Premises number or licence number:	Application for an Adult Gaming Centre Premises Licence
Region (if applicable):	Surrey
Area (if applicable):	Spelthorne Borough Council
Premises Address:	39 Church Road, Ashford, TW15 2QF
Name of Assessor:	Max Davitt
Colleagues Present:	
Date(s) of assessment:	30 October 2026
Review date:	8 November 2026

The Operator:

Applicant: Golden Slots (Southern) Limited, trading as Golden Slots. Golden Slots is licensed by the Gambling Commission and is a member of the AGC trade association, BACTA and is an extremely experienced operator of these types of premises.

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

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

1. The Gambling Act 2005
2. Gambling Commission Guidance to Licensing Authorities
3. Licence Conditions and Codes of Practice (LCCP)
4. Spelthorne Borough Council Statement of Gambling Policy 2025-2028

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

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

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

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

Local Area & Socio Economic Profile:

Ashford is a suburban town in the borough of Spelthorne, Surrey, west of London and close to Heathrow Airport. The locality includes residential streets, a town-centre shopping corridor, schools, community facilities and transport links.

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

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

The Ashford community includes people from different ethnic, cultural and religious backgrounds. Golden Slots (Southern) Limited will provide clear,

accessible safer-gambling information and train staff to respond sensitively to customers who exhibit indicators of gambling-related harm. The presence of any particular ethnic group or faith is not itself treated as evidence of gambling-related vulnerability. The operator's safeguards are directed to risks associated with its proposed gambling activities, rather than to pre-existing characteristics of the community.

Ashford has a mixed residential and employment profile, with residents working locally and commuting to surrounding employment centres. The immediate locality of 39 Church Road displays relatively strong socio-economic indicators. Total household income is estimated at approximately £67,900 per annum, with an Income score of 7/10, indicating that households within the area are generally more affluent than the England and Wales average.[1] Additionally, the area records a Health Deprivation and Disability score of 4/10 and an Education, Skills and Training Deprivation score of 3/10 (where 1 represents the least deprived areas)[2], indicating that the immediate area maintains a good standard of health as well as higher education attainment and above average skill levels.[3] Nevertheless, the area's crime score is measured as 7/10, delineating a high crime rate within the Ashford locality which the operator acknowledges increases the risk of the premises being associated with, or targeted by, crime and disorder.[4] To mitigate these risks, the premises will operate a number of safeguarding controls including CCTV, age verification and maintaining liaison with local police where needed. Living Environment Deprivation is also considerable at 7/10[5] and Barriers to Housing and Services above average at 6/10[6], both signalling poor physical living conditions and difficulty in accessing support services within the locality, which form key risk factors pertaining to those individuals who are experiencing gambling related harms. Taking account of the local risk profile, the premises will implement proportionate and context-sensitive control measures. Staff will all be aware of relevant local support services and will be trained to direct customers to appropriate sources where necessary.

Staff training, verified registration, customer welfare interactions and exclusion controls will address indicators of gambling-related harm arising in connection with the proposed premises. Financial vulnerability will be further assessed from relevant customer interactions and other information lawfully available to staff.

The site falls within Spelthorne 003C Lower Layer Super Output Area (LSOA). According to the English Indices of Deprivation 2025, published by the Ministry of Housing, Communities and Local Government on 30 October 2025, the IMD decile for the area is 6 (where 1 is most deprived 10% of LSOA).[7] This indicates that the LSOA is less deprived than the national average. Recognising both wider and local levels of deprivation helps ensure that our local risk assessment and mitigation measures are appropriately informed by the characteristics of the surrounding area. While deprivation is one factor that may contribute to vulnerability to gambling related harm, it is considered alongside several other local risk factors assessed in the risk matrix below.

Deprivation measures are relative, area-level indicators; they neither establish an individual's circumstances nor prove that the proposed premises will add to existing vulnerability. The operator has assessed potential gambling-related risks through the local sensitive uses and operational pathways identified in this LARA, with staff-verified registration, age and exclusion checks, CCTV, welfare interactions, and referral information as safeguards. Any future statistical update will identify the published dataset, reference date, geography and source and will be incorporated through the LARA review process before the figures

[1] https://crystalroof.co.uk/report/postcode/TW152QF/affluence
[2] Demographics of Church Road, Ashford, TW15 2QF - Crystal Roof - Data source: Office for National Statistics 2025
[3] Demographics of Church Road, Ashford, TW15 2QF - Crystal Roof - Data source: Office for National Statistics 2025
[4] Crime Rates in Church Road, Ashford, TW15 2QF - Crystal Roof - Data source: data.police.uk: Oct 2025 - Sept 2026
[5] Demographics of Church Road, Ashford, TW15 2QF - Crystal Roof - Data source: Office for National Statistics 2025
[6] Demographics of Church Road, Ashford, TW15 2QF - Crystal Roof - Data source: Office for National Statistics 2025
[7] IoD 2025 Index of Multiple Deprivation.xlsx

are relied upon.

Protection of children and vulnerable persons

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

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

. Area-level deprivation measures cannot establish the circumstances of any individual or, by themselves, demonstrate that the proposed premises would cause additional gambling-related harm. Nevertheless, financial distress, mental health difficulties, substance misuse and barriers to obtaining help may arise in any locality and are relevant when considering possible gambling-related harm. Staff will assess observable behaviour and relevant customer information through the verified registration, welfare-interaction and exclusion procedures described in this assessment. The operator will respond to risks associated with gambling at the proposed premises, including relevant effects on others, without treating pre-existing social vulnerabilities as harms it must independently resolve.

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

Evening and Night Time Economy:

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

The operator has carefully considered the implications of this profile in the context of the licensing objectives under the Gambling Act 2005. Whilst the absence of a significant night time economy in the immediate vicinity reduces some of the risks commonly associated with a more active evening and night time economy, such as intoxicated individuals seeking entry to gambling premises or crime and disorder spilling over from adjacent venues, the operator nonetheless recognises that this premises is not without risk and that a number of considerations will still arise from this environment. The assessment reports 2,188 offences logged in Ashford during April 2025 to March 2026. That reported count does not, without an appropriate population denominator and comparison, establish a high crime rate and is separate from the relative crime-deprivation decile. Relevant crime risks still require consideration despite a quieter evening economy. The operator must still consider the risk that the premises may be a target for opportunistic crime as well as the fact that intoxicated or high risk individuals may pass and attempt to enter the premises. Accordingly, a number of extra measures will be put in place to ensure that any potential issues relating to the operation of the premises within the Evening and Night Time Economy are mitigated, including staff closely monitoring the entrance, CCTV maintained and specific training in identified local risks of entry to and removal of individuals who appear to be under the influence of alcohol or drugs.

Overview:

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

Existing operator protections and enhanced Ashford-specific safeguards. Golden Slots already maintains an extensive framework of established policies and procedures for the safe and responsible operation of Adult Gaming Centres, including age verification, prevention of underage gambling, customer welfare and safer gambling interactions, self-exclusion, staff training, incident management and crime prevention. These existing corporate arrangements provide a foundation for the proposed Ashford premises. In recognition of the particular characteristics of Church Road and the surrounding community, the applicant proposes additional, site-specific safeguards going beyond its established operating framework. These will include a minimum staffing complement of three trained operational employees physically present throughout gambling hours, with at least two actively deployed on the shop floor continuously monitoring the entrance and gaming area and the third providing relief for breaks, toilet checks, customer interventions and other duties, a mandatory staff-verified customer registration scheme and identity checks before entry to gamble, enhanced CCTV coverage and active monitoring of the entrance and frontage, together with documented safeguarding and escalation procedures. Golden Slots (Southern) Limited will install, commission and introduce mandatory facial recognition before the premises opens for gambling and will operate the system throughout licensable gambling hours. The system will operate under documented data-protection and privacy governance, including transparency information, restricted access, security, retention arrangements, accuracy testing, safeguards against false

matches and trained human review. The technology will supplement, rather than replace, staff-led identification checks, safeguarding interventions and management oversight. All proposed site-specific controls will be implemented, tested and signed off following any licence grant and before the premises opens to customers. The purpose of these additional measures is to give the Licensing Authority confidence that public safety, the protection of children and young people, and the safeguarding of vulnerable persons are central considerations in the design and management of this proposal. The applicant recognises that risks may arise in the wider locality as well as within the premises and will maintain active oversight of frontage activity, community concerns and any emerging indicators of gambling-related harm.

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

Response to the Identified Wider-Locality Risks

The Applicant has carefully considered the concerns previously identified regarding the potential effects of an Adult Gaming Centre upon children, vulnerable persons and the wider Ashford locality.

Those concerns have informed a substantially revised and enhanced Local Area Risk Assessment.

The revised assessment does not confine itself to the operation of the premises or the management of the entrance. It expressly considers the characteristics of Church Road and its surrounding catchment, including schools, residential areas, community facilities, services used by vulnerable persons and the potential for gambling-related harm that may not be immediately apparent.

The Applicant has developed a coordinated package of additional, location-specific safeguards, including a mandatory verified customer registration scheme, a minimum staffing complement of three trained operational employees physically present throughout gambling hours, with at least two actively deployed on the shop floor continuously monitoring the entrance and gaming area and the third providing relief for breaks, toilet checks, customer interventions and other duties, enhanced CCTV, mandatory facial recognition installed and commissioned before opening and operated throughout licensable gambling hours, proactive safer gambling monitoring, documented interventions, exclusion procedures and arrangements for recording and responding to community concerns.

The Applicant recognises that no individual safeguard can eliminate every potential risk. The purpose of the revised assessment is therefore to demonstrate how the identified risks are addressed through the combined and continuing operation of complementary measures, supported by staff training, management oversight and documented review.

The Applicant respectfully submits that the LARA represents a material development from the arrangements previously considered. It provides a substantive, location-specific response to the wider-locality concerns identified and a framework for ensuring that the proposed safeguards are implemented before opening and maintained thereafter.

The Applicant accordingly submits that the revised operating arrangements provide a sound basis upon which the Licensing Authority can assess the proposal as reasonably consistent with the licensing objectives.

The revised Local Area Risk Assessment also sets out how Golden Slots will put these safeguards into practice and ensure that they remain effective.

As this is a proposed premises, the Ashford-specific arrangements will necessarily be implemented before trading commences. The assessment therefore provides not only for the identification of local risks and the measures designed to address them, but also for the practical implementation, testing and continuing oversight of those measures.

Golden Slots is committed to ensuring that all safeguards required for opening are fully operational before the premises admits customers for gambling.

This includes the mandatory verified customer registration scheme arrangements, age and exclusion checks, the requirement for a minimum staffing complement of three trained operational employees physically present throughout gambling hours, with at least two actively deployed on the shop floor continuously monitoring the entrance and gaming area and the third providing relief for breaks, toilet checks, customer interventions and other duties, CCTV, safeguarding and welfare procedures, incident reporting, and the arrangements for monitoring and responding to concerns arising within the wider locality.

Each of these measures will be incorporated into the premises' operating procedures, with clear management responsibility for its implementation and continuing operation.

Before opening, staff will receive the necessary training and will be assessed on their ability to apply the procedures in practice. The key controls will be tested, including entrance supervision, customer welfare interventions, exclusions, incidents and the three-person staffing arrangement, with two employees continuously monitoring the shop floor during breaks, toilet checks, handovers and other duties.

Golden Slots will maintain a documented record of this implementation and testing process, with any identified deficiencies addressed before the premises commences gambling operations. Senior management will review and approve the completed arrangements before opening.

Once operational, the same framework will provide for the recording and review of relevant incidents, safeguarding interventions, customer concerns and community complaints. This information will inform ongoing management oversight and periodic reviews of the Local Area Risk Assessment, allowing the operator to respond to emerging risks or changes in the locality.

Golden Slots (Southern) Limited will install, commission and introduce mandatory facial recognition before the premises opens for gambling and will operate the system throughout licensable gambling hours. Facial recognition will support registered-customer verification and the identification of persons subject to applicable exclusions. It will supplement, and will not replace, staff-administered identity and age verification, entrance supervision, customer registration or safeguarding interventions. The system will operate under documented data-protection and privacy governance, including transparency information, restricted

access, security, retention arrangements, accuracy testing, safeguards against false matches and trained human review. System failures will be recorded and escalated promptly. If facial recognition is unavailable, admission for gambling and the provision of gambling facilities will be suspended until the system is restored, with customers managed safely and all other safeguarding controls maintained.

Golden Slots' commitment is that the safeguards described in the assessment will be implemented, tested and subject to senior management sign-off before opening, and will thereafter remain subject to documented monitoring, review and improvement.

Consolidated safeguarding and operating controls

This register sets out exactly repeated control measures once in full. Each control reference in a risk table applies the complete wording of that control to the risk and licensing objective in that row. These measures form part of this LARA and carry the same operational commitment at every referenced location. Risk-specific measures elsewhere in the assessment continue to apply in full.

C01 Safeguarding lead and deputy

• 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.

C02 Challenge 25

• 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.

C03 Independent age verification testing

• Independent third-party age-verification or test-purchasing checks will take place at least once every six months and will cover different operating periods where reasonably practicable. Reports and corrective-action records will be retained for at least 24 months. Any failure will be reported to management immediately and reviewed without delay (and in any event within seven days). Targeted retraining will be completed within 24 hours of notification of the failure, where staff are available; until retraining is completed, affected staff will not undertake verification duties unsupervised. A repeat independent test will be commissioned within 14 days of the failure and completed as soon as reasonably practicable. A second failure will be escalated to senior compliance management with a documented corrective-action plan. This control supplements Condition 7 and does not reduce any requirement of that condition.

C04 Personal greeting and initial assessment

• 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.

C05 Fair and objective entry assessment

• 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.

C06 Mandatory facial recognition

• Golden Slots (Southern) Limited will install, commission and introduce mandatory facial recognition before opening for gambling and operate it throughout licensable gambling hours. It will support verification of registered customers and identification of persons subject to applicable exclusions, supplementing rather than replacing staff-administered age and identity checks. Potential matches will be reviewed by trained staff, with an appropriate opportunity to challenge the result; no refusal will be based solely on an automated match. The commissioning record, training, daily checks and operational controls will follow Condition 16.

C07 Facial recognition governance and failures

• The facial recognition system will operate with the documented governance specified in Condition 16, including the Article 6 lawful basis, applicable Article 9 condition, data protection impact assessment, necessity and proportionality assessment, privacy notices, data minimisation, retention, access controls, security, accuracy and false-match procedures. A senior manager will sign the pre-opening commissioning and readiness record. Staff will check operation at the start of each trading day, and failures, suspected misidentifications and complaints will be recorded and escalated. If the system is unavailable, admission and gambling facilities will be suspended until restoration, with customers managed safely and other safeguards maintained. Records will be retained and made available to authorised regulators on lawful request as set out in Condition 16.

C08 Verified customer registration

• 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.

C09 Returning customers and emerging vulnerability

• 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.

C10 Self exclusion alerts and response

• An alert from the customer system, or from the mandatory facial recognition system, 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.

C11 Recognition and exclusion performance review

• The effectiveness of entry-greeting, age-assessment, customer-recognition and self-exclusion controls, together with the mandatory facial recognition system, 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.

C12 Underage access prohibition

• 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.

C13 Indicators of gambling harm

• 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.

C14 Customer interaction records

• 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.

C15 Welfare breaks and continued gambling

• 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.

C16 Escalating indicators and management action

• 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.

C17 Self exclusion breach records

• 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.

C18 Staff briefings on exclusions

• 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.

C19 Quality assurance of customer interactions

• 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.

C20 Accessible information and language support

• 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.

C21 Communication adjustments

• 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.

C22 Cash access and financial vulnerability

• 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.

C23 Repeated cash related behaviour

• 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.

C24 Credit and cash withdrawal restrictions

• 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.

C25 Essential expenditure and financial distress

• 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.

C26 Review of financial vulnerability patterns

• 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.

C27 Monitoring prolonged play

• 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.

C28 Session observation and welfare intervention

• 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.

C29 Simultaneous machine play

• 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.

C30 Review of fatigue interventions

• 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.

C31 Formal LARA review and triggers

• 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.

C32 Monthly premises compliance 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, CCTV faults, complaints, machine faults and training completion.

C33 Quarterly LARA and community engagement review

• 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. The review will also consider the Condition 15 community engagement programme, the Community Engagement Register, recommendations from the Community Wellbeing and Housing Committee or its designated officers, stakeholder concerns and completion of resulting actions. The formal engagement programme and register will additionally receive a documented senior-management review at least every six months.

C34 Compliance audit and assurance

• The monthly premises compliance audit required by Condition 10 will be completed by the premises manager or another suitably trained manager. Senior management will review those monthly audit findings at least quarterly. Separately, a quarterly internal assurance audit will test the wider implementation of this LARA, and an annual independent or separately managed assurance review will sample the effectiveness of key controls. Corrective actions will be allocated, recorded and tracked to completion. These additional assurance reviews do not replace the monthly licence-condition audit.

C35 Accountable control owners

• 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 corporate policy assurance with the relevant compliance function. The Premises Manager will coordinate the Condition 15 engagement programme and maintain the Community Engagement Register; the designated safeguarding lead will assess and escalate safeguarding concerns; senior management will oversee responses, corrective actions and the six-monthly engagement review.

C36 Training and refresher requirements

• Training will be completed before a new employee undertakes 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.

C37 Management information

• 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.

C38 Verification of the local area schedule

• 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.

C39 Repeat locality walkaround

• 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.

C40 Records and regulator access

• 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.

C41 Serious disorder and exclusions

• 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.

C42 Intoxication and medical concerns

• Refusals based on apparent intoxication will be recorded. Staff will use observable indicators and will escalate uncertainty to a manager. Where a person's condition gives rise to a medical concern, welfare and emergency response will take priority over enforcement.

C43 Toilet checks and suspected drug use

• 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.

C44 CCTV checks and fault escalation

• 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.

C45 Police and licensing liaison

• 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.

C46 Post incident review

• 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.

C47 Approval of layout changes

• 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.

C48 CCTV sightlines and coverage

• 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.

C49 Critical CCTV faults

• 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 or temporary operational restrictions are necessary.

C50 Alarm testing and emergency response

• 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 should be contacted.

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	There are a number of **educational facilities in the area**, including but not limited to within half a mile of the site as follows: - Ashford Library, Church Road, TW15 2XB (282ft) - Clarendon Primary School, Knapp Road, TW15 2HZ (0.2 miles) - Kelly Dixon Dance Academy, Church Road, TW15 2TT (0.2 miles) - Language School, The Atrium, Church Lane, TW15 2PH (0.2 miles) - Kumon Maths & English, 6 Woodthorpe Road, TW15 2RY (0.2 miles) - Happy tots pre-school, Stanwell Road, TW15 3QL (0.3 miles) - St Michaels Primary School, Feltham Hill Road, TW15 2DG (0.4 miles) - St James All boys School, 10 Church Lane, TW15 3DZ (0.4 miles) - Brooklands Technical college, Stanwell Road, TW15 3DU (0.5 miles) - Thomas Knyvett College, Stanwell Road, TW15 3DU (0.5 miles) **There are no Student Accommodation facilities within the immediate area.** **Support and Educational services for teenagers and young adults are provided at**: - We Make Footballers, St James Boys School, 10 Church Road, TW15 3DZ (0.4 miles) - Stagecoach, Stanwell Road, TW15 3DU (0.6 miles) **Support for the homeless (including hostels)**	– Third party testing by an independent age-verification testing provider on age restricted sales systems will take place by testing all working shifts on a regular basis. – The premises will maintain a minimum staffing complement of three trained operational employees physically present throughout gambling hours, with at least two actively deployed on the shop floor continuously monitoring the entrance and gaming area and the third providing relief for breaks, toilet checks, customer interventions and other duties. Managers will assess whether additional trained relief is required by observed risks or simultaneous duties. – There will be a policy to refuse entry to customers who appear to be under the influence of alcohol or drugs. – We will ensure that the customer toilets are checked every hour for evidence of drug taking. These toilet checks will be documented stating the time and member of staff who made the checks. Access to the toilet will be controlled by staff once the premises opens. – Prominent GamCare documentation will be displayed	– Staff member will 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 about gambling due to a mental impairment, alcohol or drugs”. – Staff will be made aware of child truancy during school times, i.e. being aware that: a) Children should not be in the

		or potentially vulnerable: - The Salvation Army, Woodthorpe Road, TW15 3JY (0.5 miles) **Care Homes:** - Echelforde Care Home, College Way, TW15 2XG (0.2 miles) - Cedars Care Home, 16 Fordbridge Road, TW15 2SG (0.2 miles) - Allium Home Care Surrey Home Care Agency, 87 Church Road, TW15 2PE (0.2 miles) **There are no facilities for problem gambling in the vicinity.** **Drug and Alcohol Treatment Centres:** - Foundations Recovery, Twickenham, TW2 5RF (6 miles) **Job centres/employment agencies in the close area:** - Bridge Recruitment Services Ltd, Church Road, TW15 2UD (92ft) - First Choice Corporate Ltd, 8 Station Approach, TW15 2QN (0.3 miles) - Pentagon Human Resources, 21 Woodthorpe Road, TW15 2RP (0.3 miles) - Podrive Personnel Ltd, 13 Feltham Road, TW15 1DQ (0.5 miles) **Family Service Centres or Support Groups:** - Wise Blue Owl Family Counselling, 13 Clarendon Road, TW15 2QJ (0.2 miles) - Clarendon Family Centre, 1 Knapp Road, TW15 2HZ (0.2 miles) - Ultrasound Direct Heathrow, 10 Station Road TW15 2UP (0.2 miles) **There are no Housing Projects within the immediate area of the premises.**	at the premises. These notices will be displayed at the premises. – Induction training will be completed by every member of staff before undertaking relevant duties. Core refresher training will be completed at intervals not exceeding six months, supported by an annual assessed refresher and additional retraining following any material incident, failed compliance test, policy change or identified competency gap. Training will include drug and alcohol awareness, including issues relating to homelessness and street drinking, together with safeguarding of children and vulnerable adults, age verification, safer gambling, self-exclusion, conflict management and the identification and escalation of gambling-related harm. All training and competency assessments will be formally recorded in each employee's training record and made available to the Licensing Authority upon lawful request. – Staff will be trained to identify and interact with any customers who are identified as playing more than one gaming machine, including tablet machines at the same time. – The premises will maintain a minimum staffing complement of three trained operational employees physically present throughout gambling hours, with at least two actively deployed on the shop floor continuously monitoring the entrance and	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. 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 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.

		Soup Kitchen/Food Bank: - The Salvation Army, Woodthorpe Road, TW15 3JY (0.5 miles) **Places of Worship:** - Ashford Congregational Church, Clarendon Road, Ashford, TW15 2QA (322ft) - Ashford Baptist Church, Church Road, TW15 2TT (0.2 miles) - Woodthorpe Methodist Church, Clarendon Road, TW15 2QR (0.2 miles) - UK Teamspirit, Spiritist Centre, Princes Road, TW15 2LT (0.2 miles) - Saint Michaels Catholic Church, 112 Clarendon Road, TW15 2QD (0.2 miles) - The Parish Church St Matthew, Church Road, TW15 2NY (0.3 miles) - St Hildas Church, Stanwell Road, TW15 3QL (0.4 miles) **Pay Day Loan Shops or Cash Chequing Services:** - Auto Advance Logbook Loans, 45 Church Road, TW15 2TQ (92ft) **Banks/ATMs:** - Sainsburys ATM, 6 New Parade, Church Road, TW15 2UF (328ft) - Tesco Bank ATM, Church Road, TW15 2UT (463ft) - Natwest Ashford, 5 Woodthorpe Road, TW15 2RN (0.2 miles) - ATM, Coop Food, Church Road, TW15 2TX (0.2 miles) - ARM Londis, 83 Church Road, TW15 2PE (0.2 miles) - ATM, Jb's premier, 89 Church Road, TW15 2PE (0.2 miles) - ATM, 91 Fordbridge Road, TW15 2SS (0.5 miles)	gaming area and the third providing relief for breaks, toilet checks, customer interventions and other duties. If fewer than three trained operational employees are physically present, or two cannot remain actively deployed on the shop floor continuously monitoring the entrance and gaming area, no new customer will be admitted for gambling and the provision of gambling facilities will cease until both requirements are restored. Customers will be managed safely during any suspension. – Comprehensive internal and external CCTV will be installed and tested before opening, with staff access to live external images and authorised management oversight. – At least two trained operational employees will continuously monitor the entrance and gaming area from the shop floor, supported by the third relief employee, so that customers, including those presenting signs of fatigue, do not go unmonitored. – Staff will be trained on the following: a. observing changes in pace, attention or responsiveness, b. identifying prolonged sessions of play where tiredness may emerge, c. engaging with customers	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 Adule Gaming Centre premises will be an over 18 premises only. – Before opening, the operator will implement Safeguarding Policies and Procedures for both Adults and Children, having regard to Spelthorne's policy. **Enhanced controls and assurance - children, vulnerable persons and local-area exposure** Control C01 applies in full — Safeguarding lead and deputy. See consolidated controls register. Control C02 applies in full — Challenge 25. See consolidated controls register. – 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 weekly for patterns by time, shift, entrance position or member of staff. Control C03 applies in full — Independent age verification testing. See consolidated controls register. – A monthly entrance-observation audit will test whether staff have uninterrupted awareness of persons entering, whether acoustic door alerts are effective, whether CCTV provides frontal identification

		Gambling Premises: - William Hill, Unit 1, The Atrium, TW15 2UD (344ft) - Coral, 6 Church Road, TW15 2UT (397ft) **Alcohol licensed premises:** - The Kings Head, 4 Feltham Road, TW15 2EB (0.4 miles) - The Kings Fairway, 91 Fordbridge Road, TW15 2SS (0.5 miles) **Playgrounds & Parks:** - The Kub Club (indoor playground), 112 Clarendon Road, TW15 2QD (0.2 miles) - Elmsway Tennis Club, Elmsway, TW15 2SH (0.3 miles) - Ashford Recreation Ground, 3 Rosary Gardens, TW15 1BX (0.6 miles) **Leisure Centres/Community Centres:** - Energie Fitness, 40 -42 Church Road, TW15 2UY (0.2 miles) - Fordbridge Community Centre, Clarendon Road, TW15 2QA (0.2 miles) - Town Tree Hall Community Centre, TW15 2EW (0.5 miles) **Bowling Alley, shopping centres, cinemas:** - Nearest Cinema is Vue Cinema in Staines or Cineworld, Feltham - Nearest Shopping Centre is Manor Retail Park Feltham, Staines upon Thames or Sunbury Cross - all over 2 miles away. **Fast Food premises and cafes:** - Wimpy, 4 Church Road, TW15 2TY (43ft) - Costa, 33 Church Road, TW15 2UD (154ft) - Two Brothers Fish House, 20 Church Road, TW15 2UY (194ft) - NXT LVL Chicken and Cookies, New Parade, TW15 2UB (243ft)	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. – This approach acknowledges that fatigue can play a role in decision-making but avoids any assumption that this is solely a feature of late-night play. Instead, it emphasises that staff awareness and proportionate engagement are the primary safeguards at all times of day.	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** Control C04 applies in full — Personal greeting and initial assessment. See consolidated controls register. Control C05 applies in full — Fair and objective entry assessment. See consolidated controls register. Control C06 applies in full — Mandatory facial recognition. See consolidated controls register. Control C07 applies in full — Facial recognition governance and failures. See consolidated controls register. Control C08 applies in full — Verified customer registration. See consolidated controls register. – For returning customers, authorised staff will use information held within the customer-recognition system 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. Control C09 applies in full — Returning customers and emerging vulnerability. See consolidated controls register. Control C10 applies in full — Self exclusion alerts and response. See consolidated controls register.

		- Fireaway, 1 New Parade, TW15 2UF (256ft) - Viva Namaste, 18 Church Road, TW15 2UY (272ft) - Chicken City, 2 Church Road, TW15 2UT (443ft) - Chaiicoffee, 19 Church Road, TW15 2UG (0.1 mile) - Little Bodrum, 7 Church Road, YW15 2TX (0.1 mile) - M2 Pizza Pasta, 15 Church Road, TW15 2UG (0.1 mile) - KFC, Unit 3 Church Road, TW15 2UT (0.1 mile) - Subway, Unit 2 Church Road, TW15 2UT (0.1 mile) - Elle & Fee, 19 Woodthorpe Road, TW15 2RY (0.2 miles) - Costa Ashford 2, 79 Church Road, TW15 2PE (0.2 miles) - Thai Go, 22 Woodthorpe Road, TW15 2RY (0.2 miles) - Bright Cake, 2 Fir Tree Place, TW15 2PH (0.2 mile) - Burger Plus, 2 Woodthorpe Road, TW15 2RY (0.2 miles) - Anatolia, 12 Woodthorpe Road, TW15 2RY (0.2 miles) - Burger Junction, 1B Woodthorpe Road, TW15 2RL (0.2 miles) - Marhabaa Food, 4 Central Arcade, TW15 2RL (0.2 miles) - VMN Fired Chicken, 4 Fir Tree Place, TW15 2PH (0.2 miles) - Golden Grill, 81A Church Road, TW15 2PE (0.2 miles) - Top Wok, 11 Station Approach, TW15 2QN (0.3 miles) **Bus Stops:** - Dudley Road (328ft) - War Memorial (0.2 miles)		Control C11 applies in full — Recognition and exclusion performance review. See consolidated controls register. Control C12 applies in full — Underage access prohibition. See consolidated controls register. – 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 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

		- Ashford (0.3 miles) - Ashford Railway Station (0.3 miles) - Gables Avenue (0.4 miles) - Stanwell Road (0.4 mile) - Town Tree Road (0.4 miles) - Station Crescent (0.4 miles) **General Summary of Risks Considered:** – Children entering site unnoticed or unchallenged. – Potentially Vulnerable people being able to gamble. – Failure to recognise signs associated with problem gambling or substantial changes in gambling style – Failure to provide information to players on responsible gambling. – Failure to properly administer the self-exclusion process and maintain its 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		monthly premises compliance review and quarterly senior management LARA review. Control C13 applies in full — Indicators of gambling harm. See consolidated controls register. Control C14 applies in full — Customer interaction records. See consolidated controls register. Control C15 applies in full — Welfare breaks and continued gambling. See consolidated controls register. Control C16 applies in full — Escalating indicators and management action. See consolidated controls register. Control C17 applies in full — Self exclusion breach records. See consolidated controls register. Control C18 applies in full — Staff briefings on exclusions. See consolidated controls register. Control C19 applies in full — Quality assurance of customer interactions. See consolidated controls register. – Safer-gambling information will be available at the Customer Service Counter, near gaming areas and in discreet locations. Staff will be able to explain available support and self-exclusion options and will check understanding where communication difficulties are apparent. Control C20 applies in full — Accessible information and language support. See consolidated controls register. Control C21 applies in full — Communication adjustments. See consolidated controls register. Control C22 applies in full — Cash access and financial vulnerability. See consolidated controls register. Control C23 applies in full — Repeated cash related behaviour. See consolidated

		unnecessary concern. – Customers may have limited English, which could reduce their understanding of safer gambling information. – Customers gambling late at night while appearing fatigued or with reduced alertness may make poor decisions, increasing the risk of harm or exploitation. **Additional risk mechanism:** Local young-person routes, deprivation and vulnerable residents		controls register. Control C24 applies in full — Credit and cash withdrawal restrictions. See consolidated controls register. Control C25 applies in full — Essential expenditure and financial distress. See consolidated controls register. Control C26 applies in full — Review of financial vulnerability patterns. See consolidated controls register. Control C27 applies in full — Monitoring prolonged play. See consolidated controls register. Control C28 applies in full — Session observation and welfare intervention. See consolidated controls register. Control C29 applies in full — Simultaneous machine play. See consolidated controls register. Control C30 applies in full — Review of fatigue interventions. See consolidated controls register. **Management assurance and review** Control C31 applies in full — Formal LARA review and triggers. See consolidated controls register. Control C32 applies in full — Monthly premises compliance review. See consolidated controls register. Control C33 applies in full — Quarterly LARA and community engagement review. See consolidated controls register. Control C34 applies in full — Compliance audit and assurance. See consolidated controls register. Control C35 applies in full — Accountable control owners. See consolidated controls register. Control C36 applies in full — Training and refresher requirements. See consolidated controls register. – Training effectiveness will be assessed through short knowledge checks, scenario

				exercises, management observation and third-party testing. Failed assessments will result in retraining before the employee resumes the affected duty. Control C37 applies in full — Management information. See consolidated controls register. Control C38 applies in full — Verification of the local area schedule. See consolidated controls register. Control C39 applies in full — Repeat locality walkaround. See consolidated controls register. Control C40 applies in full — Records and regulator access. See consolidated controls register.

A physical walk round was conducted within a 0.6 mile radius of the premises to confirm those premises listed.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 2188 crimes were reported across the Ashford area. The highest reported crimes were Violence and Sexual Offences, Shoplifting and ASB with occasional Public Order Offences over the period of a year. [8] The nature of Church Road reflects the type of incidents commonly associated with a high street environment which experience localised retail activity and public interactions. None of these crimes are particularly linked with gambling premises. **Additional risk mechanism:** Crime, antisocial behaviour and local street exposure	– Current Ashford proposal: A minimum staffing complement of three trained operational employees physically present throughout gambling hours, with at least two actively deployed on the shop floor continuously monitoring the entrance and gaming area and the third providing relief for breaks, toilet checks, customer interventions and other duties. If fewer than three trained operational employees are physically present, or two cannot remain actively deployed on the shop floor continuously monitoring the entrance and gaming area, no new customer will be admitted for gambling and the provision of gambling facilities will cease until both requirements are restored. Customers will be managed safely during any suspension. – Induction training will be provided to all staff working at the premises and refresher training to every member of staff at least every six months. This training includes: 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	– 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 – Verified customer identity prior to commencement of Gambling – Subject to fire-safety and other necessary approvals, an appropriate entrance-control system will be installed and tested 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. – At least two trained operational employees will continuously monitor the entrance and gaming area from the shop floor, supported by the third relief employee, so that customers, including 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

[8] www.police.uk

			recognise national or equivalent standard on dealing with conflict. d. Basic anti money laundering training – This staff training will be recorded formally for each member of staff in their training records, and will be available for presentation to the licensing authority immediately upon request.	concern, medical/welfare incident, suspicious transaction, CCTV fault and any other 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 levels , entrance controls, CCTV coverage and liaison with police or the licensing authority as appropriate. Control C41 applies in full — Serious disorder and exclusions. See consolidated controls register. Control C42 applies in full — Intoxication and medical concerns. See consolidated controls register. Control C43 applies in full — Toilet checks and suspected drug use. See consolidated controls register. Control C44 applies in full — CCTV checks and fault escalation. See consolidated controls register. Control C45 applies in full — Police and licensing liaison. See consolidated controls register. Control C46 applies in full — Post incident review. See consolidated controls register. **Local-area monitoring and governance** Control C31 applies in full — Formal LARA review and triggers. See consolidated controls register. Control C32 applies in full — Monthly premises compliance review. See consolidated controls register. Control C33 applies in full — Quarterly LARA and community engagement review. See consolidated controls register. Control C34 applies in full — Compliance audit and assurance. See consolidated

				controls register. Control C35 applies in full — Accountable control owners. See consolidated controls register. Control C38 applies in full — Verification of the local area schedule. See consolidated controls register. Control C39 applies in full — Repeat locality walkaround. See consolidated controls register. Control C40 applies in full — Records and regulator access. See consolidated controls register.

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. **Additional risk mechanism: Fair and open gambling; transparent customer registration and data use**	– Before opening, terms and conditions signage will be displayed and checked against the approved games and final layout. – Before opening, relevant 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 Adult Gamine Centre and the operator's approved procedures. – Before deployment, staff will demonstrate knowledge of Golden Slots terms and conditions and the rules for the proposed 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 direct link with the successful achievement of the crime and disorder objective.	**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 without discouraging a customer from making a complaint. – Advertising and window-screen content will be subject to a

			– Before opening, all proposed advertising and customer-facing promotions will undergo documented compliance approval against applicable advertising requirements.	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** Control C31 applies in full — Formal LARA review and triggers. See consolidated controls register. Control C32 applies in full — Monthly premises compliance review. See consolidated controls register. Control C33 applies in full — Quarterly LARA and community engagement review. See consolidated controls register. Control C34 applies in full — Compliance audit and assurance. See consolidated controls register. Control C36 applies in full — Training

				and refresher requirements. See consolidated controls register. – 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 duty. Control C37 applies in full — Management information. See consolidated controls register.

Gambling Operation & Physical Design (Internal and External)				
Licensing Objective		**Risks**	**Proposed Control Measures (pre-opening implementation)**	**Further Controls Recommended**
2.1	Protecting children and other vulnerable persons from being harmed or exploited by gambling	There are a number of **educational facilities in the area**, including but not limited to within half a mile of the site as follows: - Ashford Library, Church Road, TW15 2XB (282ft) - Clarendon Primary School, Knapp Road, TW15 2HZ (0.2 miles) - Kelly Dixon Dance Academy, Church Road, TW15 2TT (0.2 miles) - Language School, The Atrium, Church Lane, TW15 2PH (0.2 miles) - Kumon Maths & English, 6 Woodthorpe Road, TW15 2RY (0.2 miles) - Happy tots pre-school, Stanwell Road, TW15 3QL (0.3 miles) - St Michaels Primary School, Feltham Hill Road, TW15 2DG (0.4 miles) - St James All boys School, 10 Church Lane, TW15 3DZ (0.4 miles) - Brooklands Technical college, Stanwell Road, TW15 3DU (0.5 miles) - Thomas Knyvett College, Stanwell Road, TW15 3DU (0.5 miles) **There are no Student Accommodation facilities within the immediate area.** **Support and Educational services for teenagers and young adults are provided at**: - We Make Footballers, St James Boys School, 10 Church Road, TW15 3DZ (0.4 miles) - Stagecoach, Stanwell Road, TW15 3DU (0.6 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. 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;	– 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 will be made aware of child truancy during school times, i.e. being aware that: a. Children should not be in the premises. b. The school day is between

		Support for the homeless (including hostels) or potentially vulnerable: - The Salvation Army, Woodthorpe Road, TW15 3JY (0.5 miles) **Care Homes:** - Echelforde Care Home, College Way, TW15 2XG (0.2 miles) - Cedars Care Home, 16 Fordbridge Road, TW15 2SG (0.2 miles) - Allium Home Care Surrey Home Care Agency, 87 Church Road, TW15 2PE (0.2 miles) **There are no facilities for problem gambling in the vicinity.** **Drug and Alcohol Treatment Centres:** - Foundations Recovery, Twickenham, TW2 5RF (6 miles) **Job centres/employment agencies in the close area:** - Bridge Recruitment Services Ltd, Church Road, TW15 2UD (92ft) - First Choice Corporate Ltd, 8 Station Approach, TW15 2QN (0.3 miles) - Pentagon Human Resources, 21 Woodthorpe Road, TW15 2RP (0.3 miles) - Podrive Personnel Ltd, 13 Feltham Road, TW15 1DQ (0.5 miles) **Family Service Centres or Support Groups:** - Wise Blue Owl Family Counselling, 13 Clarendon Road, TW15 2QJ (0.2 miles) - Clarendon Family Centre, 1 Knapp Road, TW15 2HZ (0.2 miles) - Ultrasound Direct Heathrow, 10 Station Road TW15 2UP (0.2 miles) **There are no Housing Projects within the**	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 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 three shift patterns. Results, failures, corrective actions and retesting will be	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 Adult Gaming Centre premises is an over 18 premises only. – Before opening, the operator will implement Safeguarding Policies and Procedures for both Adults and

		immediate area of the premises. **Soup Kitchen/Food Bank:** - The Salvation Army, Woodthorpe Road, TW15 3JY (0.5 miles) **Places of Worship:** - Ashford Congregational Church, Clarendon Road, Ashford, TW15 2QA (322ft) - Ashford Baptist Church, Church Road, TW15 2TT (0.2 miles) - Woodthorpe Methodist Church, Clarendon Road, TW15 2QR (0.2 miles) - UK Teamspirit, Spiritist Centre, Princes Road, TW15 2LT (0.2 miles) - Saint Michaels Catholic Church, 112 Clarendon Road, TW15 2QD (0.2 miles) - The Parish Church St Matthew, Church Road, TW15 2NY (0.3 miles) - St Hildas Church, Stanwell Road, TW15 3QL (0.4 miles) **Pay Day Loan Shops or Cash Chequing Services:** - Auto Advance Logbook Loans, 45 Church Road, TW15 2TQ (92ft) **Banks/ATMs:** - Sainsburys ATM, 6 New Parade, Church Road, TW15 2UF (328ft) - Tesco Bank ATM, Church Road, TW15 2UT (463ft) - Natwest Ashford, 5 Woodthorpe Road, TW15 2RN (0.2 miles) - ATM, Coop Food, Church Road, TW15 2TX (0.2 miles) - ARM Londis, 83 Church Road, TW15 2PE (0.2 miles) - ATM, Jb's premier, 89 Church Road, TW15 2PE (0.2 miles) - ATM, 91 Fordbridge Road, TW15 2SS (0.5 miles)	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 a mag lock and 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 a minimum complement of three trained operational employees physically present throughout gambling hours, at least two actively deployed on the shop floor continuously monitoring the entrance and gaming area, and third-person relief for breaks, toilet checks, interventions and other duties. The assessment will address absence, handovers, simultaneous demands, additional relief and suspension of admissions and gambling where either staffing requirement cannot be maintained; 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	Children, having regard to Spelthorne's policy. – The operator will adopt and implement a Safeguarding Adults Policy and Procedure for the proposed premises before opening. 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** Control C01 applies in full — Safeguarding lead and deputy. See consolidated controls register. Control C02 applies in full — Challenge 25. See consolidated controls register. – 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 weekly for patterns by time, shift, entrance position or member of staff. Control C03 applies in full — Independent age verification testing. See consolidated controls register. – A monthly entrance-observation audit will test whether staff have uninterrupted awareness of persons entering, whether acoustic door alerts are effective, whether CCTV

		Gambling Premises: - William Hill, Unit 1, The Atrium, TW15 2UD (344ft) - Coral, 6 Church Road, TW15 2UT (397ft) **Alcohol licensed premises:** - The Kings Head, 4 Feltham Road, TW15 2EB (0.4 miles) - The Kings Fairway, 91 Fordbridge Road, TW15 2SS (0.5 miles) **Playgrounds & Parks:** - The Kub Club (indoor playground), 112 Clarendon Road, TW15 2QD (0.2 miles) - Elmsway Tennis Club, Elmsway, TW15 2SH (0.3 miles) - Ashford Recreation Ground, 3 Rosary Gardens, TW15 1BX (0.6 miles) **Leisure Centres/Community Centres:** - Energie Fitness, 40 -42 Church Road, TW15 2UY (0.2 miles) - Fordbridge Community Centre, Clarendon Road, TW15 2QA (0.2 miles) - Town Tree Hall Community Centre, TW15 2EW (0.5 miles) **Bowling Alley, shopping centres, cinemas:** - Nearest Cinema is Vue Cinema in Staines or Cineworld, Feltham - Nearest Shopping Centre is Manor Retail Park Feltham, Staines upon Thames or Sunbury Cross - all over 2 miles away. **Fast Food premises and cafes:** - Wimpy, 4 Church Road, TW15 2TY (43ft) - Costa, 33 Church Road, TW15 2UD (154ft) - Two Brothers Fish House, 20 Church Road, TW15 2UY (194ft) - NXT LVL Chicken and Cookies, New	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 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	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** Control C04 applies in full — Personal greeting and initial assessment. See consolidated controls register. Control C05 applies in full — Fair and objective entry assessment. See consolidated controls register. Control C06 applies in full — Mandatory facial recognition. See consolidated controls register. Control C07 applies in full — Facial recognition governance and failures. See consolidated controls register. Control C08 applies in full — Verified customer registration. See consolidated controls register. – 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. Control C09 applies in full — Returning customers and emerging vulnerability. See consolidated controls register.

		Parade, TW15 2UB (243ft) - Fireaway, 1 New Parade, TW15 2UF (256ft) - Viva Namaste, 18 Church Road, TW15 2UY (272ft) - Chicken City, 2 Church Road, TW15 2UT (443ft) - Chaiicoffee, 19 Church Road, TW15 2UG (0.1 mile) - Little Bodrum, 7 Church Road, YW15 2TX (0.1 mile) - M2 Pizza Pasta, 15 Church Road, TW15 2UG (0.1 mile) - KFC, Unit 3 Church Road, TW15 2UT (0.1 mile) - Subway, Unit 2 Church Road, TW15 2UT (0.1 mile) - Elle & Fee, 19 Woodthorpe Road, TW15 2RY (0.2 miles) - Costa Ashford 2, 79 Church Road, TW15 2PE (0.2 miles) - Thai Go, 22 Woodthorpe Road, TW15 2RY (0.2 miles) - Bright Cake, 2 Fir Tree Place, TW15 2PH (0.2 mile) - Burger Plus, 2 Woodthorpe Road, TW15 2RY (0.2 miles) - Anatolia, 12 Woodthorpe Road, TW15 2RY (0.2 miles) - Burger Junction, 1B Woodthorpe Road, TW15 2RL (0.2 miles) - Marhabaa Food, 4 Central Arcade, TW15 2RL (0.2 miles) - VMN Fired Chicken, 4 Fir Tree Place, TW15 2PH (0.2 miles) - Golden Grill, 81A Church Road, TW15 2PE (0.2 miles) - Top Wok, 11 Station Approach, TW15 2QN (0.3 miles) **Bus Stops:** - Dudley Road (328ft)	for effective age and vulnerability screening. – Before opening, management will approve and test a staffing plan demonstrating three trained operational employees physically present and two continuously monitoring the shop floor, with third-person relief, staggered breaks, handovers, simultaneous-incident cover 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. – Before opening, a clear under-18s prohibition notice will be installed at the AGC-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	Control C10 applies in full — Self exclusion alerts and response. See consolidated controls register. Control C11 applies in full — Recognition and exclusion performance review. See consolidated controls register. Control C12 applies in full — Underage access prohibition. See consolidated controls register. Control C13 applies in full — Indicators of gambling harm. See consolidated controls register. Control C14 applies in full — Customer interaction records. See consolidated controls register. Control C15 applies in full — Welfare breaks and continued gambling. See consolidated controls register. Control C16 applies in full — Escalating indicators and management action. See consolidated controls register. Control C17 applies in full — Self exclusion breach records. See consolidated controls register. Control C18 applies in full — Staff briefings on exclusions. See consolidated controls register. Control C19 applies in full — Quality assurance of customer interactions. See consolidated controls register. – 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. Control C20 applies in full — Accessible information and language support. See

		- War Memorial (0.2 miles) - Ashford (0.3 miles) - Ashford Railway Station (0.3 miles) - Gables Avenue (0.4 miles) - Stanwell Road (0.4 mile) - Town Tree Road (0.4 miles) - Station Crescent (0.4 miles) **General Summary of Risks Considered:** – Children entering site unnoticed or unchallenged. – Potentially Vulnerable people being able to gamble. – Failure to recognise signs associated with problem gambling or substantial changes in gambling style – Failure to provide information to players on responsible gambling. – Failure to properly administer the self-exclusion process and maintain its 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	avoid appealing to children, young people or vulnerable people.	consolidated controls register. Control C21 applies in full — Communication adjustments. See consolidated controls register. Control C22 applies in full — Cash access and financial vulnerability. See consolidated controls register. Control C23 applies in full — Repeated cash related behaviour. See consolidated controls register. Control C24 applies in full — Credit and cash withdrawal restrictions. See consolidated controls register. Control C25 applies in full — Essential expenditure and financial distress. See consolidated controls register. Control C26 applies in full — Review of financial vulnerability patterns. See consolidated controls register. Control C27 applies in full — Monitoring prolonged play. See consolidated controls register. Control C28 applies in full — Session observation and welfare intervention. See consolidated controls register. Control C29 applies in full — Simultaneous machine play. See consolidated controls register. Control C30 applies in full — Review of fatigue interventions. See consolidated controls register. **Physical-design assurance** Control C47 applies in full — Approval of layout changes. See consolidated controls register. Control C48 applies in full — CCTV sightlines and coverage. See consolidated controls register. Control C49 applies in full — Critical CCTV faults. See consolidated controls register. Control C50 applies in full — Alarm testing and emergency response. See consolidated controls register.

		frontage may observe the customer once outside, which could cause unnecessary concern. – Customers may have limited English, which could reduce their understanding of safer gambling information. – Customers gambling late at night while appearing fatigued or with reduced alertness may make poor decisions, increasing the risk of harm or exploitation. **Additional risk mechanism:** Physical access, children and concealed gambling vulnerability		– Lone working will not be permitted. If fewer than three trained operational employees are physically present, or two cannot remain actively deployed on the shop floor continuously monitoring the entrance and gaming area, no new customer will be admitted for gambling and the provision of gambling facilities will cease until both requirements are restored. Customers will be managed safely during any suspension.

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 2188 crimes were reported across the Ashford area. The highest reported crimes were Violence and Sexual Offences, Shoplifting and ASB with occasional Public Order Offences over the period of a year. The nature of Church Road reflects the type of incidents commonly associated with a high street environment which experience localised retail activity and public interactions. None of these crimes are particularly linked with gambling premises. **Additional risk mechanism:** Internal/external disorder, theft, welfare and emergency response	– The proposed CCTV system will record continually whilst the premises is open for licensable activities and during all times when customers remain on the premises. The proposed CCTV system will be designed to cover the gaming area, office and toilet entrance, subject to the approved layout and privacy requirements. Once commissioned, recordings will be retained for a minimum of 31 days, with date and time stamps. Following commencement of operations, recordings will be made available to authorised persons in accordance with applicable legal requirements. – There will be monitors at the Customer Service Desk as well as at the front entrance. – Before opening, designated staff will be trained and assessed as competent in the operation of the CCTV system, with competent cover maintained whenever the premises is open. – The proposed premises will maintain a minimum staffing complement of three trained operational employees physically present throughout gambling hours, with at least two actively deployed on the shop floor continuously monitoring the entrance and gaming area and the third providing relief for breaks, toilet checks, customer interventions and other duties. Additional trained operational	– 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 will not be a cash desk in the traditional style, it will be a 'Customer Service Counter'. The proposed layout includes cash recyclers/change machines, subject to confirmation of the final equipment specification and installation before opening. Furthermore, only a minimal amount of cash will be required to be handled by staff at the 'Cashier Counter' and will be locked away. There will be no safes within the desk area. In turn will minimise the risk of crime, theft etc. b. The design will be open at the top for ease when communicating with customers. c. The customer service counter will not be continuously occupied, but the entrance must be actively supervised throughout customer access. At

			cover will be provided where recorded risks or simultaneous duties require it. – Before opening, the operator will adopt a policy for excluding customers who engage in crime or disorder within or outside the premises. – Before opening, the operator will implement a policy requiring staff to refuse entry to customers who appear to be under the influence of alcohol or drugs – We will ensure that the customer toilets are checked every hour for evidence of drug taking. These toilet checks will be documented, stating the time and member of staff who made the checks. Access to the toilet will be controlled by staff once the premises opens. – Induction training will be provided to all staff working at the premises and refresher training to every member of staff at least every six months. This training includes: 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	least three trained operational employees will be rostered and physically present throughout gambling hours. At least two will remain actively deployed on the shop floor continuously monitoring the premises: one supervising the entrance and arrivals and the other supervising the gaming area and customer welfare. The third employee will provide relief for breaks, toilet checks, customer interventions and any other operational issue. A handover will take place before either monitoring employee leaves their position. An employee on a break or undertaking a separate duty will not count towards the two actively monitoring employees. Breaks and other duties will be staggered; additional trained relief will be provided where simultaneous demands would otherwise reduce continuous monitoring below two employees. If fewer than three trained operational employees are physically present, or two cannot remain actively deployed on the shop floor continuously monitoring the entrance and gaming area, no new customer will be admitted for gambling and the provision of gambling facilities will cease until both requirements are restored. Customers will be managed safely during any suspension. The duty supervisor will allocate and record entrance, floor-monitoring and relief roles for every shift. d. Once installed and

			training provided by an instructor qualified to formally recognise national or equivalent standard on dealing with conflict. d. Basic anti money laundering training – This staff training will be recorded formally for each member of staff in their training records, and the records will be made available to the licensing authority upon request. – We will work closely with local police teams and the wider community to tackle any crime and disorder issues.	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. 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 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 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 outside the venue. b. CCTV footage can be accessed locally or remotely. A written log will be 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 will be checked regularly by management and serviced by a third party on a bi- annual basis. – Before opening, a Staff Line of Sight Policy will be adopted covering: a. The main floor will provide Category B3 machines, Category C machines and Category D machines and will be positioned to support staff visibility and CCTV coverage, including the front entrance/exit and rear emergency exit. The final plan will 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. – Gaming machines policy

				a. Machines will not be set out in a way to create blind spots and information signage is not covered by the position of the machines. b. There will be a robust Age verification policy in place. c. 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 the operator will assess and provide appropriate furniture and anti-disorder measures before opening. Should any issues arise there will be clear lines of communication with the local Police. – Staff Safety & Alarm Measures: a. Stationary panic alarms will be located on the Customer Service Desk and in the office on the ground floor and on staff. b. When staff are roaming the floor away from the stationary locations of panic alarms, they will be obliged to wear a personal panic attack alarm. c. Before deployment at Ashford, all allocated operational employees will complete or have their current conflict-management competence verified, with dated training records and management authorisation retained. Annual refresher training will be required

				thereafter, with completion monitored and recorded. d. There will be a lockable room that is a safe haven location for staff in a situation of emergency. HD CCTV monitor will also belocated here to allow for floor viewing. In addition, there will be a telephone located at the Customer Service Desk. – 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 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**

				Control C47 applies in full — Approval of layout changes. See consolidated controls register. Control C48 applies in full — CCTV sightlines and coverage. See consolidated controls register. Control C49 applies in full — Critical CCTV faults. See consolidated controls register. Control C50 applies in full — Alarm testing and emergency response. See consolidated controls register. – Lone working will not be allowed. Three trained operational employees will be physically present throughout gambling hours, with two continuously monitoring the entrance and gaming area from the shop floor and the third providing relief. If fewer than three trained operational employees are physically present, or two cannot remain actively deployed on the shop floor continuously monitoring the entrance and gaming area, no new customer will be admitted for gambling and the provision of gambling facilities will cease until both requirements are restored. Customers will be managed safely during any suspension. – 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 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, entrance controls, CCTV coverage and liaison with police or the licensing authority as appropriate. Control C41 applies in full — Serious disorder and exclusions. See consolidated controls register. Control C42 applies in full — Intoxication and medical concerns. See consolidated controls register. Control C43 applies in full — Toilet checks and suspected drug use. See consolidated controls register. Control C44 applies in full — CCTV checks and fault escalation. See consolidated controls register. Control C45 applies in full — Police and licensing liaison. See consolidated controls

				register. Control C46 applies in full — Post incident review. See consolidated controls register. **Security assurance** Control C31 applies in full — Formal LARA review and triggers. See consolidated controls register. Control C32 applies in full — Monthly premises compliance review. See consolidated controls register. Control C33 applies in full — Quarterly LARA and community engagement review. See consolidated controls register. Control C34 applies in full — Compliance audit and assurance. See consolidated controls register. – Each material control will have an accountable owner. Local operational controls will ordinarily sit with the Premises Manager, safeguarding controls with the DSL, with the responsible manager and corporate policy assurance with the relevant compliance function. The Premises Manager will coordinate the Condition 15 engagement programme and maintain the Community Engagement Register; the designated safeguarding lead will assess and escalate safeguarding concerns; senior management will oversee responses, corrective actions and the six-monthly engagement review. Control C37 applies in full — Management information. See consolidated controls register. Control C38 applies in full — Verification of the local area schedule. See consolidated controls register. Control C39 applies in full — Repeat locality walkaround. See consolidated controls

				register. Control C40 applies in full — Records and regulator access. See consolidated controls register. – Pre-opening evidence required: signed floor plan showing counter, entrance and CCTV sightlines; CCTV commissioning and retention test; operational rota demonstrating three trained employees physically present and identifying entrance, floor-monitoring and relief roles on each shift; documented staggered breaks, toilet checks, handovers, additional relief and suspension of admissions and gambling if either staffing requirement cannot be maintained; and Premises Manager approval before customer access.

2.3	Ensuring that gambling is conducted in a fair and open way	**Additional risk mechanism:** Fair operation, complaints and customer information	– Terms and conditions signage will be displayed. – Game rules signage will be displayed. – All notices regarding gambling advice or support information will be displayed. – All staff will be trained with the BACTA codes of practice. – Staff will be aware of the terms and conditions, and relevant game rules associated with all gaming machines offered on the premises. – Customer complaint forms will be available on request at the Support Desk. Before opening, staff will be trained in the complaints procedure. – As an operator, we acknowledge that this licensing objective has a direct link with the successful achievement of the crime and disorder objective. – In terms of advertising, all advertising codes will be adhered to in order to stop customers from being misled. – All machines will be purchased from manufactures/suppliers licensed by the Gambling Commission. – Machines will be maintained by qualified engineers. – Machines will be turned off	– Staffing levels will be assessed before opening and reviewed throughout operations, maintaining a minimum staffing complement of three trained operational employees physically present throughout gambling hours, with at least two actively deployed on the shop floor continuously monitoring the entrance and gaming area and the third providing relief for breaks, toilet checks, customer interventions and other duties. If fewer than three trained operational employees are physically present, or two cannot remain actively deployed on the shop floor continuously monitoring the entrance and gaming area, no new customer will be admitted for gambling and the provision of gambling facilities will cease until both requirements are restored. Customers will be managed safely during any suspension. – This is to ensure that the entire premises is being monitored, including the monitoring of all gaming machines and entrances - We will not advertise our venues, activities or customer benefits using mainstream media, television, radio or newsprint etc. - The venue windows display screens will only feature content of games available inside along with safer gambling messaging. Any content proposed for display will be checked for compliance with applicable advertising, licensing and safer-gambling requirements before installation and use. Any content

			should a fault occur.	proposed for display will be checked for compliance before installation and use. We recognise the main advertising concerns are those that may be considered of interest to children, young persons and/or the vulnerable. - We will not offer any branded merchandise either for sale or as a prize. – Before opening, the operator will adopt and implement an AGC Gambling Harm Prevention Advice Policy covering: a. Gamcare gambling advice brochures will be available throughout the premises (including at the Customer Service Counter, gaming machines and a discreet location) Additionally, A4 posters we be produced and displayed in English. b. To assist customers monitor or control their gambling, timer clocks will be available for customers to use. In addition, some machines will have inbuilt timer/spend limit devices built in by manufacturers. A self-exclusion policy will also be implemented before opening. **INTEGRATED PROPOSED SITE CONTROL (subject to pre-opening verification): The verified customer registration scheme will improve the ability of staff to recognise repeat visits and patterns that may**

				indicate gambling-related harm; it cannot eliminate hidden or otherwise unobservable harm. Customers must complete free, staff-administered registration and identity verification before admission to gamble. Registration and applicable exclusion checks will be completed on return visits. Relevant safeguarding interactions and follow-up actions will be linked to the customer record. Where required registration or verification cannot be completed, gambling will be refused. Registration does not require club or body membership, subscriptions or membership rights. Customer information will be handled under documented data-protection arrangements.

Assessment Review			
Frequency of Review (enter time period e.g. 12 months)	Monthly operational assurance; quarterly senior-management LARA review; formal contact with the Community Wellbeing and Housing Committee or its designated officers and senior-management review of the Condition 15 engagement programme at least every six months; annual formal LARA refresh and immediate review on material change.	**Date Review Due**	Before opening; first monthly review after opening; quarterly thereafter.
Completed Risk Assessment brought to the attention of:			
Name (person responsible for premises and/or implementing control measures)	**Position**	**Signature**	**Date this assessment was brought to this persons attention**
Harpreet Chatta	Authorised applicant representative / senior approver	To be signed by Harpreet Chatta; not yet executed	Date to be entered by Harpreet Chatta upon approval

Appendix 1

Local Area Profile for Gambling Risk - Spelthorne Borough Council Statement of Gambling Policy 2025-2028

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

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

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

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

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

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

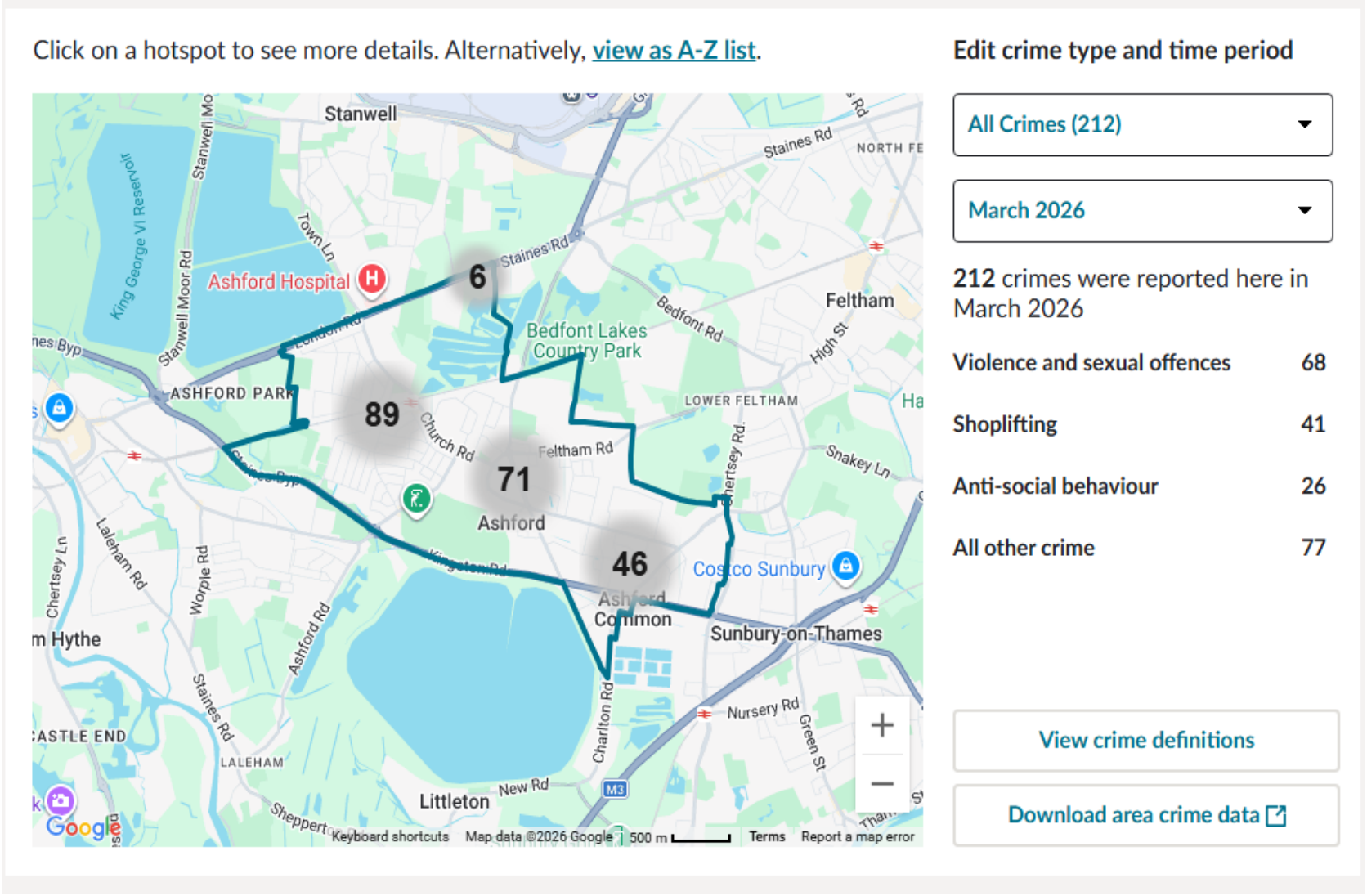
The Borough is also crossed by two tributaries, the Ash and the Colne. The Borough is flat and low lying and consequently liable to flooding. About 20% of the urban area is liable to flood in a 1 in 100-year flood event or surrounded by flood water and over 49% of the urban area would be flooded in a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

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

Spelthorne Population Data | Spelthorne Borough Council

Appendix 2

Area Map Ashford - Surrey Police Data Feed Example Map.



Ashford

View area boundary | Search another area

Overview | Crime map | Stop and search | Statistics

Top reported crimes

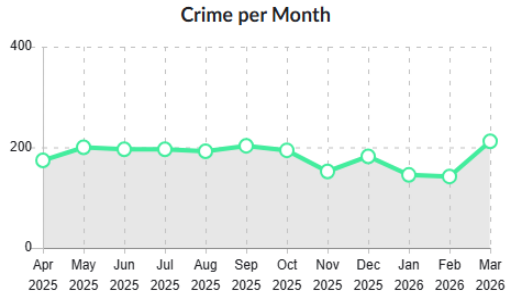
Most commonly reported crimes during Mar 2026

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

Get crime prevention advice

Crime levels overview

Crime for last year



View as a list

Appendix 3

Map of Gambling Premises in the Area



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

Appendix 4

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

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

Appendix 5

Photographs of the surrounding area of 39 Church Road



Educational facilities in the area



Clarendon Primary School, Knapp Road, TW15 2HZ



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



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



Ashford Library, Church Rd, Ashford TW15 2XB

Care Homes:



Cedars Care Home, 16 Fordbridge Road, TW15 2SG



Echelforde Care Home, College Way, TW15 2XG

Job centres/employment agencies in the close area:



Prodrive Personnel Ltd, 13 Feltham Road, TW15 1DQ

Soup Kitchen/Food Bank:



The Salvation Army, Woodthorpe Road, TW15 3JY

Places of Worship



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



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



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



St Hildas Church, Stanwell Road, TW15 3QL

Banks/ATMs



Natwest Ashford, 5 Woodthorpe Road, TW15 2RN

Family Service Centres or Support Groups:



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

Gambling Premises:



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



Coral, 6 Church Road, TW15 2UT

Alcohol licensed premises:



The Kings Head, 4 Feltham Road, TW15 2EB

Leisure Centres/Community Centres:



Fordbridge Community Centre, Clarendon Road, TW15 2QA



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

Fast Food premises and cafes:



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



Wimpy, 4 Church Road, TW15 2TY



Viva Namaste, 18 Church Rd, Ashford TW15 2UY



Little Bodrum, 7 Church Road, YW15 2TX



Fireaway, 1 New Parade, TW15 2UF



Chicken City, 2 Church Road, TW15 2UT



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



M2 Pizza Pasta, 15 Church Road, TW15 2UG



Burger Plus, 2 Woodthorpe Road, TW15 2RY



Anatolia, 12 Woodthorpe Road, TW15 2RY



Burger Junction, 1B Woodthorpe Road, TW15 2RL



Marhabaa Food, 4 Central Arcade, TW15 2RL

Statement of Local Risk, Safeguarding and Operating Commitments

Proposed Adult Gaming Centre | 39 Church Road, Ashford TW15 2QF
Applicant: Golden Slots (Southern) Limited (trading as Golden Slots)

Purpose and status of this statement
This statement accompanies the proposed Adult Gaming Centre premises licence application. It explains, in a single narrative, how the applicant has considered local risks and how it proposes to prevent crime and disorder, protect children and vulnerable people from harm or exploitation associated with gambling, and ensure that gambling is conducted fairly and openly. It records binding proposed operating commitments, not a claim that the premises is trading or that any equipment, policies, training or physical work has already been implemented. All required measures will be completed, legally approved where necessary, tested and signed off after the premises licence is granted and before any licensable gambling begins. The applicant will not open where a critical safeguard is absent or ineffective.

Local area and the risks identified
The assessment takes account of the Church Road Town-centre setting, nearby schools and routes used by young people, transport links, healthcare, care, family, community and homelessness services, local residential areas, deprivation and potential financial vulnerability, other gambling premises including the identified bookmakers, cash access and ATMs, and the public crime and antisocial-behaviour context. It also considers the potential effect of the proposed 09:00–23:00 daily hours on neighboring premises and the wider community, particularly during the evening. The identified locations and public datasets form the application-stage baseline; material changes in local uses, routes, crime patterns or planning restrictions will be checked following grant and before opening and monitored thereafter. The presence of deprivation or a sensitive service does not establish that any particular individual is vulnerable, and the operator recognises that controls inside the premises cannot eliminate all off-site or concealed gambling harm.
The applicant recognises material risks from underage access, self-exclusion breaches, prolonged or repeated play, hidden financial or psychological distress, cash-related behaviour, intoxication, customer crises, violence, disorder, equipment failures, inadequate staff cover, inappropriate use of personal data and wider community effects. Some risks remain present even when preventive controls are working. In particular, hidden customer harm cannot be treated as eliminated by customer registration or observation. The applicant will maintain a documented risk assessment, give each material risk a responsible manager, and require explicit senior review of higher-risk matters, including specific senior-level consideration of hidden harm and whether additional restrictions are necessary.

Operating hours, staffing and admission
The premises will open for gambling only between 09:00 and 23:00 each day, subject to the permissions and restrictions ultimately applicable. At least three trained operational employees will be rostered and physically present throughout gambling hours. At least two will remain actively deployed on the shop floor continuously monitoring the premises: one supervising the entrance and arrivals and the other supervising the gaming area and customer welfare. The third employee will provide relief for breaks, toilet checks, customer interventions and any other operational issue. A handover will take place before either monitoring employee leaves their position. An employee on a break or undertaking a separate duty will not count towards the two actively monitoring employees. Breaks and other duties will be staggered; additional trained relief will be provided where simultaneous demands would otherwise reduce continuous monitoring below two employees. If fewer than three trained operational employees are physically present, or two cannot remain actively deployed on the shop floor continuously monitoring the entrance and gaming area, no new customer will be admitted for gambling and the provision of gambling facilities will cease until both requirements are restored. Customers will be managed safely during any suspension. Rosters, relief cover, attendance records, training and incident drills will be

established before opening. Staff will supervise the controlled entrance and gaming floor and also use an audible pre- entrance alert and a suitable staff-operated entrance-control arrangement, and control admission particularly from 19:00 until closing and whenever safeguarding concerns arise. The final entrance design will be subject to necessary technical, accessibility, fire-safety and other approvals before use. Admission will stop if the entrance cannot be safely controlled.
The operator proposes a mandatory, staff-verified customer registration scheme for all customers. No one will be admitted to gamble until acceptable photographic identification has been checked, their identity and age of at least 18 verified, and their customer registration completed. Challenge 25 will provide an additional precaution. Every return visit will require customer registration verification and checks against applicable operator self-exclusion and premises-restriction records. Staff will refuse underage or excluded customers, document attempted entry and refusals, refer uncertain identity or exclusion matches to a trained manager, and use a tested manual fallback when lawful and equally protective. If required verification cannot be completed reliably, admission will be suspended. The operator will test admission, false-ID, underage, exclusion and outage scenarios before opening, including independent age-verification testing.

Customer welfare, gambling harm and financial vulnerability
Staff will be trained to identify and respond to observable indications of gambling harm, including prolonged or repeated attendance, changes in behaviour, distress, statements about debt, repeated cash-related exits or re-entry, and other objective signs of financial or psychological difficulty. Written procedures will require proportionate Identify–Interact–Evaluate conversations, timely intervention, recorded outcomes, escalation, follow-up and signposting to independent support. High-concern scenarios must result in the appropriate documented intervention and escalation during pre-opening training tests. The manager will review patterns and cases, with weekly supervisor consideration of recurring concerns and monthly management analysis. The customer registration scheme will assist continuity of contact.
No ATM will be installed or operated inside the premises or on its frontage. Staff, signage and advertising will not encourage cash withdrawals or suggest gambling as a response to financial hardship. Cash-related exits and re-entry will prompt proportionate welfare attention where observable. The operator will not offer time-limited reduced-stake or similar “happy-hour” inducements designed to prolong or repeat play and will not offer a customer-belongings storage service intended to facilitate prolonged attendance. Gaming information, customer registration scheme terms, support routes and complaints arrangements will be made clear and accessible.

Children, safeguarding and external conduct
The adult-only entrance and Challenge 25 checks will be supported by staff training on child safeguarding, vulnerable adults, intoxication, emergencies, complaints and safe intervention. The proposed frontage, signage and promotions will be restrained and will not target children or vulnerable people. Staff will take reasonable steps to prevent customers leaving children unattended immediately outside, record concerns and take proportionate safeguarding action. Customers apparently under the influence of alcohol or drugs will be refused admission or gambling. Staff will discourage drinking immediately outside, direct smokers away from neighbouring entrances where practicable, respond to aggressive or disruptive behaviour, and use police or emergency-service assistance when and if appropriate.

CCTV, incidents and personal information
Before opening, an operational CCTV and alarm arrangement will be installed, commissioned and tested to cover public entrances and exits, gaming-machine areas, the counter and public customer areas, excluding toilets, with appropriate entrance and frontage coverage subject to privacy law. CCTV notices will be displayed. Recording will operate throughout opening and while customers remain; footage will be retained for at least 31 days with reliable date and time information, restricted access and lawful disclosure to police or authorised officers on proper request. Camera placement, coverage, retention, fault response, maintenance, alarm performance and system outages will be tested and documented before opening. Critical failures will require safe fallback procedures or suspension of admission or affected gambling activity.

The operator will maintain a secure, tamper-evident incident record covering suspected crime and disorder, underage attempts, exclusion breaches, significant welfare interventions, complaints, CCTV and other system faults, and visits by authorities or emergency services. Serious incidents or control failures will be escalated promptly, with same-day notification to the Director for matters involving a child, excluded person, significant welfare crisis, suspected crime or other material failure. Management will document investigation, corrective action and authorisation before restarting affected activity.
Customer registration scheme and identification records will be limited to information that is necessary and lawfully processed, with clear privacy notices, role-based access, security, retention and deletion rules, and accessible alternatives. Golden Slots (Southern) Limited will install, commission and introduce mandatory facial recognition before the premises opens for gambling and will operate the system throughout licensable gambling hours. It does not replace the customer registration scheme or staff-led exclusion system. No biometric monitoring of unrelated passers-by will be taken, and the facial recognition cameras will be fixed at the internal door so that everyone will be verified before entrance. A biometric match will not be treated as infallible or used without appropriate human consideration.

Community concerns and ongoing oversight
The operator will maintain a clear route for neighbours, families, community representatives and authorities to raise credible concerns. A named manager will record, investigate, respond to and escalate complaints, maintain appropriate liaison with Surrey Police and the licensing authority, and monitor frontage behaviour and the late-evening period, particularly 19:00–23:00. Two substantiated complaints about the same locality issue within 30 days, or a material increase in verified frontage incidents, will prompt management review within five working days, a documented response and a follow-up check within 30 days. These are proposed internal action triggers, not statutory thresholds. Confirmed underage entry, exclusion breaches, serious safeguarding incidents, violence or sustained critical control failures will prompt immediate protective action, suspension where necessary and investigation before resumption.
Community wellbeing and safeguarding engagement under proposed Condition 15. The Applicant voluntarily offers the following commitments for inclusion as binding premises licence obligations if Condition 15 is imposed. Before gambling operations commence, the Premises Manager, acting on behalf of the licence holder, will formally contact Spelthorne Borough Council's Community Wellbeing and Housing Committee, or any successor committee exercising equivalent functions, and its designated officers to seek arrangements for ongoing engagement concerning children, young people, vulnerable persons and gambling-related harm in the wider community.

The Premises Manager will maintain a documented engagement programme and make formal contact with the Committee or its designated officers at least once every six months, offering relevant information about safeguarding arrangements, community concerns, harm prevention and the effectiveness of protective measures. The operator will seek appropriate meetings, consultations and safeguarding initiatives where invited or permitted, and constructive engagement with relevant residents, businesses, police, public health and safeguarding services, schools, youth organisations and services supporting families and vulnerable adults. Urgent safeguarding concerns will be escalated promptly by the designated safeguarding lead through the appropriate channels; they will not await a scheduled meeting or review.

The Premises Manager will maintain a Community Engagement Register recording correspondence, meeting requests, attendance, recommendations, formal responses, actions taken and reasons for any recommendation not adopted. Relevant recommendations will be considered and formally answered, with resulting changes to operating procedures, staff training or the LARA documented. Actions will have a responsible person, target date and completion evidence. Senior management will review the programme and register at least every six months, with emerging concerns and action progress also considered in the quarterly LARA review. The register will be available to the Licensing Authority upon reasonable request. If the Committee declines engagement, does not respond or cannot accommodate participation, reasonable attempts will be documented and the operator will continue its own obligations. Compliance will not depend on the Committee agreeing to meet, accepting participation or endorsing the premises.

After opening, the duty manager will check staffing, admission, exclusions, CCTV, alarms, incidents, welfare records and frontage concerns daily. Compliance management will review trends, refusals, repeat visits, welfare interactions, evening incidents, staff cover and complaints monthly. Senior management will review local conditions, risk treatment, training, data protection, system tests, complaints and corrective actions quarterly, with annual full refresh and earlier reassessment following a material incident or change. Each action will have a responsible owner, deadline and evidence of completion. Where monitoring identifies worsening harm or ineffective safeguards, the operator will strengthen controls or restrict hours, admission or activity as necessary.

Post-grant implementation and authority to open

Following grant and before opening, the operator will undertake and retain an updated locality review of sensitive premises, routes, cash access and other gambling facilities; document the source periods and geographic boundaries of relevant public crime and deprivation data; and assess the frontage and evening environment. It will procure and commission equipment, complete recruitment and training, and test the complete operating model through realistic scenarios, including breaks, simultaneous incidents, emergency response, critical outages and refusal of admission.

Harpreet Chattha, as the applicant's authorised final signatory, will personally oversee and approve all the completed pre-opening checks for Golden Slots (Southern) Limited after all operating arrangements, training, tests, risk-treatment decisions and corrective actions have been completed. The dated approval will identify the current LARA and supporting evidence. This final operational sign-off will take place after licence grant and before licensable gambling commences. These commitments are proposed for consideration as premises-licence conditions where appropriate and will in any event be adopted as internal operational policies, subject to the approval of the licence.

Applicant confirmation

Golden Slots (Southern) Limited confirms that this statement represents its intended operating and safeguarding commitments for the proposed Ashford premises, subject to licence grant and completion of the mandatory pre-opening assurance process described above.