

Local Area Risk Assessment - 39 Church Road, Ashford

Premises number or licence number:	TBC
Region (if applicable):	Sunbury-on-Thames
Area (if applicable):	Sunbury East (Ward)
Premises Address:	39 Church Road, Ashford, TW15 2QF
Name of Assessor:	Sophia Anstey of Woods Whur
Colleagues Present:	
Date(s) of assessment:	30 th April 2026
Review date:	

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.

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This local area risk assessment has therefore been prepared in accordance with:

1. The Gambling Act 2005¹
2. Gambling Commission Guidance to Licensing Authorities²
3. Licence Conditions and Codes of Practice (LCCP)³
4. Spelthorne Borough Council Statement of Gambling Policy 2025-2028⁴

The three licensing objectives, set out in the Gambling Act 2005, require:

1. Prevention of gambling from being a source of crime or disorder, being associated with crime or disorder, or being used to support crime;
2. Ensuring that gambling is conducted in a fair and open way;
3. Protection of children and vulnerable persons from being harmed or exploited by gambling.

We believe 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; demonstrating that the premises is suitable for the location.

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

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 that are vulnerable.

Local Area & Socio Economic Profile:

Ashford is a suburban town in the borough of Spelthorne, Surrey, situated to the west of London and within close proximity to Heathrow Airport. The population of Ashford Town is estimated to be around 8,477 people, of which 52.6% are Female and 47.4% Male.⁵ Ashford developed from a small agricultural village into a residential town during the late 19th and 20th centuries, driven largely by the expansion of the rail network and improved road connectivity. Its growth has been accelerated with suburbanisation as London has expanded outwards. It has now been established as part of the capital's commuter belt. Ashford retains a predominantly residential character, with a modest town centre and a strong functional relationship to nearby economic hubs including Heathrow, Staines-upon-Thames and west London. Ashford is typical of an outer suburban development, consisting largely of semi-detached and detached housing, interspersed with small parades of shops, schools and community facilities. The area is generally perceived as quiet and family-oriented, with a relatively low-density built environment and access to local green spaces.

¹ [The Gambling Act 2005](#)

² <https://www.gamblingcommission.gov.uk/guidance/guidance-to-licensing-authorities>

³ [Licence Conditions and Codes of Practice](#)

⁴ [Spelthorne Statement of Gambling Policy 2025-2028](#)

⁵ [ONS – Mid-year estimates \(2024\)](#)

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Church Road represents a key local corridor that reflects the everyday character of the area. Rather than functioning as a major commercial high street, Church Road is primarily residential in nature, with pockets of local amenities such as convenience shops, small businesses and community services that cater to nearby residents. Its scale and activity levels are modest, reinforcing Ashford as a localised and community-focused environment rather than a regional destination.

Ashford is generally considered a stable, lower to middle class area with pockets of relative affluence. Its proximity to Heathrow and strong transport links to London contribute to a mixed employment base, including aviation-related jobs, logistics, retail and a significant number of commuters working in professional and administrative roles in London. Compared to the other towns within Surrey, Ashford is typically more affordable, making it attractive to first-time buyers, young families and key workers. Housing around Church Road reflects this pattern, with a mix of mid-20th-century family homes and some infill development, supporting a settled and relatively diverse population.

The ethnic profile of Ashford town is mixed, with 80.5% of residents identifying as 'White', alongside a number of minority communities including 11.3% 'Asian, Asian British or Asian Welsh', 3.8% 'Mixed or Multiple ethnic groups', 2.6% 'Black, Black British, Black Welsh, Caribbean or African' and the remaining 1.8% falling within 'Other ethnic group'.⁶ Sunni-Ed Limited is aware that mixed ethnic demographics within an area require the premises to be accessible and inclusive. This will involve clear safer gambling information, staff training and identifying differing vulnerability factors. These measures demonstrate a commitment to operating sensitively within a diverse area in accordance with the Gambling Act 2005 and Spelthorne Borough Council's Statement of Gambling Policy 2025-2028. The area also presents a varied religious makeup. 52.3% of the local population identify as Christian, 3.6% Muslim, 3.4% Hindu, 2.2% Sikh, 0.7% Buddhist and 0.2% Jewish, whilst 30.9% state they hold no religion and 6.0% decline to answer.⁷ The operator recognises the diverse religious demographic of the area and has established procedures within this assessment to ensure the premises operates in a manner which is respectful and sensitive to the wider community it serves. To mitigate any potential for harm or community concern arising from this demographic profile, staff are trained to identify and sensitively manage situations where individuals may exhibit signs of cultural conflict or distress in connection with the provision of gambling.

The economic activity status for Ashford Town shows that 62.0% of residents are economically active and in employment, with only 3.2% unemployed, while 34.7% are economically inactive.⁸ Turning to inspect Socio-economic Classification, 23.7% of individuals undertake 'Lower managerial, administrative and professional occupations', followed by 16.2% in 'Intermediate occupations' and 15.3% in 'Higher managerial, administrative and professional occupations'.⁹ These indicators imply that the local area boasts stable employment, structured working patterns and a significant professional demographic. Nevertheless, it is also clear that there exists a notable minority who may be at a greater risk of vulnerability driven by economic inactivity. In response, the operator has established a set of customer safeguards of which include providing safer gambling materials and robust staff training to identify and support vulnerable individuals. This ensures that the premises is responsive to local demographics and proactive in minimising gambling related harm.

The premises falls within Spelthorne 003C LSOA. According to the English indices of deprivation 2025, this LSOA was rated 6/10, where 1 is most deprived 10% of LSOA.¹⁰ Income is measured at 8/10, classifying the immediate area as a 'Wealthy Area', alongside Health Deprivation and Disability at 4/10 (1 is less

⁶ [ONS - Census 2021 - Ashford Town - Ethnic group](#)

⁷ [ONS - Census 2021 - Ashford Town - Religion](#)

⁸ [ONS - Census 2021 - Ashford Town - Economic Activity Status](#)

⁹ [ONS - Census 2021 - Socio-economic Classification \(NS-SeC\)](#)

¹⁰ [Accredited official statistics - English indices of deprivation 2025](#)

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deprived) which reflects a local population with above-average health vulnerabilities and income levels. Education, Skills and Training Deprivation is also at 3/10. Indicating that the area has a good standard of higher education attainment and above average skill levels.¹¹ However, crime rate is determined to be 7/10, delineating a high crime rate within the Ashford locality which the operator acknowledges increases the risk of the premises being associated with, or targeted by, crime and disorder. As this relates to one of the three licensing objectives under the Gambling Act 2005, the comparatively high crime rate of Ashford forms a key concern that has been acknowledged by the operator in preparing this assessment. Additionally, the Living Environment Deprivation is high at 7/10 and Barriers to Housing and Services also above average at 6/10, both signalling a degraded local environment and difficulty in accessing support services, which form key risk factors pertaining to those individuals who are experiencing gambling related harms within the locality.¹² In response to this overall profile, the operator will implement a number of considerate measures that are sensitive to the local context, including a robust Challenge 25 policy and ID verification procedures to guard against crime and disorder risks arising from the elevated crime environment and CCTV will be maintained in further recognition of the crime rate. The operator will maintain a list of local support services and will ensure staff are able to signpost customers appropriately, particularly given the above average barriers to accessing services identified in this area.

Protection of children and vulnerable persons

The licensing objective of ‘Protecting Children and Other Vulnerable Persons’ is given special consideration in this risk assessment. The operator has identified significant risk factors, including the possibility that children or individuals under the age of eighteen may try to enter the premises or engage in gambling activities; the possibility that children and vulnerable individuals may be exposed to gambling-related advertising, signage, or promotional materials in or around the premises; and the possibility that vulnerable individuals, such as those dealing with mental health issues, financial difficulties, or gambling addiction, may engage in harmful gambling. In order to mitigate any possible effects of the proposed AGC, the operator identified the elements of the local area profile that serve to heighten these risk factors and tailored a number of proportionate protective measures. Such controls will be implemented prior to the premises opening and will be maintained at all times to safeguard children, young people and vulnerable adults from exposure to gambling-related harm.

The protection of children is critical for the operator given the number of schools, playgrounds, parks, leisure centres, toy shops and other locations where children may frequent/congregate located in close proximity to the premises and the corresponding risk that children, young people, students, parents and carers may pass the premises throughout the day, particularly surrounding drop-off and pick-up times. These premises have been identified in the risk matrix below and the operator is also aware of the surrounding residential areas with a high concentration of children. This character of the area necessitates strict controls to prevent any children from accessing the premises. The operator has set out a number of specific controls to this effect, including that staff will actively monitor entrances/exits (trained to refuse and politely guide children and guardians away if they approach the premises), Challenge 25 will be enforced and a third party testing regime will be in place.

The presence of several deprivation indicators within the Ashford area connotes a likely significant presence of vulnerable persons. As determined by the Gambling Commission, vulnerable persons ‘*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, for example, mental health, a learning disability or substance misuse relating to alcohol or drugs*’ (Paragraph 5.17).¹³ The deprivation profile of the local area is directly relevant, as high crime levels, significant living environment deprivation and notable barriers to services all contribute to increased mental health pressures within the local population. These forms of deprivation often

¹¹ [Crystal Roof - Deprivation in Ashford](#)

¹² www.crystalroof.co.uk

¹³ [Guidance to licensing authorities - Licensing objectives](#)

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result in increased stress, fatigue and depression, each of which can impair decision making capacity and increase susceptibility to impulsive gambling. The operator acknowledges that substance misuse is also more prevalent in more deprived areas, where higher levels of alcohol and drug use undermine decision making by encouraging riskier behaviour and lowering inhibitions. The operator also recognises that limited access to support services in the area can lead to gambling-related harms escalating quickly and become more difficult to address. Accordingly, the operator will implement effective controls to protect individuals who may struggle to make informed or balanced decisions about gambling. Such procedures include continuous staff monitoring of the premises, prominent GamCare documentation at the premises, refusal policies against customers who appear to be under the influence of alcohol or drugs and extensive staff induction and refresher training on customer interactions.

We note that, in addition to the vulnerability indicators that may present more obviously, e.g. overly agitated or erratic behaviour within the AGC, there also exists 'invisible' vulnerabilities, and it is more likely than not that there may arise 'invisible' harms. This refers to hidden, often overlooked factors that may increase an individual's susceptibility to gambling problems. These harms may not manifest in physical symptoms and the operator recognises that gambling harm can be hidden, requiring specific training of staff to identify the more subtle vulnerability indicators that friends and family might miss. Identifying customers at risk of, or experiencing harm, can be complex, as each consumer is different and an indicator of harm for one customer may not be relevant to another's circumstances. Staff on the premises will be trained to recognise when an individual may be at risk by observing financial, time related and behavioural indicators, and by applying what is already known about that customer from their past behaviour and interactions. The operator will take a proactive rather than reactive approach to harm minimisation at this premises, with staff intervening at an early stage rather than awaiting the presentation of crisis indicators.

Evening and Night Time Economy:

The evening and night-time economy in Ashford and particularly around Church Road, is limited in scale and primarily serves local needs. Activity is centred on a small number of pubs, takeaways and casual dining options, with most venues closing relatively early compared to larger town centres. Church Road itself does not function as a nightlife destination; instead, it supports community-oriented activity such as local convenience retail, takeaways with occasional evening trade. A wider range of leisure or nightlife options are available nearby at Staines-upon-Thames and further into London, where there is a more diverse and vibrant offer. As a result, the night-time environment in Ashford is moderate, with limited late-night footfall.

The operator has carefully considered the implications of this profile in the context of the licensing objectives under the Gambling Act 2005. Whilst the absence of a significant night time economy in the immediate vicinity reduces some of the risks commonly associated with a more active evening and night time economy, such as intoxicated individuals seeking entry to gambling premises or crime and disorder spilling over from adjacent venues, the operator nonetheless recognises that this premises is not without risk and that a number of considerations will still arise from this environment. The operator notes the fact that crime in the area is high, with 2,188 offences logged in Ashford during the period April 2025 to March 2026¹⁴, of which the risk does not diminish simply because the area exhibits a quieter evening economy. The operator must still consider the risk that the premises may be a target for opportunistic crime as well as the fact that intoxicated or high risk individuals may pass and attempt to enter the premises. Accordingly, a number of measures are in place to ensure that any potential issues relating to the operation of the premises within the Evening and Night Time Economy are mitigated, including staff closely monitoring the entrance, CCTV maintained and specific training in the refusal of entry to and removal of individuals who appear to be under the influence of alcohol or drugs.

¹⁴ www.police.uk/ashford

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Overview:

Ashford and Church Road within it, can be characterised as a stable suburban area shaped by its proximity to London and Heathrow. Its development reflects broader patterns of outer London growth, combining accessibility with relatively affordable housing and a strong residential focus. The socio-economic profile is mixed but generally stable, and the local evening economy is modest and community-oriented, reinforcing the area as a practical and liveable suburban environment rather than a commercial or nightlife hub.

Having undertaken a thorough assessment of the local area in which the proposed Adult Gaming Centre is to be located, the operator is confident that the risks identified within this document are capable of being effectively managed through the measures set out below. The assessment has considered the diverse religious and belief makeup of the Ashford area and the character of the local evening and night-time economy, addressed the socioeconomic profile of the Spelthorne 003C LSOA and has given particular weight to the protection of vulnerable persons. The operator submits that this Local Area Risk Assessment demonstrates a comprehensive, evidence based engagement with the three licensing objectives of the Gambling Act 2005 and that the control measures identified are proportionate, appropriate to the specific characteristics of this locality and sufficient to ensure that the premises will be operated in accordance with Spelthorne's Statement of Gambling Policy 2025 to 2028.

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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 educational facilities in the area, including but not limited to within half a mile of the site as follows:</p> <ul style="list-style-type: none"> - Ashford Library, Chrich Road, TW15 2XB (282ft) - Clarendon Primary School, Knapp Road, TW15 2HZ (0.2 miles) - Kelly Dixon Dance Academy, Church Road, TW15 2TT (0.2 miles) - Language School, The Atrium, Church Lane, TW15 2PH (0.2 miles) - Kumon Maths & English, 6 Woodthorpe Road, TW15 2RY (0.2 miles) - Happy tots pre-school, Stanwell Road, TW15 3QL (0.3 miles) - St Michaels Primary School, Feltham Hill Road, TW15 2DG (0.4 miles) - St James All boys School, 10 Church Lane, TW15 3DZ (0.4 miles) - Brooklands Technical college, Standwell Road, TW15 3DU (0.5 miles) - Thomas Knyvett College, Standwell Road, TW15 3DU (0.5 miles) <p>There are no Student Accommodation facilities within the immediate area.</p> <p>Support and Educational services for teenagers and young adults are provided at:</p> <ul style="list-style-type: none"> - We Make Footballers, St James Boiys School, 10 Church Road, TW15 3DZ (0.4 miles) - Stagecoach, Stanwell Road, TW15 3DU (0.6 miles) <p>Support for the homeless (including hostels) or potentially vulnerable:</p> <ul style="list-style-type: none"> - The Salvation Army, Woodthorpe Road, TW15 3JY (0.5 miles) <p>Care Homes:</p>	<ul style="list-style-type: none"> - Third party testing by (Check Policy) on age restricted sales systems takes place by testing all working shifts on a regular basis. - The total number of staff and licensed door supervisors is risk assessed to meet the needs of the LCCP conditions set for the venue. - There is a policy to refuse entry to customers who appear to be under the influence of alcohol or drugs. - 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. - Prominent GamCare documentation is displayed at the premises. These notices are displayed at the premises. - 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. - Staff are trained to identify and 	<ul style="list-style-type: none"> - 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. - The management will implement safeguarding training to ensure that staff have the basic awareness of safeguarding children and other vulnerable adults. - 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". - Staff to be made aware of child truancy during school times, i.e. being aware that: <ol style="list-style-type: none"> a. Children should not be in the premises. b. The school day is between 0830 - 1530 and staff should be extra vigilant during these periods. Currently there is no issue with this, should there be then we

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		<ul style="list-style-type: none"> - Echelforde Care Home, College Way, TW15 2XG (0.2 miles) - Cedars Care Home, 16 Fordbridge Road, TW15 2SG (0.2 miles) - Allium Home Care Surrey Home Care Agency, 87 Church Road, TW15 2PE (0.2 miles) <p>There are no facilities for problem gambling in the vicinity.</p> <p>Drug and Alcohol Treatment Centres:</p> <ul style="list-style-type: none"> - Foundations Recovery, Twickenham, TW2 5RF (6 miles) <p>Job centres/employment agencies in the close area:</p> <ul style="list-style-type: none"> - Bridge Recruitment Services Ltd, Church Road, TW15 2UD (92ft) - First Choice Corporate Ltd, 8 Station Approach, TW15 2QN (0.3 miles) - Pentagon Human Resources, 21 Woodthorpe Road, TW15 2RP (0.3 miles) - Podrive Personnel Ltd, 13 Feltham Road, TW15 1DQ (0.5 miles) <p>Family Service Centres or Support Groups:</p> <ul style="list-style-type: none"> - Wise Blue Owl Family Counselling, 13 Clarendon Road, TW15 2QJ (0.2 miles) - Clarendon Family Centre, 1 Knapp Road, TW15 2HZ (0.2 miles) - Ultrasound Direct Heathrow, 10 Station Roadm TW15 2UP (0.2 miles) <p>There are no Housing Projects within the immediate are of the premises.</p> <p>Soup Kitchen/Food Bank:</p> <ul style="list-style-type: none"> - The Salvation Army, Woodthorpe Road, TW15 3JY (0.5 miles) <p>Places of Worship:</p> <ul style="list-style-type: none"> - Ashford Congregational Church, Clarendon Road, Ashford, TW15 2QA (322ft) - Ashford Baptist Church, Church Road, TW15 2TT (0.2 miles) 	<p>interact with any customers who are identified as playing more than one gaming machine, including tablet machines at the same time.</p> <ul style="list-style-type: none"> - 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. - 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. - Staff presence at all times, supported by continuous floor coverage, ensuring that lone customers or those presenting signs of fatigue do not go unmonitored. - Staff are trained on the following: <ul style="list-style-type: none"> a. observing changes in pace, attention or responsiveness, b. identifying prolonged sessions of play where tiredness may emerge, c. engaging with customers showing signs of reduced focus or slower reactions, d. applying the Identify–Interact–Evaluate framework consistently throughout the day, and e. recording fatigue-related observations where welfare concerns are identified. 	<p>will engage with local schools.</p> <ul style="list-style-type: none"> - 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"> a. Developing relationships between a child and an older person. b. Children in the company of a group of older persons. c. Children regularly attending premises and meeting with a number of different older persons, particularly where older persons may be facilitating gambling for children. d. Children outside of licensed premises developing relationships with an older person, particularly an older person facilitating gambling for children. e. Children leaving the locality of the premises with older persons, particularly with a group of older persons. f. Children looking uncomfortable in the company of, or leaving with, older persons, particularly groups of older persons. <p>** Although obviously it is noted that our AGC is an over 18 premises only.</p> <ul style="list-style-type: none"> - In addition and in line with the Spelthorne policy, there are Safeguarding Policies and Procedures for both Adults and for Children.
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		<ul style="list-style-type: none"> - Woodthorpe Methodist Church, Clarendon Road, TW15 2QR (0.2 miles) - UK Teamspirit, Spiritist Centre, Princes Road, TW15 2LT (0.2 miles) - Saint Michaels Catholic Church, 112 Clarendon Road, TW15 2QD (0.2 miles) - The Parish Church St Matthew, Church Road, TW15 2NY (0.3 miles) - St Hildas Church, Stanwell Road, TW15 3QL (0.4 miles) <p>Pay Day Loan Shops or Cash Chequing Services:</p> <ul style="list-style-type: none"> - Auto Advance Logbook Loans, 45 Church Road, TW15 2TQ (92ft) <p>Banks/ATMs:</p> <ul style="list-style-type: none"> - Sainsburys ATM, 6 New Parade, Church Road, TW15 2UF (328ft) - Tesco Bank ATM, Church Road, TW15 2UT (463ft) - Natwest Ashford, 5 Woodthorpe Road, TW15 2RN (0.2 miles) - ATM, Coop Food, Church Road, TW15 2TX (0.2 miles) - ARM Londis, 83 Church Road, TW15 2PE (0.2 miles) - ATM, Jb's premier, 89 Church Road, TW15 2PE (0.2 miles) - ATM, 91 Fordbridge Road, TW15 2SS (0.5 miles) <p>Gambling Premises:</p> <ul style="list-style-type: none"> - William Hill, Unit 1, The Atrium, TW15 2UD (344ft) - Coral, 6 Church Road, TW15 2UT (397ft) <p>Alcohol licensed premises:</p> <ul style="list-style-type: none"> - The Kings Head, 4 Feltham Road, TW15 2EB (0.4 miles) - The Kings Fairway, 91 Fordbridge Road, TW15 2SS (0.5 miles) <p>Playgrounds & Parks:</p> <ul style="list-style-type: none"> - The Kub Club (indoor playground), 112 Clarendon Road, TW15 2QD (0.2 miles) - Elmsway Tennis Club, Elmsway, TW15 	<ul style="list-style-type: none"> - 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. 	
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		<p>2SH (0.3 miles)</p> <ul style="list-style-type: none"> - Ashford Recreation Ground, 3 Rosary Gardens, TW15 1BX (0.6 miles) <p>Leisure Centres/Community Centres:</p> <ul style="list-style-type: none"> - Energie Fitness, 40 -42 Church Road, TW15 2UY (0.2 miles) - Fordbridge Community Centre, Clarendon Road, TW15 2QA (0.2 miles) - Town Tree Hall Community Centre, TW15 2EW (0.5 miles) <p>Bowling Alley, shopping centres, cinemas:</p> <ul style="list-style-type: none"> - Nearest Cinema is Vue Cinema in Staines or Cineworld, Feltham - Nearest Shopping Centre is Manor Retail Park Feltham, Staines upon Thames or Sunbury Cross - all over 2 miles away. <p>Fast Food premises and cafes:</p> <ul style="list-style-type: none"> - Wimpy, 4 Church Road, TW15 2TY (43ft) - Costa, 33 Church Road, TW15 2UD (154ft) - Two Brothers Fish House, 20 Church Road, TW15 2UY (194ft) - NXT LVL Chicken and Cookies, New Parade, TW15 2UB (243ft) - Fireaway, 1 New Parade, TW15 2UF (256ft) - Viva Namaste, 18 Church Road, TW15 2UY (272ft) - Chicken City, 2 Church Road, TW15 2UT (443ft) - Chaicoffee, 19 Church Road, TW15 2UG (0.1 mile) - Little Bodrum, 7 Church Road, YW15 2TX (0.1 mile) - M2 Pizza Pasta, 15 Church Road, TW15 2UG (0.1 mile) - KFC, Unit 3 Church Road, TW15 2UT (0.1 mile) - Subway, Unit 2 Church Road, TW15 2UT (0.1 mile) - Elle & Fee, 19 Woodthorpe Road, TW15 2RY (0.2 miles) - Costa Ashford 2, 79 Church Road, TW15 2PE (0.2 miles) 		
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		<ul style="list-style-type: none"> - Thai Go, 22 Woodthorpe Road, TW15 2RY (0.2 miles) - Bright Cake, 2 Fir Tree Place, TW15 2PH (0.2 mile) - Burger Plus, 2 Woodthorpe Road, TW15 2RY (0.2 miles) - Anatolia, 12 Woodthorpe Road, TW15 2RY (0.2 miles) - Burger Junction, 1B Woodthorpe Road, TW15 2RL (0.2 miles) - Marhabaa Food, 4 Central Arcade, TW15 2RL (0.2 miles) - VMN Fired Chicken, 4 Fir Tree Place, TW15 2PH (0.2 miles) - Golden Grill, 81A Church Road, TW15 2PE (0.2 miles) - Top Wok, 11 Station Approach, TW15 2QN (0.3 miles) <p>Bus Stops:</p> <ul style="list-style-type: none"> - Dudley Road (328ft) - War Memorial (0.2 miles) - Ashford (0.3 miles) - Ashford Railway Station (0.3 miles) - Gables Avenue (0.4 miles) - Stanwell Road (0.4 mile) - Town Tree Road (0.4 miles) - Station Crescent (0.4 miles) <p><u>General Summary of Risks Considered:</u></p> <ul style="list-style-type: none"> - Children entering site unnoticed or unchallenged. - Potentially Vulnerable people being able to gamble. - Failure to recognise signs associated with problem gambling or substantial changes in gambling style - Failure to provide information to players on responsible gambling. - Failure to properly administer the self-exclusion process and maintain its 		
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		<p>effectiveness thereafter, including breaches and reinstatements.</p> <ul style="list-style-type: none"> - Customers gambling late at night while appearing fatigued or with reduced alertness may make poor decisions, increasing the risk of harm or exploitation. - Customers experiencing financial hardship may engage in gambling that poses a greater risk of harm or exploitation. - 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. - Customers may have limited English, which could reduce their understanding of safer gambling information. - Customers gambling late at night while appearing fatigued or with reduced alertness may make poor decisions, increasing the risk of harm or exploitation. 		
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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 2188 crimes were reported across the Ashford area.</p> <p>The highest reported crimes were Violence and Sexual Offences, Shoplifting and ASB with occasional Public Order Offences over the period of a year. ¹⁵</p> <p>The nature of Church Road reflects the type of incidents commonly associated with a high street environment which experience localised retail activity and public interactions.</p> <p>None of these crimes are particularly linked with gambling premises.</p>	<ul style="list-style-type: none"> - 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. - 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"> a. the specific local risk to the licensing objectives that have been identified for these premises within this LARA; b. drug and alcohol awareness training to include homeless and street drinking; c. conflict management training provided by an instructor qualified to formally recognise national or equivalent standard on dealing with conflict. d. Basic anti money laundering training - 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. 	<ul style="list-style-type: none"> - We will implement a Terrorism Risk Assessment concerning protective security advice in relation to counter-terrorism should it be required. - During the late-night operation of the premises enhanced control measures will be in place such as: <ul style="list-style-type: none"> - confirming door control protocols - availability of mag-lock facilities. - SIA-registered security where indicated by risk assessment. - 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. - Staff presence at all times, supported by continuous floor coverage, ensuring that lone customers or those presenting signs of fatigue do not go unmonitored.
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¹⁵ www.police.uk

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<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"> - Terms and conditions signage are displayed. - Betting and game rules signage is displayed. - All notices regarding gambling advice or support information are displayed. - All staff are trained with the BACTA codes of practice. - Staff are aware of the Golden Slots terms and conditions, and relevant game rules associated with all gaming machines offered on the premises. - Customer complaint forms are available on request at the Support Desk. Staff are trained in the complaints procedure. - As an operator, we acknowledge that this licensing objective has a direct link with the successful achievement of the crime and disorder objective. - In terms of advertising, all advertising codes are adhered to in order to stop customers from being misled. 	
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Gambling Operation & Physical Design (Internal and External)				
Licensing Objective		Risks	Existing Control Measures	Further Controls Recommended
2.1	Protecting children and other vulnerable persons from being harmed or exploited by gambling	<p>There are a number of educational facilities in the area, including but not limited to within half a mile of the site as follows:</p> <ul style="list-style-type: none"> - Ashford Library, Chrich Road, TW15 2XB (282ft) - Clarendon Primary School, Knapp Road, TW15 2HZ (0.2 miles) - Kelly Dixon Dance Academy, Church Road, TW15 2TT (0.2 miles) - Language School, The Atrium, Church Lane, TW15 2PH (0.2 miles) - Kumon Maths & English, 6 Woodthorpe Road, TW15 2RY (0.2 miles) - Happy tots pre-school, Stanwell Road, TW15 3QL (0.3 miles) - St Michaels Primary School, Feltham Hill Road, TW15 2DG (0.4 miles) - St James All boys School, 10 Church Lane, TW15 3DZ (0.4 miles) - Brooklands Technical college, Standwell Road, TW15 3DU (0.5 miles) - Thomas Knyvett College, Standwell Road, TW15 3DU (0.5 miles) <p>There are no Student Accommodation facilities within the immediate area.</p> <p>Support and Educational services for teenagers and young adults are provided at:</p> <ul style="list-style-type: none"> - We Make Footballers, St James Boiys School, 10 Church Road, TW15 3DZ (0.4 miles) - Stagecoach, Stanwell Road, TW15 3DU (0.6 miles) <p>Support for the homeless (including hostels) or potentially vulnerable:</p> <ul style="list-style-type: none"> - The Salvation Army, Woodthorpe Road, TW15 3JY (0.5 miles) 	<ul style="list-style-type: none"> - There is comprehensive CCTV in place. - 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. - 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. - There is a spotter monitor at the Customer Service Desk and Security Desk. - There is a staff member who is conversant with the operation of the CCTV on the premises at all times when it is open. - All notices regarding gambling advice or support information are displayed in the premises. - All public signage/documentation relating to age restrictions, 	<ul style="list-style-type: none"> - 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 - We will implement safeguarding training to ensure that staff have the basic awareness of safeguarding children and other vulnerable adults. - 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”. - Staff to be made aware of child truancy during school times, i.e. being aware that: <ul style="list-style-type: none"> a. Children should not be in the premises. b. The school day is between 0830 - 1530 and staff should be extra vigilant during these periods. - Should we recognise issue with this, we will engage with local schools. - Management controls will be

Local Area Risk Assessment

		<p>Care Homes:</p> <ul style="list-style-type: none"> - Echelforde Care Home, College Way, TW15 2XG (0.2 miles) - Cedars Care Home, 16 Fordbridge Road, TW15 2SG (0.2 miles) - Allium Home Care Surrey Home Care Agency, 87 Church Road, TW15 2PE (0.2 miles) <p>There are no facilities for problem gambling in the vicinity.</p> <p>Drug and Alcohol Treatment Centres:</p> <ul style="list-style-type: none"> - Foundations Recovery, Twickenham, TW2 5RF (6 miles) <p>Job centres/employment agencies in the close area:</p> <ul style="list-style-type: none"> - Bridge Recruitment Services Ltd, Church Road, TW15 2UD (92ft) - First Choice Corporate Ltd, 8 Station Approach, TW15 2QN (0.3 miles) - Pentagon Human Resources, 21 Woodthorpe Road, TW15 2RP (0.3 miles) - Podrive Personnel Ltd, 13 Feltham Road, TW15 1DQ (0.5 miles) <p>Family Service Centres or Support Groups:</p> <ul style="list-style-type: none"> - Wise Blue Owl Family Counselling, 13 Clarendon Road, TW15 2QJ (0.2 miles) - Clarendon Family Centre, 1 Knapp Road, TW15 2HZ (0.2 miles) - Ultrasound Direct Heathrow, 10 Station Roadm TW15 2UP (0.2 miles) <p>There are no Housing Projects within the immediate are of the premises.</p> <p>Soup Kitchen/Food Bank:</p> <ul style="list-style-type: none"> - The Salvation Army, Woodthorpe Road, TW15 3JY (0.5 miles) <p>Places of Worship:</p> <ul style="list-style-type: none"> - Ashford Congregational Church, Clarendon Road, Ashford, TW15 2QA (322ft) 	<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"> - 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. - Third party testing by (Check Policy) on age restricted sales systems takes place by testing all working shifts on a regular basis. - 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. - Staff receive an acoustic alert on the opening and closing of the entrance door. - The total number of staff and licensed door supervisors is risk assessed to meet the needs of the LCCP conditions set for the venue. - There is a policy to refuse entry to customers who appear to be under the influence of alcohol or drugs. - We ensure that the customer toilets are checked every hour for evidence of drug taking. These toilet checks are documented 	<p>implemented to ensure that staff are trained in relation to the risk indicators set out below:</p> <ol style="list-style-type: none"> a. Developing relationships between a child and an older person. b. Children in the company of a group of older persons. c. Children regularly attending premises and meeting with a number of different older persons, particularly where older persons may be facilitating gambling for children. d. Children outside of licensed premises developing relationships with an older person, particularly an older person facilitating gambling for children. e. Children leaving the locality of the premises with older persons, particularly with a group of older persons. f. Children looking uncomfortable in the company of, or leaving with, older persons, particularly groups of older persons. <p>** Although obviously it is noted that our AGC is an over 18 premises only.</p> <ul style="list-style-type: none"> - In addition and in line with the Spelthorne policy, there are Safeguarding Policies and Procedures for both Adults and for Children. - 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,
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Local Area Risk Assessment

		<ul style="list-style-type: none"> - Ashford Baptist Church, Church Road, TW15 2TT (0.2 miles) - Woodthorpe Methodist Church, Clarendon Road, TW15 2QR (0.2 miles) - UK Teamspirit, Spiritist Centre, Princes Road, TW15 2LT (0.2 miles) - Saint Michaels Catholic Church, 112 Clarendon Road, TW15 2QD (0.2 miles) - The Parish Church St Matthew, Church Road, TW15 2NY (0.3 miles) - St Hildas Church, Stanwell Road, TW15 3QL (0.4 miles) <p>Pay Day Loan Shops or Cash Chequing Services:</p> <ul style="list-style-type: none"> - Auto Advance Logbook Loans, 45 Church Road, TW15 2TQ (92ft) <p>Banks/ATMs:</p> <ul style="list-style-type: none"> - Sainsburys ATM, 6 New Parade, Church Road, TW15 2UF (328ft) - Tesco Bank ATM, Church Road, TW15 2UT (463ft) - Natwest Ashford, 5 Woodthorpe Road, TW15 2RN (0.2 miles) - ATM, Coop Food, Church Road, TW15 2TX (0.2 miles) - ARM Londis, 83 Church Road, TW15 2PE (0.2 miles) - ATM, Jb's premier, 89 Church Road, TW15 2PE (0.2 miles) - ATM, 91 Fordbridge Road, TW15 2SS (0.5 miles) <p>Gambling Premises:</p> <ul style="list-style-type: none"> - William Hill, Unit 1, The Atrium, TW15 2UD (344ft) - Coral, 6 Church Road, TW15 2UT (397ft) <p>Alcohol licensed premises:</p> <ul style="list-style-type: none"> - The Kings Head, 4 Feltham Road, TW15 2EB (0.4 miles) - The Kings Fairway, 91 Fordbridge Road, TW15 2SS (0.5 miles) <p>Playgrounds & Parks:</p> <ul style="list-style-type: none"> - The Kub Club (indoor playground), 112 	<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"> - Prominent GamCare documentation is displayed at the premises. These notices are displayed in the premises. - 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. - Any tea/coffee drinks facilities will be provided for playing customers only. - No customers are allowed to leave bags or other belongings in the premises. - 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. - We have considered interaction with customers as a priority and therefore maintain good staffing levels, that are risk assessed. - 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 	<p>what needs to be recorded and when matters should be reported internally and externally.</p>
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Local Area Risk Assessment

		<p>Clarendon Road, TW15 2QD (0.2 miles)</p> <ul style="list-style-type: none"> - Elmsway Tennis Club, Elmsway, TW15 2SH (0.3 miles) - Ashford Recreation Ground, 3 Rosary Gardens, TW15 1BX (0.6 miles) <p>Leisure Centres/Community Centres:</p> <ul style="list-style-type: none"> - Energie Fitness, 40 -42 Church Road, TW15 2UY (0.2 miles) - Fordbridge Community Centre, Clarendon Road, TW15 2QA (0.2 miles) - Town Tree Hall Community Centre, TW15 2EW (0.5 miles) <p>Bowling Alley, shopping centres, cinemas:</p> <ul style="list-style-type: none"> - Nearest Cinema is Vue Cinema in Staines or Cineworld, Feltham - Nearest Shopping Centre is Manor Retail Park Feltham, Staines upon Thames or Sunbury Cross - all over 2 miles away. <p>Fast Food premises and cafes:</p> <ul style="list-style-type: none"> - Wimpy, 4 Church Road, TW15 2TY (43ft) - Costa, 33 Church Road, TW15 2UD (154ft) - Two Brothers Fish House, 20 Church Road, TW15 2UY (194ft) - NXT LVL Chicken and Cookies, New Parade, TW15 2UB (243ft) - Fireaway, 1 New Parade, TW15 2UF (256ft) - Viva Namaste, 18 Church Road, TW15 2UY (272ft) - Chicken City, 2 Church Road, TW15 2UT (443ft) - Chaiicoffee, 19 Church Road, TW15 2UG (0.1 mile) - Little Bodrum, 7 Church Road, YW15 2TX (0.1 mile) - M2 Pizza Pasta, 15 Church Road, TW15 2UG (0.1 mile) - KFC, Unit 3 Church Road, TW15 2UT (0.1 mile) - Subway, Unit 2 Church Road, TW15 2UT (0.1 mile) - Elle & Fee, 19 Woodthorpe Road, TW15 2RY (0.2 miles) 	<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"> - 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. - 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. - 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. - In relation to promotional/ advertising material, it is designed to ensure that it doesn't encourage young people or children or vulnerable persons. 	
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Local Area Risk Assessment

		<ul style="list-style-type: none"> - Costa Ashford 2, 79 Church Road, TW15 2PE (0.2 miles) - Thai Go, 22 Woodthorpe Road, TW15 2RY (0.2 miles) - Bright Cake, 2 Fir Tree Place, TW15 2PH (0.2 mile) - Burger Plus, 2 Woodthorpe Road, TW15 2RY (0.2 miles) - Anatolia, 12 Woodthorpe Road, TW15 2RY (0.2 miles) - Burger Junction, 1B Woodthorpe Road, TW15 2RL (0.2 miles) - Marhabaa Food, 4 Central Arcade, TW15 2RL (0.2 miles) - VMN Fired Chicken, 4 Fir Tree Place, TW15 2PH (0.2 miles) - Golden Grill, 81A Church Road, TW15 2PE (0.2 miles) - Top Wok, 11 Station Approach, TW15 2QN (0.3 miles) <p>Bus Stops:</p> <ul style="list-style-type: none"> - Dudley Road (328ft) - War Memorial (0.2 miles) - Ashford (0.3 miles) - Ashford Railway Station (0.3 miles) - Gables Avenue (0.4 miles) - Stanwell Road (0.4 mile) - Town Tree Road (0.4 miles) - Station Crescent (0.4 miles) <p><u>General Summary of Risks Considered:</u></p> <ul style="list-style-type: none"> - Children entering site unnoticed or unchallenged. - Potentially Vulnerable people being able to gamble. - Failure to recognise signs associated with problem gambling or substantial changes in gambling style - Failure to provide information to players on responsible gambling. 		
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		<ul style="list-style-type: none"> - Failure to properly administer the self-exclusion process and maintain its effectiveness thereafter, including breaches and reinstatements. - Customers gambling late at night while appearing fatigued or with reduced alertness may make poor decisions, increasing the risk of harm or exploitation. - Customers experiencing financial hardship may engage in gambling that poses a greater risk of harm or exploitation. - 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. - Customers may have limited English, which could reduce their understanding of safer gambling information. - Customers gambling late at night while appearing fatigued or with reduced alertness may make poor decisions, increasing the risk of harm or exploitation. 		
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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 2188 crimes were reported across the Ashford area.</p> <p>The highest reported crimes were Violence and Sexual Offences, Shoplifting and ASB with occasional Public Order Offences over the period of a year.</p> <p>The nature of Church Road reflects the type of incidents commonly associated with a high street environment which experience localised retail activity and public interactions.</p> <p>None of these crimes are particularly linked with gambling premises.</p>	<ul style="list-style-type: none"> - 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. - There is a spotter monitor at the Customer Service Desk as well as at the security desk at the front entrance. - There is a staff member who is conversant with the operation of the CCTV on the premises at all times when it is open. - 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. - There is a policy of banning any customers who engage in crime and disorder within or outside the premises. - There is a policy to refuse entry to customers who appear to be under the influence of alcohol or drugs - 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 	<ul style="list-style-type: none"> - We have implemented an AGC Counter Policy, that covers: <ul style="list-style-type: none"> 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. 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. b. The design is open at the top for ease when communicating with customers. 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. 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.
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			<p>staff who made the checks. Access to the toilet is controlled by staff.</p> <ul style="list-style-type: none"> - 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"> a. the specific local risk to the licensing objectives that have been identified for these premises within this LARA; b. drug and alcohol awareness training to include homeless and street drinking; c. conflict management training provided by an instructor qualified to formally recognise national or equivalent standard on dealing with conflict. d. Basic anti money laundering training - 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. - If required will work closely with local police teams and the wider community to tackle any crime and disorder issues. 	<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"> 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. 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. g. All staff will be trained on ensuring safe and compliant operation of the Customer Service Counter. <p>- A CCTV Policy has been implemented. This policy covers:</p> <ul style="list-style-type: none"> 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. b. CCTV footage can be accessed locally or remotely. A written log is kept detailing any occurrences that require further investigation. c. All staff of the level of assistant manager and above are trained to be capable of using the system to the requirements of
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				<p>the authorities.</p> <ul style="list-style-type: none"> 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. e. The CCTV is system is checked regularly by management and serviced by a third party on a bi- annual basis. <p>– Staff Line of Sight Policy covers:</p> <ul style="list-style-type: none"> 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. 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. 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. <p>– AGC Gaming Machines Policy covers:</p> <ul style="list-style-type: none"> 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. b. Cash can go into a gaming
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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"> 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. 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. 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. <p>– Staff Safety & Alarm Measures:</p> <ul style="list-style-type: none"> a. Stationary panic alarms are located on the Customer Service Desk and in the office on the ground floor. 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.
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				<ul style="list-style-type: none"> 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. 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. <p>– AGC External Shop and Forecourt Management:</p> <ul style="list-style-type: none"> 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. 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.
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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"> - Terms and conditions signage are displayed. - Betting and game rules signage are displayed. - All notices regarding gambling advice or support information are displayed. - All staff are trained with the BACTA codes of practice. - Staff are aware of the terms and conditions, and relevant game rules associated with all gaming machines offered on the premises. - Customer complaint forms are available on request at the Support Desk. Staff are trained in the complaints procedure. - As an operator, we acknowledge that this licensing objective has a direct link with the successful achievement of the crime and disorder objective. - In terms of advertising, all advertising codes are adhered to in order to stop customers from being misled. - All machines are purchased from manufactures/suppliers licensed by the Gambling Commission. - Machines are maintained by qualified engineers. - Machines are turned off should a fault occur. 	<ul style="list-style-type: none"> - We take staffing levels very seriously. Levels of staff are risk assessed. - This is to ensure that the entire premises is being monitored, including the monitoring of all gaming machines and entrances - We do not advertise its venues, activities or customer benefits using mainstream media, television, radio or newsprint etc. - 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. - We offer no branded merchandise either for sale or as a prize. - Our AGC Provision of Gambling Harm Prevention Advice Policy covers: <ul style="list-style-type: none"> 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
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				<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

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

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.

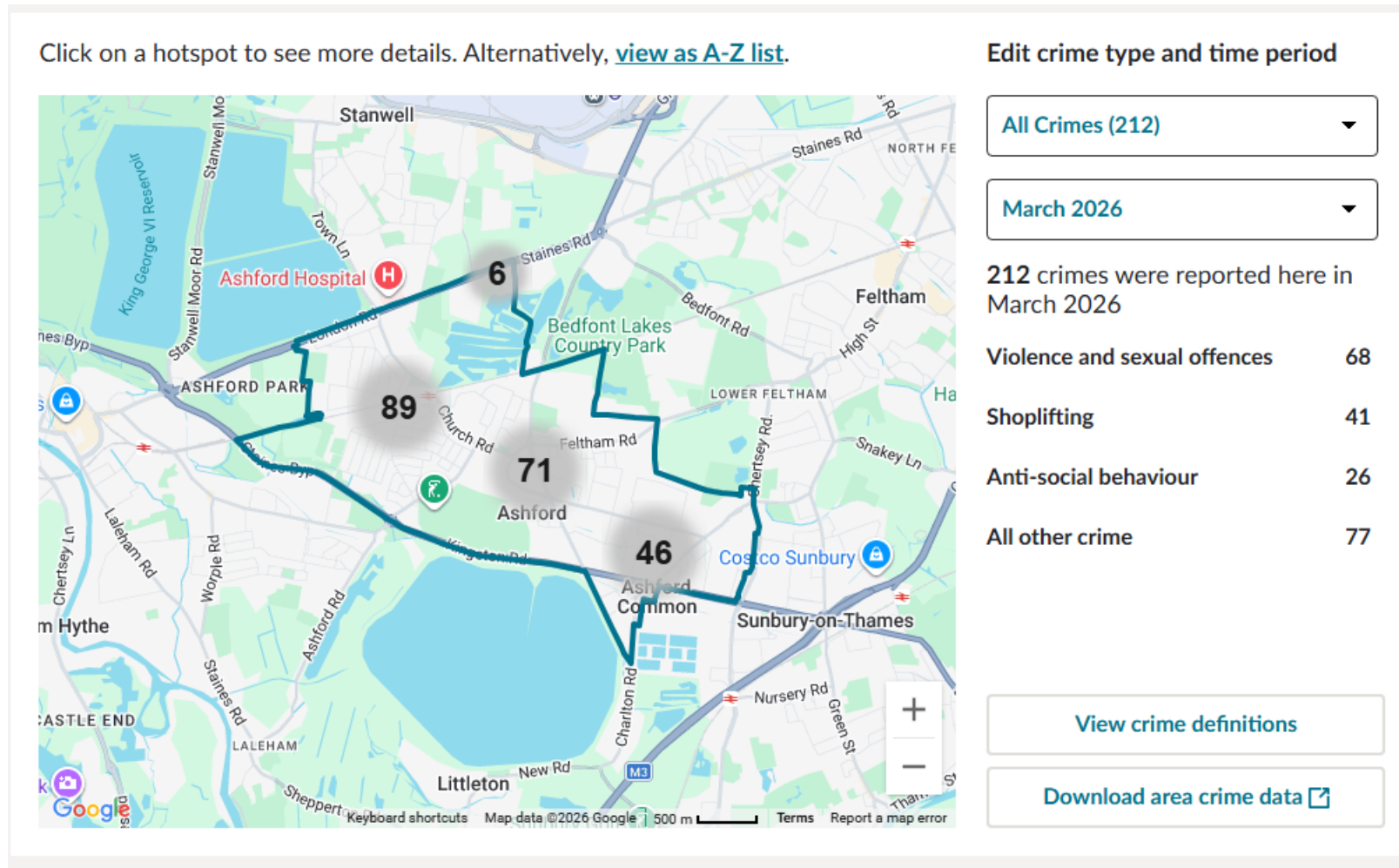
The Borough is also crossed by two tributaries, the Ash and the Colne. The Borough is flat and low lying and consequently liable to flooding. About 20% of the urban area is liable to flood in a 1 in 100-year flood event or surrounded by flood water and over 49% of the urban area would be flooded in a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





Ashford

[View area boundary](#)

[Search another area](#)

[Overview](#)

[Crime map](#)

[Stop and search](#)

[Statistics](#)

Top reported crimes

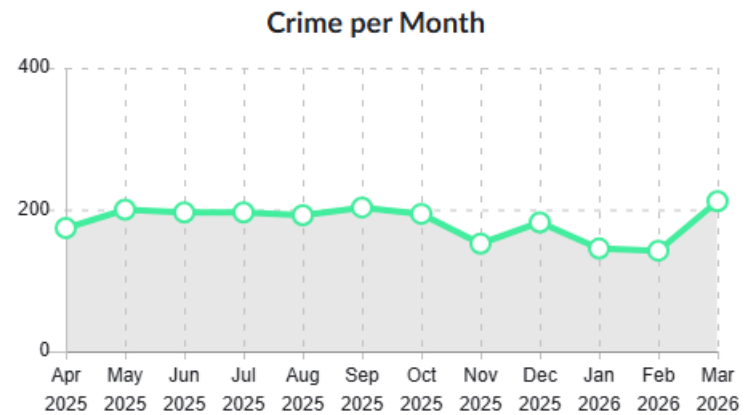
Most commonly reported crimes during Mar 2026

Violence and sexual offences	68
Shoplifting	41
Anti-social behaviour	26
Public order	15

[Get crime prevention advice](#)

Crime levels overview

Crime for last year






[View as a list](#)



Appendix 3

Map of Gambling Premises in the Area



	Premises
	William Hill, Unit 1, The Atrium, TW15 2UD (344ft away)
	Coral, 6 Church Road, TW15 2UT (397ft away)

Appendix 4

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

- Kelly Dixon Dance Academy, Church Road, TW15 2TT (0.2 miles) - Church is present, unclear whether dance class actually takes place inside
- Language School, The Atrium, Church Lane, TW15 2PH (0.2 miles) - The atrium does exist but unclear whether language school is inside
- Stagecoach, Stanwell Road, TW15 3DU (0.6 miles) - Supposedly located within college, was not able to access to check (School gates)
- Pentagon Human Resources, 21 Woodthorpe Road, TW15 2RP (0.3 miles) - Presents as Office space - unclear if Job centre is inside
- Bridge Recruitment Services Ltd, Church Rd, Ashford TW15 2UD (92ft) - Unclear if vacant or still operating, appears to be open as per online information
- Wise Blue Owl Family Counselling, 13 Clarendon Road, TW15 2QJ (0.2 miles) - Directs you to residential - Unclear if counselling operates from viewing the premises from the outside
- Clarendon Family Centre, 1 Knapp Road, TW15 2HZ (0.2 miles) - Directs you to Clarendon Primary school
- Auto Advance Logbook Loans, 45 Church Road, TW15 2TQ (92ft) - Vacant Premises
- ATM, 91 Fordbridge Road, TW15 2SS (0.5 miles) - could not locate
- The Kub Club (indoor playground), 112 Clarendon Road, TW15 2QD (0.2 miles) - Says it is within the church, unclear as not advertised at church
- Town Tree Hall Community Centre, TW15 2EW (0.5 miles) - Could not locate

Appendix 5

Photographs of the surrounding area of 39 Church Road



Educational facilities in the area



Clarendon Primary School, Knapp Road, TW15 2HZ



St Michaels Primary School, Feltham Hill Road, TW15 2DG



Kumon Maths & English, 6 Woodthorpe Rd, Ashford TW15 2RY



Ashford Library, Church Rd, Ashford TW15 2XB

Care Homes:



Cedars Care Home, 16 Fordbridge Road, TW15 2SG



Echelforde Care Home, College Way, TW15 2XG

Job centres/employment agencies in the close area:



Prodrive Personnel Ltd, 13 Feltham Road, TW15 1DQ

Soup Kitchen/Food Bank:



The Salvation Army, Woodthorpe Road, TW15 3JY

Places of Worship



Ashford Congregational Church, Clarendon Road, Ashford, TW15 2QA



Saint Michaels Catholic Church, 112 Clarendon Road, TW15 2QD



The Parish Church St Matthew, Church Road, TW15 2NY



St Hildas Church, Stanwell Road, TW15 3QL

Banks/ATMs



Natwest Ashford, 5 Woodthorpe Road, TW15 2RN

Family Service Centres or Support Groups:



Ultrasound Direct Heathrow, 10 Station Rd, Ashford TW15 2UP

Gambling Premises:



William Hill, Unit 1, The Atrium, TW15 2UD



Coral, 6 Church Road, TW15 2UT

Alcohol licensed premises:



The Kings Head, 4 Feltham Road, TW15 2EB

Leisure Centres/Community Centres:



Fordbridge Community Centre, Clarendon Road, TW15 2QA



Energie Fitness Ashford, 40-42 Church Rd, Ashford TW15 2UY

Fast Food premises and cafes:



Two Brothers Fish House, 20 Church Rd, Ashford TW15 2UY



Wimpy, 4 Church Road, TW15 2TY



Viva Namaste, 18 Church Rd, Ashford TW15 2UY



Little Bodrum, 7 Church Road, YW15 2TX



Fireaway, 1 New Parade, TW15 2UF



Chicken City, 2 Church Road, TW15 2UT



*KFC, Unit 3 Church Road, TW15 2UT
Subway, Unit 2 Church Road, TW15 2UT*



M2 Pizza Pasta, 15 Church Road, TW15 2UG



Burger Plus, 2 Woodthorpe Road, TW15 2RY



Anatolia, 12 Woodthorpe Road, TW15 2RY



Burger Junction, 1B Woodthorpe Road, TW15 2RL



Marhabaa Food, 4 Central Arcade, TW15 2RL