

Front page for Redacted application to go on the web

**APPLICATION FOR AN ADULT GAMING CENTRE LICENCE TO BE
GRANTED UNDER THE GAMBLING ACT 2005**

Name of Applicant: Chongie Entertainment Limited

Full postal address of premises: 8 - 10 George Street Croydon
CR0 1PA

Postal address of local authority where register of applications is kept for general viewing: London Borough of Croydon, Place Department, Licensing 6th Floor Zone A, Bernard Weatherill House, 8 Mint Walk, Croydon, CR0 1EA. Application details can be viewed at Access Croydon, Bernard Weatherill House, between 9am - 3.45pm, Monday to Friday (except bank holidays)

If you wish to make any representations in relation to this application, please do so in writing by midnight on **Tuesday 9th November 2021 to the following address:**

**London Borough of Croydon
Place Department, Licensing Team,
6th Floor, Zone A
Bernard Weatherill House
8 Mint Walk
Croydon, CR0 1EA
Or By Email to: licensing@croydon.gov.uk**

It is an offence to knowingly or recklessly make a false statement in connection with an application. The maximum fine on summary conviction for such an offence

**Application for a premises licence
under the Gambling Act 2005 (standard form)**

PLEASE READ THE FOLLOWING INSTRUCTIONS FIRST

If you are completing this form by hand, please write legibly in block capitals using ink. Use additional sheets if necessary (marked with the number of the relevant question). You may wish to keep a copy of the completed form for your records.

Where the application is -

- In respect of a vessel, or
- To convert an authorisation granted under the Betting, Gaming and Lotteries Act 1963 or the Gaming Act 1968,

the application should be made on the relevant form for that type of premises or application.

Part 1 - Type of premises licence applied for

Regional Casino Large Casino Small Casino

Bingo Adult Gaming Centre Family Entertainment Centre

Betting (Track) Betting (Other)

Do you hold a provisional statement in respect of the premises? Yes No

If the answer is "yes", please give the unique reference number for the provisional statement (as set out at the top of the first page of the statement): [*****]

Part 2 – Applicant Details

If you are an individual, please fill in Section A. If the application is being made on behalf of an organisation (such as a company or partnership), please fill in Section B.

Section A

Individual Applicant

1 Title: Mr Mrs Miss Ms Dr Other (please specify)

2 Surname: [*****] Other name(s): [*****]

3 Applicant's address (home/business -):

[*****]

[*****]

[*****]

[*****]

Postcode: [*****]

4(a) The number of the applicant's operating licence (as set out in the operating licence): [*****]

4(b) If the applicant does not hold an operating licence but is in the process of applying for one, give the date on which the application was made: [*****]

5 Tick the box if the application is being made by more than one person.

Section B

Application on Behalf of an organisation

6 Name of applicant business or organisation: **Chongie Entertainment Limited**

7. The applicant's registered or principal address:

3-5 Wardour Street, London

Postcode: **W1D 6PB**

8(a) The number of the applicant's operating licence (as given in the operating licence): **000-057549-N-333196-001**

8(b) If the applicant does not hold an operating licence but is in the process of applying for one, give

the date on which the application was made: [*****]

- 9 Tick the box if the application is being made by more than one organisation.

Part 3 – Premises Details

10. Proposed trading name to be used at the premises (if known): **Little Vegas**

11. Address of the premises (or, if none, give a description of the premises and their location):

8-10 George Street, Croydon

Postcode: **CR0 1PA**

12 Telephone number at premises (if known): [*****]

13 If the premises are in only a part of a building, please describe the nature of the building (for example, a shopping centre or office block). The description should include the number of floors within the building and the floor(s) on which the premises are located.

Ground floor and basement premises. The building consists of 3 floors, floors 1 and 2 not in use.

14(a) Are the premises situated in more than one licensing authority area? **No**

14(b) If the answer to question 14(a) is yes, please give the names of all the licensing authorities within whose area the premises are partly located, other than the licensing authority to which this application is made:

[*****]

Part 4 – Times of Operation

15(a) Do you want the licensing authority to exclude a default condition so that the premises may be used for longer periods than would otherwise be the case? **No**

15(b) If the answer to question 15(a) is yes, please complete the table below to indicate the times when you want the premises to be available for use under the premises licence.

	Start	Finish	Details of any seasonal variation
Mon	[hh:mm]	[hh:mm]	[*****]
Tues	[hh:mm]	[hh:mm]	[*****]
Wed	[hh:mm]	[hh:mm]	[*****]
Thurs	[hh:mm]	[hh:mm]	[*****]
Fri	[hh:mm]	[hh:mm]	[*****]
Sat	[hh:mm]	[hh:mm]	[*****]
Sun	[hh:mm]	[hh:mm]	[*****]

16 If you wish to apply for a premises licence with a condition restricting gambling to specific periods in a year, please state the periods below using calendar dates:

[*****]

Part 5 - Miscellaneous

17 Proposed commencement date for licence (leave blank if you want the licence to commence as soon as it is issued): **ASAP**

18(a) Does the application relate to premises which are part of a track or other sporting venue which already has a premises licence? **No**

18(b) If the answer to question 18(a) is yes, please confirm by ticking the box that an application to vary the main track premises licence has been submitted with this application.

19(a) Do you hold any other premises licences that have been issued by this licensing authority?

No

19(b) If the answer to question 19(a) is yes, please provide full details:

[*****]

20 Please set out any other matters which you consider to be relevant to your application:

[*****]

Part 6 – Declarations and Checklist (Please tick)

I/ We confirm that, to the best of my/ our knowledge, the information contained in this application is true. I/ We understand that it is an offence under section 342 of the Gambling Act 2005 to give information which is false or misleading in, or in relation to, this application.

I/ We confirm that the applicant(s) have the right to occupy the premises.

Checklist:

- Payment of the appropriate fee has been made/is enclosed
- A plan of the premises is enclosed
- I/ we understand that if the above requirements are not complied with the application may be rejected
- I/ we understand that it is now necessary to advertise the application and give the appropriate notice to the responsible authorities

Part 7 – Signatures

21 Signature of applicant or applicant's solicitor or other duly authorised agent. If signing on behalf of the applicant, please state in what capacity:

Signature:

Print Name: Woods Whur 2014 Limited

Date: 13.10.2021 Capacity: Solicitors for the Applicant

22 For joint applications, signature of 2nd applicant, or 2nd applicant's solicitor or other authorised agent. If signing on behalf of the applicant, please state in what capacity:

Signature:

Print Name: [*****]

Date: (dd/mm/yyyy) Capacity: [*****]

Part 8 – Contact Details

23(a) Please give the name of a person who can be contacted about the application: Paddy Whur

23(b) Please give one or more telephone numbers at which the person identified in question 23(a) can be contacted: [REDACTED]

24 Postal address for correspondence associated with this application:

Woods Whur 2014 Limited

St James House

28 Park Place

Leeds

Postcode: LS1 2SP

25 If you are happy for correspondence in relation to your application to be sent via e-mail, please give the e-mail address to which you would like correspondence to be sent:

[REDACTED]

CHONGIE ENTERTAINMENT LTD - LOCAL GAMBLING RISK ASSESSMENT

PREMISES

Premises Name:	Little Vegas
Premises Address:	8-10 George Street, Croydon,
Premises Post Code:	CR0 1PA
Premises Licence Number	New Application
Category of Premises	Adult Gaming Centre

COMPANY

Operating Company:	Chongie Entertainment Ltd
Operating Licence Number	000-057549-N-333196-001

ASSESSMENT WRITER

Name of Person Writing this Assessment:	██████████
Position within the Company:	Compliance Consultant
Date that Original Assessment was written:	9th September 2021

REQUIREMENT TO COMPLY

All non-remote casino, adult gaming centre, bingo, family entertainment centre, betting and remote betting intermediary (trading room only) licences, except non-remote general betting (limited) and betting intermediary licences.

Effective as at April 6th 2016

Social Responsibility Code Provision 10.1.1

1. Licensees must assess the local risks to the Licensing Objectives posed by the provision of gambling facilities at **each of their premises**, and have policies, procedure's and control measures to mitigate those risks. In making risk assessments, licensees must take into account relevant matters identified in the licensing authority's statement of licensing policy.
2. Licensees must review (and update as necessary) their local risk assessments.
 - a. To take account of significant changes in local circumstances, including those identified in a licensing authority's statement of licensing policy;
 - b. When there are significant changes at a licensee's premises that may affect their mitigation of local risks;
 - c. When applying for variation of a premises licence; and
 - d. In any case, undertake a local risk assessment when applying for a new premises licence.

Ordinary Code Provision 10.1.2

1. Licensees should share their risk assessment with licensing authorities when applying for premises licence or applying for a variation to existing Licensed premises, or otherwise on request.

The purpose of this document is to assist staff in understanding and carrying out their responsibilities in running the premises including alerting them to any special problems of which they need to be aware in carrying out their duties.

The Operator

Chongie Entertainment Ltd is licensed by the Gambling Commission. It is familiar with the guidance in Croydon Borough Councils Statement of Gambling Principles published in September 2018. The company has an independent regime for testing the robustness of its policies & procedures.

We believe this Local Area Risk Assessment (and future updates) identifies all necessary steps required in both complying with the Croydon Statement of Gambling Principles, upholding the Licence Conditions and Codes of Practice and promoting the 3 Licensing Objectives. The grid matrix at pages 8 to 12 detail how the operator intends dealing with key points identified in the Croydon Council Statement of Gambling Principles.

As requested in the Councils Statement of Gambling Principles the applicant contacted the Croydon Licensing Team for a copy of the Local Area Profile for this part of Croydon but were advised that no profile was available for this particular area.

Croydon

The London Borough of Croydon covers an area of approximately 86 square kilometres and has a population of circa 382,000. The borough is mainly urban in character, being made up of a number of district retail and commercial centres each surrounded by residential accommodation. Croydon town centre is a well defined retail and commercial area with a large number of shops, offices and businesses.

The Local Area

The Adult Gaming Centre proposed is located in George Street, which is a secondary shopping street and serves as the main pedestrian link from the very busy East Croydon station (approx. 300 metres from the proposed gaming centre) and the town centre retail area. There is also tram stop almost directly opposite the proposed gaming centre site. The vacant Alders Department store is also opposite.

Businesses in the nearby area include Tesco Metro, Townends Estate Agents, Nat West Bank, Game-On Game Exchange, The Enclave Shisha Lounge and Croydon Careers Support. The entrance to the Whitgift Alms-Houses is also close by.

The main shopping street of North End and both the Whitgift and Centrale Shopping Centres are a short walk away, as are the numerous pubs and night clubs in the High Street. All major high street brands are represented within the main Croydon shopping area.

ATM's

ATM machines are widely in use in the nearby area with 4 being available with a 100 metre radius at Tesco Metro, Santander, Nationwide and Nat West. All of the major banks and building societies will be found in the town centre shopping area.

Betting Shops:

Paddy Power and Ladbrokes are both close by on George Street, with a BetFred within 150 metres on High Street. There are 2 further Paddy Power branches in Church Street and North End respectively. There are 2 branches of William Hill which are a little further away in Wellesley Road and Station Road.

All of these bookmakers operate a Challenge 21 scheme.

Adult Gaming Centres:

There are currently 3 Adult Gaming Centres in the town Centre:

Cashino, 10-12 High Street;

Palace Amusements, 57 North End;

Admiral, 71 North End

In line with the charter of the AGC trade association BACTA, all AGC's operate a Think 25 policy, whereby any customer who appears to be under the Age of 25 will be asked to provide proof that they are over 18.

These noted gambling premises all possibly have links to people who are potentially vulnerable to gambling related harm as either providing a source of funds to gamble or which provide gambling services. The applicant is mindful of this and staff training programmes and procedures ensure that customers that might display signs of gambling related problems are identified quickly and the appropriate action taken.

Pubs

As with any busy town centre there are numerous pubs, bars and clubs within an easy walk of the proposed premises, these include:

The George, George Street,

The Basil & Grape, George Street,

The Dog & Bull, Surrey Street,

The Market Tavern, Surrey Street,

The Green Dragon, High Street

The Ship, High Street,

The Spread Eagle, High Street

The Milan Bar, High Street,

Dice, Bar & Night Club, High Street

Fun House, High Street (open until 4am).

Risks to the Vulnerable

All the above establishments (banks & ATM's, pubs and bars, betting shops and AGC's) might potentially have links to people who are vulnerable from gambling related harm such as establishments which provide gambling services to source of funds to gamble such as ATM's or pawnbrokers. Pubs and bars create a risk of customers becoming inebriated and therefore potentially not in control of their gambling. Pubs also offer the ability to play gaming machines.

Chongie Entertainment note that the potential of risk posed from gambling related harm in this area might be increased due to an element of street drinking and homelessness that was noted during this Risk Assessment. However, this potential increased risk will be mitigated by the company's excellent levels of staff training and the procedures identified in pages 8 to 12.

Schools/Education facilities.

There are a number of schools and other educational facilities close to the proposed Adult Gaming Centre site. This list notes a number of them, but is not exhaustive:

The Croydon College Campus

Old Palace of John Whitgift School, Old Palace Road

St Marys Catholic Infant & Junior Schools, Sydenham Road

Ark Oval Primary Academy, Cherry Orchard Road

Al Khair Secondary School, Cherry Orchard Road

Archbishop Tennyson Church of England School

London South Bank University, Croydon Campus, Wellesley Road.

It is not unusual to see college and school children in the city centre after school hours using the train & tram links. The risk of these children gambling is mitigated by the processes noted on page 8 of this Risk Assessment. It should also be noted that there will be no visibility of gambling through the entrance or windows of the proposed premises.

Churches/meeting places for vulnerable people.

There are numerous churches and religious meeting places within Croydon town centre. Many of these meeting places offer groups that support the vulnerable. This is a list of those that are within a 300 metre radius of the proposed AGC, or further afield if relevant:

Croydon Minster, Church Street

Unitarian Church & Friends Meeting House, Edridge Road

First Church of Christ, Scientist, Altyre Road

East Croydon United Reform Church, Addiscombe Road

West Croydon Baptist Church, Whitehorse Road Gamblers Anonymous meet here fortnightly.

Baptist Chapel, Tamworth Road

St Michael & All Angels Church of England, Poplar Walk.

Our Space, Drop in Mental Health Support, High Street,

Child & Adolescent Mental Health Support, Christopher Wren House, High Street.

CRISIS, Support & Advice for the Homeless, Surrey Street.

The Premises

CCTV

A 12 camera high definition system will be installed to include at least 1 camera on the exterior of the premises (subject to Data Protection considerations) which will monitor those entering/exiting the premises.

All CCTV images will be stored in the appropriate GDPR fashion and images will be made available to the Police and licensing authority to recover any required images.

Door control

Chongie Entertainment realise that management of door control is a significant consideration. Decisions relating to the levels of staff and night security required are detailed below:

- External CCTV coverage
- Night time Mag lock controls
- SIA registered Night Security will be considered if required via ongoing Risk Assessment
- Door and frontage design will ensure that children or the vulnerable will not be able to see gambling taking place through the windows or doors.

Local factors

Through local observations we noted that a certain degree of street drinking takes place in George Street and High Street. However, Chongie Entertainment propose to minimise the risk of these issues being associated with their proposed premises through systems and procedures already mentioned above along with further measures relating to Toilets:

Toilets

- Access controlled by staff
- UV lighting to deter drug abuse by injection.
- Toilets inspected hourly to identify those individuals involved in potential drug or alcohol abuse.
- Zero tolerance to drug or alcohol abuse with appropriate signage
- Toilet facilities designed so that no areas are accessible to hide drugs syringes or alcohol

Gambling Act 2005 – The Licensing Objectives

The Gambling Act 2005 sets out the three licensing Objections (LO), which are.

- A. Preventing Gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.
- B. Ensuring that Gambling is Conducted in a fair and open way; and
- C. Protecting children and other vulnerable people from being harmed or exploited by gambling.

Risk Assessment	LO	Level of Risk	Impact	Control System	Risk Management	Reviewed
Children entering site unnoticed or unchallenged	(C)	Low	Severe to business Severe to child Breach of conditions	Interior Design	*Constant and effective monitoring of entrance by staff with well positioned cash desk having direct line of visibility to all gaming machines. Clear signage +18	Aug 2021
				Exterior Design	*Frontage of Venue designed so as not to be attractive to children or the vulnerable. Think 25 posters	Aug 2021
				Physical	CCTV coverage of entrance linked to office, position of any cash desk and staff to monitor main entrance. Staff constantly walking around the venue.	Aug 2021
				Systems	*Think 25 policies in place and implemented *Use of BACTA resources for age verification testing. *Regular staff training (6 monthly) in house. *Adherence to company policies. *Clear & prominent premises signage and machine	Aug 2021

					<ul style="list-style-type: none"> labelling. *Think 25 material displayed. *Policy of preventing the wearing of hoods. *Regular monthly review of incident report logs. *Policies & Procedures in place and regularly reviewed. 	
Out of control gambling by other vulnerable persons	(C)	Low	Non-compliant to social responsibility code provisions.	Systems	<ul style="list-style-type: none"> *Customer interaction policy & procedure/log adhered to. *Liaison with head office *Regular staff training. 	Aug 2021
Failure to deal with Customers making complaints about the outcome of Gambling	(B)	Low	Moderate to business. Severe to vulnerable customer.	Physical	<ul style="list-style-type: none"> *Machine maintenance carried out by qualified engineers from a suitably licensed company. *Machine turned off immediately should fault be identified. *Machines only acquired from licensed suppliers 	Aug 2021
Risk Assessment	LO	Level of Risk	Impact	Control System	Risk Management	Reviewed
Failure to deal with consumers making complaints about the outcome of Gambling(continued)	(B)	Low	Moderate to business Severe to customer	Systems	<ul style="list-style-type: none"> *Complaints procedure & forms available on premises. *Half yearly staff training on company policy. *Compliant with Company practices and policies. 	Aug 2021
Failure to provide information to players on responsible gambling.	(C)	Low	Severe to business Severe to customer	Physical	<ul style="list-style-type: none"> *Stay in Control posters displayed prominently. *Sufficient quantity of stay in control leaflets, discretely located. *Machine labelling displaying national gambling helpline. 	Aug 2021
				Systems	<ul style="list-style-type: none"> *Stock control system in place for leaflets. *Ensure adherence with company policies and practices *Regular checks to ensure systems in place. 	Aug 2021
Failure to recognise signs associated with problem gambling or substantial changes in gambling style	(c)	Moderate	Moderate to business Severe to customer	Interior Design	<ul style="list-style-type: none"> *Players positions effectively monitored *Players behaviour closely monitored 	Aug 2021
				Systems	<ul style="list-style-type: none"> *Staffed trained in customer interaction in line with company policies and practices *Clear policy to record the procedure for interaction and level of staff that are authorised to intervene (manager) 	Aug 2021
Failure to properly administer the self-exclusion process and maintain its effectiveness thereafter, including breaches and reinstatements.	(C)	Low	Severe to business Severe to customer	Physical	<ul style="list-style-type: none"> *CCTV effectively positioned on entrance to benefit identification. Of known excluders and images on Smart Hub tablet. Staff to view Self Excluder Register at the beginning of every shift. 	

				Interior Design	*Consideration given to internal layout so as to ensure effective monitoring of customers entering the premises and those that might enter in order to gamble on behalf of a self-excluder	
				Systems	*All data subject to regular review IHL Multi operator self exclusion system (MOSES) in place IHL Smart Hub tablet always available to ensure that customers wishing to exclude can do so. Details of self excluded customers distributed to other sites and operators via MOSES systems. Customer Complaints to be fully investigated in accordance with policy and referred to nominated ADR 3 rd party as required by LCCP	
Risk Assessment	LO	Level of Risk	Impact	Control System	Risk Management	Reviewed

Failure to identify attempts to launder money on premises. (e.g. dye stained notes) and to follow correct reporting procedure	(A)	Low	Severe to business Low to customers	Interior Design	*Effective monitoring of customer's behaviour by good lines of sight from staff members and well positioned CCTV	Aug 2021
				Systems	*Fully compliant with LCCP requirements *Comply with companies' policies and practices in particular the reporting procedure to company appointment Money Laundering Officer *Where machines operate TiTo tickets these cannot be transferred or used in any other premises. Suspicious tickets are automatically flagged and staff interaction is then required. Review unusual patterns of play (as per PoCA), non-regular players and consider exclusion/reporting	Aug 2021
Poor security increasing vulnerability to crime	(A)	Low	Severe to business Severe to customers	Physical	*Static panic Alarm *Staff Guard Personal Panic alarm fob *Intruder alarm installed and regularly serviced. *Effective CCTV coverage with data stored for 30 days *Safes kept locked at all times not in use	Aug 2021

				Exterior Design	*Frontage designed so that gambling cannot be viewed from outside the premises. * External CCTV with full coverage of entrance and rear exit.	Aug 2021
				Systems	*Limited cash desk and personal floats *Key storage and authorisation of use policy in place *Regular liaison with local police *Incident log maintained for police called for assistance *Staff Guard system *Subscribe to BACTA's crime bulletins	Aug 2021
Risk Assessment	LO	Level of Risk	Impact	Control System	Risk Management	Reviewed
Awareness of heightened local crime in the local area	(A)			Systems	In line with national urban levels. NO heightened risk https://www.police.uk https://ukcrimestats.com https://www.gov.uk/government/collections/crim-statistics	Aug 2021
Awareness of student learning facilities (schools & colleges) in the local area	(C)			Systems	*There are colleges and schools in the local vicinity *Entrance monitoring given extra resources between 3pm and 4pm on school/college days, Think 25+ policy	Aug 2021
Awareness of residential facilities for the vulnerable in local area	(C)			Systems	*No care homes or other residential facilities for the vulnerable in the vicinity http://www.carehome.co.uk	Aug 2021
Awareness of gambling care agencies in local area	(C)			Systems	*No specific facilities for problem gambling in the vicinity, although it is noted that Gamblers Anonymous meet every fortnight at the West Croydon Baptist Church. Also REHAB 4 offer Addiction Services in the Croydon area. www.gamcare.org.uk www.gordonmoody.org.uk	Aug 2021

Assessment Review

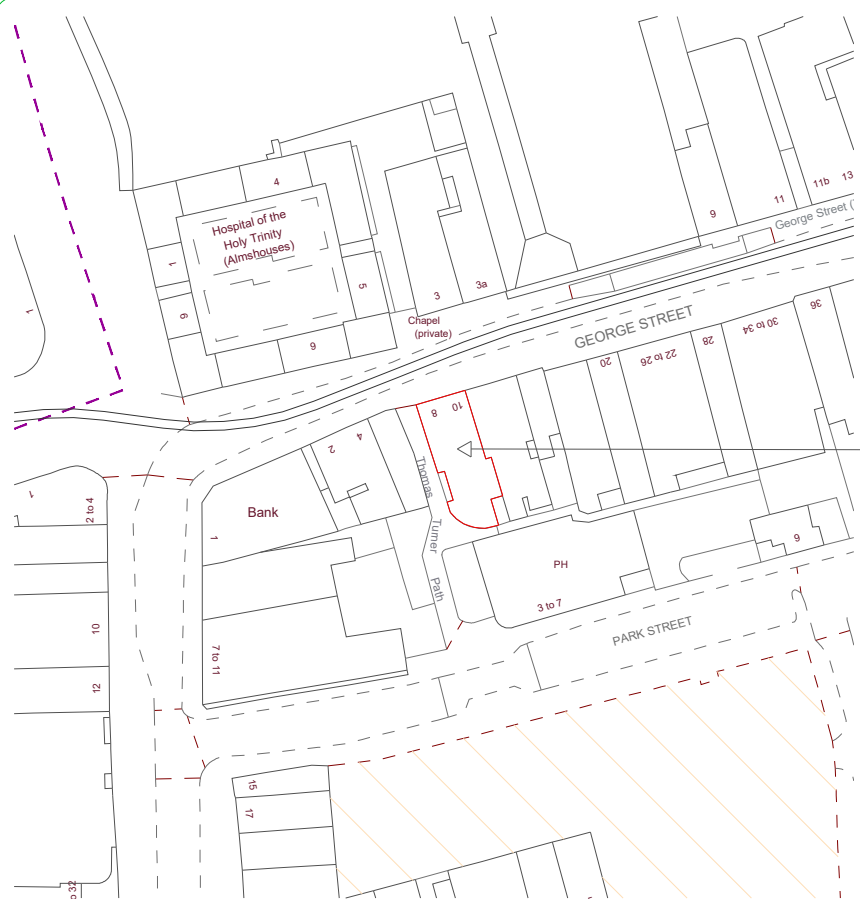
Frequency of Review

e.g. Every 12 months or after any incidents or changes

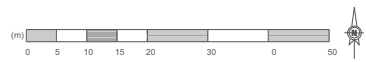
Date Review Due:

Prior to premises opening

Signature of Lead Assessor



Location Plan 1:1250 @A3

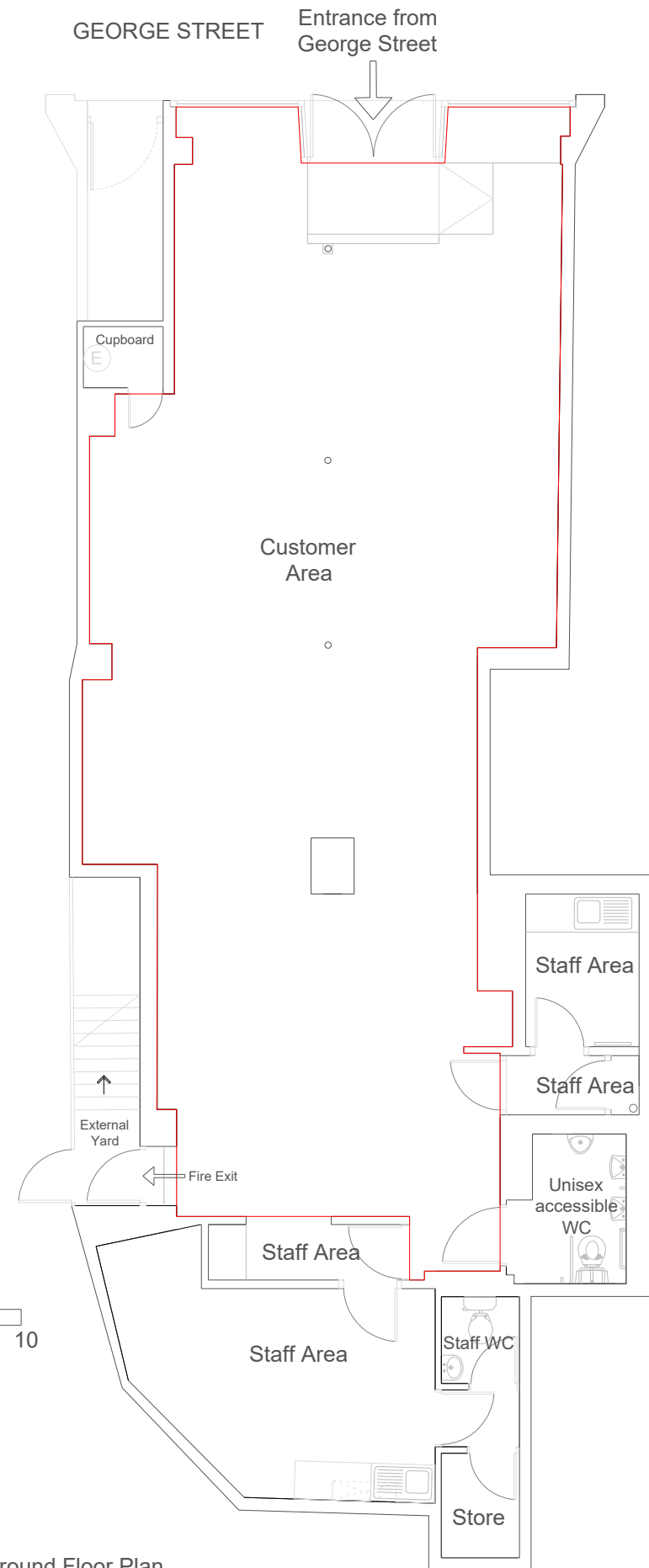


Indicates site in application at:
8-10 George Street, Croydon, CR0 1PA

GAMBLING ACT 2005 LICENSING PLAN

Anything shown on plan that is not required by The Gambling Act 2005 (Premises Licences and Provisional Statements) Regulation 2007 is for illustrative purposes only and does not form part of the premises licence.

— Area in which facilities will be provided for gaming



Proposed Ground Floor Plan

Rev.	Description	Date:
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28 Carnaby Street
London
W1F 7DQ

Tel: (0)20 328 7690

www.candpltd.com

Project Address:
8-10 George Street, Croydon, CR0 1PA

Client:
Chongie Entertainments Limited

Drawing Title:
Licence Plan

Project Number: 20.0091
Drawing Number: 04 Revision:

Drawing Status: Issue
First Issue: 12/03/2021

Scale:
1:100 @ A3 Date:
12/03/2021

Drawn By: EB Checked By: AB