

Type of Premises:	Bingo — main use; Category B3 and Category C gaming machines ancillary
Region (if applicable):	Staines Town
Area (if applicable):	Staines South (Ward)
Premises Address:	67 High Street, Staines upon Thames, TW18 4PU
Name of Assessor:	Woods Whur
Colleagues Present:	
Date(s) of assessment:	30 th September 2026
Review date:	

The Operator:

Golden Slots (Southern) Limited is licensed by the Gambling Commission and is a member of The Bingo Association. Golden Slots (Southern) Limited is an extremely experienced operator of these types of premises.

Main use and fixed equipment specification

Bingo will be the main use of the premises. We will provide 12 dedicated bingo machines, each with a seat, and 24 Jigsaw terminals supplied by Boomerang, all with dedicated bingo-only offerings. The 12 Category B3 gaming machines and 48 Category C gaming machines will be ancillary to the main bingo use. The final bingo technical specification, supplier confirmation for all 36 positions, product evidence, approved floor layout and session timetable will be appended to the pre-opening evidence register and signed off before opening; these documents are not represented as already received or verified.

The dedicated bingo equipment comprises 36 bingo playing positions/terminals and is recorded separately from the 60 ancillary gaming machines. Bingo will be a substantive, identifiable and supervised offer; equipment numbers alone do not demonstrate that the offer is operating effectively.

Equipment specification updated on 6 October 2026. This update records the proposed provision and does not certify installation, commissioning or a new site visit.

Local Area Risk Assessment - 67 High Street, Staines-Upon-Thames, Surrey, TW18 4PU

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

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 neighbourhood of the premises is Spelthorne 004F (2021 LSOA E01034291). It should be assessed using local evidence, rather than borough averages or a general description of Staines as affluent. The official 2025 Index of Multiple Deprivation places this LSOA in decile 6 overall, where decile 1 is the most deprived tenth of English LSOAs and decile 10 is the least deprived tenth. This overall result does not remove specific local vulnerabilities.

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. The area accommodates a mix of long-term owner occupiers, commuter households, young professionals and private renters. 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.

Official English Indices of Deprivation 2025 for Spelthorne 004F (E01034291) show: overall IMD decile 6; income 6; employment 7; education, skills and training 7; health

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deprivation and disability 9; crime 1; barriers to housing and services 6; and living environment 4. Every domain uses the same direction: 1 is most deprived and 10 least deprived. The crime domain places this neighbourhood in the most deprived national tenth on that measure. The living environment domain is somewhat more deprived than the national midpoint, while health deprivation is relatively low. Income decile 6 is a relative deprivation ranking, not a measure of household earnings or proof that no customer faces financial hardship. These are area-level statistics and do not identify individual customers. Source: Ministry of Housing, Communities and Local Government, English Indices of Deprivation 2025, File 7, updated November 2025; LSOA E01034291.

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, 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 Bingo 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.

The mixed local evidence requires attention to crime exposure, the evening economy and customers who may experience financial stress, while avoiding an assumption that every resident shares the circumstances measured for the neighbourhood. The site-specific assessment below addresses those mechanisms and identifies where premises or controls still need verification.

Staines-upon-Thames is a commercially active and well-connected town centre. The site LSOA has an overall IMD decile of 6 but a crime deprivation decile of 1. The assessment therefore gives particular weight to observed crime and disorder patterns, financial-vulnerability indicators, nearby sensitive uses and the proposed operation at 67 High Street.

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 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.

Verified Player Access — mandatory personal registration scheme. Every customer wishing to gamble must first complete personal, non-transferable registration under the scheme. Age and identity will be appropriately verified before gambling access is enabled; anonymous walk-in gambling will not be permitted. Staff will use controlled admission to check eligibility, self-exclusion and any other applicable restrictions before permitting play. scheme does not replace ongoing observation, safer-gambling interactions or the duty to refuse access when eligibility is uncertain. As a further player-protection measure, this system is intended to reduce the risk of gambling-related harm to vulnerable people by enabling consistent checks for self-exclusion and known access restrictions, providing an accountable point of contact for welfare interventions and helping staff identify repeat visits or concerning patterns where lawful and proportionate. Registration is not proof that a customer is free from vulnerability or harm: staff must remain alert to distress, prolonged gambling, impaired decision-making and other warning signs and intervene appropriately. A positive admission decision must be based on the current exclusion/restriction status, not merely possession of a registration card.

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.

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Firm underage-gambling prevention. The premises are adults-only: children must not be admitted to gamble. Challenge 25, acceptable documentary identity evidence and a trained staff decision are mandatory where age is in doubt. If age or identity cannot be satisfactorily verified, registration and gambling access must be refused, irrespective of customer pressure or inconvenience. Attempts, refusals and escalations will be recorded, and staff will be supported by management when making a firm refusal.

Deprivation and related socio-economic indicators are considered as contextual, population-level factors that may be associated with financial pressure and differing exposure to gambling-related harm. They do not establish that any particular resident, customer or group is vulnerable or will experience harm. The operator will review relevant published evidence, including the applicable Index of Multiple Deprivation data and Gambling Commission research on gambling harms and vulnerability, and will record source dates and geographical limitations in the local evidence register before approval. The proposed controls will focus on observable indicators of harm, informed customer interactions, accessible support information and documented escalation rather than assumptions about individuals based on postcode or socio-economic status.

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.

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

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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 proposal adds a bingo premises to a High Street with a betting shop at 76 High Street and an adult gaming centre at 109 High Street, identified in the walkaround. The potential for cumulative exposure remains a High target residual risk in row L08. Staff recognition, customer interactions, self-exclusion controls and management review are proposed to manage that risk; their effectiveness must be evidenced. Claims of improved surveillance or social benefit are not treated as offsets to the licensing risks.

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.

The nearby gambling premises form part of the local exposure considered below. The proposed operation will be judged against the three licensing objectives and its evidenced controls, including cumulative exposure and possible movement between venues.

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	Operator control policy (site implementation to verify)	Further controls planned before opening
1.1	Protecting children and other vulnerable persons from being harmed or exploited by gambling	The following facilities are identified for local context. Only those at or within 0.5 mile are counted within the scored proximity radius; more distant facilities are contextual and not counted in that radius: - Little Burrows Montessori Nursery, Thames Street, TW18 4SD (0.2 miles) - St Peters Nursery, St Peters Church Hall, Laleham Road, TW18 2DX (0.5 miles) - The Magna Carta Secondary School, Thorpe Road, TW18 3HJ (approximately 0.7 miles; contextual only, OUTSIDE the scored 0.5-mile radius; name, location and distance to be independently verified) - School Uniform Direct , 23 High St, Staines TW18 4QY - 0.1 miles from the premises. Support and Educational services for teenagers and young adults are provided at: - Staines & Egham Sea Cadets, The Lammas Park, Wraysbury Road, TW18 4XZ (0.6 miles) - Leacroft Centre, 2 Leacroft, TW18 4NQ (0.6 miles) - Army Cadets, 1 Langley Road, TW18 2EH (0.7 miles) Care Homes: - Splendour Care, Centurion House, London Road, TW18 4AX (0.4 miles)	- Before opening, management will approve and commission an independent age-verification test programme appropriate to adult-only gambling admission, including all four shift patterns and the overnight period. Results, failures, corrective actions and retesting will be recorded; testing frequency will be documented and reviewed. - Before opening, management will approve a site-specific staffing and security risk assessment covering minimum two-person operational cover at all hours, directly employed SIA-licensed cover from 19:00 to 07:00, breaks, relief, absence and escalation; deployment will be checked against applicable licence conditions and regulatory requirements. - Before opening, the premises team will be trained to refuse admission or gambling to customers who appear intoxicated by alcohol or drugs, in accordance with the approved admission and safeguarding policies; refusals	- 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. - Before deployment, all staff will complete safeguarding and vulnerability training, demonstrate understanding through documented assessment, and receive manager sign-off. Training will cover the Gambling Commission description 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

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		Drug and Alcohol Treatment Centres: - Addiction Recover Now located in Windsor (6.3 miles) - Foundations Recovery located in Twickenham (8.1 miles) Job centres/employment agencies in the close area: - Contract Options, 118 High Street, TW18 4BY (0.1 mile) - Burnham Recourses, 1A Fairfield Avenue, TW18 4AB (0.2 miles) - Reed Recruitment Agency, Church House, 18-20 Church St, TW18 4EP (0.2miles) - Workmates, 40 Church Street, TW18 4EP (0.2 miles) - Ochre House Job Centre, Ashby House, Church Street, TW18 4XS (0.3 miles) - Cielo, 59 Church Street, TW18 4XS (0.3 miles) - StaffConnect, Rourke House, Watermans Business Park, The Causeway, TW18 3BA (0.4 miles) - CRL, 1 Kingsbury Crescent, TW18 3BA (0.4 miles) - Staines Job Centre, 62 London Road, TW18 4HB (0.4 miles) Housing Projects: - A2Dominion, Spelthorne House, TW18 4TA (0.2 miles) - Ability Housing Association, The Coach House, Gresham Road, TW18 2AE (0.5 miles) - Transform Housing and Support, Field View Court, Burges Way, TW18 2EX (0.8 miles) - Spelthorne Rent Start, Knowle Grn, TW18 1XA (0.9 miles) - HomeStart, The Resource Centre, Commercial Road, TW18 2QW (1 mile)	and interventions will be logged. - Before opening, management will approve an hourly toilet inspection procedure, with privacy-respecting checks for suspected drug use and welfare concerns. Staff will record the inspection time, their identity, findings and any action in a site inspection log; controlled access will be assessed against the final layout. - Before opening, GamCare and other approved safer-gambling information will be placed at accessible, prominent and discreet locations. The manager will complete a dated photographic signage audit and retain the approved materials list. - Before deployment, all operational and security staff will complete documented induction and role-specific safeguarding, vulnerability, drug/alcohol awareness, conflict and safer-gambling training. Refresher training will be scheduled at least every six months. Competency assessments, attendance and manager authorisation records will be retained for regulatory inspection. - Before deployment, staff will be trained and assessed to	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: a. Children should not be in the premises. b. During typical school hours (approximately 08:30–15:30 on school days), staff will apply enhanced awareness of attempted underage entry and any safeguarding concerns outside the entrance. As the premises has not opened, no claim is made about historic local truancy incidents. All concerns will be logged, escalated to the safeguarding lead and, where appropriate, referred to local schools or statutory safeguarding agencies. - Management controls will be implemented to ensure that staff are trained in relation to the risk indicators set out below: 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
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		Places of Worship: - The Redeemed Christian Church of God Chapel, Methodist Church, TW18 4SD (0.2 miles) - IPC Staines UK Pentecostal Church, Thames Street, TW18 4SD (0.2 miles) - Staines Methodist Church, Thames Street, TW18 4SD (0.2 miles) - Staines and District Synagogue, Westbrook Road, TW18 4PR (0.3 miles) - Staines Baptist Church, 16 Hale Street, TW18 4UW (0.3 miles) - Assembly of God for the Nations, Kingston Road, TW18 4LN (0.4 miles) - Our Lady of the Rosary Church, 59 Gresham Road, TW 18 2BD (0.5 miles) - Church of Jesus Christ of Latter Day Saints, 41 Kingston Road, TW18 4JG (0.5 miles) - St Marys Church, Vicarage Road, TW18 4YF (0.5 miles) Pay Day Loan Shops or Cash Chequing Services: - H&T Pawnbrokers, 53 High Street, TW18 4QH (100ft) - Vape Mobile (We buy phones for cash), 20 High Street, TW18 4EE (351ft) - Cash Converters, 14 High Road, TW18 4EE (440ft) Banks/ATMs: - Halifax, 56 High Street, TW18 4DY (16ft) - Barclays Bank, 71 High Street, TW18 4PS (39ft) - Lloyds Bank, 73-75 High Street, TW18 4PP (92ft) - Santander, 59A High Street, TW18 4QH (112ft) - Nationwide, 30 High Street, TW18 4EE (272ft) - Metro ATM, TW18 4WB (02 miles) Gambling Premises: - Betfred, 76 High Street, TW18 4DP (256ft) - Admiral Slots, 109 High Street, TW18 4PQ (433ft)	identify and interact with customers displaying simultaneous or prolonged play across dedicated bingo equipment or ancillary gaming machines. The 12 dedicated seated bingo machines and 24 Boomerang-supplied Jigsaw bingo terminals will remain distinct from the 12 Category B3 and 48 Category C ancillary gaming machines. - Before opening, Golden Slots (Southern) Limited will appoint directly employed, appropriately SIA-licensed security officers to provide scheduled coverage from 19:00 to 07:00 daily. Licensed relief officers will cover breaks, sickness and absence. The final site-specific security risk assessment, individual licence checks, duty roster and relief arrangements will be approved and evidenced before opening. - Before opening, comprehensive CCTV will be installed, tested and signed off, with both internal and external cameras and remote viewing capability for senior management, allowing for real-time oversight during out-of-hours periods. - The approved rota will provide at least two operational employees on	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. ** Although obviously it is noted that our Bingo premises is an over 18 premises only. - In addition and in line with the Spelthorne policy, there are Safeguarding Policies and Procedures for both Adults and for Children. Enhanced controls and assurance - children, vulnerable persons and local-area exposure • A Designated Safeguarding Lead (DSL) and deputy will be appointed for the premises. Their names, role descriptions and current contact details will be available to all staff, and the DSL will be responsible for oversight of child safeguarding, adult safeguarding,
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		Alcohol licensed premises: - Nostro Lounge, 55 Hight Street, TW18 4QH (144ft) - Turtle Bay, 24 High Street, TW18 4EE (335ft) - The George, 2-8 High Street, TW18 4EE (0.1 mile) - London Stone, 14 Church Street, TW18 4EP (0.1 mile) - Slug & Lettuce, 15-18 Clarence Street, TW18 4SU (0.2 miles) - Thames Side Brewery, 1 Hale Street, TW18 4UW (0.2 miles) - Last Hop, Thames Edge, 15-18 Clarence St, TW18 4SU (0.3 miles) - Three Tuns, 63 London Road, TW18 4BN (0.4 miles) - The Star Staines, 52 Kingston Road, TW18 4NL (0.4 miles) Playgrounds & Parks: - Playground, 5-8 Mill Mead, TW18 4DP (0.2 miles) - Birch Green, TW18 4HA (0.5 miles) - Lammas Lower Playground and Splash Park, Lammas Recreational Ground, TW18 4XZ (0.6 miles) - Moormede Play Area, Staines, TW18 4WA (0.6 miles) Leisure Centres/Community Centres: - Staines Community Centre, Thames St, TW18 4EA (0.1 mile) Bowling Alley, shopping centres, cinemas and hotels: - Two Rivers Shopping Centre, Mustard Mill Road, TW18 4WB (0.1 mile) - Premier Inn Staines upon Thames Hotel 90, 106 High Street, TW18 4DP (0.1 mile) - Elmsleigh Shopping Centre, 62 South Street, TW18 4QB (0.2 miles) - Vue Cinema, Mustard Mill Road, TW18 4BL (0.2 miles) Fast Food premises and cafes: - McDonalds, 62 High Street, TW18 4DY	duty throughout opening hours, with continuous observation of the entrance and gaming floor. Staff will be trained to engage customers showing fatigue or welfare concerns, and cover will be maintained during breaks and interventions. - Before deployment, staff will receive assessed training on the following indicators and responses: 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. - 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	safer-gambling vulnerability concerns and liaison with statutory agencies where appropriate. • Challenge 25 will apply at the point of entry and throughout the premises. A customer who appears under 25 must produce an accepted original photographic document before being permitted to gamble. Accepted documents, refusal requirements and escalation arrangements will be set out in the Age Verification Policy and reinforced during induction and refresher training. • Every age-related refusal or attempted under-age entry will be recorded in a refusals log showing date, time, staff member, reason for challenge, identification offered, outcome and any management action. The Premises Manager will review the log monthly for patterns by time, shift, entrance position or member of staff. • Independent third-party age-verification testing will cover all operating shifts on a risk-based programme. Results will be retained. Any failed test will result in immediate management review, targeted retraining within 48 hours and a repeat test within 14 days. A second failure will be escalated to senior compliance management with a documented corrective action plan. • A quarterly entrance-observation audit will test whether staff have uninterrupted awareness of persons entering, whether acoustic door alerts are effective, whether CCTV provides frontal identification and whether signage is visible before entry. Findings
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		(23ft) - Burger King, 68 High Street, TW18 4DY (128ft) - Slim Chickens, 2 Norris Road, TW18 4UP (349ft) - KFC, 32 High Street, TW18 4EE (420ft) - 1517 Chicken Shop, 15 Church Street, TW18 4EN (0.1 mile) - Big Brother Burger House, 14 Church Street, TW18 4EP (0.1 mile) - Don Grill, 25 Church Street, TW18 4EN (0.1 mile) - Nandos, Mustard Mill Road, TW18 4BL (0.1 mile) - Five Guys, Two Rivers, TW18 4BL (0.1 mile) Toy Shops: - CeX, Unit 5, 88 High Street, TW18 4DP (358ft) - Sports Direct, Elmsleigh Shopping Centre, High Street, TW18 4PJ (0.2 miles) - GAME, Elmsleigh Shopping Centre, High Street, TW18 4PJ (0.2 miles) Bus Stops: - Thames Street Stop H (433ft) - Staines Bridge Stop C (0.1 mile) - Staines Bridge Stop Z (0.1 mile) - South Street Stop K (0.2 miles) - High Street Stop J (0.2 miles) - Two Rivers (0.2 miles) - Staines Police Station Stop M (0.3 miles) - Staines Police Station Stop U (0.3 miles) - Bridge Street Stop B (0.3 miles) - Staines Bus Station (0.3 miles) - Pinetrees Business Park (0.4 miles) - Staines Sainsburys (0.4 miles) - Sainsburys (0.5 miles) <u>General Summary of Risks Considered:</u> - Children entering site unnoticed or unchallenged. - Potentially Vulnerable people being	late-night play. Instead, it emphasises that staff awareness and proportionate engagement are the primary safeguards at all times of day.	and corrective actions will be recorded. Enhanced entry screening, facial recognition, customer recognition and self-exclusion controls • Every customer entering the premises will be personally greeted by a dedicated, trained member of staff before any gambling takes place. The greeting is a mandatory first-line safeguarding and safer-gambling control, not merely a customer-service function. The staff member will make an initial, proportionate assessment of apparent age and of any observable indicators of vulnerability, intoxication, impairment, distress, confusion or other circumstance that may require intervention. Where a concern is identified, the appropriate Challenge 25, safeguarding, safer-gambling, refusal or management-escalation procedure will be completed before the customer is permitted to gamble. • The entry assessment will be applied consistently and staff will not infer vulnerability from ethnicity, nationality, disability, religion, accent or other protected characteristic. The assessment will be based on apparent age where relevant to Challenge 25, observable behaviour, communication and other objective indicators. A customer who appears under 25 will be required to produce acceptable photographic identification before being permitted to gamble. • Facial recognition may be considered as a supplementary safeguarding, self-exclusion and security control, but will not be deployed unless all necessary privacy, legal, technical and
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		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 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.		management approvals have been completed. Baseline safeguarding and age-verification controls will operate independently of facial recognition. If subsequently approved and deployed, any potential match or alert will be verified by trained staff under the relevant policy before action is taken. • The facial-recognition system will be operated under documented data-protection and privacy governance, including appropriate transparency information, access controls, accuracy and false-match procedures, retention arrangements, audit trails and periodic testing. Any material system failure or loss of critical recognition capability will be logged and subject to a documented contingency assessment, including enhanced manual entry checks where required. • Customers wishing to gamble must register under the operator's Verified Player Access scheme before play is permitted. The purpose of the system includes improving customer service while enabling the operator, where lawfully and appropriately recorded, to recognise returning customers and to build a longitudinal understanding of relevant attendance and safer-gambling interactions. This will assist staff to identify material changes or repeated patterns that may not be apparent from a single visit. • For returning customers, authorised staff will use information held within the customer-recognition system, where relevant and lawful, to support safer-gambling decisions. Relevant information may include previous
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Local Area Risk Assessment

				significant customer interactions, self-exclusion status, restrictions, welfare concerns and other customer-protection information necessary to reduce gambling-related harm. Access will be role-based and limited to information required for the staff member's duties. • Recognition of a returning customer will not be treated as evidence that the customer is free from vulnerability. Staff will remain alert to changes in frequency of attendance, duration or pattern of play, repeated visits, behaviour, presentation, cash-related behaviour and other indicators identified elsewhere in this assessment. Where a material change or pattern is identified, staff will undertake and record an appropriate customer interaction. • A facial-recognition or customer-system alert indicating a possible self-excluded person will require prompt staff verification. Where the person is confirmed as subject to an applicable self-exclusion, they will not be permitted to gamble and the attempted breach will be recorded in the self-exclusion breach log. Management will review the circumstances, including whether the alert and staff response operated effectively and whether corrective action, retraining or system adjustment is required. • The effectiveness of the entry-greeting, age-assessment, facial-recognition, customer-recognition and
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Local Area Risk Assessment

				self-exclusion controls will be included in the monthly premises compliance review and quarterly LARA assurance review. Management information will include relevant entry interventions, age challenges/refusals, recognition alerts, confirmed and false matches, self-exclusion alerts/breaches, significant customer interactions, system availability and remedial actions. Trends will be used to refine staffing, training and control settings. • No person under 18 will be permitted to enter or remain in the gambling area, including where accompanied by an adult. Any ambiguity will be resolved in favour of refusal until satisfactory age evidence is produced. • During normal school hours, and particularly approximately 08:30-15:30 on school days, staff will maintain heightened awareness of young persons passing or approaching the frontage. Any recurring pattern of truancy, attempted entry or congregation associated with the premises will be recorded and escalated to the DSL, with proportionate engagement with local schools, police or safeguarding partners where appropriate. • Safeguarding training will include scenario-based exercises covering attempted under-age access, proxy gambling, grooming or exploitation indicators, a child waiting for an adult customer, a young person being given money to gamble, and a child appearing distressed in the vicinity. Staff competence will be assessed rather than training attendance alone
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Local Area Risk Assessment

				being recorded. • A safeguarding concern form will be used for any material concern. It will record observed facts, action taken, persons informed and follow-up. Staff will not investigate suspected abuse themselves; they will preserve relevant evidence and escalate in accordance with the safeguarding procedure. • Age-verification performance, refusals, third-party test results and safeguarding concerns will form a standing item at the monthly premises compliance review and quarterly senior management LARA review. • Staff will use a structured Identify-Interact-Evaluate approach supported by objective and behavioural prompts. Indicators will include marked changes in frequency or spend, extended or repeated sessions, rapid re-spending of winnings, repeated machine changes, simultaneous play, repeated cash withdrawals, agitation following losses, chasing losses, visible distress, statements indicating financial pressure, impaired judgement, intoxication, cognitive difficulty, bereavement or other circumstances that may increase vulnerability. • Significant customer interactions will be recorded with the trigger, observations, conversation, customer response, action taken, outcome, any restriction or exclusion, follow-up requirement and manager review. Records will be factual and proportionate and will avoid unsupported assumptions about a customer's personal circumstances. • Where staff identify a material
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Local Area Risk Assessment

				welfare or safer-gambling concern, a customer may be invited to take a break or pause play while the concern is discussed. Continued gambling will not be treated as automatic evidence that the concern has been resolved. The interaction will be evaluated and escalated where indicators persist. • Repeated or escalating indicators will require manager review. Management may apply enhanced monitoring, provide support information, encourage or implement self-exclusion in accordance with policy, refuse further gambling or entry where justified, or take other proportionate action to protect the customer. • The premises will maintain a self-exclusion breach log. Any suspected breach will be acted upon promptly, recorded and reviewed. The review will consider how the breach occurred, whether staff recognition or process failed, and what corrective action is required. Reinstatement will be subject to the operator's formal process and will not be treated as automatic at the end of an exclusion period. • New self-exclusions and relevant updates will be communicated to staff through a controlled briefing process, with access to the information limited to what is necessary for effective implementation and handled in accordance with data-protection requirements. • Management will conduct monthly quality-assurance sampling of customer-interaction records to test whether triggers were identified, interactions were timely, outcomes were evaluated and follow-up was
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Local Area Risk Assessment

				completed. Learning points will be fed back into staff briefings and training. • Safer-gambling information will be available at the Customer Service Counter, near gaming areas and in a discreet location. Staff will be able to explain available support and self-exclusion options and will check understanding where communication difficulties are apparent. • For customers with limited English, key safer-gambling and age-restriction information will be made available in accessible formats appropriate to the local customer profile, including plain-language and pictogram-based information where useful. Staff will have a defined route to obtain translation or interpretation assistance where necessary to explain a material safeguarding or safer-gambling intervention. • Reasonable communication adjustments will be considered for customers with hearing, visual, cognitive or other communication needs. Large-print or alternative-format information will be available on request and staff will be trained to check understanding without making assumptions about disability or capacity. • The proximity of banks, ATMs, pawnbrokers and cash-conversion businesses will be treated as a specific local vulnerability factor. Staff will be trained to recognise observable patterns such as repeated exits and rapid re-entry, repeated requests to break or obtain cash, or statements indicating that a customer is seeking
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Local Area Risk Assessment

				additional funds to continue gambling. • Repeated cash-related patterns, when combined with other indicators of harm, will trigger a proportionate customer interaction. Staff will record the observed pattern and the outcome rather than assuming that use of a nearby ATM or cash business is itself evidence of gambling harm. • The premises will not provide customer credit, payday lending, an internal ATM or a cash-back service. Staff will not direct customers to particular external credit or pawnbroking services for the purpose of obtaining further gambling funds. • Staff will be trained to respond to statements such as inability to afford essential expenditure, borrowing to gamble, selling possessions to obtain gambling funds or requests for credit as significant financial-vulnerability indicators requiring immediate interaction and manager awareness. • Monthly safer-gambling review will consider whether repeated cash withdrawal/re-entry patterns or financial-vulnerability interactions are concentrated at particular times or among repeat customers and whether additional staffing, interaction or exclusion controls are required. • Prolonged play will be monitored throughout the day, not only late at night. Staff will pay attention to changes in pace, responsiveness, concentration, posture, repeated play without breaks and other observable signs of fatigue or reduced alertness. • The operator will maintain a documented session-observation
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				protocol. Where prolonged continuous play or observable fatigue gives rise to concern, staff will conduct a welfare interaction, offer a break and evaluate whether continued play is appropriate. Repeat long-session concerns will be escalated to a manager. • Where a customer attempts to play multiple machines simultaneously, staff will intervene in accordance with the operator's safer-gambling policy and assess whether the behaviour forms part of a wider pattern of loss of control or harmful play. Material interventions will be recorded. • Fatigue-related observations and interventions will be included in monthly customer-interaction quality assurance so that management can assess whether staffing and floor coverage remain adequate during late or extended operating periods. Management assurance and review • The LARA will be reviewed formally at least annually and sooner whenever a material trigger occurs. Trigger events include a serious incident; safeguarding concern; failed age-verification test; material change in local crime or vulnerability profile; change in operating hours; material premises-layout change; introduction of a new gambling product or machine arrangement; repeated self-exclusion breach; enforcement or licensing feedback; significant complaint trend; or the opening/closure of a nearby sensitive use that materially changes the local risk profile. • A monthly premises compliance review will consider age challenges and
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				refusals, third-party test results, safeguarding concerns, customer interactions, self-exclusion events, financial-vulnerability indicators, crime/ASB incidents, intoxication/drug incidents, SIA deployment, CCTV faults, complaints, machine faults and training completion. • A quarterly senior-management LARA review will assess whether controls remain proportionate and effective. The review will record decisions, responsible persons, target dates and closure evidence for corrective actions. • A quarterly internal compliance audit will test implementation of the LARA. An annual independent or separately managed assurance review will sample the effectiveness of key controls. Audit actions will be tracked to completion. • Each material control will have an accountable owner. Local operational controls will ordinarily sit with the Premises Manager, safeguarding controls with the DSL, security controls with the responsible manager and designated internal SIA lead and corporate policy assurance with the relevant compliance function. • Training will be completed before a new employee undertakes unsupervised relevant duties. Core refresher training will take place at least every six months, supported by an annual assessed refresher and additional retraining after a material incident, failed test, policy change or identified competency gap. • Training effectiveness will be assessed through short knowledge checks, scenario exercises,
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				management observation and, where appropriate, third-party testing. Failed assessments will result in retraining before the employee resumes the affected unsupervised duty. • Management information will include age-test pass rate, age refusals, training completion, significant customer interactions, self-exclusion breaches, CCTV availability, security incidents, complaints and overdue audit actions. Trends will be used to determine whether further controls are required. • The local-area schedule will be checked at least annually and after material changes. A newly claimed use enters the scored inventory only after its current operation, location, observation date and evidence source are recorded. • The physical walkaround will be repeated as part of the annual review and following material local change. The reviewer will record the date, route, material observations, photographs where appropriate, verification status of sensitive premises and resulting amendments to controls. • Records created under this LARA will be retained in accordance with the operator's applicable retention and data-protection policies and will be made available to authorised regulators or enforcement officers where lawfully required.
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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.

1.2	Preventing Gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime	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. 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. 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. The published aggregate crime figures do not establish whether individual reported incidents were gambling-related. The operator will review location-specific incidents and police or council intelligence when available, without assuming either a connection or absence of connection to gambling premises.	- Before opening, Golden Slots (Southern) Limited will recruit or allocate directly employed, appropriately SIA-licensed officers to cover 19:00–07:00 daily, with separate licensed relief for breaks, absence and incidents. The final deployment hours and escalation thresholds will be supported by a site-specific risk assessment approved by management before opening. - Before opening, all staff allocated to this site will complete assessed induction and role-specific training covering the local risks identified in this LARA, drug and alcohol awareness, conflict management and proportionate anti-money-laundering awareness. Refresher training will be scheduled at least every six months. Individual completion records, competency assessments and management authorisation will be retained and made available to the licensing authority where lawfully required. a. the specific local risk to the licensing objectives that have been identified for these premises within this LARA;	- 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: - confirming door control protocols - availability of mag-lock facilities. - Directly employed SIA-licensed security officers will be rostered from 19:00 to 07:00, with additional deployment determined by the approved site-specific risk assessment and incident trends. Individual SIA licence status, break relief and absence cover will be checked and documented before opening. - 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
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			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 – Before opening, each allocated employee's completed and assessed training will be documented in an individual training record. Records will be checked by the responsible manager and retained for inspection; no training completion at this proposed site is assumed.	floor coverage, ensuring that lone customers or those presenting signs of fatigue do not go unmonitored. Enhanced controls and assurance - crime, disorder and night-time economy • A single premises incident register will categorise crime, violence, threats, anti-social behaviour, intoxication, suspected drug activity, theft, criminal damage, self-exclusion breach, safeguarding concern, medical/welfare incident, suspicious transaction, CCTV fault and security intervention. Each entry will record time, location, persons involved, action, evidence preserved and follow-up. • The Premises Manager will review incident data monthly for trends by day, hour, location and incident type. A sustained increase or serious event will trigger reconsideration of staffing, SIA deployment, entrance controls, CCTV coverage and liaison with police or the licensing authority as appropriate. • The minimum planned SIA deployment of a directly employed licensed officer from 19:00 to 07:00 will be maintained; any additional SIA deployment will be governed by a written risk-based matrix considering day of week, late-night hours, nearby venue closing times, local events, police intelligence, previous incidents and expected footfall. The basis for deployment and any temporary increase in coverage will be recorded. • The late-night security plan will
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				define when mag-lock or enhanced door-control arrangements may be used, subject to fire and evacuation requirements, and when additional SIA presence or management supervision is required. • Any customer involved in serious violence, threats, deliberate criminal damage, drug dealing or other significant disorder may be refused entry or excluded in accordance with the operator's banning policy. Repeat incidents will be reviewed centrally where appropriate. • Refusals based on apparent intoxication will be recorded. Staff will use observable indicators and will escalate uncertainty to a manager or SIA door supervisor. Where a person's condition gives rise to a medical concern, welfare and emergency response will take priority over enforcement. • Toilet checks will continue at least hourly, with the frequency increased where incidents or intelligence justify it. Checks will be recorded and supervisors will verify completion. A defined procedure will cover suspected drug use, drug paraphernalia, sharps, medical emergencies and preservation of evidence. • CCTV will be subject to a recorded opening check, regular management test and prompt fault escalation. The contingency plan will state what operational restrictions or additional staffing are required if critical coverage is unavailable. Coverage will be reviewed after any material layout change.
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				• The operator will maintain a police/licensing liaison log recording material contacts, requests, intelligence relevant to the premises and actions taken. This will support evidence that the LARA remains responsive to changes in the local environment. • Following any serious incident, management will complete a proportionate post-incident review to identify root causes, adequacy of controls, training or equipment issues and whether the LARA requires amendment. Actions will have named owners and target completion dates. Local-area monitoring and governance • The LARA will be reviewed formally at least annually and sooner whenever a material trigger occurs. Trigger events include a serious incident; safeguarding concern; failed age-verification test; material change in local crime or vulnerability profile; change in operating hours; material premises-layout change; introduction of a new gambling product or machine arrangement; repeated self-exclusion breach; enforcement or licensing feedback; significant complaint trend; or the opening/closure of a nearby sensitive use that materially changes the local risk profile. • A monthly premises compliance review will consider age challenges and refusals, third-party test results, safeguarding concerns, customer interactions, self-exclusion events, financial-vulnerability indicators, crime/ASB incidents, intoxication/drug incidents, SIA deployment, CCTV faults,
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Local Area Risk Assessment

				complaints, machine faults and training completion. • A quarterly senior-management LARA review will assess whether controls remain proportionate and effective. The review will record decisions, responsible persons, target dates and closure evidence for corrective actions. • A quarterly internal compliance audit will test implementation of the LARA. An annual independent or separately managed assurance review will sample the effectiveness of key controls. Audit actions will be tracked to completion. • Each material control will have an accountable owner. Local operational controls will ordinarily sit with the Premises Manager, safeguarding controls with the DSL, security controls with the responsible manager and designated internal SIA lead and corporate policy assurance with the relevant compliance function. • The local-area schedule will be checked at least annually and after material changes. A newly claimed use enters the scored inventory only after its current operation, location, observation date and evidence source are recorded. • The physical walkaround will be repeated as part of the annual review and following material local change. The reviewer will record the date, route, material observations, photographs where appropriate, verification status of sensitive premises and resulting amendments to controls. • Records created under this LARA will be retained in accordance with the operator's applicable retention and
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				data-protection policies and will be made available to authorised regulators or enforcement officers where lawfully required.
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1.3	Ensuring that gambling is conducted in a fair and open way	Failure to provide or manage the complaints procedure correctly (Gambling related complaints). Failure to provide clear or correct terms and conditions.	– Before opening, terms and conditions signage will be displayed and checked against the approved games and final layout. – Before opening, relevant bingo and gaming-machine rules will be displayed clearly. – Before opening, approved safer-gambling advice and support notices will be displayed and audited. – Before deployment, relevant staff will be trained and assessed on applicable Bingo Association codes and the operator's approved procedures. – Before deployment, staff will demonstrate knowledge of Golden Slots terms and conditions and the rules for the proposed bingo and ancillary gaming-machine products. – Before opening, complaint forms and the approved complaints procedure will be available at the customer service position; staff will be trained and assessed in handling and escalation. – As an operator, we acknowledge that this licensing objective has a	Enhanced controls and assurance - fair and open gambling • A documented signage and customer-information audit will be completed at least quarterly to confirm that terms and conditions, game rules, age restrictions, safer-gambling information and complaint information are present, legible, current and positioned where customers can reasonably see them. • Changes to material terms, game rules, promotional content or customer-facing safer-gambling information will be subject to management approval and version control so that superseded information is removed promptly. • A machine fault log will record faults, customer impact, isolation of the machine, engineer attendance and resolution. A machine presenting a material fault will be removed from play until it is safe and appropriate to return it to service. • Complaints will be entered in a central register showing date, subject, acknowledgement, investigation, response, escalation and closure. Management will review complaint themes at least quarterly to identify systemic issues or training needs. • The complaints procedure will state clear response timescales and escalation routes, including information about any applicable independent dispute-resolution route. Staff will be able to explain the process
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			direct link with the successful achievement of the crime and disorder objective. – Before opening, all proposed advertising and customer-facing promotions will undergo documented compliance approval against applicable advertising requirements.	without discouraging a customer from making a complaint. • Advertising and window-screen content will be subject to a documented pre-approval check considering age appeal, vulnerability, accuracy, prominence of material terms and compliance with applicable advertising and gambling requirements. Records of approval will be retained. • The frontage will be audited quarterly to ensure that material is not positioned or designed in a manner likely to have particular appeal to children or young persons and that age-restriction information remains prominent before entry. • No branded merchandise intended to encourage repeat gambling will be offered where it would conflict with the operator's safer-gambling or advertising controls. Any future promotional proposition will be risk assessed before launch. • Machine suppliers and maintenance providers will continue to be appropriately licensed or authorised where required. Evidence of supplier status and maintenance arrangements will be retained as part of premises compliance records. Governance and evidence • The LARA will be reviewed formally at least annually and sooner whenever a material trigger occurs. Trigger events include a serious incident; safeguarding concern; failed age-verification test; material change in local crime or vulnerability profile; change in operating hours; material premises-
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				layout change; introduction of a new gambling product or machine arrangement; repeated self-exclusion breach; enforcement or licensing feedback; significant complaint trend; or the opening/closure of a nearby sensitive use that materially changes the local risk profile. • A monthly premises compliance review will consider age challenges and refusals, third-party test results, safeguarding concerns, customer interactions, self-exclusion events, financial-vulnerability indicators, crime/ASB incidents, intoxication/drug incidents, SIA deployment, CCTV faults, complaints, machine faults and training completion. • A quarterly senior-management LARA review will assess whether controls remain proportionate and effective. The review will record decisions, responsible persons, target dates and closure evidence for corrective actions. • A quarterly internal compliance audit will test implementation of the LARA. An annual independent or separately managed assurance review will sample the effectiveness of key controls. Audit actions will be tracked to completion. • Training will be completed before a new employee undertakes unsupervised relevant duties. Core refresher training will take place at least every six months, supported by an annual assessed refresher and additional retraining after a material incident, failed test, policy change or identified competency gap. • Training effectiveness will be assessed through short knowledge
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Local Area Risk Assessment

				checks, scenario exercises, management observation and, where appropriate, third-party testing. Failed assessments will result in retraining before the employee resumes the affected unsupervised duty. • Management information will include age-test pass rate, age refusals, training completion, significant customer interactions, self-exclusion breaches, CCTV availability, security incidents, complaints and overdue audit actions. Trends will be used to determine whether further controls are required.
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Gambling Operation & Physical Design (Internal and External)				
Licensing Objective		Risks	Operator control policy (site implementation to verify)	Further controls planned before opening
2.1	Protecting children and other vulnerable persons from being harmed or exploited by gambling	The following facilities are identified for local context. Only those at or within 0.5 mile are counted within the scored proximity radius; more distant facilities are contextual and not counted in that radius: - Little Burrows Montessori Nursery, Thames Street, TW18 4SD (0.2 miles) - St Peters Nursery, St Peters Church Hall, Laleham Road, TW18 2DX (0.5 miles) - The Magna Carta Secondary School, Thorpe Road, TW18 3HJ (approximately 0.7 miles; contextual only, OUTSIDE the scored 0.5-mile radius; name, location and distance to be independently verified) - School Uniform Direct , 23 High St, Staines TW18 4QY - 0.1 miles from the premises. Support and Educational services for teenagers and young adults are provided at: - Staines & Egham Sea Cadets, The Lammas Park, Wraysbury Road, TW18 4XZ (0.6 miles) - Leacroft Centre, 2 Leacroft, TW18 4NQ (0.6 miles) - Army Cadets, 1 Langley Road, TW18 2EH (0.7 miles)	- Before opening, we will install and commission a site-specific CCTV system; no existing installation or coverage is assumed. - The proposed CCTV design will cover entry and exit points and aim to obtain usable frontal identification under anticipated lighting conditions; coverage and image quality will be tested and recorded before opening. - The proposed CCTV system will be configured for continuous recording whenever customers are present, including proposed 24-hour machine-access periods. Planned coverage includes the gaming floor, entrance and exits, office access and toilet entrance (not private toilet interiors). Before opening, commissioning tests will confirm camera fields of view, recording continuity, accurate time stamps, playback, secure access, export capability and a minimum 31-day retention configuration, subject to applicable legal requirements.	- 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. - Before deployment, all staff will complete safeguarding and vulnerability training, demonstrate understanding through documented assessment, and receive manager sign-off. Training will cover the Gambling Commission description 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: a. Children should not be in

		Care Homes: - Splendour Care, Centurion House, London Road, TW18 4AX (0.4 miles) Drug and Alcohol Treatment Centres: - Addiction Recover Now located in Windsor (6.3 miles) - Foundations Recovery located in Twickenham (8.1 miles) Job centres/employment agencies in the close area: - Contract Options, 118 High Street, TW18 4BY (0.1 mile) - Burnham Recourses, 1A Fairfield Avenue, TW18 4AB (0.2 miles) - Reed Recruitment Agency, Church House, 18-20 Church St, TW18 4EP (0.2miles) - Workmates, 40 Church Street, TW18 4EP (0.2 miles) - Ochre House Job Centre, Ashby House, Church Street, TW18 4XS (0.3 miles) - Cielo, 59 Church Street, TW18 4XS (0.3 miles) - StaffConnect, Rourke House, Watermans Business Park, The Causeway, TW18 3BA (0.4 miles) - CRL, 1 Kingsbury Crescent, TW18 3BA (0.4 miles) - Staines Job Centre, 62 London Road, TW18 4HB (0.4 miles) Housing Projects: - A2Dominion, Spelthorne House, TW18 4TA (0.2 miles) - Ability Housing Association, The Coach House, Gresham Road,	A manager will sign off the results; recordings will be provided to authorised persons in accordance with law and the approved disclosure procedure. - The proposed design includes CCTV viewing monitors at the customer service and security positions; locations and functionality will be verified at commissioning. - Before deployment, designated staff on every shift will be trained and assessed as competent to operate CCTV and respond to faults; rota coverage and training records will be signed off before opening. - Before opening, approved gambling-advice and safer-gambling support notices will be installed and checked against the final signage plan. - Before opening, age-restriction signs and gambling-support information, including GamCare or an appropriate equivalent service, will be installed in prominent and discreetly accessible positions. Dated photographic evidence will be retained. - Before opening, management will approve an adult-only admission and Challenge 25 procedure requiring	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 implemented to ensure that staff are trained in relation to the risk indicators set out below: 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. ** Although obviously it is noted that our Bingo premises is an over
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		TW18 2AE (0.5 miles) - Transform Housing and Support, Field View Court, Burges Way, TW18 2EX (0.8 miles) - Spelthorne Rent Start, Knowle Grn, TW18 1XA (0.9 miles) - HomeStart, The Resource Centre, Commercial Road, TW18 2QW (1 mile) Places of Worship: - The Redeemed Christian Church of God Chapel, Methodist Church, TW18 4SD (0.2 miles) - IPC Staines UK Pentecostal Church, Thames Street, TW18 4SD (0.2 miles) - Staines Methodist Church, Thames Street, TW18 4SD (0.2 miles) - Staines and District Synagogue, Westbrook Road, TW18 4PR (0.3 miles) - Staines Baptist Church, 16 Hale Street, TW18 4UW (0.3 miles) - Assembly of God for the Nations, Kingston Road, TW18 4LN (0.4 miles) - Our Lady of the Rosary Church, 59 Gresham Road, TW 18 2BD (0.5 miles) - Church of Jesus Christ of Latter Day Saints, 41 Kingston Road, TW18 4JG (0.5 miles) - St Marys Church, Vicarage Road, TW18 4YF (0.5 miles) Pay Day Loan Shops or Cash Chequing Services: - H&T Pawnbrokers, 53 High Street, TW18 4QH (100ft) - Vape Mobile (We buy phones for cash), 20 High Street, TW18 4EE (351ft) - Cash Converters, 14 High Road, TW18 4EE (440ft)	acceptable original photographic identification (for example, a passport, photocard driving licence or PASS-accredited proof-of-age card). Staff will be trained and age-refusal scenarios tested before customer admission. - Before opening, management will approve and commission an independent age-verification test programme appropriate to adult-only gambling admission, including all four shift patterns and the overnight period. Results, failures, corrective actions and retesting will be recorded; testing frequency will be documented and reviewed. - Before opening, the site-specific Age Verification Policy will be approved, covering Challenge 25, accepted identification, refusals recording and an independent age-verification testing programme. Implementation and testing evidence will be retained. - Before opening, the entrance-door acoustic alert will be installed, commissioned and tested from the designated staff positions. - Before opening, management will approve a site-specific staffing and security risk assessment covering minimum	18 premises only. - In addition and in line with the Spelthorne policy, there are Safeguarding Policies and Procedures for both Adults and for Children. - The operator has adopted a Safeguarding Adults Policy and Procedure. Before opening, the policy will be implemented at the proposed premises through staff induction, allocated responsibilities, local escalation arrangements and documented competence checks. This policy focuses on ensuring the processes are put in place to keep adults safe. The policy also directs staff on how to respond, what needs to be recorded and when matters should be reported internally and externally. Enhanced premises controls - access, safeguarding and safer gambling • A Designated Safeguarding Lead (DSL) and deputy will be appointed for the premises. Their names, role descriptions and current contact details will be available to all staff, and the DSL will be responsible for oversight of child safeguarding, adult safeguarding, safer-gambling vulnerability concerns and liaison with statutory agencies where appropriate. • Challenge 25 will apply at the point of entry and throughout the premises. A customer who appears under 25 must produce an accepted original photographic document before being permitted to gamble. Accepted documents, refusal requirements and escalation arrangements will be set out in the Age Verification Policy and reinforced during induction and
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		Banks/ATMs: - Halifax, 56 High Street, TW18 4DY (16ft) - Barclays Bank, 71 High Street, TW18 4PS (39ft) - Lloyds Bank, 73-75 High Street, TW18 4PP (92ft) - Santander, 59A High Street, TW18 4QH (112ft) - Nationwide, 30 High Street, TW18 4EE (272ft) - Metro ATM, TW18 4WB (02 miles) Gambling Premises: - Betfred, 76 High Street, TW18 4DP (256ft) - Admiral Slots, 109 High Street, TW18 4PQ (433ft) Alcohol licensed premises: - Nostro Lounge, 55 High Street, TW18 4QH (144ft) - Turtle Bay, 24 High Street, TW18 4EE (335ft) - The George, 2-8 High Street, TW18 4EE (0.1 mile) - London Stone, 14 Church Street, TW18 4EP (0.1 mile) - Slug & Lettuce, 15-18 Clarence Street, TW18 4SU (0.2 miles) - Thames Side Brewery, 1 Hale Street, TW18 4UW (0.2 miles) - Last Hop, Thames Edge, 15-18 Clarence St, TW18 4SU (0.3 miles) - Three Tuns, 63 London Road, TW18 4BN (0.4 miles) - The Star Staines, 52 Kingston Road, TW18 4NL (0.4 miles) Playgrounds & Parks: - Playground, 5-8 Mill Mead, TW18	two-person operational cover at all hours, directly employed SIA-licensed cover from 19:00 to 07:00, breaks, relief, absence and escalation; deployment will be checked against applicable licence conditions and regulatory requirements. - Before opening, management will approve and train staff on a proportionate procedure for refusing admission to customers who appear to be under the influence of alcohol or drugs, with welfare and emergency escalation where appropriate. - Before opening, a documented procedure will require customer-toilet checks at least hourly, increased where risk warrants, with each check and any action recorded. Staff-controlled access will be assessed against the approved layout and safeguarding requirements. - Before opening, GamCare or equivalent safer-gambling information will be displayed in approved locations; signage will be photographed and signed off. - Before opening, all allocated employees will complete assessed induction covering local risks, drugs and alcohol, conflict management, safer	refresher training. • Every age-related refusal or attempted under-age entry will be recorded in a refusals log showing date, time, staff member, reason for challenge, identification offered, outcome and any management action. The Premises Manager will review the log monthly for patterns by time, shift, entrance position or member of staff. • Independent third-party age-verification testing will cover all operating shifts on a risk-based programme. Results will be retained. Any failed test will result in immediate management review, targeted retraining within 48 hours and a repeat test within 14 days. A second failure will be escalated to senior compliance management with a documented corrective action plan. • A quarterly entrance-observation audit will test whether staff have uninterrupted awareness of persons entering, whether acoustic door alerts are effective, whether CCTV provides frontal identification and whether signage is visible before entry. Findings and corrective actions will be recorded. Enhanced entry screening, facial recognition, customer recognition and self-exclusion controls • Every customer entering the premises will be personally greeted by a dedicated, trained member of staff before any gambling takes place. The greeting is a mandatory first-line safeguarding and safer-gambling control, not merely a customer-service function. The staff member will make an initial, proportionate assessment of
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		4DP (0.2 miles) - Birch Green, TW18 4HA (0.5 miles) - Lammas Lower Playground and Splash Park, Lammas Recreational Ground, TW18 4XZ (0.6 miles) - Moormede Play Area, Staines, TW18 4WA (0.6 miles) Leisure Centres/Community Centres: - Staines Community Centre, Thames St, TW18 4EA (0.1 mile) Bowling Alley, shopping centres, cinemas and hotels: - Two Rivers Shopping Centre, Mustard Mill Road, TW18 4WB (0.1 mile) - Premier Inn Staines upon Thames Hotel 90, 106 High Street, TW18 4DP (0.1 mile) - Elmsleigh Shopping Centre, 62 South Street, TW18 4QB (0.2 miles) - Vue Cinema, Mustard Mill Road, TW18 4BL (0.2 miles) Fast Food premises and cafes: - McDonalds, 62 High Street, TW18 4DY (23ft) - Burger King, 68 High Street, TW18 4DY (128ft) - Slim Chickens, 2 Norris Road, TW18 4UP (349ft) - KFC, 32 High Street, TW18 4EE (420ft) - 1517 Chicken Shop, 15 Church Street, TW18 4EN (0.1 mile) - Big Brother Burger House, 14 Church Street, TW18 4EP (0.1 mile) - Don Grill, 25 Church Street, TW18 4EN (0.1 mile) - Nandos, Mustard Mill Road, TW18 4BL (0.1 mile)	gambling and vulnerability. Refresher training will be scheduled at least every six months, and completion records retained; no site-specific completion is assumed. - If refreshments are provided, they will be restricted to playing customers under an approved procedure. - Before opening, management will approve a customer-belongings policy prohibiting unattended bags or other belongings in the premises, with a proportionate response procedure. - Before opening, the entrance sightlines, staffing positions and layout will be assessed and tested for effective age and vulnerability screening. - Before opening, management will approve and test a staffing plan designed to support customer interaction, with the proposed minimum cover, relief and escalation arrangements evidenced. - Before opening, training and supervision procedures will address the risks of solitary machine play, rapid payouts and repetitive or excessive gambling, with recorded customer interactions and escalation.	apparent age and of any observable indicators of vulnerability, intoxication, impairment, distress, confusion or other circumstance that may require intervention. Where a concern is identified, the appropriate Challenge 25, safeguarding, safer-gambling, refusal or management-escalation procedure will be completed before the customer is permitted to gamble. • The entry assessment will be applied consistently and staff will not infer vulnerability from ethnicity, nationality, disability, religion, accent or other protected characteristic. The assessment will be based on apparent age where relevant to Challenge 25, observable behaviour, communication and other objective indicators. A customer who appears under 25 will be required to produce acceptable photographic identification before being permitted to gamble. • Facial recognition may be considered as a supplementary safeguarding, self-exclusion and security control, but will not be deployed unless all necessary privacy, legal, technical and management approvals have been completed. Baseline safeguarding and age-verification controls will operate independently of facial recognition. If subsequently approved and deployed, any potential match or alert will be verified by trained staff under the relevant policy before action is taken. • The facial-recognition system will be operated under documented data-protection and privacy governance, including appropriate transparency information, access controls, accuracy
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		- Five Guys, Two Rivers, TW18 4BL (0.1 mile) Toy Shops: - CeX, Unit 5, 88 High Street, TW18 4DP (358ft) - Sports Direct, Elmsleigh Shopping Centre, High Street, TW18 4PJ (0.2 miles) - GAME, Elmsleigh Shopping Centre, High Street, TW18 4PJ (0.2 miles) Bus Stops: - Thames Street Stop H (433ft) - Staines Bridge Stop C (0.1 mile) - Staines Bridge Stop Z (0.1 mile) - South Street Stop K (0.2 miles) - High Street Stop J (0.2 miles) - Two Rivers (0.2 miles) - Staines Police Station Stop M (0.3 miles) - Staines Police Station Stop U (0.3 miles) - Bridge Street Stop B (0.3 miles) - Staines Bus Station (0.3 miles) - Pinetrees Business Park (0.4 miles) - Staines Sainsburys (0.4 miles) - Sainsburys (0.5 miles) <u>General Summary of Risks Considered:</u> - 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	- Before opening, a clear under-18s prohibition notice will be installed at the bingo-premises entrance and its visibility verified. - Before opening, staff will complete assessed training to identify and respond appropriately to underage customers and potentially vulnerable people, including refusal of admission and welfare escalation. - Before opening, the frontage, lighting, internal layout and sightlines will be assessed and signed off against child-protection, vulnerability and staff line-of-sight requirements; no completed fit-out is assumed. - Before opening, all proposed promotions and advertising will be reviewed and approved to avoid appealing to children, young people or vulnerable people.	and false-match procedures, retention arrangements, audit trails and periodic testing. Any material system failure or loss of critical recognition capability will be logged and subject to a documented contingency assessment, including enhanced manual entry checks where required. • Customers wishing to gamble must register under the operator's Verified Player Access scheme before play is permitted. The purpose of the system includes improving customer service while enabling the operator, where lawfully and appropriately recorded, to recognise returning customers and to build a longitudinal understanding of relevant attendance and safer-gambling interactions. This will assist staff to identify material changes or repeated patterns that may not be apparent from a single visit. • For returning customers, authorised staff will use information held within the customer-recognition system, where relevant and lawful, to support safer-gambling decisions. Relevant information may include previous significant customer interactions, self-exclusion status, restrictions, welfare concerns and other customer-protection information necessary to reduce gambling-related harm. Access will be role-based and limited to information required for the staff member's duties. • Recognition of a returning customer will not be treated as evidence that the customer is free from vulnerability. Staff will remain alert to changes in frequency of attendance, duration or
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		- Failure to provide information to players on responsible gambling. - 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.	pattern of play, repeated visits, behaviour, presentation, cash-related behaviour and other indicators identified elsewhere in this assessment. Where a material change or pattern is identified, staff will undertake and record an appropriate customer interaction. • A facial-recognition or customer-system alert indicating a possible self-excluded person will require prompt staff verification. Where the person is confirmed as subject to an applicable self-exclusion, they will not be permitted to gamble and the attempted breach will be recorded in the self-exclusion breach log. Management will review the circumstances, including whether the alert and staff response operated effectively and whether corrective action, retraining or system adjustment is required. • The effectiveness of the entry-greeting, age-assessment, facial-recognition, customer-recognition and self-exclusion controls will be included in the monthly premises compliance review and quarterly LARA assurance review. Management information will include relevant entry interventions, age challenges/refusals, recognition alerts, confirmed and false matches, self-exclusion alerts/breaches, significant customer interactions, system availability and remedial actions. Trends will be used to refine staffing, training and control settings. • No person under 18 will be permitted
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				to enter or remain in the gambling area, including where accompanied by an adult. Any ambiguity will be resolved in favour of refusal until satisfactory age evidence is produced. • Staff will use a structured Identify-Interact-Evaluate approach supported by objective and behavioural prompts. Indicators will include marked changes in frequency or spend, extended or repeated sessions, rapid re-spending of winnings, repeated machine changes, simultaneous play, repeated cash withdrawals, agitation following losses, chasing losses, visible distress, statements indicating financial pressure, impaired judgement, intoxication, cognitive difficulty, bereavement or other circumstances that may increase vulnerability. • Significant customer interactions will be recorded with the trigger, observations, conversation, customer response, action taken, outcome, any restriction or exclusion, follow-up requirement and manager review. Records will be factual and proportionate and will avoid unsupported assumptions about a customer's personal circumstances. • Where staff identify a material welfare or safer-gambling concern, a customer may be invited to take a break or pause play while the concern is discussed. Continued gambling will not be treated as automatic evidence that the concern has been resolved. The interaction will be evaluated and escalated where indicators persist. • Repeated or escalating indicators will require manager review. Management may apply enhanced monitoring,
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				provide support information, encourage or implement self-exclusion in accordance with policy, refuse further gambling or entry where justified, or take other proportionate action to protect the customer. • The premises will maintain a self-exclusion breach log. Any suspected breach will be acted upon promptly, recorded and reviewed. The review will consider how the breach occurred, whether staff recognition or process failed, and what corrective action is required. Reinstatement will be subject to the operator's formal process and will not be treated as automatic at the end of an exclusion period. • New self-exclusions and relevant updates will be communicated to staff through a controlled briefing process, with access to the information limited to what is necessary for effective implementation and handled in accordance with data-protection requirements. • Management will conduct monthly quality-assurance sampling of customer-interaction records to test whether triggers were identified, interactions were timely, outcomes were evaluated and follow-up was completed. Learning points will be fed back into staff briefings and training. • Safer-gambling information will be available at the Customer Service Counter, near gaming areas and in a discreet location. Staff will be able to explain available support and self-exclusion options and will check understanding where communication difficulties are apparent.
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				• For customers with limited English, key safer-gambling and age-restriction information will be made available in accessible formats appropriate to the local customer profile, including plain-language and pictogram-based information where useful. Staff will have a defined route to obtain translation or interpretation assistance where necessary to explain a material safeguarding or safer-gambling intervention. • Reasonable communication adjustments will be considered for customers with hearing, visual, cognitive or other communication needs. Large-print or alternative-format information will be available on request and staff will be trained to check understanding without making assumptions about disability or capacity. • The proximity of banks, ATMs, pawnbrokers and cash-conversion businesses will be treated as a specific local vulnerability factor. Staff will be trained to recognise observable patterns such as repeated exits and rapid re-entry, repeated requests to break or obtain cash, or statements indicating that a customer is seeking additional funds to continue gambling. • Repeated cash-related patterns, when combined with other indicators of harm, will trigger a proportionate customer interaction. Staff will record the observed pattern and the outcome rather than assuming that use of a nearby ATM or cash business is itself evidence of gambling harm. • The premises will not provide customer credit, payday lending, an
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				internal ATM or a cash-back service. Staff will not direct customers to particular external credit or pawnbroking services for the purpose of obtaining further gambling funds. • Staff will be trained to respond to statements such as inability to afford essential expenditure, borrowing to gamble, selling possessions to obtain gambling funds or requests for credit as significant financial-vulnerability indicators requiring immediate interaction and manager awareness. • Monthly safer-gambling review will consider whether repeated cash withdrawal/re-entry patterns or financial-vulnerability interactions are concentrated at particular times or among repeat customers and whether additional staffing, interaction or exclusion controls are required. • Prolonged play will be monitored throughout the day, not only late at night. Staff will pay attention to changes in pace, responsiveness, concentration, posture, repeated play without breaks and other observable signs of fatigue or reduced alertness. • The operator will maintain a documented session-observation protocol. Where prolonged continuous play or observable fatigue gives rise to concern, staff will conduct a welfare interaction, offer a break and evaluate whether continued play is appropriate. Repeat long-session concerns will be escalated to a manager. • Where a customer attempts to play multiple machines simultaneously, staff will intervene in accordance with the operator's safer-gambling policy and
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				assess whether the behaviour forms part of a wider pattern of loss of control or harmful play. Material interventions will be recorded. • Fatigue-related observations and interventions will be included in monthly customer-interaction quality assurance so that management can assess whether staffing and floor coverage remain adequate during late or extended operating periods. Physical-design assurance • Any proposed movement of gaming machines, screens, promotional material, furniture, partitions or the Customer Service Counter that could affect line of sight, circulation or CCTV coverage will require management approval and a documented review against this LARA before implementation. • CCTV blind-spot and identification-quality checks will be repeated after layout changes and periodically as part of the premises audit. The review will confirm that entrances, exits, gaming areas, the office, toilet entrance and relevant external areas remain adequately covered. • CCTV faults affecting critical coverage will be logged immediately and escalated for repair under a defined service standard. Until rectified, management will assess whether additional staff positioning, SIA presence or temporary operational restrictions are necessary. • Panic alarms and personal alarms will be function-tested on a recorded schedule. Staff will receive practical instruction in their use, the safe-haven
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				procedure, emergency communications and the circumstances in which police or emergency services should be contacted. • Lone working will be avoided where the assessed risk requires more than one member of staff. Where lone working is exceptionally permitted, a specific lone-worker assessment, check-in arrangements, personal alarm and escalation procedure will apply.
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2.2	Preventing Gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime	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. 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. 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. The published aggregate crime figures do not establish whether individual reported incidents were gambling-related. Site-specific incident trends and relevant police or council intelligence will be reviewed before opening and during operation.	- The proposed CCTV system will be configured for continuous recording whenever customers are present, including proposed 24-hour machine-access periods. Planned coverage includes the gaming floor, entrance and exits, office access and toilet entrance (not private toilet interiors). Before opening, commissioning tests will confirm camera fields of view, recording continuity, accurate time stamps, playback, secure access, export capability and a minimum 31-day retention configuration, subject to applicable legal requirements. A manager will sign off the results; recordings will be provided to authorised persons in accordance with law and the approved disclosure procedure. - The proposed design includes CCTV viewing monitors at the customer service position and front security position, subject to commissioning and approved final layout. - Before deployment, designated staff on every shift will be trained and assessed as competent to operate CCTV and respond to faults; rota coverage and training records	- Before opening, we will implement a counter Policy, that covers: a. The Customer Service Counter will be positioned deliberately in a part of the venue that maximises customer viewing and total line of sight to the entrance/exit. Any area outside direct staff sightlines will be covered by CCTV, subject to verification against the final approved premises plan and a witnessed pre-opening CCTV commissioning inspection 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
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			will be signed off before opening. – For this proposed site, SIA-licensed security officers will be directly employed by the operator, not supplied by an external security contractor. The proposed 19:00–07:00 coverage, individual licence status, relief arrangements and deployment assessment will be verified and signed off before opening. – Before opening, a site-specific exclusion and barring procedure will be approved for any customers who engage in crime and disorder within or outside the premises. – Before opening, an admission-refusal policy will be approved and staff trained to respond to customers who appear intoxicated, with appropriate welfare escalation. – Before opening, the site procedure will require recorded customer-toilet checks at least hourly, with more frequent checks where risk warrants; controlled access will be assessed against the approved layout. – Before opening, every allocated employee will complete assessed induction	communicating with customers. c. The customer service counter need not be continuously occupied, but the entrance must be actively supervised throughout customer access. On every six-hour shift, one of the minimum two operational employees will be designated as entrance/arrival supervisor, positioned to see and greet all entrants and operate Verified Player Access checks; the second will supervise the gaming floor and respond to customer needs. During a break, intervention, toilet check or other duty that removes the entrance supervisor from that position, the floor employee must assume entrance supervision only if safe continuous floor oversight is maintained; otherwise admissions will be temporarily paused until the original supervisor or approved additional relief employee resumes position. Breaks will be staggered, and no operational employee may be counted as on-duty cover while off duty. The 19:00–07:00 directly employed SIA officer provides supplementary security and does not
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			and role-specific training. Refresher training will be scheduled at least every six months and completion recorded. Planned topics include: 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 - Before opening, completed induction and refresher training will be entered in each employee's individual training record, checked by the responsible manager and retained for licensing inspection. No completed site-specific training is assumed. - Following opening, management will liaise with local police and community	replace either operational employee. The final staffing and entrance-visibility plan, break/relief rota, admissions-pause protocol and CCTV sightline test will be approved before opening. d. Once installed and commissioned, the planned Full HD CCTV coverage of the premises will be viewable from the Service Counter Desk, as well as, the main office. A 'spotter' monitor will also be positioned at the Customer Service Desk and Security Desk. The proposed system will be configured for 31-day retention, subject to documented commissioning checks and applicable data-protection requirements. All appointed staff will be trained in its use and assessed before opening, with signed training records. e. In terms of 'Cash Handling', cash is not stocked at the desk. However, there is a need to restock the cash recyclers. Cash-recycler replenishment will take place only on the scheduled cash-collection cycle. For that cycle, the entire venue will close temporarily to the public: admissions will be suspended, all customers
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			partners as necessary to address crime and disorder; escalation contacts and information-sharing procedures will be agreed before opening.	will leave and no customers will be permitted inside until replenishment and cash handling are complete. Management will approve the closure, customer-clearance and reopening procedure, maintain minimum safe staff and SIA cover as applicable, and record each closure and replenishment. f. The final approved premises layout will include a lockable staff safe-haven room, with CCTV for full viewing of the premise and offers various communication capabilities. Static panic alarms will be positioned at the desk and in the office and tested before opening. 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. – Before opening, the operator's CCTV policy will be adopted for this site and site-specific procedures approved. This policy covers: a. Sufficient coverage, as CCTV system is designed to cover the whole floor, all entrances, exits, entrance to toilets, the office and
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				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. Before opening, designated assistant managers and senior staff will be trained and assessed as competent to use the CCTV system, including lawful access, playback, export, fault escalation and disclosure procedures. Training records will be signed off. d. The proposed system will be configured and tested for a minimum 31-day retention period, subject to applicable law 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 system is checked regularly by management and serviced by a third party on a bi-annual basis. – Staff Line of Sight Policy covers: a. The main bingo area will provide the 12 dedicated bingo machines with seats
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				and 24 Boomerang-supplied Jigsaw terminals with dedicated bingo-only offerings. The 12 Category B3 and 48 Category C ancillary gaming machines will be positioned to support staff visibility and CCTV coverage, including the front entrance/exit and rear emergency exit. The final plan will keep bingo identifiable as the main use and maintain clear customer circulation and exit routes. b. Coverage of all required public areas will be verified against the approved floor plan and recorded at commissioning, excluding private toilet interiors to allow viewing of machines when required. This considers any potential blind spots around the structural pillars. c. The final machine layout will be checked before opening to confirm that gaming positions, structural features and signage do not obstruct staff sightlines or required CCTV coverage. Any identified blind spots will be addressed and retested, with results recorded in the site commissioning evidence. – Ancillary gaming machines policy
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				— 12 Category B3 and 48 Category C machines: a. The proposed gaming-machine positions will be assessed against the approved floor plan before opening. Direct staff sightlines and CCTV coverage will be verified by an on-site commissioning test, and any required machine relocation or additional coverage will be completed and signed off before customer admission. b. The proposed TITO (Tickets In, Tickets Out) arrangements apply to the 12 Category B3 and 48 Category C ancillary gaming machines. These cash and ticket arrangements will be confirmed in supplier and commissioning records; they must not be assumed to describe the separate dedicated bingo machines or Jigsaw bingo terminals. 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
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				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. – Staff Safety & Alarm Measures: 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. c. Before deployment at Staines, all allocated operational and security employees will complete or have their current conflict-management competence verified, with dated training records and management authorisation
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				retained. Annual refresher training will be required thereafter, with completion monitored and recorded. 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. – Bingo External Shop and Forecourt Management: a. Before opening, the single proposed customer entrance/exit will be checked against the approved floor plan for direct staff observation and CCTV visibility. The proposed spotter monitor position will be confirmed through commissioning; the entrance supervisor must retain active awareness of every arrival. 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
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				person suspected of engaging in crime and disorder in the immediate vicinity of the premises will also be banned. Enhanced premises controls - security, cash, CCTV and staff safety - Any proposed movement of gaming machines, screens, promotional material, furniture, partitions or the Customer Service Counter that could affect line of sight, circulation or CCTV coverage will require management approval and a documented review against this LARA before implementation. - CCTV blind-spot and identification-quality checks will be repeated after layout changes and periodically as part of the premises audit. The review will confirm that entrances, exits, gaming areas, the office, toilet entrance and relevant external areas remain adequately covered. - CCTV faults affecting critical coverage will be logged immediately and escalated for repair under a defined service standard. Until rectified, management will assess whether additional staff positioning, SIA presence or temporary operational restrictions are necessary. - Panic alarms and personal alarms will be function-tested on a recorded schedule. Staff will receive practical instruction in their use, the safe-haven procedure, emergency communications and the circumstances in which police or emergency services
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				should be contacted. • Lone working will be avoided where the assessed risk requires more than one member of staff. Where lone working is exceptionally permitted, a specific lone-worker assessment, check-in arrangements, personal alarm and escalation procedure will apply. • Cash-recycler replenishment will take place when customers are not present and in accordance with a controlled procedure. Where the assessed value or circumstances warrant it, dual control will be used. Cash variances, security incidents and unusual access to cash-handling areas will be recorded and investigated. • The premises will maintain maximum working cash levels appropriate to operations. Staff will not discuss cash holdings with customers, and cash movements will be planned to reduce predictability and exposure to robbery risk. • Emergency and security drills will be conducted periodically, including violence/threat response, safe-haven use, evacuation, alarm activation and medical emergency scenarios. Learning will be recorded and incorporated into refresher training. • A single premises incident register will categorise crime, violence, threats, anti-social behaviour, intoxication, suspected drug activity, theft, criminal damage, self-exclusion breach, safeguarding concern, medical/welfare incident, suspicious transaction, CCTV fault and security intervention. Each entry will record time, location, persons involved, action, evidence
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				preserved and follow-up. • The Premises Manager will review incident data monthly for trends by day, hour, location and incident type. A sustained increase or serious event will trigger reconsideration of staffing, SIA deployment, entrance controls, CCTV coverage and liaison with police or the licensing authority as appropriate. • The minimum planned SIA deployment of a directly employed licensed officer from 19:00 to 07:00 will be maintained; any additional SIA deployment will be governed by a written risk-based matrix considering day of week, late-night hours, nearby venue closing times, local events, police intelligence, previous incidents and expected footfall. The basis for deployment and any temporary increase in coverage will be recorded. • The late-night security plan will define when mag-lock or enhanced door-control arrangements may be used, subject to fire and evacuation requirements, and when additional SIA presence or management supervision is required. • Any customer involved in serious violence, threats, deliberate criminal damage, drug dealing or other significant disorder may be refused entry or excluded in accordance with the operator's banning policy. Repeat incidents will be reviewed centrally where appropriate. • Refusals based on apparent intoxication will be recorded. Staff will use observable indicators and will escalate uncertainty to a manager or SIA door supervisor. Where a person's
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Local Area Risk Assessment

				condition gives rise to a medical concern, welfare and emergency response will take priority over enforcement. • Toilet checks will continue at least hourly, with the frequency increased where incidents or intelligence justify it. Checks will be recorded and supervisors will verify completion. A defined procedure will cover suspected drug use, drug paraphernalia, sharps, medical emergencies and preservation of evidence. • CCTV will be subject to a recorded opening check, regular management test and prompt fault escalation. The contingency plan will state what operational restrictions or additional staffing are required if critical coverage is unavailable. Coverage will be reviewed after any material layout change. • The operator will maintain a police/licensing liaison log recording material contacts, requests, intelligence relevant to the premises and actions taken. This will support evidence that the LARA remains responsive to changes in the local environment. • Following any serious incident, management will complete a proportionate post-incident review to identify root causes, adequacy of controls, training or equipment issues and whether the LARA requires amendment. Actions will have named owners and target completion dates. Security assurance • The LARA will be reviewed formally at least annually and sooner whenever a
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Local Area Risk Assessment

				material trigger occurs. Trigger events include a serious incident; safeguarding concern; failed age-verification test; material change in local crime or vulnerability profile; change in operating hours; material premises-layout change; introduction of a new gambling product or machine arrangement; repeated self-exclusion breach; enforcement or licensing feedback; significant complaint trend; or the opening/closure of a nearby sensitive use that materially changes the local risk profile. • A monthly premises compliance review will consider age challenges and refusals, third-party test results, safeguarding concerns, customer interactions, self-exclusion events, financial-vulnerability indicators, crime/ASB incidents, intoxication/drug incidents, SIA deployment, CCTV faults, complaints, machine faults and training completion. • A quarterly senior-management LARA review will assess whether controls remain proportionate and effective. The review will record decisions, responsible persons, target dates and closure evidence for corrective actions. • A quarterly internal compliance audit will test implementation of the LARA. An annual independent or separately managed assurance review will sample the effectiveness of key controls. Audit actions will be tracked to completion. • Each material control will have an accountable owner. Local operational controls will ordinarily sit with the Premises Manager, safeguarding controls with the DSL, security controls with the responsible manager and
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Local Area Risk Assessment

				designated internal SIA lead and corporate policy assurance with the relevant compliance function. • Management information will include age-test pass rate, age refusals, training completion, significant customer interactions, self-exclusion breaches, CCTV availability, security incidents, complaints and overdue audit actions. Trends will be used to determine whether further controls are required. • The local-area schedule will be checked at least annually and after material changes. A newly claimed use enters the scored inventory only after its current operation, location, observation date and evidence source are recorded. • The physical walkaround will be repeated as part of the annual review and following material local change. The reviewer will record the date, route, material observations, photographs where appropriate, verification status of sensitive premises and resulting amendments to controls. • Records created under this LARA will be retained in accordance with the operator's applicable retention and data-protection policies and will be made available to authorised regulators or enforcement officers where lawfully required. Pre-opening evidence required: signed floor plan showing counter, entrance and CCTV sightlines; CCTV commissioning and retention test; operational rota naming the entrance supervisor on each shift; documented staggered breaks, relief and admission-pause procedure; and Premises
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Local Area Risk Assessment

				Manager approval before customer access.
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2.3	Ensuring that gambling is conducted in a fair and open way		– Before opening, terms and conditions signage will be displayed and checked against the approved games and final layout. – Before opening, relevant bingo and gaming-machine rules will be displayed clearly. – Before opening, approved safer-gambling advice and support notices will be displayed and audited. – Before deployment, relevant staff will be trained and assessed on applicable Bingo Association codes and the operator's approved procedures. – Staff will explain the bingo rules and terms for the 12 dedicated seated bingo machines and 24 Boomerang-supplied Jigsaw terminals with dedicated bingo-only offerings, and the separate rules and terms for the 12 Category B3 and 48 Category C ancillary gaming machines. Customer information will identify bingo as the main use. – Before opening, complaint forms and the approved complaints procedure will be available at the customer service position; staff will be	– Before opening, management will complete and sign off the site-specific staffing assessment, four-shift operational rota, directly employed SIA coverage, break arrangements, leave and sickness relief, and escalation testing. The minimum staffing requirement will be reviewed following incidents or material operating changes. – This is to ensure that the whole premises is monitored, including the entrance, the 12 dedicated bingo machines with seats, the 24 Boomerang-supplied Jigsaw bingo terminals, and the 12 Category B3 and 48 Category C ancillary gaming machines. – We do not advertise its venues, activities or customer benefits using mainstream media, television, radio or newsprint etc. – The proposed frontage may include screens showing approved game-related content only if permitted by the final frontage design and applicable advertising requirements. Screen placement, brightness, visibility to children and vulnerable persons, and content will be reviewed and approved before installation and opening. All content displayed is produced by Gambling Commission
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Local Area Risk Assessment

			trained and assessed in handling and escalation. - As an operator, we acknowledge that this licensing objective has a direct link with the successful achievement of the crime and disorder objective. - Before opening, all proposed advertising and customer-facing promotions will undergo documented compliance approval against applicable advertising requirements. - Before opening, the operator will verify and retain evidence that all machine suppliers hold any required Gambling Commission licences or authorisations. - Before opening, qualified maintenance arrangements will be contracted and recorded; machine commissioning certificates will be retained. - Before opening, a machine fault and isolation procedure will be approved; faulty equipment will be withdrawn from play until assessed and cleared by authorised personnel.	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 Provision of Gambling Harm Prevention Advice Policy covers: a. Before opening, approved safer-gambling brochures and posters will be placed at the customer service counter, near gaming areas and in a discreet location; placement will be recorded in a pre-opening signage audit. b. Before opening, the operator will verify available customer time-awareness aids and any manufacturer-enabled timer or spend-limit functions on the final approved machines, and will implement a documented self-exclusion procedure; staff will be trained to explain the available controls.
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Local Area Risk Assessment

				Enhanced premises controls - customer information, advertising, machines and complaints • A documented signage and customer-information audit will be completed at least quarterly to confirm that terms and conditions, game rules, age restrictions, safer-gambling information and complaint information are present, legible, current and positioned where customers can reasonably see them. • Changes to material terms, game rules, promotional content or customer-facing safer-gambling information will be subject to management approval and version control so that superseded information is removed promptly. • A machine fault log will record faults, customer impact, isolation of the machine, engineer attendance and resolution. A machine presenting a material fault will be removed from play until it is safe and appropriate to return it to service. • Complaints will be entered in a central register showing date, subject, acknowledgement, investigation, response, escalation and closure. Management will review complaint themes at least quarterly to identify systemic issues or training needs. • The complaints procedure will state clear response timescales and escalation routes, including information about any applicable independent dispute-resolution route. Staff will be able to explain the process without discouraging a customer from making a complaint.
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				• Advertising and window-screen content will be subject to a documented pre-approval check considering age appeal, vulnerability, accuracy, prominence of material terms and compliance with applicable advertising and gambling requirements. Records of approval will be retained. • The frontage will be audited quarterly to ensure that material is not positioned or designed in a manner likely to have particular appeal to children or young persons and that age-restriction information remains prominent before entry. • No branded merchandise intended to encourage repeat gambling will be offered where it would conflict with the operator's safer-gambling or advertising controls. Any future promotional proposition will be risk assessed before launch. • Machine suppliers and maintenance providers will continue to be appropriately licensed or authorised where required. Evidence of supplier status and maintenance arrangements will be retained as part of premises compliance records. Competence and management assurance • The LARA will be reviewed formally at least annually and sooner whenever a material trigger occurs. Trigger events include a serious incident; safeguarding concern; failed age-verification test; material change in local crime or vulnerability profile; change in operating hours; material premises-layout change; introduction of a new
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				gambling product or machine arrangement; repeated self-exclusion breach; enforcement or licensing feedback; significant complaint trend; or the opening/closure of a nearby sensitive use that materially changes the local risk profile. • A monthly premises compliance review will consider age challenges and refusals, third-party test results, safeguarding concerns, customer interactions, self-exclusion events, financial-vulnerability indicators, crime/ASB incidents, intoxication/drug incidents, SIA deployment, CCTV faults, complaints, machine faults and training completion. • A quarterly senior-management LARA review will assess whether controls remain proportionate and effective. The review will record decisions, responsible persons, target dates and closure evidence for corrective actions. • A quarterly internal compliance audit will test implementation of the LARA. An annual independent or separately managed assurance review will sample the effectiveness of key controls. Audit actions will be tracked to completion. • Each material control will have an accountable owner. Local operational controls will ordinarily sit with the Premises Manager, safeguarding controls with the DSL, security controls with the responsible manager and designated internal SIA lead and corporate policy assurance with the relevant compliance function. • Training will be completed before a new employee undertakes unsupervised relevant duties. Core
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				refresher training will take place at least every six months, supported by an annual assessed refresher and additional retraining after a material incident, failed test, policy change or identified competency gap. • Training effectiveness will be assessed through short knowledge checks, scenario exercises, management observation and, where appropriate, third-party testing. Failed assessments will result in retraining before the employee resumes the affected unsupervised duty. • Management information will include age-test pass rate, age refusals, training completion, significant customer interactions, self-exclusion breaches, CCTV availability, security incidents, complaints and overdue audit actions. Trends will be used to determine whether further controls are required. • The local-area schedule will be checked at least annually and after material changes. A newly claimed use enters the scored inventory only after its current operation, location, observation date and evidence source are recorded. • The physical walkaround will be repeated as part of the annual review and following material local change. The reviewer will record the date, route, material observations, photographs where appropriate, verification status of sensitive premises and resulting amendments to controls. • Records created under this LARA will be retained in accordance with the operator's applicable retention and data-protection policies and will be
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				made available to authorised regulators or enforcement officers where lawfully required.
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Control Assurance, Accountability and Evidence Framework

The following framework applies across all licensing objectives and is intended to ensure that the controls described in this assessment are implemented, evidenced, reviewed and improved in response to actual operating experience. It supplements the detailed controls in the risk matrices and avoids reliance on policy statements that cannot be demonstrated in practice.

Control ownership and accountability

- Each material control will have an accountable owner. Local operational controls will ordinarily sit with the Premises Manager, safeguarding controls with the DSL, security controls with the responsible manager and designated internal SIA lead and corporate policy assurance with the relevant compliance function.

Training and competence

- Training will be completed before a new employee undertakes unsupervised relevant duties. Core refresher training will take place at least every six months, supported by an annual assessed refresher and additional retraining after a material incident, failed test, policy change or identified competency gap.
- Training effectiveness will be assessed through short knowledge checks, scenario exercises, management observation and, where appropriate, third-party testing. Failed assessments will result in retraining before the employee resumes the affected unsupervised duty.

Management information and effectiveness measures

- Management information will include age-test pass rate, age refusals, training completion, significant customer interactions, self-exclusion breaches, CCTV availability, security incidents, complaints and overdue audit actions. Trends will be used to determine whether further controls are required.

Local-area verification

- The local-area schedule will be re-verified at least annually and after material changes. A new use will enter the scored inventory only once its name, location, current operation, date and evidence source have been recorded.
- The physical walkaround will be repeated as part of the annual review and following material local change. The reviewer will record the date, route, material observations, photographs where appropriate, verification status of sensitive premises and resulting amendments to controls.

Records and regulatory availability

- Records created under this LARA will be retained in accordance with the operator's applicable retention and data-protection policies and will be made available to authorised regulators or enforcement officers where lawfully required.

Formal review and event-driven review

- The LARA will be reviewed formally at least annually and sooner whenever a material trigger occurs. Trigger events include a serious incident; safeguarding concern; failed age-verification test; material change in local crime or vulnerability profile; change in operating hours; material premises-layout change; introduction of a new gambling product or machine arrangement; repeated self-exclusion breach; enforcement or licensing feedback; significant complaint trend; or the opening/closure of a nearby sensitive use that materially changes the local risk profile.

Monthly and quarterly review

- A monthly premises compliance review will consider age challenges and refusals, third-party test results, safeguarding concerns, customer interactions, self-exclusion events, financial-vulnerability indicators, crime/ASB incidents, intoxication/drug incidents, SIA deployment, CCTV faults, complaints, machine faults and training completion.
- A quarterly senior-management LARA review will assess whether controls remain proportionate and effective. The review will record decisions, responsible persons, target dates and closure evidence for corrective actions.

Audit and corrective action

- A quarterly internal compliance audit will test implementation of the LARA. An annual independent or separately managed assurance review will sample the effectiveness of key controls. Audit actions will be tracked to completion.

Verified location and evidence basis

The site is 67 High Street, Staines-upon-Thames TW18 4PU. The walkaround inventory records Betfred at 76 High Street and Admiral Slots at 109 High Street. Entries observed outside the stated half-mile radius are excluded from proximity scoring. Dates, sources and evidence for any material addition will be recorded in the next review.

The 2025 deprivation values are for the site LSOA Spelthorne 004F, code E01034291. They are relative area rankings, not counts of people affected by gambling harm. Crime decile 1

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supports a conservative local crime exposure rating. The local police figure of 1,980 reports covers Staines Town over April 2025 to March 2026 and is not an incident count at this doorway. Source: MHCLG English Indices of Deprivation 2025, File 7; Surrey Police dashboard figure quoted in the source assessment.

Staffing, supervision, SIA deployment and absence-cover assurance

This application proposes a 24-hour, seven-day adult-only bingo premises. The premises will remain open to customers for lawful ancillary Category B3 and C gaming-machine play at all hours. Substantive non-remote bingo will be offered only between 09:00 and midnight, with no bingo play or bingo facilities made available between 00:00 and 09:00. The default bingo premises hours restriction does not apply to access to gaming machines, subject to any specific premises-licence conditions. The 24-hour model is a proposed operating arrangement requiring licensing approval and site commissioning; it is not a claim that trading has already been authorised. Before implementing any 24-hour machine-only access, the operator will obtain and document a site-specific legal and licensing review of the Gambling Act 2005 framework, relevant regulations, Gambling Commission guidance, premises-licence conditions and the licensing authority position; any uncertainty or restriction will be resolved before approval. This assessment does not itself authorise 24-hour trading.

Minimum supervision commitment. Throughout licensed trading the operator proposes to maintain at least two appropriately trained operational employees actively available for entrance supervision, customer observation, safeguarding and intervention. The minimum is an active deployment requirement, not merely the number of names entered on a rota. Duties will be allocated so that entry, the bingo and ancillary gaming areas, customer welfare and incident response remain effectively supervised. Staff will have a clear escalation route to the duty manager and safeguarding lead.

24-hour rota and SIA deployment. The supporting live workforce rota covers all seven days with fixed six-hour shifts: 07:00–13:00, 13:00–19:00, 19:00–01:00 and 01:00–07:00. Each shift provides two operational staff; a separate SIA-licensed security position is scheduled for 19:00–01:00 and 01:00–07:00 (19:00–07:00 continuous overnight coverage). The rota therefore provides 56 operational six-hour positions (336 operational staff-hours) and 14 SIA six-hour positions (84 SIA staff-hours), a total of 420 scheduled staff-hours per week, before any additional relief for breaks, absence or incidents. Operational staff remain on duty overnight while bingo is unavailable and the ancillary gaming machines remain accessible. Actual SIA deployment must be reviewed against the night-time risk assessment, and any break/absence cover must preserve the required active positions.

Sickness, annual leave and unexpected absence. The proposed establishment comprises 12 operational employees to cover 336 scheduled operational staff-hours weekly, averaging 28 rostered hours per person, and four proposed directly employed SIA-licensed officers to cover 84 scheduled SIA hours, averaging 21 hours per person. This provides potential capacity within the proposed team once recruited and trained to allocate additional shifts, subject to individual availability, competence, contractual terms, lawful working time and rest, night-work requirements and appropriate SIA licensing. The Premises Manager will maintain a live relief register identifying the individuals qualified and available for each role and will confirm cover before approving leave or responding to absence. The duty roster and attendance records will show all replacement allocations. Spare rostered capacity will not be treated as guaranteed availability; if the minimum safe deployment cannot be achieved, the restriction and escalation procedure applies.

Breaks and handovers. The duty manager will schedule handovers and any breaks so that the minimum two operational employees remain actively available. A six-hour shift does not remove the need to comply with applicable daily and weekly rest, night-work and other working-time requirements. Where relief is required, a trained venue employee will take over before a colleague ceases active supervision. Staff assigned to safeguarding interventions, incidents or other duties that prevent effective monitoring will be replaced or supplemented as necessary.

Failure and escalation procedure. If the minimum operational staffing cannot be maintained, admissions will be suspended immediately and gambling activity restricted or stopped as necessary until effective supervision is restored. Where the risk assessment requires an SIA officer, that deployment must be maintained or the affected operation restricted. Any shortfall, corrective action, reopening decision and manager authorisation will be logged. No employee will be required to provide unsafe or unlawful hours to fill a gap.

Evidence, review and approval. Before opening, the Operations Director and Premises Manager will approve and retain: (i) the seven-day 24-hour roster, staff competency and duty allocation; (ii) an internal relief-cover register and evidence of training; (iii) the overnight SIA risk assessment, direct-employment arrangements and licence checks; (iv) break and handover procedures; (v) attendance and exception logs; (vi) the physical or system-enforced 00:00–09:00 bingo shutdown procedure and opening checks; and (vii) a documented staffing/security shortfall-response test. Monthly compliance reviews will consider overnight incidents, machine use, safer-gambling interactions, staffing exceptions and SIA deployment. These remain proposed controls pending site-specific verification and sign-off. The pre-opening pack must also include named recruitment and competency records, individual SIA licence checks, break-cover and absence-relief allocation, a tested shortfall-response scenario, and documented approval; until these are complete, the staffing model is a forecast rather than an implemented control.

Bingo hours separation and customer information. Bingo terminals and dedicated bingo machines must be programmed or physically secured so that no bingo games can be commenced or continued outside 09:00–00:00. A manager will check the shutdown at midnight and the authorised restart at 09:00 daily, record exceptions and investigate any failure. Customer notices, screens and staff scripts will distinguish bingo hours from 24-hour ancillary machine availability. Gaming-machine products must not be represented as bingo or used as a workaround for the bingo-hours restriction.

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Overnight gambling-harm and crime controls. Between midnight and 09:00, the premises will provide ancillary gaming-machine play only, with the same adult-only scheme, identity, age, self-exclusion and safeguarding controls applied during daytime trading. The premises will retain two operational staff on every six-hour shift and a separate SIA officer between 19:00 and 07:00. Staff will monitor customer wellbeing throughout the night, paying particular attention to extended or repeated visits, repeated cash withdrawals where observable, distress, tiredness, intoxication, agitation, impaired decision-making and requests for help. A prolonged visit is a prompt for proportionate engagement, not automatic proof of harm. Staff will use a staged approach: discreet welfare enquiry, safer-gambling information and break suggestions, escalation to the duty manager, and restriction or cessation of play where necessary. Significant interactions, refusals, exclusions and outcomes will be recorded in a restricted-access log. Overnight handovers will flag unresolved safeguarding concerns on a need-to-know basis. The Premises Manager will review overnight incidents and interaction trends monthly and adjust supervision, training or opening arrangements where evidence shows a need. CCTV, controlled entry, cash procedures, SIA presence and incident escalation will also address external disorder and staff safety. If adequate supervision is temporarily unavailable, admissions or gambling will be suspended until restored.

Scheme and overnight controls. Every customer must have a verified, personal, non-transferable registration under the scheme before gambling at any hour. At each admission staff will confirm registration status and applicable exclusions or access restrictions; an inactive, suspended, excluded, unverified or uncertain record prevents admission to gamble until resolved. Staff will not infer that a customer is free from vulnerability merely because their identity has been verified. Where repeat overnight visits or observable welfare concerns arise, trained staff will engage respectfully, record material interventions proportionately and escalate where necessary. Access and safeguarding decisions will be made by trained staff, not automatically by an unverified facial-recognition alert.

Bingo remains the substantive licensed activity. The proposed premises will provide 12 dedicated seated bingo machines and 24 Boomerang-supplied Jigsaw terminals with dedicated bingo-only offerings, giving 36 identifiable bingo positions, alongside 12 Category B3 and 48 Category C ancillary gaming machines. Non-remote bingo will be available between 09:00 and midnight, and ancillary machines are proposed to remain available during the wider 24-hour opening period, subject to the applicable statutory framework and any specific premises-licence conditions. The operator will maintain a genuine, available bingo offer, suitable equipment, customer information and operational arrangements. The LARA does not rely on speculative bingo participation forecasts as a safeguarding control. The final bingo technical specification, supplier confirmation for all 36 positions, product evidence, approved floor layout and session timetable will be appended to the pre-opening evidence register and signed off before opening; these documents are not represented as already received or verified. Before implementing any 24-hour machine-only access, the operator will obtain and document a site-specific legal and licensing review of the Gambling Act 2005 framework, relevant regulations, Gambling Commission guidance, premises-licence conditions and the licensing authority position; any uncertainty or restriction will be resolved before approval. This assessment does not itself authorise 24-hour trading.

Supporting schedule: Staff_Rota_SIA_24_18_Synchronised.xlsx (24-hour, seven-day operational and overnight SIA staffing model). The manager must verify the final roster against the installed premises layout, actual shift coverage and relief arrangements before opening.

Proposed bingo operation and staffing

Bingo offer proposed for approval

The main use of 67 High Street will be substantive non-remote bingo. The dedicated bingo provision will comprise 12 dedicated bingo machines, each with a seat, and 24 Jigsaw terminals supplied by Boomerang, all offering dedicated bingo-only games. These 36 bingo playing positions/terminals are separate from the 12 Category B3 gaming machines and 48 Category C gaming machines provided for ancillary use. The bingo equipment will not offer B3 or Category C gaming-machine content. A published bingo schedule will identify the approved game formats and any live-called sessions. During advertised bingo provision, electronic bingo will be a genuine available product, rather than a demonstration or incidental gaming-machine feature. Staff will explain bingo participation, rules, prices, prizes and complaints. Boomerang is the specified supplier of the 24 Jigsaw terminals; the supplier of the 12 dedicated seated bingo machines, technical configurations, session frequency and any linked national game must be recorded and approved in writing before the final operating specification is submitted. The final bingo technical specification, supplier confirmation for all 36 positions, product evidence, approved floor layout and session timetable will be appended to the pre-opening evidence register and signed off before opening; these documents are not represented as already received or verified.

The approved premises plan will show the entrance and service point, the 12 dedicated bingo machines with their seats, the 24 Boomerang-supplied Jigsaw terminals with dedicated bingo-only offerings, and the separate 12 Category B3 and 48 Category C ancillary gaming machines. The layout and customer-facing presentation will make bingo recognisable as the main use, with a clearly identifiable and supervised bingo area. Staff will supervise both bingo participation and ancillary machine play, interact with customers on prolonged or repeated play, and record age challenges, safer-gambling contacts and self-exclusion events. The shift plan will allocate entrance supervision, bingo and ancillary machine-floor coverage, and breaks; if minimum coverage is lost, admission and gambling activity will be restricted until suitable cover is restored. A failure of required substantive bingo provision will trigger suspension of affected ancillary gaming-machine play until bingo facilities are restored and the Premises Manager records authorisation to resume.

Children and vulnerable customers

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Before opening the operator will sign off an adult-only admissions procedure, Challenge 25 training and test scenario, permitted ID list, refusal and incident logging, and a witnessed entrance-line check at busy shopping and school travel times. Staff must actively challenge and refuse access where appropriate, including when a child is accompanied by an adult. Window screens and external messages will be approved against child appeal and safeguarding risks. The safeguarding lead will train every shift in observing prolonged play, repeat cash withdrawal, visible distress, intoxication, difficulty understanding information and attempts to circumvent self-exclusion. Staff will make a proportionate customer interaction, escalate to a manager and record the outcome; they will not infer vulnerability from residence, age group or scheme of a local community. Self-exclusion checks, breaches, manual fallback and reinstatement decisions will be tested at commissioning. Facial recognition, if adopted, remains supplementary and requires separate legal and operational approval; human age checks and interactions are mandatory.

Verified Player Access, self-exclusion and information-governance procedure. Before any gambling access is enabled, trained staff will verify identity and age using the approved identification procedure and create a unique, non-transferable player registration record under the scheme. Admission checks will confirm the current status of the player registration, any applicable self-exclusion and venue-imposed restrictions, and any pending safeguarding decision. The operator will participate in applicable industry self-exclusion arrangements and maintain an accurate local exclusion register, with prompt entry of new exclusions, documented updates, controlled reinstatement only after the relevant exclusion period and required checks, and a prohibition on staff overriding an active exclusion merely to admit a customer. Excluded customers will be refused gambling access discreetly and offered appropriate support information; attempted access, control failures and remedial actions will be logged and reviewed. Where the electronic system is unavailable, no gambling access will be granted unless trained staff can complete and document an approved secure manual identity and restriction check against current records; otherwise admission to gamble will be paused. Staff will be trained on confidentiality, conflict handling and escalation. The operator will document the controller, processing purposes, lawful bases, privacy notice, access permissions, processor agreements, security safeguards, retention and deletion schedule, data-subject rights process, breach response and periodic audits in its approved data-protection policy. Identity documents and safeguarding records will not be retained or disclosed beyond what is necessary and lawful. Access to sensitive customer-interaction and exclusion records will be role-restricted and logged, and information will be shared only where authorised and necessary. Facial recognition, if introduced, will be separately assessed and must not be used until all applicable legal and governance requirements are satisfied.

Crime and evening economy

The 2025 site LSOA crime decile and the Staines Town incident profile justify active supervision at the entrance throughout the 24-hour operation, with enhanced risk controls for evening and overnight machine play. The manager will review footfall, nearby venue closing times, late-night disorder and transport patterns before approving the night-time SIA assessment. Two trained operational employees will be deployed on each six-hour shift and an additional SIA-licensed officer will be scheduled from 19:00 to 07:00. Trained on-site employees will provide sickness, holiday and break relief without allowing supervision to fall below minimum. Staff will refuse visibly intoxicated entrants, keep incident and evidence logs, test CCTV and duress alarms, and escalate threats, robbery, drugs and disorder. The manager will review incidents by day and hour monthly and strengthen deployment where indicated.

The application is for a bingo premises licence for Golden Slots (Southern) Limited at 67 High Street, with 24-hour public opening and ancillary gaming-machine access. Bingo remains the main licensed purpose and substantive non-remote bingo will be available between 09:00 and midnight only. The proposed adult-only bingo provision comprises 12 dedicated seated bingo machines and 24 Boomerang Jigsaw terminals with dedicated bingo-only offerings; these must be disabled for bingo play between midnight and 09:00. The separate 12 Category B3 and 48 Category C gaming machines may remain available 24 hours, subject to the applicable licence conditions and the continuing requirement for substantive non-remote bingo facilities during the permitted bingo period. A minimum of two trained operational employees will supervise every shift, with an additional appropriately SIA-licensed officer from 19:00 to 07:00. This is a proposed 24-hour operating plan requiring pre-opening approval and verification, not a statement that the unbuilt venue is already trading.

Before the application is finalised, the operator must approve the bingo product schedule for the 12 dedicated seated bingo machines and 24 Boomerang-supplied Jigsaw terminals with dedicated bingo-only offerings, recording game formats, supplier details, session timetable, customer access and prize/rules information. Before opening, the Premises Manager must verify that this fixed bingo provision is installed and genuinely available throughout the advertised bingo provision, with a staffed point of help and appropriate supervision. The final plan and equipment inventory must separately identify the 36 dedicated bingo playing positions/terminals and the 60 ancillary gaming machines comprising 12 Category B3 and 48 Category C machines. They must also show entry and service-desk sightlines, camera coverage, seats and customer circulation. Staff training, frontage and customer information must identify bingo as the main use and distinguish bingo rules from ancillary gaming-machine rules. Approved trading hours, staff and SIA rosters, breaks, absence cover and a failure response for bingo equipment, CCTV and staffing must be recorded. No ancillary gaming machines will be made available without the required substantive non-remote bingo provision at the premises. Supplier specifications and commissioning records must evidence the bingo-only content, seated provision, equipment counts and separate ancillary machine categories.

Control implementation status

The matrices below retain the original scope of the operator's risk assessment and distinguish operator-wide policies from controls proposed for 67 High Street. References in the source

Local Area Risk Assessment

to controls already in place do not establish that they have been installed or tested at this proposed venue. All target residual risk scores forecast the result of full implementation before opening; verified site residual scores remain to be entered after commissioning.

Facial recognition is a proposed supplementary control. It must not be relied on for a lower verified residual score until the operator documents its necessity, a data-protection impact assessment, lawful basis and special-category condition where applicable, accuracy and false-match testing, transparency, retention and a manual fallback. Staff must verify alerts and conduct age checks themselves. Source: Information Commissioner's Office guidance on facial recognition and biometric recognition.

Relationship between facial-recognition CCTV and scheme verification. Facial-recognition CCTV is proposed as an additional risk-detection and alerting measure, not as a substitute for mandatory personal registration, documentary age/identity verification, Challenge 25, staff judgement or self-exclusion controls. Any match or alert must be reviewed by an authorised, trained member of staff; uncertain or adverse alerts must follow a documented manual escalation process before access or play is authorised. Facial recognition must not be represented as operational or relied upon for mitigation scoring unless its lawful deployment, privacy safeguards, testing, accuracy, retention, oversight and required approvals have been evidenced. Conventional CCTV remains a separate security and incident-evidence control.

Overnight welfare assurance: duty management will review significant overnight interventions at handover, and the Premises Manager will review trends monthly in repeated visits, fatigue indicators, refusals, safeguarding, self-exclusion, disorder and staffing. Actions will have named owners and completion dates.

Registration and privacy assurance: before opening, we will test compulsory personal registration, age/identity verification, entry refusal, duplicate records, restriction checks, system outage and manual fallback. We will approve privacy notices, retention schedules, permissions, supplier due diligence and breach procedures. Any biometric recognition will remain a separate proposed enhancement subject to necessary assessments and approvals and will not be counted as an operational control.

Self-exclusion assurance: before opening, we will test live and manual exclusion checks, alert escalation, refusal, controlled reinstatement and incident recording; we will withhold access where eligibility cannot be established. Staff will acknowledge training, receive refreshers and record corrective actions to closure.

We will maintain a trained staff bank using spare available operational employees to cover sickness, annual leave, breaks and short-notice absences without reducing the two-person operational minimum. We will separately maintain appropriately SIA-licensed relief to protect the 19:00–07:00 security commitment. The Premises Manager will check actual availability, qualifications, lawful rest and night-work arrangements before approving the rota and will record cover substitutions. The example rota demonstrates planned base coverage, not confirmed employment or relief availability.

Pre-opening operational assurance and staff-bank relief

Risk Evaluation Method

For management purposes, each material risk will be evaluated using a 1–5 likelihood scale and a 1–5 impact scale. The inherent score will be likelihood multiplied by impact before controls. Before opening, each post-control forecast will be identified as a target residual risk score, not an achieved or verified site result. Once safeguards are commissioned and tested, management will record an evidence-based verified residual risk score. Scores of 1–4 are Low, 5–9 Moderate, 10–16 High and 17–25 Very High. Numerical scoring supports consistency but does not replace professional judgement or action on an individual safeguarding concern.

Where a target residual risk is High or Very High, senior management will document further controls, a reasoned decision on the forecast risk or an operational restriction. The proposed premises will not open until required controls have been evidenced and the pre-opening approval has been signed. Verified residual risk scores will be reviewed after commissioning, incidents, control failures and material changes, and at least annually.

Assessment Review			
Frequency of Review (enter time period e.g. 12 months)	Formal review at least every 12 months after signed approval and after any material trigger. Pre-opening review is mandatory before licensable gambling starts.	Date Review Due	Before opening; then 12 months after signed approval or sooner on a material trigger.
Completed Risk Assessment brought to the attention of:			

Local Area Risk Assessment

Name (person responsible for premises and/or implementing control measures)	Position	Signature	Date that this assessment was brought to this persons attention
Senior manager name pending	Authorised senior management approver	Pending actual signature — opening not approved	Pending evidence and approval

Numerical scoring across the Staines risk assessment

Pre-opening status: NOT APPROVED FOR OPENING. All target residual risk ratings assume complete installation, training, commissioning and effective operation of the specified controls. Before opening, we will attach the approved bingo and ancillary-machine specifications, policies, premises plan, staffing rota, staff-bank relief plan, safeguarding training, registration and exclusion test records, security checks and commissioning evidence to the signed opening pack. None of these commitments constitutes evidence of current site implementation.

This register supplements, and does not replace or shorten, the existing local-area and physical-operation matrices (1.1-2.3). It applies the Risk Evaluation Method above to each material exposure identified there. Repeated location lists are scored once by risk mechanism and cross-referenced to both relevant matrices.

Likelihood (L): 1 rare, 2 unlikely, 3 possible, 4 likely, 5 expected. Impact (I): 1 minor, 2 limited, 3 material, 4 serious, 5 severe. Score = $L \times I$; 1-4 Low, 5-9 Moderate, 10-16 High, 17-25 Very High. These are reasoned management estimates, not measured frequencies or proof of control effectiveness.

Inherent ratings assume no listed controls. Target residual risk ratings forecast fully implemented, staffed, trained and effective controls; no verified site residual rating is claimed. The 12 High target residual risks—L01, L04, L05, L07, L08, L13, O01, O03, O04, O06, O07 and O11—will each require a documented senior-management decision after the final operating details and commissioning evidence have been checked. L14 remains Moderate and will be revisited on material local change.

A Local area exposure and evidence reliability

Ref	Material risk and source	Inherent LxI	Target residual LxI	Planned controls and target residual risk rationale
L01	Schools, nurseries, uniform retailer and cadets 1.1 / 2.1	4x5 = 20	2x5 = 10	Nearby child-oriented uses and routes raise exposure. Before opening, we will approve adult-only admission and Challenge 25 procedures, train staff, test entrance sightlines and refusals, and confirm shift coverage. We will not count facial recognition in the target residual risk score.
L02	Parks, playgrounds, toy shop and leisure 1.1 / 2.1	3x4 = 12	2x4 = 8	Family and child footfall is intermittent. We will maintain a neutral frontage, supervise controlled admission and increase vigilance during school holidays to reduce the target residual likelihood.
L03	Bus stops, shopping centres and cinema 1.1 / 2.1	4x4 = 16	2x4 = 8	High pedestrian flow raises incidental youth exposure. We will roster two operational employees continuously, supervise entry, carry out age checks and maintain a neutral frontage. We will not rely on facial recognition to justify the target residual risk score.
L04	Care homes and adult vulnerability 1.1 / 2.1	3x5 = 15	2x5 = 10	Nearby care uses may include vulnerable adults. We will appoint a safeguarding lead, train staff in welfare interaction and establish documented escalation before opening; these controls underpin the target residual risk score.
L05	Job centres, housing support and financial stress 1.1 / 2.1	4x5 = 20	3x5 = 15	The official income decile does not establish any individual customer's affordability. We will train staff, document interactions prompted by prolonged play and repeated withdrawals, escalate concerns and review records before relying on the target residual risk score.
L06	Observed housing and employment support uses / 1.1 / 2.1	3x4 = 12	2x4 = 8	We will assess signs of financial stress through observed customer behaviour and recorded interactions. We will maintain a neutral frontage, make support information available and escalate concerns to management.
L07	Pawnbrokers, cash services, banks and ATMs 1.1 / 2.1	4x4 = 16	3x4 = 12	Nearby cash access can facilitate repeated withdrawals. We will monitor repeated returns and changes in play, intervene on observable financial-distress indicators and retain interaction records. The target residual risk remains High pending evidence of control effectiveness.

Local Area Risk Assessment

Ref	Material risk and source	Inherent LxI	Target residual LxI	Planned controls and target residual risk rationale
L08	Nearby gambling premises and cumulative exposure 1.1 / 2.1	3x4 = 12	3x4 = 12	The local walkaround records a betting shop at 76 High Street and an adult gaming centre at 109 High Street. Cumulative exposure and movement between venues remain possible. We will record interactions and self-exclusion incidents, test site controls and review trends; the target residual risk remains High.
L09	Public houses and evening economy 1.1 / 1.2 / 2.2	4x4 = 16	2x4 = 8	Evening footfall can create disorder or welfare exposure. We will refuse admission to visibly intoxicated customers, maintain two operational employees, supervise the frontage, record incidents and deploy a separate SIA-licensed officer from 19:00 to 07:00.
L10	Places of worship and community centre 1.1 / 2.1	2x3 = 6	1x3 = 3	Sensitive community uses create lower-frequency exposure. We will maintain a neutral exterior and supervise the frontage considerably to limit disturbance.
L11	Hotels, fast food and retail footfall 1.1 / 2.1	3x3 = 9	2x3 = 6	Mixed daytime and evening trade increases passing footfall. We will approve window content before use and supervise controlled entry to limit unintended attraction.
L12	Limited English and support accessibility 1.1 / 2.1	3x4 = 12	2x4 = 8	Customers may have difficulty understanding safer-gambling information. We will train staff to check understanding and provide accessible support information where needed.
L13	Town-centre violence, ASB and shoplifting 1.2 / 2.2	4x4 = 16	4x4 = 16	The official 2025 site LSOA crime deprivation decile is 1. Before opening, we will confirm two-person staffing, 19:00–07:00 SIA cover, CCTV and alarm testing, intoxication refusals and incident-review arrangements. The target residual risk remains High because wider town-centre exposure persists.
L14	Premises inventory becoming outdated / 1.1 / 2.1; annual review	3x3 = 9	2x3 = 6	We will maintain a dated local inventory, check it at least annually and on material changes, and document evidence for new or closed sensitive uses before adjusting risk scores.

High target residual risks in section A: L01, L04, L05, L07, L08 and L13. The now evidence-based inventory excludes entries whose claimed operation was not confirmed on the walkaround. The recorded controls and remaining High scores require the pre-opening decision process below.

B Gambling operation and physical design

Ref	Material risk and source	Inherent LxI	Target residual LxI	Planned controls and target residual risk rationale
O01	Under-18 entry and failed challenge 1.1 / 2.1	4x5 = 20	2x5 = 10	We will deploy two trained operational employees on every shift, supervise adult-only entry, operate Challenge 25 and refusal logs, test entrance sightlines and commission independent age testing before opening and thereafter. Facial recognition will not be counted in the target residual risk score.
O02	Frontage and window content appealing to minors 1.1 / 2.1 / 2.3	3x4 = 12	2x4 = 8	We will approve screens and advertisements before use and audit age signage and frontage monthly.
O03	Unrecognised gambling harm or concealed vulnerability 1.1 / 2.1	4x5 = 20	2x5 = 10	Before opening, we will train and assess employees across all shifts on gambling-harm and welfare indicators, including prolonged play and repeated cash use. We will require documented interactions and manager escalation.

Local Area Risk Assessment

Ref	Material risk and source	Inherent LxI	Target residual LxI	Planned controls and target residual risk rationale
O04	Self-exclusion breach or faulty reinstatement 1.1 / 2.1	4x5 = 20	2x5 = 10	We will verify registration under the Verified Player Access Scheme and current exclusion or restriction status before every admission. We will update exclusion records promptly, prevent override of active exclusions, control reinstatement, record and refuse attempted access, test manual fallback and train staff. We will review exceptions monthly.
O05	Missing or unclear safer-gambling information 1.1 / 2.1 / 2.3	3x4 = 12	2x4 = 8	We will display support information and terms prominently and audit legibility, currency and customer understanding.
O06	Late-night fatigue and impaired judgment 1.1 / 2.1	4x4 = 16	3x4 = 12	We will apply the same verified-entry, exclusion and customer-interaction controls overnight as during the day. Two operational employees will remain on duty, supported by a separate SIA-licensed officer until 07:00. Staff will respond to extended play, distress, fatigue, intoxication and other observable indicators, record significant interventions and review overnight trends monthly.
O07	Financial hardship and repeated cash use 1.1 / 2.1	4x5 = 20	2x5 = 10	We will monitor changes in play, repeated cash visits and welfare signals; record relevant customer interactions and referrals; and escalate agitation or financial-distress indicators under the approved customer-interaction procedure. The target residual risk remains High pending evidence of effectiveness.
O08	Welfare removal causing frontage concern 1.1 / 2.1	3x3 = 9	2x3 = 6	We will use safe, discreet exit procedures, supervise the frontage and record incidents.

B Gambling operation and physical design continued

Ref	Material risk and source	Inherent LxI	Target residual LxI	Planned controls and target residual risk rationale
O09	Intoxicated or drug-affected customers 1.1 / 1.2 / 2.2	4x4 = 16	2x4 = 8	We will refuse entry to customers who appear intoxicated or affected by drugs, train staff in safe refusal and escalation, deploy separate SIA cover from 19:00 to 07:00 and record incidents.
O10	CCTV outage or blind spots 1.2 / 2.1 / 2.2	3x4 = 12	2x4 = 8	We will check CCTV coverage, camera function and sightlines weekly, apply approved retention rules, log faults and increase supervision or isolate affected areas until restoration.
O11	Insufficient staff or SIA deployment 1.2 / 2.1 / 2.2	4x4 = 16	3x4 = 12	We will roster at least two trained operational employees continuously and a separate SIA-licensed officer from 19:00 to 07:00. We will establish a trained staff bank using available spare employees for breaks, sickness and absence, including suitably licensed SIA relief. Before opening, management will verify relief availability, rest periods and individual SIA licence validity. If minimum safe coverage cannot be maintained, we will restrict admission or suspend affected gambling activity.
O12	Cash theft, robbery and machine replenishment 1.2 / 2.2	3x4 = 12	2x4 = 8	We will secure cash handling and replenishment, test panic alarms, designate a staff safe haven and use CCTV for incident evidence. Facial recognition will not be counted in the target residual risk score.
O13	Machine positioning and hidden customer activity 2.1 / 2.2	3x4 = 12	2x4 = 8	Before opening, we will approve a final plan showing 12 dedicated seated bingo machines, 24 Boomerang Jigsaw bingo-only terminals and separate 12 Category B3 and 48 Category C machines. We will maintain identifiable, supervised bingo provision, clear sightlines and CCTV, review layout changes and suspend affected ancillary play if required bingo provision fails.
O14	Machine faults affecting fair play 1.3 / 2.3	3x4 = 12	2x4 = 8	We will log equipment faults by product category, remove materially faulty equipment from play, document engineering work and approve restoration. We will assess any effect on substantive bingo availability or permitted ancillary machines before continuing affected play.
O15	Incorrect terms, game rules or signage 1.3 / 2.3	3x4 = 12	2x4 = 8	We will audit signage weekly, apply version control and management approval, and promptly remove superseded information.
O16	Poor complaint handling or escalation 1.3 / 2.3	3x4 = 12	2x4 = 8	We will establish a central complaints register, published response and escalation arrangements, an independent dispute route where applicable and quarterly thematic review.
O17	Inappropriate promotion or advertising 2.1 / 2.3	3x4 = 12	2x4 = 8	We will approve promotions and window screens before use for age appeal, accuracy and vulnerability considerations, and retain approvals.
O18	Failure to record, review or correct control gaps 1.1-2.3; assurance	4x4 = 16	2x4 = 8	We will assign named owners, conduct monthly compliance and quarterly management reviews, and track audit actions to evidenced closure.

High target residual risks in section B: O01, O03, O04, O06, O07 and O11. Each safeguard must be commissioned and checked before trading. The senior manager must record any further control or reasoned acceptance of the remaining High target residual risks after reviewing final hours, bingo product, staffing and the completed site evidence.

Interim High Risk Decision Register

Draft decision: the licence application may describe the measures as binding pre-opening commitments, but licensable gambling will not commence until the bingo specification, Verified Player Access Scheme, self-exclusion checks, staffing and staff-bank relief arrangements, training and all other required controls have been approved, installed and tested. A named senior manager will then sign the completed assessment and determine each High target residual risk. No forecast rating is a verified residual score or signed acceptance.

Ref	High risk	Accountable role	Evidence required before opening
L01	Schools and young people	Premises Manager / Safeguarding Lead	Approved nearby-use inventory, witnessed entrance supervision, signed adult-only and Challenge 25 procedure, refusals test and shift training.
L04	Adult vulnerability	Safeguarding Lead	Confirm relevant care uses, staff training and welfare escalation route.
L05	Financial stress	Premises Manager	Approve cash-return observation, interaction records and support escalation.
L07	Cash access	Premises Manager	Confirm nearby cash points and protocol for repeated withdrawals and re-entry.
L08	Cumulative gambling	Compliance Director	Confirm the two listed venues and review venue movement, exclusions and interventions.
L13	Local crime and disorder	Security Manager	Dated town-centre incident baseline, actual licensed hours, tested CCTV and alarm, two-person rota and approved evening SIA matrix.
O01	Under-18 entry	Premises Manager	Signed adult-only admission and Challenge 25 procedure; witnessed entrance and age-refusal tests; independent age-verification plan; Verified Player Access Scheme registration, identity, duplicate-entry and outage/fallback test results.
O03	Concealed harm	Safeguarding Lead	Approved safeguarding and customer-interaction procedures; training attendance and competence assessments for every shift; scenario tests, escalation and interaction-record templates.
O04	Self-exclusion	Compliance Director	Approved self-exclusion procedure and applicable scheme arrangements; dated tests of registration-linked exclusion checks, refusal, alert verification, manual fallback, reinstatement controls and breach logging; staff training sign-offs.
O06	Fatigue	Premises Manager	Approved overnight welfare triggers, interaction and handover logs, escalation,

			monthly review plan and documented staff-bank relief.
O07	Financial hardship	Safeguarding Lead	Approve financial-harm triggers, interventions and manager escalation.
O11	Staffing and SIA	Operations Director	Approved 24-hour rota and bingo hours 09:00–00:00; two-person cover; separate SIA 19:00–07:00; individual licence checks; staff-bank names/availability and suitably licensed relief; break, sickness, annual-leave and rest-period contingencies.

Approval status: NOT APPROVED FOR OPENING. Named senior-management sign-off and date remain pending. Each accountable role will submit dated commissioning evidence. The approver will record a reasoned decision for every High target residual risk, including any additional safeguards or operational restrictions. Until signed, this LARA records proposed arrangements only.

Pre-opening evidence and approval register — all items pending verification

The following entries are commitments and document requirements, not claims of completed installation. Evidence reference, reviewer, date and sign-off must be completed before opening. The 12 High target residual risks remain subject to the separate decision register above.

 Control / linked risks	Evidence to retain	Accountable role	Status / approval
 Verified Player Access Scheme / O01, O04	Signed registration SOP; age/ID and restriction checks; exception and fallback tests; privacy notices	Premises Manager / Compliance	Pending — evidence ref, date and signature
 Self-exclusion / O04, L08	Applicable exclusion arrangements; live alert, refusal, reinstatement and outage test records	Compliance Director	Pending — evidence ref, date and signature
Safeguarding and financial harm / L04, L05, L07, O03, O07	Training matrix for all shifts; competence checks; interaction scenarios; welfare and financial-harm escalation	Safeguarding Lead	Pending — evidence ref, date and signature
Young persons and entrance / L01, O01	Challenge 25; entrance sightlines; age-test schedule; refusal records and mock scenarios	Premises Manager	Pending — evidence ref, date and signature
Crime, cumulative exposure / L08, L13	Local inventory and dated baseline; tested CCTV/alarms; incident and venue-movement review	Security Manager / Compliance	Pending — evidence ref, date and signature
Overnight welfare / O06	Handover, welfare and monthly-review templates; completed training; response escalation	Premises Manager	Pending — evidence ref, date and signature
Staffing and security / O11	Individual 24-hour rota; two-person minimum; SIA licence checks 19:00–07:00; staff-bank relief and absence availability	Operations Director	Pending — evidence ref, date and signature
Final opening authorisation / all 12 High risks	Signed risk-by-risk acceptance/additional controls/restrictions; approved bingo and machine specification; site commissioning checklist	Authorised senior manager	NOT APPROVED — signature/date pending

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.

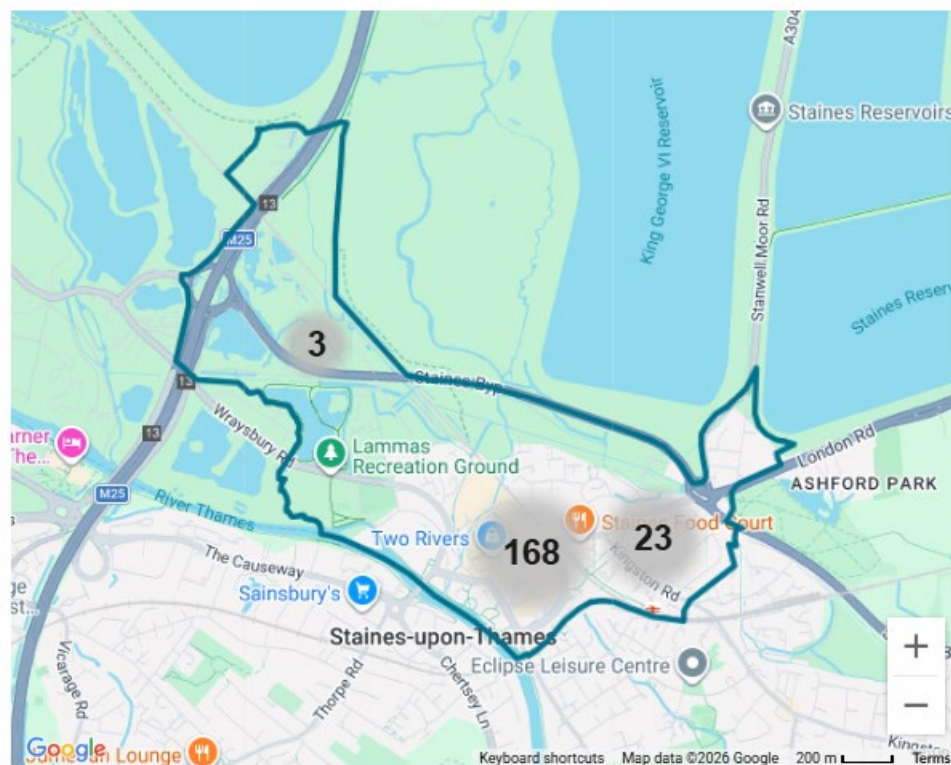
The Local Area Profile itself is a separate document from this policy, this enables timely changes to the profile to be made as and when changes occur, or additional information is made available...

[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

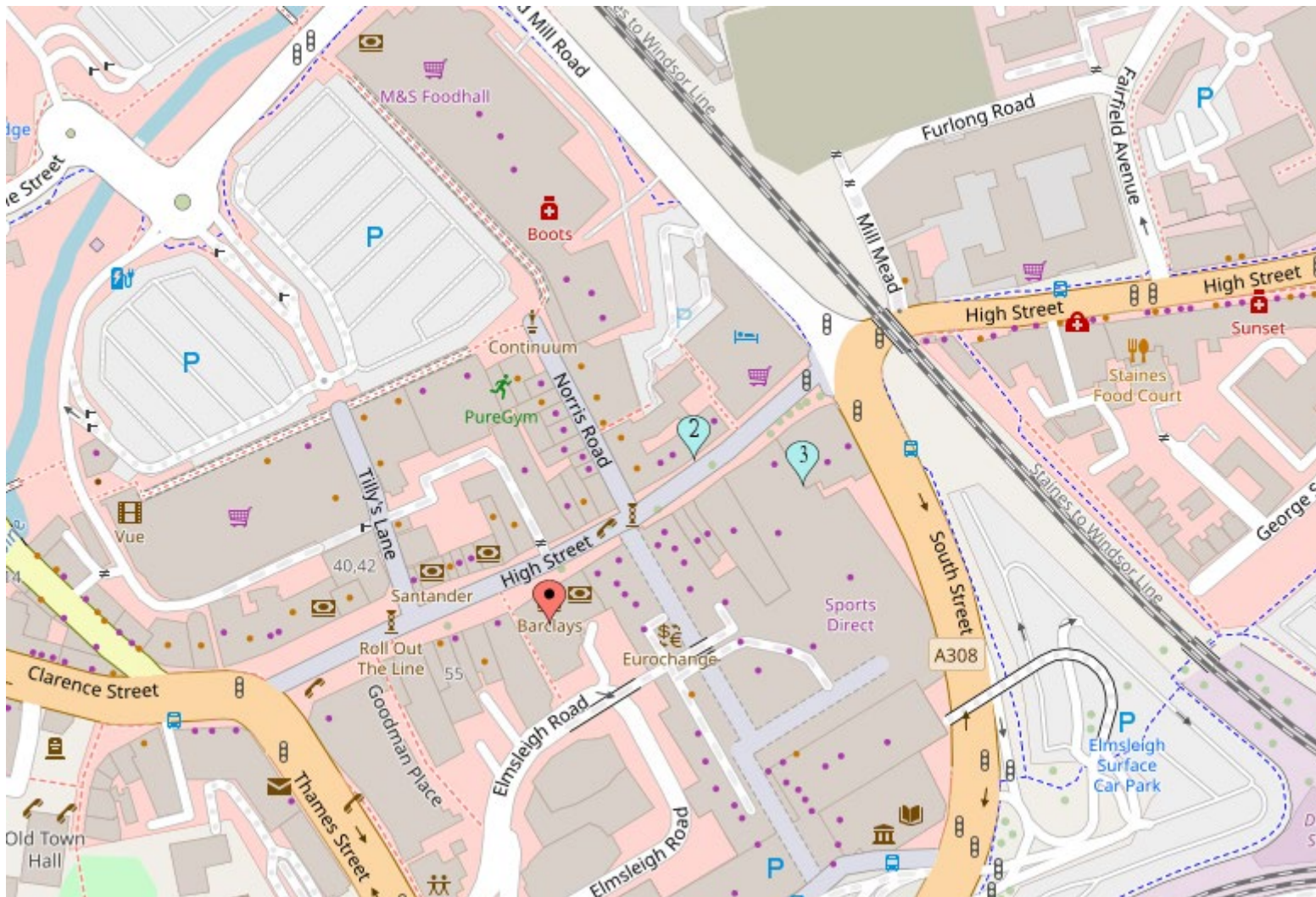
[View crime definitions](#)

[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 was conducted to check the local schedule. Only uses observed or supported by the assessment evidence are listed in the risk inventory; repeat checks after material changes.

- Metro ATM, TW18 4WB (0.2 miles) within Two Rivers Shopping Centre
- 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 Peters Nursery, St Peters 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



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



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



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



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

PRE-OPENING EVIDENCE AND VERIFICATION SCHEDULE — OUTSTANDING

Evidence area	Required documents / sign-off	Current status
Bingo offer	Signed final supplier and technical specifications for 12 seated bingo units and 24 Boomerang Jigsaw bingo-only terminals; product evidence, final floor plan, game/session schedule, shutdown testing.	Pending; no documents attached or represented as verified.
24-hour operating model	Site-specific legal opinion/approval note covering statutory machine-access framework, premises licence conditions, licensing authority requirements and hours controls.	Pending independent verification and licence-condition review.
CCTV	Approved design and camera map, installation and commissioning report, 31-day retention configuration test, night-image and export test, manager sign-off.	Pending installation and commissioning.

Age verification and safeguarding	Independent age-verification testing plan covering each shift, staff training and competence assessments, designated safeguarding lead sign-off.	Pending commissioning and training records.
Staffing and internal SIA	Named 24-hour operational rota, directly employed SIA personnel and individual licence checks, break/leave/sickness relief register, tested staffing-shortfall procedure.	Pending recruitment and evidence.
Local evidence	Dated deprivation and gambling-harm sources, verified premises distances and separate 0.5-mile scored/contextual listing.	Pending evidence audit.

Approval gate: no outstanding item above is evidence of an implemented safeguard. The Operations Director and Premises Manager must record the document reference, approval date and any unresolved restrictions before opening.

PRE-OPENING MANAGEMENT DECISIONS AND COMMISSIONING CONDITIONS

CCTV and physical layout: Before opening, management will approve the final premises plan and CCTV camera schedule. Installation, sightlines (including entrance, customer-service counter and blind spots), continuous recording, 31-day retention configuration, retrieval and fault escalation will be demonstrated in a witnessed commissioning inspection and signed off. No untested system is represented as operational.

Age verification and safeguarding: All appointed staff will receive site-specific age-verification, safeguarding and vulnerability training, complete documented competence assessments and obtain management sign-off before deployment. Independent third-party age-verification testing will be commissioned, recorded and reviewed before opening and subsequently on a documented periodic programme. Any existing company-wide testing programme is separate from, and does not evidence completion of, this site-specific test.

Operational staffing and directly employed SIA: The planned minimum is two operational employees on site continuously, with directly employed SIA-licensed officer cover from 19:00 to 07:00, separate from the operational minimum. The proposed four six-hour operational shifts are 07:00–13:00, 13:00–19:00, 19:00–01:00 and 01:00–07:00. Management will approve named rotas, recruitment, breaks, relief, leave/sickness cover, individual SIA licence checks and escalation before opening; additional cover will follow a documented risk assessment.

School proximity classification: Any school identified approximately 0.7 miles from the premises is wider contextual information only. It is outside the 0.5-mile scoring boundary and must not be counted as a school within half a mile. Final distances and source dates will be checked against the approved local inventory.

Cash-collection cycle and temporary closure: Cash-recycler replenishment will be carried out on the scheduled collection cycle only, during a temporary full public closure of the venue. Staff will suspend admission, ensure every customer has left, prohibit all customer entry during collection/replenishment and reopen only after cash handling is complete and the manager authorises reopening. A written procedure will allocate staff, security, door-control, incident-response and recordkeeping responsibilities, maintaining safe cover notwithstanding the usual 24-hour proposed public-access model.

High residual risk sign-off: Before opening, the accountable manager for each High target residual risk — L01, L04, L05, L07, L08, L13, O01, O03, O04, O06, O07 and O11 — must record a dated evidence-based decision, additional controls or restrictions where needed, accountable owner, evidence references and senior-management approval. An unsigned or unsupported decision is not opening authorisation.

OPENING GATE: NOT APPROVED FOR OPENING until all commissioning, risk decisions and senior-management sign-offs are complete.