



## Local Area Risk Assessment

<b>Date of assessment:</b>	17 <sup>th</sup> December 2025
<b>Review date:</b>	16 <sup>th</sup> December 2026 or before if any significant changes take place within the location.

<b>Shop Name:</b>	Stoke Newington
<b>Premises Address:</b>	157 Stoke Newington High Street London N16 0NY
<b>Name of Assessor:</b>	Sue Spencer and Peter Jowett
<b>Branch Manager:</b>	TBC

### 1. Local Area

The premises, a former Ladbrokes betting shop is in a secondary position within Stoke Newington High Street. It forms part of a parade of shops offering a range of services, shopping opportunities and socialising. Adjoining units are an independent book shop and a hardware shop. Above the unit is a self-contained residential property.

Shop Banking Arrangements:	
<b>Address and Location to Shop:</b>	<b>Opening Times:</b>
<b>MAIN</b> Stoke Newington Post Office & UOE Store 150-152, Stoke Newington High St,	Monday – Saturday 09:30-17:00 Sunday – 12:00 -16:00
<b>Secondary-</b> Stamford Hill Post Office 250-252 Stamford Hill	Mon – Fri 09:30-17:30 Sat – 09:00 – 12:30 Sun - Closed
Local Police Details:	
<b>Address and Location to Shop:</b>	<b>Opening Times:</b>
Stoke Newington Police Station: 33 Stoke Newington High Street  999 For emergencies  101 For non-emergencies or 0300 123 1212	Open 24 hours
External Shop Details:	
<b>Access Routes to the Shop:</b>	The premises is situated on part of the one way system of Stoke Newington High Street and has one route of access via the public highway.
<b>Passing Traffic:</b>	A busy route (A10) with a constant flow of traffic during trading hours
<b>Adjoining Properties:</b>	Adjoining units are an independent book shop and a hardware shop. Above the unit is a self-contained residential property.
<b>Betwatch Scheme:</b>	None available that serve this locality
<b>Establishment type</b>	<b>Risk</b>   <b>Location and details</b>

<b>Other gambling premises:</b>	Problem gamblers could self-exclude from other operators but still attempt to gamble in our premises	Paddy Power and Admiral Casino have premises in this locality. North in Stamford Hill, Ladbrokes, William Hill and Jenningsbet are represented
<b>Educational establishment:</b>	Increased presence of under 25s in local area.	William Patten Primary School on Stoke Newington Church Street is the closest school to the site with other primary schools in the wider vicinity.  Tawhid Boys Secondary School is a 5 minute walk north.  Further afield (15 minute walk) to the west is Stoke Newington School & Sixth Form
<b>Hospital or mental health facility:</b>	This could lead to an increased presence in the local area of vulnerable people	City & Hackney Centre for Mental Health Homerton Hospital Raybould Centre Homerton Row, E9 6SR
<b>Job centre:</b>	This could lead to an increased presence in the local area of vulnerable people	The closest dedicated Job Centre is a 40 minute walk and located on Mare Street
<b>Pub, social club, club serving alcohol:</b>	This could lead to an increased presence in the local area of vulnerable people	There are several pubs within the location, the three closest all within a short (2 minute) walk are: The Rochester Castle 143-145 Stoke Newington High Street Three Crowns @ 175 Stoke Newington High Street The Coach & Horses @ 178 Stoke Newington High Street
<b>Off licences:</b>	This could lead to an increased presence in the local area of vulnerable people	There are several off licences and other convenience stores in the local vicinity that sell alcohol
<b>Specialised housing for vulnerable people:</b>	This could lead to an increased presence in the local area of vulnerable people	Sanctuary Supported Living: Park Lodge for adults 18-65 with mental health needs is 2.5 miles south on the edge of Victoria Park

<b>Gambling addiction support facilities:</b>	This could lead to an increased presence in the local area of vulnerable people	Eagle Recovery Project is just over a mile away in Dalston.
<b>Alcohol or drug support facilities:</b>	This could lead to an increased presence in the local area of vulnerable people	Haga: Action on Alcohol is 1.5 miles north on Seven Sisters Road.
<b>Hostels or support services for homeless:</b>	This could lead to an increased presence in the local area of vulnerable people	St Mungo's a Charity works with homeless persons has accommodation in Mare St Hackney. There are 6 Food Bank Centres in Hackney the closest is located at St Mary's Centre (behind St Mary's Church on Church Street around 0.5 miles to the west.
<b>Pawn brokers or pay day loan businesses:</b>	This could lead to an increased presence in the local area of vulnerable people	H&T Pawnbrokers have 2 two branches and Fish Brothers have a branch a mile south on Kingsland High St.
<b>Public Transport Hubs:</b>	Increased presence of under 18 in local area. Groups of young people gathering during evenings would heighten risk	The area is served by several local bus routes. Stoke Newington mainline station is 0.3miles away to the north, and West Hackney mainline station is 0.4miles away to the south east.
<b>Others:</b>	This could lead to an increased presence in the local area of vulnerable people	N/A

2. The Gambling Operation	
Winter Trading Times (September to April)  Monday to Friday: 08:30 to 22:00  Saturday: 08:30 to 22:00  Sunday: 08:30 to 22:00	Summer Trading Times (April to September)  Monday to Friday: 08:30 to 22:00  Saturday: 08:30 to 22:00  Sunday: 08:30 to 22:00
How many employees are based in this shop?	5 full time & 1 part time
How many employees are usually on duty at the specified times:	
Opening time to 12:40:	1
12:40 to close	2
Will the company operate lone person working in this shop from 18:30	No
What products does the premises provide for gambling: No. of tills to process over the counter bets in operation:	2
No. of FOBTs in operation:	4
No. of SSBT's in operation:	8
How is training provided to employees in the premises:	<p>All training is devised with the three licencing objectives at its core. The Company's Training Manager provides face to face induction training to new employees before they take up a formal position. On site training further enhances their development over the first 8 weeks working alongside a suitable branch training manager. All new recruits to the business whether previously employed in the sector or not MUST undertake and pass a final examination before being allowed to manage a branch. Refresher training is undertaken on at least an annual basis via the Elearning portal. All training records are held at by the Compliance Team.</p> <p>All new staff complete Social Responsibility training again covering Safer Gambling, Age Verification, and vulnerability. This takes place in a face-to-face training workshop in induction week.</p> <p>All staff complete the Jenningsbet refresher online course on Social Responsibility, this covers Safer Gambling, Age Verification, and vulnerability. This has a yearly refresher every October.</p>

	<p>Duty Managers from each branch complete a module (with City &amp; Guilds certifications) provided by the BetKnowMore/YGAM training partnership 'Safer Gambling Training'. Last year this module was 'enhanced skills for customer interactions'. This year is 'Understanding customer vulnerability in a gambling context'.</p> <p>In addition, E-Learning Programmes:</p> <ul style="list-style-type: none"><li>o Understanding customer vulnerability in a gambling environment</li><li>o Understanding gambling harms</li><li>o Understanding safeguarding and managing welfare</li><li>o Enhanced skills for customer interactions</li><li>o Awareness of Gambling Support Services</li><li>o Health and Wellbeing</li></ul>

**Site Specific Control Measures – 157 Stoke Newington High Street N16 0NY**

- The alarm system is to be installed by **Link Integrated**; they are a leading specialist in electronic integrated security. This will include the installation of their **StaffGuard** system which provides a 24/7/365 security system, ensuring rapid response times and continuous staff safety.
- Full CCTV will be installed to cover all areas including all entry and exit points to and from the premises enabling frontal **identification size image** of every person exiting the premises under any light conditions, Gaming machines and the counter area. The CCTV will record activities 24 hours a day whilst persons are on the premises and retain the footage for at least 28 days. Live footage can also be viewed by the Operational control team and Security department. The footage captured is available upon request (within hours) and provided by our Security teams. Signage will be displayed in the customer area and upon the entrance door advising that CCTV is in operation.
- **StaffGuard** also provide a live link to an operator and can call for Police assistance if deemed necessary. If the StaffGuard facility is triggered due to criminal activity the video and audio is recorded to be used as evidence. Adherence to procedures is monitored via both the security department and compliance team.
- A concealed safe will be installed with appropriate time delays and be located behind the main service area out of public view.
- Staff Guard lanyards in shop which the shop team wear upon themselves with full visibility to the customers. These lanyards provide employees the opportunity to activate and contact the operational control team by a press of a button.
- Full height reinforced security screen to the counter
- EGMs located in full view of the staff counter
- The entrance doors with electronic bolt lock enabling the shop team to control access remotely from behind the counter (this is stronger than Mag Locks).
- The entrances will have a ‘bleep’ announcement upon entry and exit, enabling the shop team to be aware of any persons entering/leaving the premises
- Customer toilet, controlled and monitored by the shop team via buzzer entry system operated from behind the counter
- Think/Challenge 25 will be in operation with a ‘refusals’ register kept upon the premises and made available for inspection as required.
- Prominent signage promoting our Think/Challenge 25 policy will be displayed.
- Independent third-party testing on our Think/Challenge 25 procedures will take place at least twice a year with results available to the Licensing Authority upon request.
- Having risk assessed the location, staffing levels will reflect the operational needs alongside the security and responsible gambling obligations.

**Operating Hours:**

Despite the mandatory hours allowed by the Gambling act being 07:00 – 22:00 we do not envisage opening before 08:30 (09:00 on a Sunday)

Specific Control Measures	YES/NO	Location and details
<b>Safe:</b>	Yes	Free standing with a 2 minute time delay and a 10 minute time delay for the insert.
<b>Time-Delay Insert:</b>	Yes	This will be 10 minutes.
<b>Intruder Alarm:</b>	Yes	Alarm Monitored by Central Monitoring System
<b>CCTV:</b>	Yes	Covers the customer area, the counter area, the machines area and a covert camera to cover persons leaving the premises to provide a head and shoulder image in evidential quality. External camera will cover the entrance
<b>Blind Spot Mirrors:</b>	No	All areas covered by the CCTV.
<b>Staff Guard:</b>	Yes	Staff Guard lanyards will be used in shop which the shop team wear upon themselves with full visibility to the customers.
<b>EGM/FOBT Blocking Facility:</b>	Yes	Blocking facility controlled and monitored by staff behind the counter.
<b>Security Screens:</b>	Yes	Full screen, counter to ceiling
<b>Counter Door Lock:</b>	Yes	Push button digital lock and further internally controlled lock/bolt
<b>Safe Haven:</b>	Yes	To the rear of the counter area
<b>Toilet Door Maglock:</b>	Yes	Buzzer entry access only, controlled and monitored by staff behind the counter.
<b>Front Door Electric Lock:</b>	Yes	An electric locking device will be installed and maintained on the main entrance/exit to the premises which will be operable by staff to restrict entry when required.
<b>Shutters:</b>	Yes	Full curtain internal shutter
<b>Steel Doors:</b>	Yes	The rear emergency Exit door
<b>External Lighting:</b>	No	None other than the High Street lights
<b>Other:</b>	Yes	We operate a third-party system called StaffGuard that provides a live link to an off-site operator, Shop staff can also trigger assistance and request a call for police assistance if deemed necessary. If the StaffGuard facility is triggered due to criminal activity the audio is recorded and used as evidence.

<b>Local Risk Profile – 157 Stoke Newington High Street N16 0NY</b>	
<b>Local Authority:</b>	<b>London Borough of Hackney</b>
<b>Potential Licensing Risk Factors:</b>	<p>Those identified within the LCCP, Gambling Act (2005) and the Local Authorities Statement of Licensing Principles 2025-2028 notably GLP1-GLP7 and GLP10.</p> <p>In addition, The Hackney Community Strategy 2018-2028 along with the BGC Code which incorporates the 2010 Safe Bet Alliance voluntary code have been considered.</p>
<b>Demographic:</b>	<p>Stoke Newington High Street in Hackney is in the London region of England. The postcode is within the Stoke Newington ward/electoral division, which is in the constituency of Hackney North and Stoke Newington.</p> <p>From the 2021 Census, the Stoke Newington ward houses predominantly white (71%), British ethnicity (67%) with 98% of the resident population classing themselves as in fair/good or very good health. Households that are considered to be affected by deprivation in at least one dimension are 41.2% with 22.5 residents considered economically inactive.</p>
<b>Deprivation Quintile:</b>	<p>This Betting Office is located in an area that is ranked 6<sup>th</sup> in the national Index of Multiple Deprivation (IMD) for England, where 1 donates the most deprived 10% of areas in the nation and 10 the least.</p>

<p>Additional Associated Information</p>	
<p>CCTV Camera View:</p>	<p>To be added</p>
<p>Shop Floor Plan:</p>	<p>PREMISES LICENSE PLAN</p> <p>EMERGENCY REAR STAFF EXIT</p> <p>STAFF ONLY AREAS</p> <p>STAFF COUNTER</p> <p>CUSTOMER WC DDA COMPLIANT</p> <p>4 x EGMs/FOBTs (ELECTRONIC GAMING TERMINALS)</p> <p>8 x SSBTs (SELF SERVICE BETTING TERMINALS)</p> <p>ENTRANCE FROM PUBLIC HIGHWAY</p> <p>Legend: [ ] = GAMBLING AREA TO BE LICENSED • = CCTV CAMERAS</p> <p>Scale: 0 2 4 6 8 10m</p>

to be amended once Jenningsbet are trading

11

18 Months ago

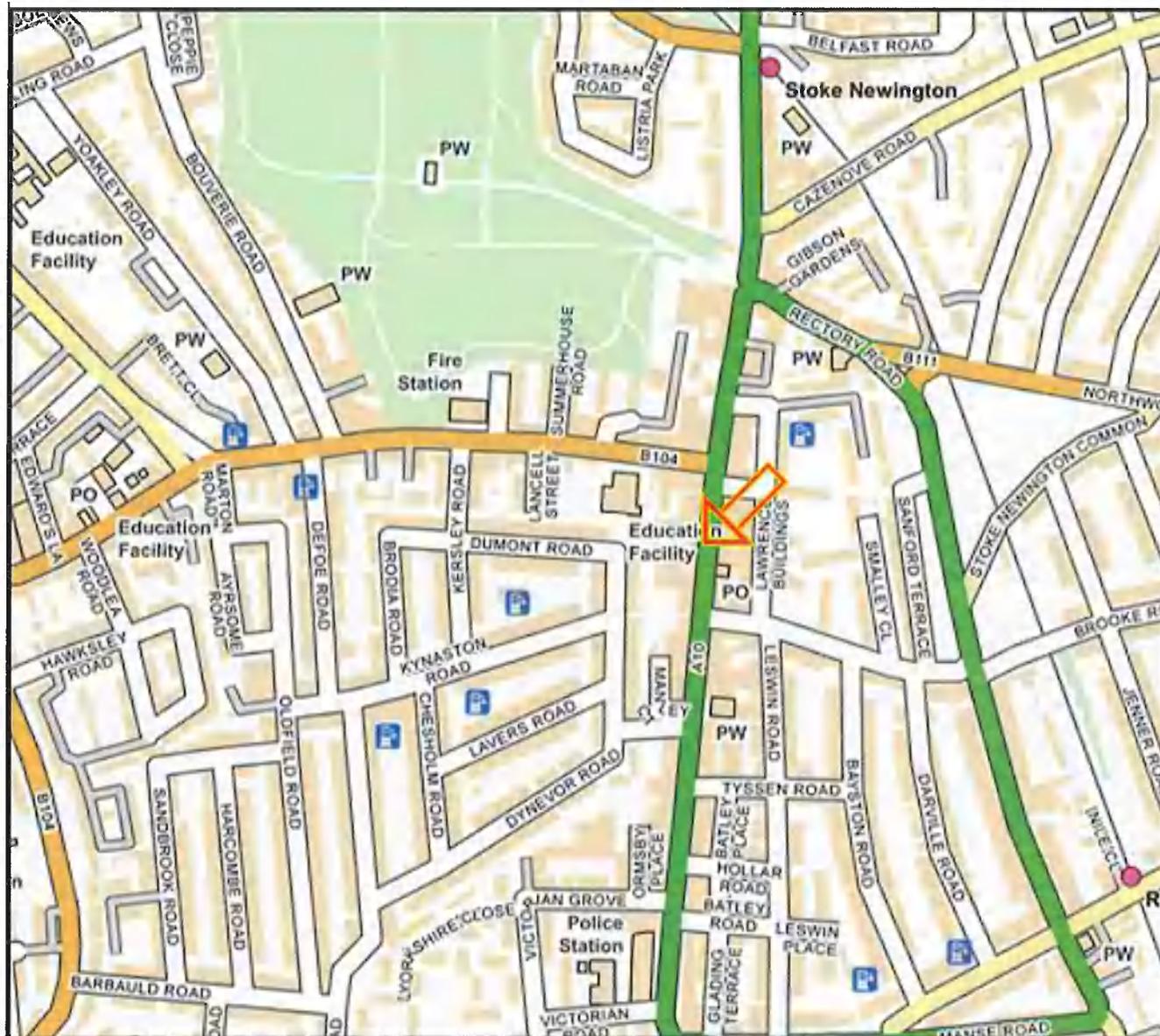
Shop Front View:



December 2025



Street Plan:



Site Attributes			
Shop Level:	Ground floor	No. of Entrances:	one
Shape:	Rectangle	Entrance Detail:	To the front of the branch
Size:	Large	Additional Egress:	Staff Only Exit to the rear
Counter Position:	To the rear with a direct line of sight of the customer entrance and machines	Machine Positions:	Self Service Betting Terminals (SSBTs) To the left-hand wall as you enter in sight from the counter. Electronic Gaming Machines (EGMs / FOBTs) to the right-hand side in the center of the unit. again, in direct sight of the counter.
Hidden Areas:	None	Welfare Facilities :	Staff room/kitchen and toilet facilities
Miscellaneous:	Bleep activation every time the entrance door is opened and closed. This raises awareness for the shop team of who is entering the premises.	DVR Located:	Cloud based system with footage held off site

CCTV - COMPLETED BY COMPLIANCE DEPT			
Internal cameras:	Minimum of 14	External Cameras:	1
Employee Monitors:	1	Employee Monitor:	1(same as internal)
Public Monitor:	0	Public Monitor:	0
Type of DVR:	Cloud based system with footage held off site. accessed via internet for live viewing by customer service and security teams. Further recording is available by security teams. Footage held for minimum of 31 days	Type of DVR:	Same for internal.

LBO Specific License Conditions. COMPLETED BY COMPLIANCE DEPT	
Licence Conditions	Remarks
<p><b>Mandatory Conditions</b></p> <p><b>Default condition for opening hours</b></p>	<p>1. The summary of the terms and conditions of the premises licence issued under section 164(1) (c) of the 2005 Act shall be displayed in a prominent place within the premises.</p> <p>2. The layout of the premises shall be maintained in accordance with the plan.</p> <p>3. The premises shall not be used for—</p> <p>(a) the sale of tickets in a private lottery or customer lottery, or</p> <p>(b) the sale of tickets in any other lottery in respect of which the sale of tickets on the premises is otherwise prohibited(a).</p> <p>4. In this regulation—</p> <p>(a) a “private lottery” means a private society lottery or a work lottery within the meaning of paragraphs 10 and 11 of Schedule 11 to the 2005 Act; and</p> <p>(b) a “customer lottery” has the same meaning as in Part 3 of Schedule 11 to the 2005 Act.</p> <p>5. A notice stating that no person under the age of 18 years is permitted to enter the premises shall be displayed in a prominent place at every entrance to the premises.</p> <p>6.1 Access to the premises shall be from a street or from other premises with a betting premises licence.</p> <p>6.2 Without prejudice to sub-paragraph (1), there shall be no means of direct access between the premises and other premises used for the retail sale of merchandise or services.</p> <p>7. Subject to anything permitted by virtue of the 2005 Act, or done in accordance with paragraphs 8, 9, 10 and 11 below, the premises shall not be used for any purpose other than for providing facilities for betting.</p> <p>8. Any ATM made available for use on the premises shall be located in a place that requires any customer who wishes to use it to leave any gaming machine or betting machine in order to do so.</p> <p>9. No apparatus for making information or other material available in the form of sounds or visual images may be used on the premises, except for apparatus used for the following purposes—</p> <p>(a) communicating information about, or coverage of, sporting events, including—</p> <p>(i) information relating to betting on such an event; and</p> <p>(ii) any other matter or information, including an advertisement, which is incidental to such an event;</p> <p>(b) communicating information relating to betting on any event (including the result of the event) in connection with</p>

which betting transactions may be or have been effected on the premises.

10. No publications, other than racing periodicals or specialist betting publications, may be sold or offered for sale on the premises.

11. No music, dancing or other entertainment shall be provided or permitted on the premises, save for entertainment provided in accordance with paragraph 5.

12.1 No alcohol shall be permitted to be consumed on the premises at any time during which facilities for gambling are being provided on the premises.

12.2 A notice stating the condition in sub-paragraph (1) shall be displayed in a prominent place at every entrance to the premises.

13. A notice setting out the terms on which customers are invited to bet on the premises shall be displayed in a prominent place on the premises to which customers have unrestricted access.

14. No facilities for gambling shall be provided on the premises between the hours of 10pm on one day and 7am on the next day.

3. Licensing objectives			
Licensing Objective	Risks	Existing Control Measures	Further Controls Recommended
<p><b>Protecting children and other vulnerable persons from being harmed or exploited by gambling.</b></p>	<ul style="list-style-type: none"> <li>• Underage customers attempting to gamble on the premises.</li> <li>• Children accompanying adults onto the premises.</li> <li>• Enhanced number of children or young adults in vicinity before school, at lunchtimes and after school</li>   <li>• Vulnerable people visiting the premises and gambling beyond their means or in an out-of-control manner. Vulnerable people could include (but not limited to) people with:               <ul style="list-style-type: none"> <li>• Mental health conditions</li> <li>• Drug dependency.</li> <li>• Alcohol dependency</li> <li>• Problem gamblers</li> <li>• Homelessness</li> <li>• Debt issues</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• <b>Access is completely restricted to those under the age of 18.</b></li> <li>• Think 25 policy in operation to aid identification of under 18's.</li> <li>• Zero tolerance on children being on the premises.</li> <li>• Serve legal test purchase checks our adherence to this policy.</li> <li>• External advertising is not aimed at young people or use images likely to appeal to young people.</li> <li>• Age Verification policy fully assessed by an independent third party and deemed have robust policies and procedures which cover all of the Licensing Objectives and Licensing Conditions and Codes of Practice.</li> <li>• Jenningsbet work closely with 2 charities that offer lived experiences of gambling harm. <b>BetKnowMore (BKM) and Young Gamers &amp; Gamblers Education Trust. (YGAM).</b></li> <li>• Via these two charities our staff training includes Social Responsibility training covering Safer Gambling, Age Verification, and vulnerability. This takes place in a face-to-face training workshop in induction week.</li> <li>• All staff complete the Jenningsbet refresher online course on Social Responsibility, this covers Safer Gambling, Age Verification, and vulnerability. This has a yearly refresher every October.</li> <li>• Duty Managers from each branch complete a module (with City &amp; Guilds certifications) provided by the <b>BetKnowMore/YGAM training partnership 'Safer Gambling Training'</b>. In</li> </ul>	<p>Increased awareness of children attempting to enter the shop after 3pm and at weekends</p>

	<ul style="list-style-type: none"> <li>• Persons that have identified as having potential or actual gambling problems have self-excluded from the premises or other betting shops locally but still attempt to enter the premises.</li> <li>• Customers may show 'trigger' signs of developing a problem with gambling.</li> </ul>	<p>2022 this module was 'enhanced skills for customer interactions'. In 2023 the module is 'Understanding customer vulnerability in a gambling context'.</p> <ul style="list-style-type: none"> <li>• In person full day workshops provided by the BetKnowMore/YGAM training partnership 'Safer Gambling Training' with a lived experience speaker. These days cover vulnerability, gambling harms and customer interaction skills.</li> <li>• Jenningsbet funded BetKnowMore's New Beginnings' programme which provided a real opportunity for engagement for our Duty Mangers with the BKM female lived experience speakers..</li> <li>• No alcohol policy on premises</li> <li>• Internal self-exclusion process in place</li> <li>• We subscribe to the multi operator self-exclusion scheme (MOSES) now known as Gamstop.</li> <li>• Safer Gambling material is available in a prominent position in the branch as per the GamCare land-based Code definition of prominent i.e. visible at a 360-degree view anywhere in the branch where gambling can take place, in addition these materials are available in discreet locations such as toilets. There are also materials by the exits to allow customers the option of 'discreet takeaway'.</li> </ul>	<ul style="list-style-type: none"> <li>• Increased awareness of customer behaviour. Refuse service to any customers who are not in control of themselves.</li> <li>• Jenningsbet provide extensive ongoing guidance and awareness training in this area, which includes off-site training, the use of distance learning and availability of reference materials on the staff portal.</li> <li>• <b>JB are part of the Multi Operational Self Exclusion Scheme now known as Gamstop Betting Shops and will add this branch to the scheme before it opens.</b></li> <li>• <b>All current self excluders from our Stamford Hill branch will have this branch added.</b></li> <li>• Check self-exclusions at the start of every shift for new Gamstop self-excluded customers.</li> <li>• Make sure any self-exclusion breaches are logged with support.</li> </ul>
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		<ul style="list-style-type: none"> <li>• Staff are trained in spotting signs of problem gambling and responding with customer interactions encouraging customers to take a break from play when exhibiting signs of problem gambling.</li> <li>• Relevant self-exclusion information and forms are available for customers and colleagues. Responsible gambling interactions (RGIs) are reported and recorded centrally; and trend reporting conducted on a regular basis by the Compliance Department.</li> <li>• FOBT terminals have mandatory warnings in place for session time and spend. These pause the session for 30 seconds to allow the customer to take a break.</li> <li>• FOBT terminals allow customers to voluntarily set limits for both time and spend, when reached the session is paused for 30 seconds to allow the customer to take a break.</li> <li>• We adhere to the cross-industry Gambling Industry Code on Socially Responsible Advertising</li> <li>• Responsible gambling messages are displayed on all external marketing material and also on FOBT terminals.</li> <li>• All staff trained in these policies and refresher training takes place on an annual basis.</li> </ul>	
<p><b>Preventing Gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.</b></p>	<ul style="list-style-type: none"> <li>• Shop to be used for money laundering purposes, either through over the counter bets or on the terminals in the shop</li> </ul>	<ul style="list-style-type: none"> <li>• Company policies and procedures in place to operate in accordance with the Proceeds of Crime Act 2002 (POCA) to mitigate against Money Laundering and Terrorist Financing. These are independently audited annually to ensure compliance.</li> <li>• Jenningsbet Money Laundering Reporting Officer (MLRO) is Peter Jowett. There is a clear escalation and reporting process in respect of all products. The MLRO monitors staking patterns for KYC purposes.</li> </ul>	<ul style="list-style-type: none"> <li>• Jenningsbet provide extensive ongoing guidance and awareness training in this area, which includes off-site training, the use of distance learning and availability of reference materials on the staff portal.</li> <li>• Staff to be vigilant to local crime levels and instances. Crimes local to the branch should be reported to senior management as appropriate.</li> </ul>

	<ul style="list-style-type: none"> <li>• Gaming machines may allow 'dyed notes' for credit.</li> <li>• Premises may be used by drug dealers.</li> <li>• Vulnerable people may fund their betting through crime e.g., shoplifting.</li> <li>• Visitors to the shop may attempt to sell stolen goods to customers.</li> <li>• Robbery</li>   <li>• Anti-Social Behaviour</li> <li>• Conflict Management</li> </ul>	<ul style="list-style-type: none"> <li>• Terminals raise alert if suspicious pattern of play. All instances reported via the online reporting system to the MLRO.</li> <li>• Staff trained to report suspicions to MLRO.</li>   <li>• Staff trained to report any instances of dyed notes in terminals to MLRO and the security department.</li> <li>• We have zero tolerance on drugs on the premises and a drug policy in place. Any suspicions will be reported to the police.</li> <li>• Staff trained to not allow any goods to be sold on the premises.</li>   <li>• Shop is fitted with the following security measures:             <ul style="list-style-type: none"> <li>• CCTV</li> <li>• StaffGuard monitoring system.</li> <li>• Remote operated electronic lock</li> <li>• Time delayed safe.</li> </ul> </li> <li>• Staff receive training on dealing with robberies and serious incidents.</li>   <li>• Systems to mitigate potential risk of conflicts include:             <ul style="list-style-type: none"> <li>• Staff Guard (monitored two-way audio and video support)</li> <li>• Central operational control team</li> <li>• Security Department with video support</li> <li>• Suitability of lone person working assessed on a shop-to-shop basis.</li> </ul> </li> </ul>	<p>Branch has been risk assessed and will be double staffed between 12:40 22:00</p>
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	<ul style="list-style-type: none"> <li>• Subject to customer fraud</li> <li>• Subject to staff fraud</li> <li>• Alcohol</li> <li>• Drug Misuse</li> <li>• Begging and Money Lending</li> </ul>	<ul style="list-style-type: none"> <li>• Staff are trained in identifying and preventing attempted customer fraud. Images of known offenders are circulated regularly to shop.</li> <li>• Security department monitor transactions in shop to identify and prevent staff fraud.</li> <li>• Customers may not bring onto the premises any intoxicating liquor for consumption on the premises. Sale or resale of any item is strictly forbidden. Staff are trained in removing any customer consuming alcohol with the assistance of staff guard.</li> <li>• Staff are trained in the definitive escalation process for reporting suspected drug problems, which include informing the Security department and other relevant Operations Managers.</li> <li>• Staff are trained to treat all customers with dignity and respect, where appropriate, known street beggars are refused service.</li> <li>• Suspicions of organised money lending will be escalated to the security department and onwards to local authority investigation teams.</li> <li>• Jenningsbet operate a zero-tolerance approach to all criminal activity, there are comprehensive reporting processes to escalate, record and ensure action is taken in respect of exceptional incidents. We have full CCTV installed to cover all areas and the facility to record and store footage.</li> </ul>	
<p><b>Ensuring that gambling is conducted in a fair and open way.</b></p>	<ul style="list-style-type: none"> <li>• Customer disputes and Complaints</li> </ul>	<ul style="list-style-type: none"> <li>• The law states that bets are contracts and, therefore legally enforceable. The independent Betting Adjudication Service (IBAS) acts as an impartial adjudicator on disputes that arise between operator and customers.</li> </ul>	<p>Colleagues receive on-going training to verify the accuracy of bets at the point of acceptance and to resolve issues with customers where possible, along with refresher training on discretionary payments.</p>

	<ul style="list-style-type: none"> <li>• Customer disputes and Complaints</li> <li>• Customers may not be aware of who to make a complaint to</li> <li>• Unusual betting patterns may lead to the integrity of events being questioned.</li> <li>• Data Protection- GDPR</li> <li>• Gaming machine's chance and Randomness.</li> </ul>	<ul style="list-style-type: none"> <li>• Bets are settled by Jenningsbet Rules, which are displayed in a prominent position in every Jenningsbet branch, a QR code allows for the rules to be accessed by remote devices and Rules books are available on request.</li> <li>• Any changes to rules are communicated to customers by way of customer notice in advance of any changes coming into effect.</li> <li>• Terms and Conditions of any in shop promotions will be available for customers.</li> <li>• Complaints leaflets are available in store in prominent location.</li> <li>• To ensure disputes are dealt with efficiently managers may make discretionary payments to defined thresholds based on seniority. Jenningsbet will process gestures of goodwill were applicable.</li> <li>• We receive information about unusual betting patterns or suspicious betting from the Gambling Commission, either directly or via the BGC</li> <li>• Jenningsbet GDPR policy is available upon request included within that information is our policy concerning our CCTV.</li> <li>• Staff are trained on Return to Player Ratios (RTP) and where these are located on the FOBTs in order to inform customers about each games chance and randomness.</li> </ul>	
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4. Gambling Operation & Physical Design (Internal and External)			
Licensing Objective	Risks	Existing Control Measures	Further Controls Recommended
<p><b>Protecting children and other vulnerable persons from being harmed or exploited by gambling.</b></p>	<ul style="list-style-type: none"> <li>• Underage customers could enter the premises unseen and gamble on a FOBT or a SSBT</li> <li>• Self-excluded customer could enter the premises unseen and gamble on a FOBT or SSBT</li> <li>• Problem gamblers may not have access to responsible gambling literature.</li> <li>• Vulnerable people able to see into the premises and having sight of gambling activity.</li> </ul>	<ul style="list-style-type: none"> <li>• Access is completely restricted to those under the age of 18</li> <li>• The entrance has a direct line of sight from the counter and is covered by CCTV.</li> <li>• All FOBT and SSBT's can be seen directly from the counter position and are covered by our CCTV.</li> <li>• FOBT's have the facility to be blocked immediately by staff from behind the counter if required.</li> <li>• Responsible gambling posters and leaflets are available next to the FOBT's.</li> <li>• Safer Gambling material is available in a prominent position in the branch as per the GamCare land-based Code definition of prominent i.e visible at a 360-degree view anywhere in the branch where gambling can take place, in addition these materials are available in discreet locations such as toilets. There are also materials by the exits to allow customers the option of 'discreet takeaway'.</li> <li>• Self-exclusion leaflets are available in multiple positions on the premises.</li> <li>• This branch has a restricted view from the public highway providing privacy for customers and creating difficulty for vulnerable persons to see the gambling activity within the branch.</li> </ul>	<p>Think / Challenge 25 in place.</p>

<p><b>Preventing Gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.</b></p>	<ul style="list-style-type: none"> <li>• Blind spots in shop / toilets being used to carry out illegal activity.</li> <li>• Premises and equipment being damaged by customers.</li> <li>• The use of stolen debit cards as payment for bets</li> <li>• Shop being targeted for burglary out of hours.</li> <li>• Customers potential to use Gaming Machines to launder criminal funds</li> </ul>	<ul style="list-style-type: none"> <li>• Entrance to the toilet is in clear view of the counter and entry is controlled by staff.</li> <li>• Staff are trained in identifying signs of problem gambling and having meaningful customer interaction.</li> <li>• All card transactions over £100 requires PIN.</li> <li>• Any bet / terminal credit that is paid by card has returns paid back to the same card.</li> <li>• Names on card are checked to ensure it belongs to the customer i.e. A male name.</li> <li>• Alarm system in place for out of hours.</li> <li>• Terminals raise alert if suspicious pattern of play. All instances reported via the online reporting system to the MLRO.</li> </ul>	<p>Staff to be vigilant to local crime levels and instances. Crimes local to the branch should be reported to senior management as appropriate. Information to be shared between local branches.</p> <p>Jenningsbet staff to remain vigilant and adhere to company policy when carrying out banking process.</p>
<p><b>Ensuring that gambling is conducted in a fair and open way.</b></p>	<ul style="list-style-type: none"> <li>• Customers may be mis-led by unclear offers.</li> <li>• Customers may not be aware of who to make a complaint to</li> <li>• Advertising may mis-lead customers</li> </ul>	<ul style="list-style-type: none"> <li>• Our rules are clearly displayed in shop, available to download via a QR code and booklets available upon request.</li> <li>• Any changes to rules are communicated to customers by way of customer notice in advance of any changes coming into effect.</li> <li>• Terms and Conditions of any in shop promotions will be available for customers.</li> <li>• Complaints leaflets are available in store in prominent location.</li> <li>• All marketing of gambling products and services is undertaken in a socially responsible manner.</li> <li>• Jenningsbet comply with the advertising codes of practice issued by the Committee of Advertising Practice (CAP)</li> </ul>	



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**6. Assessment Review**

<b>Frequency of Review</b> (Enter time period e.g., 12 months)	<b>12 months</b>	<b>Date Review Due</b>	<b>16 December 2026</b>
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**Completed Risk Assessment brought to the attention of:**

<b>Name</b>	<b>Position</b>	<b>Signature</b>	<b>Date this assessment was brought to this persons attention</b>
	Branch Manager		
	Senior Duty Manager		
	Duty Manager		