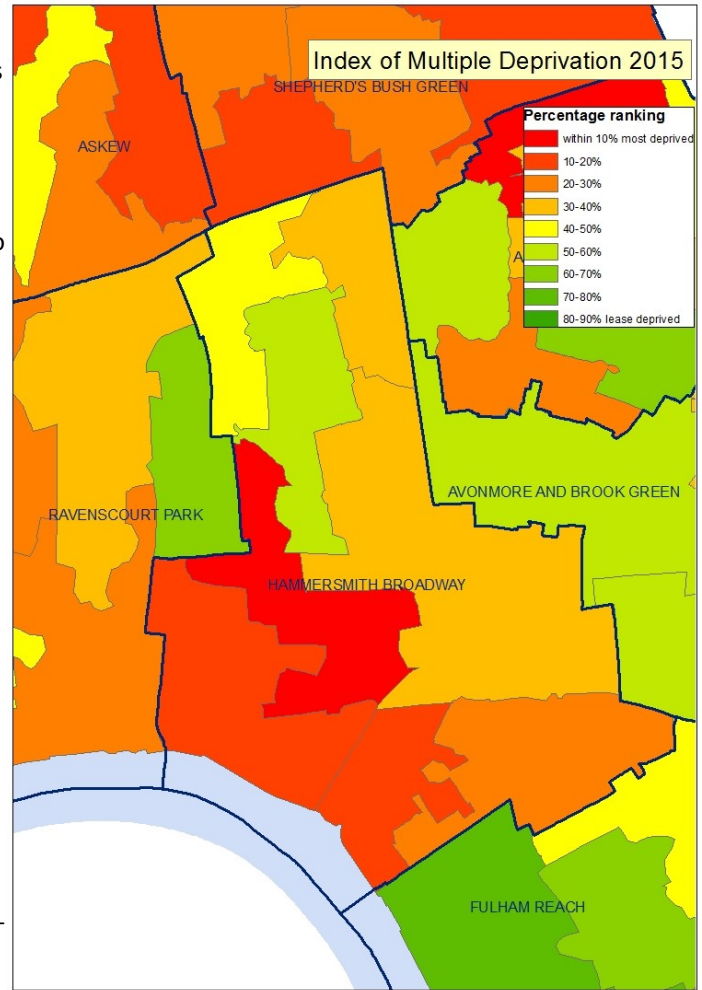
**9.1%** of the ward area is classified as open space and green area; this compares to 21.1% in H&F and 39.1% in London as a whole. **30.9%** of households within wards have easy access to at least one open space and 25% have easy access to local parks.

## Public Transport Accessibility and Car Ownership

Public Transport Accessibility Level (PTAL) is a measure which rates locations by distance from frequent public transport services. In the ward that score is **5.6** which is higher than both the borough and regional averages at 4.7 and 3.8 respectively.

There are **48** cars per 100 households in the ward compared to 54 in the borough and 82 in London. **60%** of households do not have access to a car per year (55% in H&F and 42% in London).

Map 7: Index of Multiple Deprivation





## Crime

All recorded crime has been rising across the borough over the last four years (+4% in year to 2017-18). The ward has seen a **16.7%** increase in total notifiable offences in the last year; this is the second highest increase amongst all wards.

There were 3,023 crime committed (**237.1** per 1,000 residents) which ranks the ward second highest in H&F.

In 2016-17, the rate of all recorded crime per 1,000 population was **206.1** in the ward compared to 117 across the borough.

**Table 20: Crime Categories 2017-18**

	Ward		Hammersmith	
	No.	Rate	No.	Rate
Burglary	214	16.8	2092	11.4
Criminal Damage	151	11.8	1336	7.3
Drugs	94	7.4	935	5.1
Other Notifiable Offences	51	4.0	413	2.2
Robbery	95	7.4	660	3.6
Sexual Offences	50	3.9	380	2.1
Theft & Handling	1575	123.5	9476	51.5
Violence Against The Person	787	61.7	6294	34.2

Source: Met Police

The most high volume crimes in the ward during the last financial year have been 'Theft & Handling' (**1,575**), 'Violence Against the Person' (**787**) and Burglary offences (**214**).

All crime types have seen a larger rates per 1,000 population in the ward compared to the H&F average. Those include: Theft & Handling (**72** percentage points difference), Violence Against The Person (**27.5** percentage points difference), Burglary (**5.4** percentage points difference) and Robbery (**3.8** percentage points difference).

## Top Businesses

The top 10 businesses in the ward employ nearly **16,000** employees and the majority of these businesses have been based in the ward for many years (see Table 23).

Employment activities is the main industrial sector in the ward employing **5,972** people; this is followed by Wholesale of household goods (**5,398**), Office administrative and business support (**3,565**), Motion picture, video and television programme activities (**2,663**), General public administration activities (**2,298**) and Hotels and similar accommodation (**1,967**).

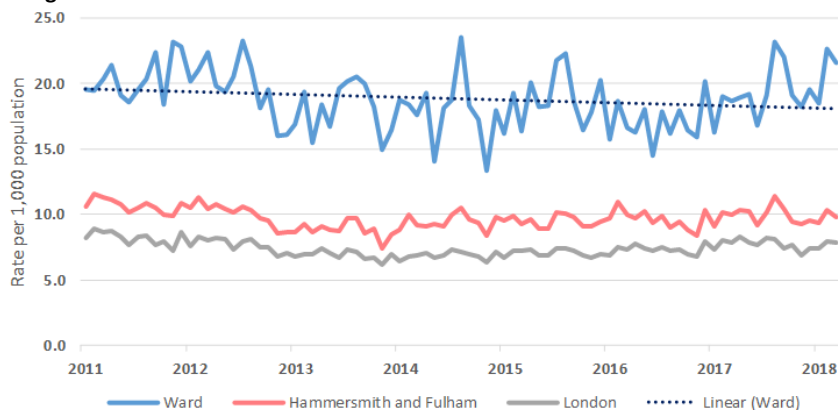
**Table 23: Top 10 employers by employment size**

Position	Company Name	Employee No.	Sector
1	L'Oreal Ltd	4,650	Wholesale of perfume and cosmetics
2	Omni Facilities Management	3,981	Labour recruitment and provision of personnel
3	Hammersmith & Fulham Council	2,325	General public service activities (excl. schools)
4	Walt Disney Co Ltd	1,626	TV, Film & Video Production Services
5	Mref Tradeco Ltd	878	Hotels & Inns
6	MER Manor Operations Ltd	634	Hotels & Inns
7	Summit Recruitment Ltd	493	Other professional, scientific and technical activities
8	Accor UK (Novotel)	488	Hotels & Inns
9	Industrial Light & Magic (UK) Ltd	478	Software consultancy and supply
10	Philip Morris Ltd	360	Wholesale of tobacco products

**Other major employers:** Carbonado Industries (UK) Ltd, Merryweather Productions Ltd, Elevate East London LLP, Fexco Ltd, 360 Worldwide Ltd, Blue Arrow Ltd, Winton Capital Management Ltd, Coca Cola GB Ltd, Sony Mobile Communications, and CHIVAS Brothers Ltd.

Source: MINT, Bureau van Dijk

**Figure 21: All Recorded Crimes**



## Anti-social Behaviour

Anti-social behaviour (ASB) levels are generally high in the ward with **158** incidents being recorded on ReACT since June 2013. This totals just **6.1%** of all ASB incidents recorded on the system over this time period.

The ASB incident rate per 1,000 population is **12.4** (the tenth lowest in H&F). Noise was the most frequent incident followed by Harassment / Verbal Abuse and Substance Misuse.

**Table 22: Rate of Anti-Social Behaviour, 2013-2018**

Ward	Incidents	Rate per 1,000 pop	Rank (1=Best)
Addison	138	12.4	9
Askew	157	10.8	7
Avonmore and Brook Green	96	8.2	3
College Park and Old Oak	34	3.7	2
Fulham Broadway	135	11.5	8
Fulham Reach	213	18.5	13
Hammersmith Broadway	158	12.4	10
Munster	96	8.8	4
North End	252	22.7	14
Palace Riverside	70	9.6	6
Parsons Green and Walham	100	9.1	5
Ravenscourt Park	32	3.0	1
Sands End	216	15.2	12
Shepherd's Bush Green	297	24.9	15
Town	145	13.3	11
Wormholt and White City	471	35.2	16

Source: ReACT H&F