

Local Area Risk Assessment - 39 Church Road, Ashford

<b>Premises number or licence number:</b>	TBC
<b>Region (if applicable):</b>	Staines Town
<b>Area (if applicable):</b>	Staines South (Ward)
<b>Premises Address:</b>	67 High Street, Staines upon Thames, TW18 4PU
<b>Name of Assessor:</b>	Sophia Anstey of Woods Whur
<b>Colleagues Present:</b>	
<b>Date(s) of assessment:</b>	30 <sup>th</sup> April 2026
<b>Review date:</b>	

**The Operator:**

Sunni-Ed Limited trading as Golden Slots is licensed by the Gambling Commission and is a member of the AGC trade association, BACTA. Sunni-ED Limited is an extremely experienced operator of these types of premises.

We are familiar with the guidance and information contained in the [Spelthorne Statement of Gambling Policy 2025 to 2028](#) including the Guide to Undertaking Local Gambling Risk Assessments contained within the Statement of Licensing Principles.

## Local Area Risk Assessment

Sunni-Ed Ltd intend to operate one other Adult Gaming Centre premises within the Borough of Spelthorne.

We believe that this Local Area Risk Assessment (and future updates) identifies all necessary steps required to comply with the Statement of Licensing Principles for Gambling, uphold the Licence Conditions and Codes of Practice and promote the three Licensing Objectives.

We have assessed the specific risks associated with the vulnerabilities linked to ASB and gambling related harm, as well as the location where the premises are situated, to identify any premises nearby which may be utilised by vulnerable persons. Several other research studies have been undertaken into the impact of gambling on the vulnerable which have helped us to understand the key issues concerning gambling related harm so as to protect those who are vulnerable within the local area.

### **Local Area Profile:**

Staines-upon-Thames is a well-established commuter and market town located within the Borough of Spelthorne in north-west Surrey, approximately 17 miles west of Central London. Positioned on the River Thames and immediately adjacent to Heathrow Airport, the town benefits from a strategically advantageous location with excellent access to the M25, M3 and A30 road networks, as well as direct rail services into London Waterloo. The town has historically functioned as an important crossing point on the Thames and has evolved into a significant commercial, retail and residential centre serving both Surrey and west London.

The town centre is focused around a large pedestrianised High Street, which forms the primary commercial and social hub of the area. In comparison to many neighbouring Surrey towns, Staines-upon-Thames offers a substantial retail and leisure provision, incorporating the Elmsleigh Shopping Centre and the Two Rivers retail and entertainment development. The High Street accommodates a wide range of national retailers, cafés, restaurants and service providers, resulting in a busy and active town-centre environment throughout both the daytime and evening economy. The presence of a long-standing market also reinforces the town's traditional market-town character despite the extensive modern redevelopment that has taken place over recent decades.

Staines-upon-Thames is generally regarded as a practical and well-connected residential location, particularly attractive to commuters working in Central London, Heathrow Airport and the wider Thames Valley employment corridor. The town benefits from comparatively strong transport connectivity and accessibility, which has supported continued residential growth and inward investment. In recent years, substantial apartment-led development has taken place within and around the town centre, particularly close to the railway station and riverside areas. This has contributed to a more urban and higher-density character in parts of the town and has strengthened its appeal amongst younger professionals, renters and first-time buyers.

### **Socio Economic Profile:**

The socio-economic profile of the area is broadly characterised by an economically active and relatively affluent population. Household income levels are generally above national averages<sup>1</sup> and there is a strong representation of residents employed within professional, managerial, technical and administrative

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<sup>11</sup> Income determined to be 'Wealthy area 8/10' - <https://crystalroof.co.uk/report/postcode/TW184PU/overview>

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occupations.<sup>2</sup> Employment within aviation, logistics, retail, professional services and technology-related sectors is particularly significant due to the town's proximity to Heathrow Airport (3.5 miles) and the wider Thames Valley business corridor. Educational attainment levels are also comparatively strong<sup>3</sup>, with a notable proportion of residents holding higher education qualifications.<sup>4</sup>

Demographically, the town has a younger population profile than many traditional Surrey settlements, with a significant concentration of residents aged between 20 and 39 years old.<sup>5</sup> The area accommodates a mix of long-term owner occupiers, commuter households, young professionals and private renters.<sup>6</sup> Housing across the area is varied and includes Victorian terraces, suburban housing, modern apartment developments and riverside residential schemes. While owner occupation remains prevalent in many suburban parts of the town, the proportion of privately rented accommodation has increased in recent years due to ongoing residential development and sustained commuter demand. Relative to more traditionally affluent Surrey towns such as Weybridge, Esher and Richmond, Staines-upon-Thames is generally perceived as offering comparatively better affordability and value, particularly for first-time buyers and younger households seeking access to London and Heathrow.

The area presents a mixed deprivation profile. A Crime Deprivation score of 9/10 suggests that crime levels are among the highest compared with other areas, as well as Living Environment Deprivation scoring 7/10, indicating that a significant proportion of residents experience inadequate housing conditions and poor physical surroundings.<sup>7</sup> In contrast, the overall deprivation score of 5/10 places the area around the national midpoint. This is supported by the Income score of 8/10 which indicates that a large share of households experience higher earnings, as well as 4/10 for Education, Skills and Training Deprivation which implies that educational disadvantage is below average. Health Deprivation and Disability is also measured as 2/10, indicating comparatively positive health in the area. Considered together, these scores describe High Street Staines-Upon-Thames as an area where crime levels and living quality are the standout challenges, but where income levels, education and health conditions are notably more positive, helping to balance the overall deprivation picture.<sup>8</sup> This is equally reflected in the Index of Multiple Deprivation 2025 in which the Lower layer super output area (LSOA) for the premises, Spelthorne 004F, is determined as 6/10 (where 1 is the most deprived 10% of LSOA), reiterating the notion that the area is not amongst the most deprived areas in the UK, but still faces a number of challenges that the operator has taken into account when conducting this assessment.<sup>9</sup>

The ethnic profile of the area is consistent with the national average. The ethnic composition of Spelthorne is composed of around 78.7% White, followed by 12.8% Asian, Asian British or Asian Welsh. Mixed or Multiple ethnic groups make up 3.7% and Black, Black British, Black Welsh, Caribbean or African at 2.5%. The remaining 1% is identified as 'Other'. The operator recognises the diverse ethnic composition of the local community and that this may influence the character of the area in a number of ways. A mixed demographic profile often contributes to a wider range of cultural, social and economic behaviours,

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<sup>2</sup> 26.5% of local population in Professional occupations, 16.9% in Associate professional and technical occupations, 14.4% as Managers, directors and senior officials, 9.7% in Administrative and secretarial occupations, 7.4% in Skilled trades occupations, 7.1% in Caring, leisure and other service occupations, 5.9% in Sales and customer service occupations, 4.7% as Process, plant and machine operatives and 7.4% in Elementary occupations - [www.ons.gov.uk](http://www.ons.gov.uk)

<sup>3</sup> Education, Skills and Training Deprivation 4/10 - [Deprivation in High Street, Staines-Upon-Thames, TW18 4PU](#)

<sup>4</sup> Highest Level of Qualification: 45.0% with Level 4 qualifications and above, 4.1% Apprenticeship, 35.4% with Level 1, 2 or 3 qualifications, 2.6% with Other qualifications and remaining 12.8% with No qualifications - [Highest level of qualification - ONS - Census 2021](#)

<sup>5</sup> Age 20-24: 5.1%, Age 25-29: 7.7%, Age 30-34: 9.8%, Age 35-39: 9.9% (All above average for England) [Area profile for Staines - Age profile 2024 - ONS – Mid-year estimates](#)

<sup>6</sup> Tenure of Household: 23.7% own outright, 29.3% own with a mortgage or loan or shared ownership, 11.6% social rented and 35.5% private rents or live rent free - [www.ons.gov.uk](http://www.ons.gov.uk)

<sup>7</sup> [Statistics taken from www.crystalroof.co.uk](#)

<sup>8</sup> [Statistics taken from www.crystalroof.co.uk](#)

<sup>9</sup> [Accredited official statistics - English indices of deprivation 2025](#)

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including a variety of work patterns, leisure activities and community activity. This will also impact the types of businesses and services provided within the vicinity as well as the manner in which residents will use and interact with the High Street. The operator is aware, therefore, that a mixed ethnic profile will influence the way in which residents will perceive and interact with an Adult Gaming Centre so will ensure that policies relating to customer engagement and interactions are conducted in a way that is sensitive to the ethnic makeup of the community.<sup>10</sup>

Whilst the overall socio-economic profile of Staines-upon-Thames can be considered positive, local commentary frequently identifies concerns regarding congestion, pressure on infrastructure and the pace of recent development. Increased residential density has placed growing demand upon transport, healthcare and public services and some areas of the town centre experience elevated levels of antisocial behaviour associated with the night-time economy. Nevertheless, the town continues to perform strongly as a regional retail centre and remains a popular and practical residential location due to its connectivity, amenities and strategic position within the wider London commuter belt.

Staines-upon-Thames can be characterised as a modern and commercially active commuter town with strong transport connections, an extensive retail and leisure offer, and a broadly affluent and economically active population. Although more urban in character than many neighbouring Surrey settlements, the town's riverside environment, accessibility and relative affordability continue to support its popularity amongst a broad range of residents and occupiers.

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

The operator gives particular weight to the licensing objective of protecting children and other vulnerable persons. Significant risks have been identified, including the potential for attempts by under-18s to enter the premises and gamble, exposure of children and vulnerable individuals to gambling-related advertising or promotional materials and the potential for vulnerable adults to engage in harmful gambling. Relevant local factors that may heighten these risks have been assessed and proportionate measures have been designated accordingly. These procedures will be implemented prior to opening and maintained to ensure the ongoing protection of children, young people and vulnerable adults from gambling-related harm.

Given the number of schools, playgrounds, parks, leisure centres, toy shops and other locations where children may frequent/congregate in the vicinity (recognised in the risk matrix below) and the consequent possibility that these students may pass the site throughout the day, the operator places a key focus on the protection of children. Considering such local conditions, including a notable number of residential areas with a high concentration of children, stringent standards must be put in place to keep any children off the premises. As a result, the operator has put in place specific controls, such as the implementation of an independent third-party testing regime, the enforcement of Challenge 25 and ID verification and active monitoring of all entrances and exits by trained staff who will refuse entry to anyone underage attempting to enter the premises.

Additionally, the operator recognises that levels of deprivation, especially where income deprivation and higher crime levels are present, can contribute to the creation and concentration of vulnerable groups within an area. Such conditions typically correlate with increased susceptibility to addiction, mental health difficulties, financial hardship and a higher likelihood of impulsive decision making. In this setting, the operator has carefully considered the socio-economic profile of the area in which deprivation can significantly impact the extent to which individuals may be exposed to or affected by gambling-related harm. Areas of higher deprivation also often exhibit reduced access to support services and increased social isolation, both of which exacerbate vulnerability. Accordingly, this risk assessment has assessed deprivation levels, potential impacts to local residents and identified the groups that may be at higher risk. The

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<sup>10</sup> [Spelthorne Demographic Data taken from www.spelthorne.gov.uk](http://www.spelthorne.gov.uk)

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operator has developed proportionate and robust mitigation controls to ensure that the grant of an AGC licence to this premises will not serve to worsen any of the existing challenges facing vulnerable groups. The measures have been established to promote safer gambling, support early identification of risk in vulnerable persons and ensure that vulnerable individuals are signposted to support services. These procedures ensure that the premises contributes positively and responsibly to local area. The operator has also considered the existence of "invisible" vulnerabilities in addition to the more obvious problematic gambling signs, such as excessively agitated or erratic activity within the AGC, whereby "invisible" harms may occur. Gambling harm can be concealed, therefore staff members at the premises will receive specialised training to identify the more subtle susceptibility indicators that friends and family might overlook. These harms might not show up as overtly physical symptoms and will instead involve staff closely assessing behavioural, time or financial indicators in conjunction with applying what is already known about that customer from their past behaviour and interactions .

#### **Evening and Night Time Economy:**

The evening and night-time economy of Staines-upon-Thames is one of the strongest and most active within the immediate north Surrey and lower Thames Valley area. The town functions as a significant leisure and hospitality destination for both local residents and visitors from surrounding settlements including Egham, Ashford, Chertsey, Sunbury and parts of Berkshire. Its role as a regional retail and entertainment centre, combined with strong transport links and a relatively young commuter population, supports a busy evening economy throughout much of the week, with activity increasing significantly on Thursday, Friday and Saturday evenings.

The principal focus of the evening economy is centred around the pedestrianised High Street, Two Rivers retail and leisure development, and the riverside hospitality areas adjacent to the River Thames. These areas collectively provide a broad mix of restaurants, bars, pubs, cafés, fast-food operators and entertainment uses, creating a relatively vibrant and commercially active town-centre environment. National restaurant and leisure operators are well represented alongside independent venues, contributing to a varied food and beverage offer that caters to a broad demographic profile including younger professionals, families and students from nearby Royal Holloway University.

The Two Rivers development plays a particularly important role within the evening economy and acts as the town's primary leisure destination. The scheme includes a cinema, restaurants, casual dining operators and gym facilities, generating activity into the late evening and supporting wider footfall across the town centre. The concentration of leisure uses within this area helps extend activity beyond traditional retail trading hours and contributes to a stronger evening economy than is typically found in comparable suburban commuter towns.

The riverside environment also contributes positively to the character of the evening economy. Several hospitality venues benefit from Thames frontage and outdoor seating areas, which are particularly popular during spring and summer months. The riverside setting helps soften the commercial nature of the town centre and creates a more attractive social environment for dining and evening leisure activity. This aspect of the town is generally regarded as one of Staines-upon-Thames' key lifestyle advantages and contributes positively to local perception amongst residents and visitors.

The evening and night-time economy of Staines-upon-Thames can be characterised as active, commercially strong and regionally significant within the local area. The town benefits from a broad and accessible leisure offer, supported by good transport connectivity, a substantial commuter population and an established retail centre. While more urban and commercially focused than many neighbouring Surrey settlements, the riverside setting and concentration of leisure facilities contribute positively to the town's attractiveness as both a residential and social destination.

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In considering the commercially vibrant nature of the Evening and Night Time Economy, the operator has adopted a carefully considered approach to managing the potential risks associated with higher footfall, the variety of leisure uses on offer and the presence of vulnerable groups. The Evening and Night-time economy experiences higher levels of anti-social behaviour, alcohol and drug related erratic behaviour/violence and individuals congregating on the streets following closure times. This assessment has therefore set out a number of mitigation controls tailored to the risk profile of the local area's evening/night time economy, which includes proportionate staffing, comprehensive CCTV and efficient supervision measures to ensure that the premises will operate responsibly within this busy town centre environment, particularly during the late hours where levels of crime and anti-social behaviour are anticipated to increase.

### **Gambling Premises:**

The High Street in Staines-upon-Thames accommodates licensed gambling premises which form part of the town's wider retail and leisure offer. Positioned within a busy and well-established commercial centre, these premises contribute to the overall vitality and footfall of the High Street, particularly throughout the daytime and evening economy.

As one of the main commercial destinations in the local area, the High Street benefits from a diverse mix of retail, hospitality and leisure uses, with gambling premises operating alongside cafés, restaurants, shops and entertainment venues. Their presence reflects the town's role as a busy regional centre serving both local residents and visitors from surrounding areas.

The gambling premises along the High Street operate within a regulated and professionally managed environment and contribute to maintaining active commercial frontage within the town centre. Collectively, they form part of a broad and varied leisure offer that supports the continued vibrancy and commercial strength of Staines-upon-Thames town centre.

The operator is considerate that the High Street already hosts a number of gambling premises within the mixed use commercial town centre and, accordingly, will ensure that the addition of the proposed Adult Gaming Centre will integrate without creating any form of cumulative risk. This risk assessment outlines the robust controls in place, such as CCTV coverage, specific staff training programs to take appropriate action and refusal policies against high risk customers, to ensure that the level of risk within the local area is not exacerbated by the addition of this gambling premises. It is proposed that the Adult Gaming Centre will represent a positive contribution to the town centre through heightened surveillance of the high street, increased activity and the provision of an additional leisure offer for local residents.

### **Overview:**

Staines-upon-Thames is a well-connected and commercially active commuter town in north-west Surrey, benefiting from strong transport links, a busy town centre and an attractive riverside setting. The High Street forms the focal point of the area and supports a diverse mix of retail, hospitality and leisure uses, creating a vibrant environment throughout both the daytime and evening economy.

The town has a relatively affluent and economically active population, with a strong commuter presence linked to London, Heathrow and the wider Thames Valley. Ongoing residential and commercial development has further strengthened the town centre's role as a regional destination for shopping, dining and entertainment.

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Licensed gambling premises located along the High Street form part of the wider leisure offer and contribute positively to town-centre activity and footfall. Operating alongside restaurants, cafés, bars and other leisure uses, they help support the vitality and commercial strength of the area within a regulated and professionally managed environment.

In preparing this assessment, the operator has considered the High Street's position as a busy commercial destination and the presence of existing licensed gambling premises. This assessment evaluates local risks associated with high footfall and Staines' resident and visitor demographic, setting out proportionate control measures implemented to mitigate the identified risks, including staff training, customer interaction procedures, identification requirements and premises design. Such measures ensure that the premises operates in a safe and responsible manner, adding to the vitality of the High Street, Staines upon Thames.

This Local Area Risk Assessment is a live document and will be subject to ongoing review to ensure it remains accurate, relevant and reflective of current legislation, local conditions, operational practices and emerging risks.

Local Area				
Licensing Objective		Risks	Existing Control Measures	Further Controls Recommended
1.1	Protecting children and other vulnerable persons from being harmed or exploited by gambling	<p>There are a number of <b>educational facilities in the area</b>, including but not limited to within half a mile of the site as follows:</p> <ul style="list-style-type: none"> <li>- <a href="#">Explore Learning Staines, Unit T3, Two River Retail Park, TW18 4BL (0.1 mile)</a></li> <li>- Little Burrows Montessori Nursery, Thames Street, TW18 4SD (0.2 miles)</li> <li>- <a href="#">ABMA Business School, 42 London Road, TW18 4HF (0.4 miles)</a></li> <li>- <a href="#">MWB Staines upon Thames, Centurion House, London Road, TW18 4AX (0.4 miles)</a></li> <li>- <a href="#">London College of Innovation, Centurion House, TW18 4AX (0.4 miles)</a></li> <li>- St Peters Nursery, St Peters Church Hall, Laleham Road, TW18 2DX (0.5 miles)</li> <li>- The Magna Carter Secondary School, Thorpe Road, TW18 3HJ (0.7 miles)* <b>nearest secondary school</b></li> <li>- School Uniform Direct , 23 High St, Staines TW18 4QY - 0.1 miles from the premises.</li> </ul> <p><b>There are no Student Accommodation facilities within the immediate area.</b></p> <p><b>Support and Educational services for teenagers and young adults are provided at:</b></p> <ul style="list-style-type: none"> <li>- Staines &amp; Egham Sea Cadets, The Lammas Park, Wraysbury Road, TW18 4XZ (0.6 miles)</li> <li>- Leacroft Centre, 2 Leacroft, TW18 4NQ (0.6 miles)</li> <li>- Army Cadets, 1 Langley Road, TW18 2EH (0.7 miles)</li> </ul>	<ul style="list-style-type: none"> <li>- Third party testing by (Check Policy) on age restricted sales systems takes place by testing all working shifts on a regular basis.</li> <li>- The total number of staff and licensed door supervisors is risk assessed to meet the needs of the LCCP conditions set for the venue.</li> <li>- There is a policy to refuse entry to customers who appear to be under the influence of alcohol or drugs.</li> <li>- We ensure that the customer toilets are checked every hour for evidence of drug taking. These toilet checks are documented stating the time and member of staff who made the checks. Access to the toilet is controlled by staff.</li> <li>- Prominent GamCare documentation is displayed at the premises. These notices are displayed at the premises.</li> <li>- Induction and refresher training is undertaken by every member of staff at least every 12 months. The training includes drug and alcohol awareness training to include homeless and street drinking. This training is formally recorded on each member of staff's training record, which again is available for presentation to the Licensing Authority immediately upon request.</li> </ul>	<ul style="list-style-type: none"> <li>- Staff member to be appointed with the responsibility of championing the protection of children, including safeguarding and child sexual exploitation, as well as other vulnerable persons from harm. This staff member will also be the point of contact for concerns in relation to Adult Safeguarding.</li> <li>- The management will implement safeguarding training to ensure that staff have the basic awareness of safeguarding children and other vulnerable adults.</li> <li>- All staff are aware of the Gambling Commission definition of vulnerable persons, it being "it will, for regulatory purposes, assume that this group includes people who gamble more than they want to; people who gamble beyond their means; and people who may not be able to make informed or balanced decisions about gambling due to a mental impairment, alcohol or drugs".</li> <li>- Staff to be made aware of child truancy during school times, i.e. being aware that: <ul style="list-style-type: none"> <li>a. Children should not be in the premises.</li> <li>b. The school day is between 0830 - 1530 and staff should be extra vigilant during these periods.</li> </ul> </li> </ul>

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		<p><b>There are no facilities for the homeless (including hostels ) or potentially vulnerable within the immediate vicinity of the premises.</b></p> <p><b>Care Homes:</b></p> <ul style="list-style-type: none"> <li>- Splendour Care, Centurion House, London Road, TW18 4AX (0.4 miles)</li> <li>- <a href="#">Almondsbury Care, 44A Gresham Road, TW18 2AN (0.6 miles)</a></li> </ul> <p><b>There are no facilities for problem gambling in the vicinity.</b></p> <p><b>Drug and Alcohol Treatment Centres:</b></p> <ul style="list-style-type: none"> <li>- Addiction Recover Now located in Windsor (6.3 miles)</li> <li>- Foundations Recovery located in Twickenham (8.1 miles)</li> </ul> <p><b>Job centres/employment agencies in the close area:</b></p> <ul style="list-style-type: none"> <li>- Contract Options, 118 High Street, TW18 4BY (0.1 mile)</li> <li>- Burnham Recourses, 1A Fairfield Avenue, TW18 4AB (0.2 miles)</li> <li>- Reed Recruitment Agency, Church House, 18-20 Church St, TW18 4EP (0.2miles)</li> <li>- Workmates, 40 Church Street, TW18 4EP (0.2 miles)</li> <li>- Ochre House Job Centre, Ashby House, Church Street, TW18 4XS (0.3 miles)</li> <li>- Cielo, 59 Church Street, TW18 4XS (0.3 miles)</li> <li>- StaffConnect, Rourke House, Watermans Business Park, The Causeway, TW18 3BA (0.4 miles)</li> <li>- CRL, 1 Kingsbury Cresent, TW18 3BA (0.4 miles)</li> <li>- Staines Job Centre, 62 London Road, TW18 4HB (0.4 miles)</li> </ul> <p><b>There are no Family Service Centres or Support Groups within the immediate area of the premises.</b></p>	<ul style="list-style-type: none"> <li>- Staff are trained to identify and interact with any customers who are identified as playing more than one gaming machine, including tablet machines at the same time.</li> <li>- Employ the services of an external SIA door supervisor company for all its venues. The hours that the SIA door supervisor is employed is risk assessed.</li> <li>- There is comprehensive CCTV in place, with both internal and external cameras and remote viewing capability for senior management, allowing for real-time oversight during out-of-hours periods.</li> <li>- Staff presence at all times, supported by continuous floor coverage, ensuring that lone customers or those presenting signs of fatigue do not go unmonitored.</li> <li>- Staff are trained on the following:             <ul style="list-style-type: none"> <li>a. observing changes in pace, attention or responsiveness,</li> <li>b. identifying prolonged sessions of play where tiredness may emerge,</li> <li>c. engaging with customers showing signs of reduced focus or slower reactions,</li> <li>d. applying the Identify–Interact–Evaluate framework consistently throughout the day, and</li> <li>e. recording fatigue-related</li> </ul> </li> </ul>	<p>Currently there is no issue with this, should there be then we will engage with local schools.</p> <ul style="list-style-type: none"> <li>- Management controls will be implemented to ensure that staff are trained in relation to the risk indicators set out below:             <ul style="list-style-type: none"> <li>a. Developing relationships between a child and an older person.</li> <li>b. Children in the company of a group of older persons.</li> <li>c. Children regularly attending premises and meeting with a number of different older persons, particularly where older persons may be facilitating gambling for children.</li> <li>d. Children outside of licensed premises developing relationships with an older person, particularly an older person facilitating gambling for children.</li> <li>e. Children leaving the locality of the premises with older persons, particularly with a group of older persons.</li> <li>f. Children looking uncomfortable in the company of, or leaving with, older persons, particularly groups of older persons.</li> </ul> </li> </ul> <p>** Although obviously it is noted that our AGC is an over 18 premises only.</p> <ul style="list-style-type: none"> <li>- In addition and in line with the Spelthorne policy, there are Safeguarding Policies and</li> </ul>
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		<p><b>Housing Projects:</b></p> <ul style="list-style-type: none"> <li>- A2Dominion, Spelthorne House, TW18 4TA (0.2 miles)</li> <li>- Ability Housing Association, The Coach House, Gresham Road, TW18 2AE (0.5 miles)</li> <li>- Transform Housing and Support, Field View Court, Burges Way, TW18 2EX (0.8 miles)</li> <li>- Spelthorne Rent Start, Knowle Grn, TW18 1XA (0.9 miles)</li> <li>- HomeStart, The Resource Centre, Commercial Road, TW18 2QW (1 mile)</li> </ul> <p><b>Soup Kitchen/Food Bank:</b></p> <ul style="list-style-type: none"> <li>- <a href="#">Former Site of Franks Snack Bar, High Street, TW18 4DP (0.1 mile) (Soup Kitchen)</a></li> <li>- <a href="#">St Peters Church Food Bank, Laleham Road, TW18 2DX (0.5 miles)</a></li> </ul> <p><b>Places of Worship:</b></p> <ul style="list-style-type: none"> <li>- The Redeemed Christian Church of God Chapel, Methodist Church, TW18 4SD (0.2 miles)</li> <li>- IPC Staines UK Pentecostal Church, Thames Street, TW18 4SD (0.2 miles)</li> <li>- Staines Methodist Church, Thames Street, TW18 4SD (0.2 miles)</li> <li>- Staines and District Synagogue, Westbrook Road, TW18 4PR (0.3 miles)</li> <li>- Staines Baptist Church, 16 Hale Street, TW18 4UW (0.3 miles)</li> <li>- Assembly of God for the Nations, Kingston Road, TW18 4LN (0.4 miles)</li> <li>- Our Lady of the Rosary Church, 59 Gresham Road, TW 18 2BD (0.5 miles)</li> <li>- Church of Jesus Christ of Latter Day Saints, 41 Kingston Road, TW18 4JG (0.5 miles)</li> <li>- St Marys Church, Vicarage Road, TW18 4YF (0.5 miles)</li> </ul> <p><b>Pay Day Loan Shops or Cash Chequing Services:</b></p> <ul style="list-style-type: none"> <li>- H&amp;T Pawnbrokers, 53 High Street,</li> </ul>	<p>observations where welfare concerns are identified.</p> <ul style="list-style-type: none"> <li>- Please note this approach acknowledges that fatigue can play a role in decision-making but avoids any assumption that this is solely a feature of late-night play. Instead, it emphasises that staff awareness and proportionate engagement are the primary safeguards at all times of day.</li> </ul>	<p>Procedures for both Adults and for Children.</p>
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		<p>TW18 4QH (100ft)</p> <ul style="list-style-type: none"> <li>- Vape Mobile (We buy phones for cash), 20 High Street, TW18 4EE (351ft)</li> <li>- Cash Converters, 14 High Road, TW18 4EE (440ft)</li> </ul> <p><b>Banks/ATMs:</b></p> <ul style="list-style-type: none"> <li>- Halifax, 56 High Street, TW18 4DY (16ft)</li> <li>- Barclays Bank, 71 High Street, TW18 4PS (39ft)</li> <li>- Lloyds Bank, 73-75 High Street, TW18 4PP (92ft)</li> <li>- Santander, 59A High Street, TW18 4QH (112ft)</li> <li>- Nationwide, 30 High Street, TW18 4EE (272ft)</li> <li>- <a href="#">Cash Machine, 169 High Street, TW18 4PA (0.2 miles)</a></li> <li>- <a href="#">Metro ATM, TW18 4WB (02 miles)</a></li> <li>- <a href="#">Cash Machine, 93 London Road, TW18 4HN (0.4 miles)</a></li> </ul> <p><b>Gambling Premises:</b></p> <ul style="list-style-type: none"> <li>- Betfred, 76 High Street, TW18 4DP (256ft)</li> <li>- Admiral Slots, 109 High Street, TW18 4PQ (433ft)</li> <li>- <a href="#">Stains Majesty Casino, 37-45 High Street, TW18 4QU (446ft)</a></li> </ul> <p><b>Alcohol licensed premises:</b></p> <ul style="list-style-type: none"> <li>- Nostro Lounge, 55 High Street, TW18 4QH (144ft)</li> <li>- Turtle Bay, 24 High Street, TW18 4EE (335ft)</li> <li>- The George, 2-8 High Street, TW18 4EE (0.1 mile)</li> <li>- London Stone, 14 Church Street, TW18 4EP (0.1 mile)</li> <li>- Slug &amp; Lettuce, 15-18 Clarence Street, TW18 4SU (0.2 miles)</li> <li>- Thames Side Brewery, 1 Hale Street, TW18 4UW (0.2 miles)</li> <li>- Last Hop, Thames Edge, 15-18 Clarence St, TW18 4SU (0.3 miles)</li> <li>- Three Tuns, 63 London Road, TW18 4BN (0.4 miles)</li> <li>- The Star Staines, 52 Kingston Road, TW18</li> </ul>		
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		<p>4NL (0.4 miles)</p> <p><b>Playgrounds &amp; Parks:</b></p> <ul style="list-style-type: none"> <li>- Playground, 5-8 Mill Mead, TW18 4DP (0.2 miles)</li> <li>- Birch Green, TW18 4HA (0.5 miles)</li> <li>- Lammas Lower Playground and Splash Park, Lammas Recreational Ground, TW18 4XZ (0.6 miles)</li> <li>- Moormede Play Area, Staines, TW18 4WA (0.6 miles)</li> </ul> <p><b>Leisure Centres/Community Centres:</b></p> <ul style="list-style-type: none"> <li>- Staines Community Centre, Thames St, TW18 4EA (0.1 mile)</li> <li>- <a href="#">Spelthorne Leisure Centre, Knowle Gardens, TW18 1AJ (1 mile)</a></li> </ul> <p><b>Bowling Alley, shopping centres, cinemas and hotels:</b></p> <ul style="list-style-type: none"> <li>- Two Rivers Shopping Centre, Mustard Mill Road, TW18 4WB (0.1 mile)</li> <li>- Premier Inn Staines upon Thames Hotel 90, 106 High Street, TW18 4DP (0.1 mile)</li> <li>- Elmsleigh Shopping Centre, 62 South Street, TW18 4QB (0.2 miles)</li> <li>- <a href="#">Vue Cinema, Mustard Mill Road, TW18 4BL (0.2 miles)</a></li> </ul> <p><b>Fast Food premises and cafes:</b></p> <ul style="list-style-type: none"> <li>- McDonalds, 62 High Street, TW18 4DY (23ft)</li> <li>- Burger King, 68 High Street, TW18 4DY (128ft)</li> <li>- Slim Chickens, 2 Norris Road, TW18 4UP (349ft)</li> <li>- KFC, 32 High Street, TW18 4EE (420ft)</li> <li>- 1517 Chicken Shop, 15 Church Street, TW18 4EN (0.1 mile)</li> <li>- Big Brother Burger House, 14 Church Street, TW18 4EP (0.1 mile)</li> <li>- Don Grill, 25 Church Street, TW18 4EN (0.1 mile)</li> <li>- Nandos, Mustard Mill Road, TW18 4BL (0.1 mile)</li> <li>- Five Guys, Two Rivers, TW18 4BL (0.1 mile)</li> </ul>		
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Local Area Risk Assessment

		<p><b>Toy Shops:</b></p> <ul style="list-style-type: none"> <li>- CeX, Unit 5, 88 High Street, TW18 4DP (358ft)</li> <li>- Sports Direct, Elmsleigh Shopping Centre, High Street, TW18 4PJ (0.2 miles)</li> <li>- GAME, Elmsleigh Shopping Centre, High Street, TW18 4PJ (0.2 miles)</li> </ul> <p><b>Bus Stops:</b></p> <ul style="list-style-type: none"> <li>- Thames Street Stop H (433ft)</li> <li>- Staines Bridge Stop C (0.1 mile)</li> <li>- Staines Bridge Stop Z (0.1 mile)</li> <li>- South Street Stop K (0.2 miles)</li> <li>- High Street Stop J (0.2 miles)</li> <li>- Two Rivers (0.2 miles)</li> <li>- Staines Police Station Stop M (0.3 miles)</li> <li>- Staines Police Station Stop U (0.3 miles)</li> <li>- Bridge Street Stop B (0.3 miles)</li> <li>- Staines Bus Station (0.3 miles)</li> <li>- Pinetrees Business Park (0.4 miles)</li> <li>- Staines Sainsburys (0.4 miles)</li> <li>- Sainsburys (0.5 miles)</li> </ul> <p><b><u>General Summary of Risks Considered:</u></b></p> <ul style="list-style-type: none"> <li>- Children entering site unnoticed or unchallenged.</li> <li>- Potentially Vulnerable people being able to gamble.</li> <li>- Failure to recognise signs associated with problem gambling or substantial changes in gambling style</li> <li>- Failure to provide information to players on responsible gambling.</li> <li>- Failure to properly administer the self-exclusion process and maintain its effectiveness thereafter, including breaches and reinstatements.</li> <li>- Customers gambling late at night while</li> </ul>		
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Local Area Risk Assessment

		<p>appearing fatigued or with reduced alertness may make poor decisions, increasing the risk of harm or exploitation.</p> <ul style="list-style-type: none"> <li>- Customers experiencing financial hardship may engage in gambling that poses a greater risk of harm or exploitation.</li> <li>- Customer may be asked to leave the premises for welfare, safety or safer-gambling reasons. Children passing the frontage may observe the customer once outside, which could cause unnecessary concern.</li> <li>- Customers may have limited English, which could reduce their understanding of safer gambling information.</li> <li>- Customers gambling late at night while appearing fatigued or with reduced alertness may make poor decisions, increasing the risk of harm or exploitation.</li> </ul>		
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A physical walk round was conducted within a 0.6 mile radius of the premises to confirm those premises listed from the Desk Top exercise were where stated, please see [Appendix 4](#) for further details.

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<p>1.2</p>	<p>Preventing Gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime</p>	<p>The Surrey Police crime data dashboard reveals over a one year period (April 2025 to March 2026) a total of 1980 crimes were reported across the Staines Town area. <sup>11</sup></p> <p>The highest reported crimes were Violence and Sexual Offences, Anti-Social Behaviour and Shoplifting interspersed with Public Order offences over the period of a year. <sup>12</sup></p> <p>The nature of the High Street reflects the type of incidents commonly associated with a busy town centre environment which experience retail activity and public interactions.</p> <p>None of these crimes are particularly linked with gambling premises.</p>	<ul style="list-style-type: none"> <li>- We employ the services of an external SIA door supervisor company for all its venues. The hours that the SIA door supervisor is employed is risk assessed.</li> <li>- Induction training is provided to all staff working at the premises and refresher training to every member of staff at least every six months. This training includes:             <ul style="list-style-type: none"> <li>a. the specific local risk to the licensing objectives that have been identified for these premises within this LARA;</li> <li>b. drug and alcohol awareness training to include homeless and street drinking;</li> <li>c. conflict management training provided by an instructor qualified to formally recognise national or equivalent standard on dealing with conflict.</li> <li>d. Basic anti money laundering training</li> </ul> </li> <li>- This staff training is recorded formally for each member of staff in their training records, and is available for presentation to the licensing authority immediately upon request.</li> </ul>	<ul style="list-style-type: none"> <li>- We will implement a Terrorism Risk Assessment concerning protective security advice in relation to counter-terrorism should it be required.</li> <li>- During the late-night operation of the premises enhanced control measures will be in place such as:             <ul style="list-style-type: none"> <li>- confirming door control protocols</li> <li>- availability of mag-lock facilities.</li> <li>- SIA-registered security where indicated by risk assessment.</li> <li>- CCTV coverage with both internal and external cameras and remote viewing capability for senior management allowing for real-time oversight during out-of-hours periods.</li> <li>- Staff presence at all times, supported by continuous floor coverage, ensuring that lone customers or those presenting signs of fatigue do not go unmonitored.</li> </ul> </li> </ul>
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<sup>11</sup> <https://www.police.uk/pu/your-area/surrey-police/stanwell/?yourlocalpolicingteam=about-us>

<sup>12</sup> [www.police.uk](http://www.police.uk)

Local Area Risk Assessment

<p>1.3</p>	<p>Ensuring that gambling is conducted in a fair and open way</p>	<p>Failure to provide or manage the complaints procedure correctly (Gambling related complaints).</p> <p>Failure to provide clear or correct terms and conditions.</p>	<ul style="list-style-type: none"> <li>- Terms and conditions signage are displayed.</li> <li>- Betting and game rules signage is displayed.</li> <li>- All notices regarding gambling advice or support information are displayed.</li> <li>- All staff are trained with the BACTA codes of practice.</li> <li>- Staff are aware of the Golden Slots terms and conditions, and relevant game rules associated with all gaming machines offered on the premises.</li> <li>- Customer complaint forms are available on request at the Support Desk. Staff are trained in the complaints procedure.</li> <li>- As an operator, we acknowledge that this licensing objective has a direct link with the successful achievement of the crime and disorder objective.</li> <li>- In terms of advertising, all advertising codes are adhered to in order to stop customers from being misled.</li> </ul>	
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<b>Gambling Operation &amp; Physical Design (Internal and External)</b>			
<b>Licensing Objective</b>	<b>Risks</b>	<b>Existing Control Measures</b>	<b>Further Controls Recommended</b>
2.1	<p>Protecting children and other vulnerable persons from being harmed or exploited by gambling</p> <p>There are a number of <b>educational facilities in the area</b>, including but not limited to within half a mile of the site as follows:</p> <ul style="list-style-type: none"> <li>- <a href="#">Explore Learning Staines, Unit T3, Two River Retail Park, TW18 4BL (0.1 mile)</a></li> <li>- Little Burrows Montessori Nursery, Thames Street, TW18 4SD (0.2 miles)</li> <li>- <a href="#">ABMA Business School, 42 London Road, TW18 4HF (0.4 miles)</a></li> <li>- <a href="#">MWB Staines upon Thames, Centurion House, London Road, TW18 4AX (0.4 miles)</a></li> <li>- <a href="#">London College of Innovation, Centurion House, TW18 4AX (0.4 miles)</a></li> <li>- St Peters Nursery, St Peters Church Hall, Laleham Road, TW18 2DX (0.5 miles)</li> <li>- The Magna Carter Secondary School, Thorpe Road, TW18 3HJ (0.7 miles)* <b>nearest secondary school</b></li> <li>- School Uniform Direct , 23 High St, Staines TW18 4QY - 0.1 miles from the premises.</li> </ul> <p><b>There are no Student Accommodation facilities within the immediate area.</b></p> <p><b>Support and Educational services for teenagers and young adults are provided at:</b></p> <ul style="list-style-type: none"> <li>- Staines &amp; Egham Sea Cadets, The Lammas Park, Wraysbury Road, TW18 4XZ (0.6 miles)</li> <li>- Leacroft Centre, 2 Leacroft, TW18 4NQ (0.6 miles)</li> <li>- Army Cadets, 1 Langley Road, TW18 2EH (0.7 miles)</li> </ul> <p><b>There are no facilities for the homeless</b></p>	<ul style="list-style-type: none"> <li>- There is comprehensive CCTV in place.</li> <li>- The CCTV system in place ensures that all entry and exit points are covered, so that there can be frontal identification of every person entering in any light condition.</li> <li>- The CCTV system records continually whilst the premises is open for licensable activities and during all times when customers remain on the premises. It covers the gaming area, office and toilet entrance. All recordings are stored for a minimum of 31 days, with a date and time stamp. Recordings are made available immediately upon request to the Police or authorised officer throughout the entire 31 day period.</li> <li>- There is a spotter monitor at the Customer Service Desk and Security Desk.</li> <li>- There is a staff member who is conversant with the operation of the CCTV on the premises at all times when it is open.</li> <li>- All notices regarding gambling advice or support information are displayed in the premises.</li> <li>- All public signage/documentation relating to age restrictions,</li> </ul>	<ul style="list-style-type: none"> <li>- There will be a designated member of staff with the responsibility for championing the protection of children, including safeguarding and child sexual exploitation, as well as other vulnerable persons from harm. They will also be the point of contact for concerns in relation to Adult Safeguarding</li> <li>- We will implement safeguarding training to ensure that staff have the basic awareness of safeguarding children and other vulnerable adults.</li> <li>- All staff are aware of the Gambling Commission definition of vulnerable persons, it being “it will, for regulatory purposes, assume that this group includes people who gamble more than they want to; people who gamble beyond their means; and people who may not be able to make informed or balanced decisions about gambling due to a mental impairment, alcohol or drugs”.</li> <li>- Staff to be made aware of child truancy during school times, i.e. being aware that: <ul style="list-style-type: none"> <li>a. Children should not be in the premises.</li> <li>b. The school day is between 0830 - 1530 and staff should be extra vigilant during these periods.</li> </ul> </li> <li>- Should we recognise issue with this, we will engage with local schools.</li> <li>- Management controls will be</li> </ul>

		<p><b>(including hostels ) or potentially vulnerable within the immediate vicinity of the premises.</b></p> <p><b>Care Homes:</b></p> <ul style="list-style-type: none"> <li>- Splendour Care, Centurion House, London Road, TW18 4AX (0.4 miles)</li> <li>- <a href="#">Almondsbury Care, 44A Gresham Road, TW18 2AN (0.6 miles)</a></li> </ul> <p><b>There are no facilities for problem gambling in the vicinity.</b></p> <p><b>Drug and Alcohol Treatment Centres:</b></p> <ul style="list-style-type: none"> <li>- Addiction Recover Now located in Windsor (6.3 miles)</li> <li>- Foundations Recovery located in Twickenham (8.1 miles)</li> </ul> <p><b>Job centres/employment agencies in the close area:</b></p> <ul style="list-style-type: none"> <li>- Contract Options, 118 High Street, TW18 4BY (0.1 mile)</li> <li>- Burnham Recourses, 1A Fairfield Avenue, TW18 4AB (0.2 miles)</li> <li>- Reed Recruitment Agency, Church House, 18-20 Church St, TW18 4EP (0.2miles)</li> <li>- Workmates, 40 Church Street, TW18 4EP (0.2 miles)</li> <li>- Ochre House Job Centre, Ashby House, Church Street, TW18 4XS (0.3 miles)</li> <li>- Cielo, 59 Church Street, TW18 4XS (0.3 miles)</li> <li>- StaffConnect, Rourke House, Watermans Business Park, The Causeway, TW18 3BA (0.4 miles)</li> <li>- CRL, 1 Kingsbury Cresent, TW18 3BA (0.4 miles)</li> <li>- Staines Job Centre, 62 London Road, TW18 4HB (0.4 miles)</li> </ul> <p><b>There are no Family Service Centres or Support Groups within the immediate area of the premises.</b></p>	<p>gambling advice, gambling support information (e.g. GamCare or similar support service) is displayed or provided on the premises.</p> <ul style="list-style-type: none"> <li>- A Challenge 25 proof of age scheme is operated at the premises whereby the only acceptable forms of identification are recognised photographic identification cards such as driving licence, passport, or proof of age card with the PASS hologram.</li> <li>- Third party testing by (Check Policy) on age restricted sales systems takes place by testing all working shifts on a regular basis.</li> <li>- There is an AGC Age Verification Policy in place at the premises, that stipulates the Challenge 25 Policy. It sets out the types of ID that are accepted should anyone be challenged. It also confirms there is a 'refusals log' and a third party testing regime in place.</li> <li>- Staff receive an acoustic alert on the opening and closing of the entrance door.</li> <li>- The total number of staff and licensed door supervisors is risk assessed to meet the needs of the LCCP conditions set for the venue.</li> <li>- There is a policy to refuse entry to customers who appear to be under the influence of alcohol or drugs.</li> <li>- We ensure that the customer toilets are checked every hour for evidence of drug taking. These toilet checks are documented</li> </ul>	<p>implemented to ensure that staff are trained in relation to the risk indicators set out below:</p> <ol style="list-style-type: none"> <li>a. Developing relationships between a child and an older person.</li> <li>b. Children in the company of a group of older persons.</li> <li>c. Children regularly attending premises and meeting with a number of different older persons, particularly where older persons may be facilitating gambling for children.</li> <li>d. Children outside of licensed premises developing relationships with an older person, particularly an older person facilitating gambling for children.</li> <li>e. Children leaving the locality of the premises with older persons, particularly with a group of older persons.</li> <li>f. Children looking uncomfortable in the company of, or leaving with, older persons, particularly groups of older persons.</li> </ol> <p>** Although obviously it is noted that our AGC is an over 18 premises only.</p> <ul style="list-style-type: none"> <li>- In addition and in line with the Spelthorne policy, there are Safeguarding Policies and Procedures for both Adults and for Children.</li> <li>- We have implemented a Safeguarding Adults Policy and Procedure document. This policy focuses on ensuring the processes are put in place to keep adults safe. The policy also directs staff on how to respond,</li> </ul>
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		<p><b>Housing Projects:</b></p> <ul style="list-style-type: none"> <li>- A2Dominion, Spelthorne House, TW18 4TA (0.2 miles)</li> <li>- Ability Housing Association, The Coach House, Gresham Road, TW18 2AE (0.5 miles)</li> <li>- Transform Housing and Support, Field View Court, Burges Way, TW18 2EX (0.8 miles)</li> <li>- Spelthorne Rent Start, Knowle Grn, TW18 1XA (0.9 miles)</li> <li>- HomeStart, The Resource Centre, Commercial Road, TW18 2QW (1 mile)</li> </ul> <p><b>Soup Kitchen/Food Bank:</b></p> <ul style="list-style-type: none"> <li>- <a href="#">Former Site of Franks Snack Bar, High Street, TW18 4DP (0.1 mile) (Soup Kitchen)</a></li> <li>- <a href="#">St Peters Church Food Bank, Laleham Road, TW18 2DX (0.5 miles)</a></li> </ul> <p><b>Places of Worship:</b></p> <ul style="list-style-type: none"> <li>- The Redeemed Christian Church of God Chapel, Methodist Church, TW18 4SD (0.2 miles)</li> <li>- IPC Staines UK Pentecostal Church, Thames Street, TW18 4SD (0.2 miles)</li> <li>- Staines Methodist Church, Thames Street, TW18 4SD (0.2 miles)</li> <li>- Staines and District Synagogue, Westbrook Road, TW18 4PR (0.3 miles)</li> <li>- Staines Baptist Church, 16 Hale Street, TW18 4UW (0.3 miles)</li> <li>- Assembly of God for the Nations, Kingston Road, TW18 4LN (0.4 miles)</li> <li>- Our Lady of the Rosary Church, 59 Gresham Road, TW 18 2BD (0.5 miles)</li> <li>- Church of Jesus Christ of Latter Day Saints, 41 Kingston Road, TW18 4JG (0.5 miles)</li> <li>- St Marys Church, Vicarage Road, TW18 4YF (0.5 miles)</li> </ul> <p><b>Pay Day Loan Shops or Cash Chequing Services:</b></p> <ul style="list-style-type: none"> <li>- H&amp;T Pawnbrokers, 53 High Street, TW18 4QH (100ft)</li> <li>- Vape Mobile (We buy phones for cash),</li> </ul>	<p>stating the time and member of staff who made the checks. Access to the toilet is controlled by staff.</p> <ul style="list-style-type: none"> <li>- Prominent GamCare documentation is displayed at the premises. These notices are displayed in the premises.</li> <li>- Induction and refresher training is undertaken by every member of staff at least every 12 months. The training includes drug and alcohol awareness training to include homeless and street drinking. This training is formally recorded on each member of staff's training record, which again is available for presentation to the Licensing Authority immediately upon request.</li> <li>- Any tea/coffee drinks facilities will be provided for playing customers only.</li> <li>- No customers are allowed to leave bags or other belongings in the premises.</li> <li>- The entrance to the premises has been carefully considered in order to assess age and potential vulnerability of any person wishing to enter the premises.</li> <li>- We have considered interaction with customers as a priority and therefore maintain good staffing levels, that are risk assessed.</li> <li>- In line with the Spelthorne Policy, as gaming machines provide opportunities for solitary play and immediate pay-outs we understand that they are more likely to engender repetitive and</li> </ul>	<p>what needs to be recorded and when matters should be reported internally and externally.</p>
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		<p>20 High Street, TW18 4EE (351ft)</p> <ul style="list-style-type: none"> <li>- Cash Converters, 14 High Road, TW18 4EE (440ft)</li> </ul> <p><b>Banks/ATMs:</b></p> <ul style="list-style-type: none"> <li>- Halifax, 56 High Street, TW18 4DY (16ft)</li> <li>- Barclays Bank, 71 High Street, TW18 4PS (39ft)</li> <li>- Lloyds Bank, 73-75 High Street, TW18 4PP (92ft)</li> <li>- Santander, 59A High Street, TW18 4QH (112ft)</li> <li>- Nationwide, 30 High Street, TW18 4EE (272ft)</li> <li>- <a href="#">Cash Machine, 169 High Street, TW18 4PA (0.2 miles)</a></li> <li>- <a href="#">Metro ATM, TW18 4WB (02 miles)</a></li> <li>- <a href="#">Cash Machine, 93 London Road, TW18 4HN (0.4 miles)</a></li> </ul> <p><b>Gambling Premises:</b></p> <ul style="list-style-type: none"> <li>- Betfred, 76 High Street, TW18 4DP (256ft)</li> <li>- Admiral Slots, 109 High Street, TW18 4PQ (433ft)</li> <li>- <a href="#">Stains Majesty Casino, 37-45 High Street, TW18 4QU (446ft)</a></li> </ul> <p><b>Alcohol licensed premises:</b></p> <ul style="list-style-type: none"> <li>- Nostro Lounge, 55 High Street, TW18 4QH (144ft)</li> <li>- Turtle Bay, 24 High Street, TW18 4EE (335ft)</li> <li>- The George, 2-8 High Street, TW18 4EE (0.1 mile)</li> <li>- London Stone, 14 Church Street, TW18 4EP (0.1 mile)</li> <li>- Slug &amp; Lettuce, 15-18 Clarence Street, TW18 4SU (0.2 miles)</li> <li>- Thames Side Brewery, 1 Hale Street, TW18 4UW (0.2 miles)</li> <li>- Last Hop, Thames Edge, 15-18 Clarence St, TW18 4SU (0.3 miles)</li> <li>- Three Tuns, 63 London Road, TW18 4BN (0.4 miles)</li> <li>- The Star Staines, 52 Kingston Road, TW18 4NL (0.4 miles)</li> </ul>	<p>excessive play. Particular regard via way of training is undertaken to deal with this to ensure that the vulnerable are protected from gambling related harm.</p> <ul style="list-style-type: none"> <li>- There is a notice displayed at the entrance to the AGC stating that no person under the age of 18 years will be admitted to the premises.</li> <li>- As an operator, we have a specific training program for staff to ensure that they are able to identify children and other vulnerable people to take appropriate action to be reasonably consistent with this objective, and to exclude them from the premises if required.</li> <li>- The frontage, layout, lighting and fitting out of the premises has been designed so as to not attract children or other vulnerable persons and the interior is laid out in line with the following policies: Staff Line of Sight Policy so that issues such as line of sight and the like are paramount.</li> <li>- In relation to promotional/ advertising material, it is designed to ensure that it doesn't encourage young people or children or vulnerable persons.</li> </ul>	
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		<p><b>Playgrounds &amp; Parks:</b></p> <ul style="list-style-type: none"> <li>- Playground, 5-8 Mill Mead, TW18 4DP (0.2 miles)</li> <li>- Birch Green, TW18 4HA (0.5 miles)</li> <li>- Lammas Lower Playground and Splash Park, Lammas Recreational Ground, TW18 4XZ (0.6 miles)</li> <li>- Moormede Play Area, Staines, TW18 4WA (0.6 miles)</li> </ul> <p><b>Leisure Centres/Community Centres:</b></p> <ul style="list-style-type: none"> <li>- Staines Community Centre, Thames St, TW18 4EA (0.1 mile)</li> <li>- <a href="#">Spelthorne Leisure Centre, Knowle Gardens, TW18 1AJ (1 mile)</a></li> </ul> <p><b>Bowling Alley, shopping centres, cinemas and hotels:</b></p> <ul style="list-style-type: none"> <li>- Two Rivers Shopping Centre, Mustard Mill Road, TW18 4WB (0.1 mile)</li> <li>- Premier Inn Staines upon Thames Hotel 90, 106 High Street, TW18 4DP (0.1 mile)</li> <li>- Elmsleigh Shopping Centre, 62 South Street, TW18 4QB (0.2 miles)</li> <li>- <a href="#">Vue Cinema, Mustard Mill Road, TW18 4BL (0.2 miles)</a></li> </ul> <p><b>Fast Food premises and cafes:</b></p> <ul style="list-style-type: none"> <li>- McDonalds, 62 High Street, TW18 4DY (23ft)</li> <li>- Burger King, 68 High Street, TW18 4DY (128ft)</li> <li>- Slim Chickens, 2 Norris Road, TW18 4UP (349ft)</li> <li>- KFC, 32 High Street, TW18 4EE (420ft)</li> <li>- 1517 Chicken Shop, 15 Church Street, TW18 4EN (0.1 mile)</li> <li>- Big Brother Burger House, 14 Church Street, TW18 4EP (0.1 mile)</li> <li>- Don Grill, 25 Church Street, TW18 4EN (0.1 mile)</li> <li>- Nandos, Mustard Mill Road, TW18 4BL (0.1 mile)</li> <li>- Five Guys, Two Rivers, TW18 4BL (0.1 mile)</li> </ul> <p><b>Toy Shops:</b></p>		
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		<ul style="list-style-type: none"> <li>- CeX, Unit 5, 88 High Street, TW18 4DP (358ft)</li> <li>- Sports Direct, Elmsleigh Shopping Centre, High Street, TW18 4PJ (0.2 miles)</li> <li>- GAME, Elmsleigh Shopping Centre, High Street, TW18 4PJ (0.2 miles)</li> </ul> <p><b>Bus Stops:</b></p> <ul style="list-style-type: none"> <li>- Thames Street Stop H (433ft)</li> <li>- Staines Bridge Stop C (0.1 mile)</li> <li>- Staines Bridge Stop Z (0.1 mile)</li> <li>- South Street Stop K (0.2 miles)</li> <li>- High Street Stop J (0.2 miles)</li> <li>- Two Rivers (0.2 miles)</li> <li>- Staines Police Station Stop M (0.3 miles)</li> <li>- Staines Police Station Stop U (0.3 miles)</li> <li>- Bridge Street Stop B (0.3 miles)</li> <li>- Staines Bus Station (0.3 miles)</li> <li>- Pinetrees Business Park (0.4 miles)</li> <li>- Staines Sainsburys (0.4 miles)</li> <li>- Sainsburys (0.5 miles)</li> </ul> <p><b><u>General Summary of Risks Considered:</u></b></p> <ul style="list-style-type: none"> <li>- Children entering site unnoticed or unchallenged.</li> <li>- Potentially Vulnerable people being able to gamble.</li> <li>- Failure to recognise signs associated with problem gambling or substantial changes in gambling style</li> <li>- Failure to provide information to players on responsible gambling.</li> <li>- Failure to properly administer the self-exclusion process and maintain its effectiveness thereafter, including breaches and reinstatements.</li> <li>- Customers gambling late at night while appearing fatigued or with reduced alertness may make poor decisions,</li> </ul>		
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Local Area Risk Assessment

		<p>increasing the risk of harm or exploitation.</p> <ul style="list-style-type: none"><li>- Customers experiencing financial hardship may engage in gambling that poses a greater risk of harm or exploitation.</li><li>- Customer may be asked to leave the premises for welfare, safety or safer-gambling reasons. Children passing the frontage may observe the customer once outside, which could cause unnecessary concern.</li><li>- Customers may have limited English, which could reduce their understanding of safer gambling information.</li><li>- Customers gambling late at night while appearing fatigued or with reduced alertness may make poor decisions, increasing the risk of harm or exploitation.</li></ul>		
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<p>2.2</p>	<p>Preventing Gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime</p>	<p>The Surrey Police crime data dashboard reveals over a one year period (April 2025 to March 2026) a total of 1980 crimes were reported across the Staines Town area.</p> <p>The highest reported crimes were Violence and Sexual Offences, Anti-Social Behaviour and Shoplifting interspersed with Public Order offences over the period of a year.</p> <p>The nature of the High Street reflects the type of incidents commonly associated with a busy town centre environment which experience retail activity and public interactions.</p> <p>None of these crimes are particularly linked with gambling premises.</p>	<ul style="list-style-type: none"> <li>- The CCTV system records continually whilst the premises is open for licensable activities and during all times when customers remain on the premises. It covers the gaming area, office and toilet entrance. All recordings are stored for a minimum of 31 days, with a date and time stamp. Recordings are made available immediately upon request to the Police or authorised officer throughout the entire 31 day period.</li> <li>- There is a spotter monitor at the Customer Service Desk as well as at the security desk at the front entrance.</li> <li>- There is a staff member who is conversant with the operation of the CCTV on the premises at all times when it is open.</li> <li>- We will employ the services of an external SIA door supervisor company for all its venues. The hours that the SIA door supervisor is employed is risk assessed.</li> <li>- There is a policy of banning any customers who engage in crime and disorder within or outside the premises.</li> <li>- There is a policy to refuse entry to customers who appear to be under the influence of alcohol or drugs</li> <li>- We ensure that the customer toilets are checked every hour for evidence of drug taking. These toilet checks are documented stating the time and member of</li> </ul>	<ul style="list-style-type: none"> <li>- We have implemented an AGC Counter Policy, that covers:             <ul style="list-style-type: none"> <li>a. The Customer Service Counter is positioned deliberately in a part of the venue that maximises customer viewing and total line of sight to the entrance/exit. Any area out of sight from the desk is covered by CCTV to offer a complete view of the venue.</li> <li>b. The Counter is not a cash desk in the traditional style, it is a 'Customer Service Counter'. This is due to our use of cash recyclers/change machines that are located on the floor within clear view of the desk. Furthermore, only a minimal amount of cash is required to be handled by staff at the 'Cashier Counter' and this is locked away. There are no safes within the desk area. In turn this minimises the risk of crime, theft etc.</li> <li>b. The design is open at the top for ease when communicating with customers.</li> <li>c. In relation to staffing levels, due to the staff operating method there is not specifically a requirement for a member of staff to be permanently situated at the counter.</li> <li>d. Full HD CCTV coverage of the whole premises can be viewed from the Service Counter Desk, as well as, the main office. A 'spotter' monitor is also positioned at the Customer Service Desk and Security Desk.</li> </ul> </li> </ul>
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Local Area Risk Assessment

			<p>staff who made the checks. Access to the toilet is controlled by staff.</p> <ul style="list-style-type: none"> <li>- Induction training is provided to all staff working at the premises and refresher training to every member of staff at least every six months. This training includes:             <ul style="list-style-type: none"> <li>a. the specific local risk to the licensing objectives that have been identified for these premises within this LARA;</li> <li>b. drug and alcohol awareness training to include homeless and street drinking;</li> <li>c. conflict management training provided by an instructor qualified to formally recognise national or equivalent standard on dealing with conflict.</li> <li>d. Basic anti money laundering training</li> </ul> </li> <li>- This staff training is recorded formally for each member of staff in their training records, and is available for presentation to the licensing authority immediately upon request.</li> <li>- If required will work closely with local police teams and the wider community to tackle any crime and disorder issues.</li> </ul>	<p>The system retains recordings for 31 days. All staff are trained in its use and this is detailed in the staff training log.</p> <ul style="list-style-type: none"> <li>e. In terms of 'Cash Handling', cash is not stocked at the desk. However, there is a need to restock the cash recyclers. This is carried out when the venue doors are closed to the public.</li> <li>f. There is a lockable room which is a staff safe haven, with CCTV for full viewing of the premise and offers various communication capabilities. Static panic alarms are positioned at the desk and in the office. Staff have to wear a personal alarm at all times when on duty.</li> <li>g. All staff will be trained on ensuring safe and compliant operation of the Customer Service Counter.</li> </ul> <p>- A CCTV Policy has been implemented. This policy covers:</p> <ul style="list-style-type: none"> <li>a. Sufficient coverage, as CCTV system is designed to cover the whole floor, all entrances, exits, entrance to toilets, the office and outside the venue.</li> <li>b. CCTV footage can be accessed locally or remotely. A written log is kept detailing any occurrences that require further investigation.</li> <li>c. All staff of the level of assistant manager and above are trained to be capable of using the system to the requirements of</li> </ul>
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Local Area Risk Assessment

				<p>the authorities.</p> <ul style="list-style-type: none"> <li>d. Footage is retained for 31 days and held on a hard drive. Recordings of the CCTV will be provided to Police Enforcement Officers or authorised persons on request.</li> <li>e. The CCTV is system is checked regularly by management and serviced by a third party on a bi- annual basis.</li> </ul> <p>– Staff Line of Sight Policy covers:</p> <ul style="list-style-type: none"> <li>a. The machine layout follows the perimeter of the venue to allow for enhanced customer visibility for staff and when viewing from CCTV. This includes the entrance/exit to the front and the emergency exit to the rear.</li> <li>b. All areas of the venue are covered by the CCTV to allow viewing of machines when required. This considers any potential blind spots around the structural pillars.</li> <li>c. Gaming Machines are not set out in a way to create blind spots and information signage is not covered by the position of the machines.</li> </ul> <p>– AGC Gaming Machines Policy covers:</p> <ul style="list-style-type: none"> <li>a. Gaming Machines are located around the perimeter of the premises to ensure that they are sufficiently monitored at all times, either by direct line of sight or CCTV coverage.</li> <li>b. Cash can go into a gaming</li> </ul>
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Local Area Risk Assessment

				<p>machine, but it cannot come out. This is due to the TITO (Tickets in, Tickets out) system employed on all machines. This is to minimise risk of crime.</p> <ul style="list-style-type: none"> <li>c. Machines are not set out in a way to create blind spots and information signage is not covered by the position of the machines.</li> <li>d. There is a robust Age verification policy in place. Although it is noted that higher category machines should be and are in a separate area, we would advise it is difficult to identify a higher category B3 machine to a lower category C as they look very similar.</li> <li>e. As an operator we are mindful that on occasion customers may lose control of their gambling which can lead to criminal damage, as such and in line with the condition on the premises licence the premises has weighted stools. Should any issues arise there will be clear lines of communication with the local Police.</li> </ul> <p>– Staff Safety &amp; Alarm Measures:</p> <ul style="list-style-type: none"> <li>a. Stationary panic alarms are located on the Customer Service Desk and in the office on the ground floor.</li> <li>b. When staff are roaming the floor away from the stationary locations of panic alarms, they are obliged to wear a personal panic attack alarm.</li> </ul>
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Local Area Risk Assessment

				<ul style="list-style-type: none"> <li>c. All staff have certified Conflict Management Training as detailed in the staff training log and on their HR portal. This Conflict Management Training is carried out annually.</li> <li>d. There is a lockable room that is a safe haven location for staff in a situation of emergency. HD CCTV monitor is also located here to allow for floor viewing. In addition, there is a landline telephone located at the Customer Service Desk.</li> </ul> <p>– AGC External Shop and Forecourt Management:</p> <ul style="list-style-type: none"> <li>a. In terms of entrance and egress points, we have a single entry/exit that is covered by CCTV therefore viewed by staff inside and a spotter monitor is positioned at the Customer Service Desk and Security Desk. Signs in the windows are displayed in English, which advise of house rules and note consumption of alcohol outside the entrance will result in no admittance.</li> <li>b. In addition, we will refuse entry to customers who appear to be under the influence of alcohol or drugs. Any person believed to be street drinking alcohol directly outside the premises will be banned from the premises. Any person suspected of engaging in crime and disorder in the immediate vicinity of the premises will also be banned.</li> </ul>
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Local Area Risk Assessment

<p>2.3</p>	<p>Ensuring that gambling is conducted in a fair and open way</p>		<ul style="list-style-type: none"> <li>- Terms and conditions signage are displayed.</li> <li>- Betting and game rules signage are displayed.</li> <li>- All notices regarding gambling advice or support information are displayed.</li> <li>- All staff are trained with the BACTA codes of practice.</li> <li>- Staff are aware of the terms and conditions, and relevant game rules associated with all gaming machines offered on the premises.</li> <li>- Customer complaint forms are available on request at the Support Desk. Staff are trained in the complaints procedure.</li> <li>- As an operator, we acknowledge that this licensing objective has a direct link with the successful achievement of the crime and disorder objective.</li> <li>- In terms of advertising, all advertising codes are adhered to in order to stop customers from being misled.</li> <li>- All machines are purchased from manufactures/suppliers licensed by the Gambling Commission.</li> <li>- Machines are maintained by qualified engineers.</li> <li>- Machines are turned off should a fault occur.</li> </ul>	<ul style="list-style-type: none"> <li>- We take staffing levels very seriously. Levels of staff are risk assessed.</li> <li>- This is to ensure that the entire premises is being monitored, including the monitoring of all gaming machines and entrances</li> <li>- We do not advertise its venues, activities or customer benefits using mainstream media, television, radio or newsprint etc.</li> <li>- The venue windows display screens that feature content of games available inside. All content displayed is produced by Gambling Commission recognised and regulated companies that are subjected to LCCP criteria and therefore must be designed and worded in a way not to attract children to gamble. All content displayed is checked and verified by our managers to ensure its appropriateness. We recognise the main advertising concerns are those that may be considered of interest to children, young persons and/or the vulnerable.</li> <li>- We offer no branded merchandise either for sale or as a prize.</li> <li>- Our AGC Provision of Gambling Harm Prevention Advice Policy covers:             <ul style="list-style-type: none"> <li>a. Gamcare gambling advice brochures are available throughout the premises (including at the Customer Service Counter, gaming machines and a discreet location) Additionally, A4 posters have been produced and</li> </ul> </li> </ul>
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Local Area Risk Assessment

				<p>displayed in English.</p> <p>b. To assist customers monitor or control their gambling, timer clocks are available for customers to use. In addition, some machines have inbuilt timer/spend limit devices built in by manufacturers. There is also the self- exclusion policy.</p>
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Local Area Risk Assessment

<b>Assessment Review</b>			
<b>Frequency of Review (enter time period e.g. 12 months)</b>	Every 3 years or major change in the legislation.	<b>Date Review Due</b>	
<b>Completed Risk Assessment brought to the attention of:</b>			
<b>Name (person responsible for premises and/or implementing control measures)</b>	<b>Position</b>	<b>Signature</b>	<b>Date the this assessment was brought to this persons attention</b>

## Appendix 1

### Local Area Profile for Gambling Risk - [Spelthorne Borough Council Statement of Gambling Policy 2025-2028](#)

*...Spelthorne's local area profile is an assessment of the local environment and identifies the key characteristics of the Borough.*

*It is intended that the local area profile will provide the Council's staff, operators, and public with a better understanding and awareness of the gambling-related risks in the Borough.*

*In this context, risk includes actual and potential risk and considers any future or emerging risks. Located in Surrey, approximately 16 miles from central London, Spelthorne benefits from good transport links to both London and the southeast via both the road and rail network.*

*In addition, the proximity of Heathrow Airport and easy access to Gatwick via the motorway network further serves to make the Borough accessible and attractive to both individuals and businesses. Covering an area of approximately 19.75 sq. miles, Spelthorne has a population of approximately 103,000 (2021 Census) compared to 95,598 in 2011.*

*Over that ten-year period there has been a marginal increase in the under 19's (from 22.7% to 22.9%), a decrease in the working age population from 59.8% to 58.8% and an increase in over 65's (from 17.4% up to 18%). It is home to over 7,500 businesses including BP, Pinewood (Shepperton Studios), dnata and Woodgroup Ltd. Kempton Park is a key visitor attraction. Located where the continuous built-up area of London gives way to a more dispersed pattern of urban areas and villages.*

*The urban area of the Borough occupies about 35% of the total area, while the land outside the urban area covers about 65% of the Borough and is designated as Green Belt. 22% of the Borough is water. Spelthorne adjoins the River Thames with the river frontage extending for 12 miles (the longest stretch of any council) and demarcates one of the boundaries of the Borough.*

*The Borough is also crossed by two tributaries, the Ash and the Colne. The Borough is flat and low lying and consequently liable to flooding. About 20% of the urban area is liable to flood in a 1 in 100-year flood event or surrounded by flood water and over 49% of the urban area would be flooded in a 1 in 1,000-year event.*

*The Local Area Profile itself is a separate document from this policy, this enables timely changes to the profile to be made as and when changes occur, or additional information is made available...*

[Spelthorne Population Data | Spelthorne Borough Council](#)

## Appendix 2

### Area Map Staines Town - Surrey Police Data Feed Example Map.

Click on a hotspot to see more details. Alternatively, [view as A-Z list](#).



Edit crime type and time period

All Crimes (194)

March 2026

194 crimes were reported here in March 2026

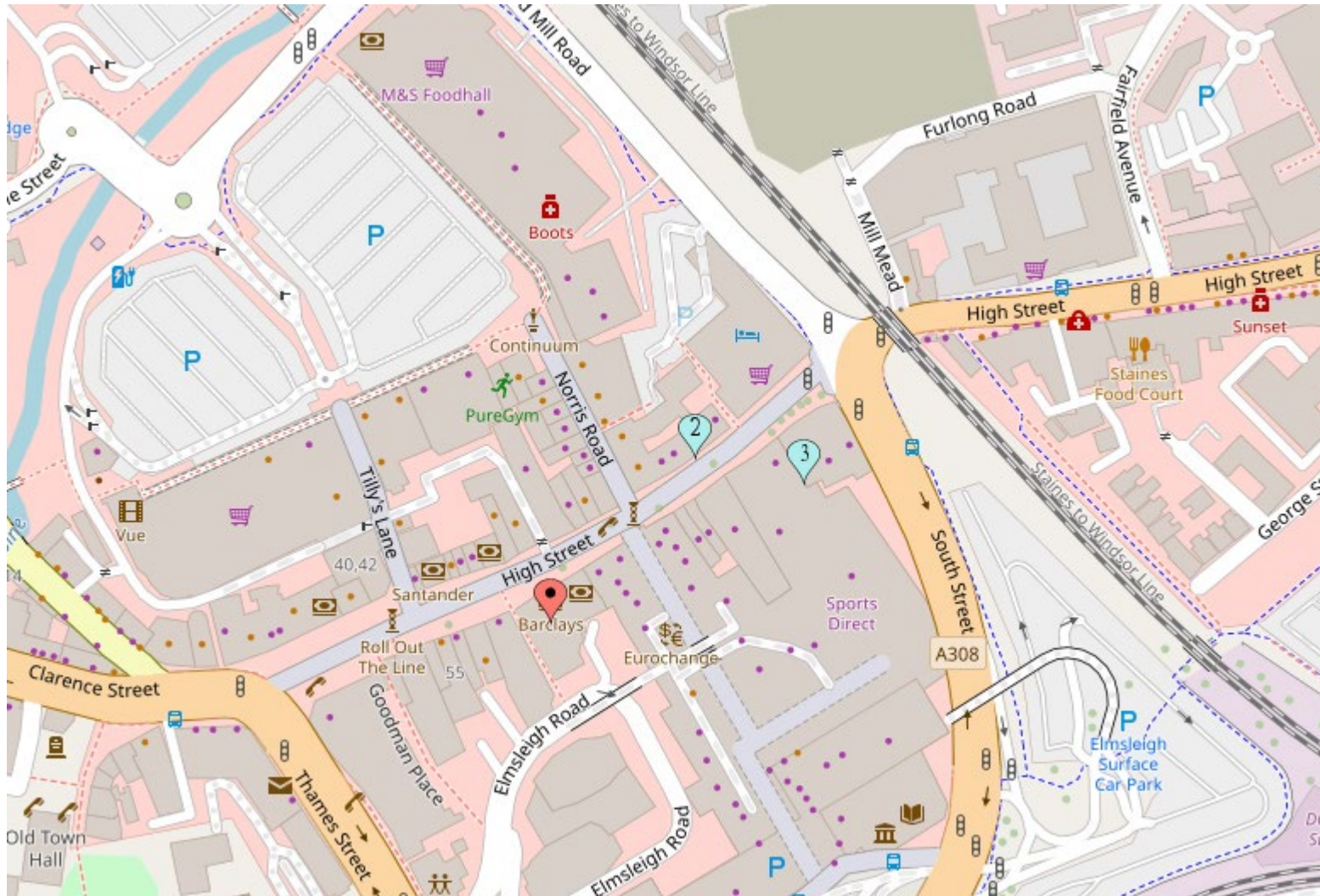
Violence and sexual offences	53
Anti-social behaviour	45
Shoplifting	36
All other crime	60




[View crime definitions](#)

[Download area crime data](#)

### Appendix 3

#### Map of Gambling Premises in the Area



	Premises
	Betfred, 76 High Street, TW18 4DP (256ft away)
	Admiral Slots, 109 High Street, TW18 4PQ (433ft away)

## Appendix 4

A physical walkaround of the area was conducted and the following reservations were noted:

- Explore Learning Staines, Unit T3, Two River Retail Park, TW18 4BL (0.1 mile) Supposedly within Two Rivers shopping centre though could not locate on walk round
- ABMA Business School, 42 London Road, TW18 4HF (0.4 miles) Could not locate
- MWB Staines upon Thames, Centurion House, London Road, TW18 4AX (0.4 miles) Appears to be Office Space
- London College of Innovation, Centurion House, TW18 4AX (0.4 miles) Appears to be Office Space
- Almondsbury Care, 44A Gresham Road, TW18 2AN (0.6 miles) Exceeds the 0.5 mile walking distance
- Former Site of Franks Snack Bar, High Street, TW18 4DP (0.1 mile) (Soup Kitchen) Could not locate
- St Peters Church Food Bank, Laleham Road, TW18 2DX (0.5 miles) Church present - no advertisement externally for food bank (check website)
- Cash Machine, 169 High Street, TW18 4PA (0.2 miles) Could not locate
- Metro ATM, TW18 4WB (0.2 miles) within Two Rivers Shopping Centre
- Cash Machine, 93 London Road, TW18 4HN (0.4 miles) Could not locate
- Stains Majesty Casino, 37-45 High Street, TW18 4QU (446ft) Could not locate - appears to be a Debenhams
- Spelthorne Leisure Centre, Knowle Gardens, TW18 1AJ (1 mile) - exceeds 0.5 mile walking distance
- Vue Cinema, Mustard Mill Road, TW18 4BL (0.2 miles) within Two Rivers Shopping Centre

## Appendix 5

Photographs of the surrounding area of 67 High Street.



Educational facilities in the area



*St Peter's Nursery, St Peter's Church Hall, Laleham Road, TW18 2DX*



*School Uniform Direct (Direct School Uniform), 23 High St, Staines TW18 4QY*

Places of worship



*St Peters Church, Laleham Road, TW18 2DX*

Pay Day Loan Shops, Cash Chequing Services & Pawnbrokers



*H&T Pawnbrokers, 53 High Street, Staines, TW18 4QH*



*Vape Mobile (WE BUY PHONES FOR CASH), 20 High St, Staines TW18 4EE*



*Cash Converters, 14 High Road, TW18 4EE*

Banks/ATMs



*Lloyds Bank, 73-75 High Street, TW18 4PP*



*Barclays Bank, 71 High Street, TW18 4PS*



*Santander, 59A High Street, TW18 4QH*



*Nationwide, 30 High Street, TW18 4EE*

Gambling Premises



*Betfred, 76 High Street, TW18 4DP*



*Admiral Slots, 109 High Street, TW18 4PQ*

Alcohol licensed premises:



*Nostrano Lounge, 55 Hight Street, TW18 4QH*



*Turtle Bay, 24 High Street, TW18 4EE*



*The George, 2-8 High Street, TW18 4EE*



*Slug & Lettuce, 15-18 Clarence Street, TW18 4SU*

**Leisure Centres/Community Centres**



*Staines Community Centre, Thames St, TW18 4EA*

**Bowling Alley, shopping centres, cinemas & hotels**



*Two Rivers Shopping Centre, Mustard Mill Road, TW18 4WB*



*Elmsleigh Shopping Centre, 62 South Street, TW18 4QB*



*Premier Inn Staines-upon-Thames, 90, 106 High St, Staines-upon-Thames, Staines TW18 4DP*

Toy Shops



*CeX, Unit 5, 88 High Street, TW18 4DP*