

**LOCAL GAMBLING RISK ASSESSMENT**

**Premises:** Golden Slots 39 Church Road Ashford TW15 2QF

**Operator:** Golden Slots (Southern) Limited

**Operating Licence:** 043695-N-323074-011

**Prepared by:** Debbie Bollard

**Date:** 20 May 2025

**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

**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, procedures 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 a 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 a premises licence or applying for a variation to existing licensed premises, or otherwise on request.

**Premises Location**

The Premises are located on the ground floor of a three-storey building previously occupied by a bank which has Sui Generis (Amusement) planning permission.

The premises will be open 24/7 with at least 2 members of staff working on site at any given time on the basis of a maximum of 8 customers, if the numbers increase then an additional member of staff will be used for busier periods. A maglock will be in use between the hours 2200 and 0800 with the door locked during those hours and opened by a member of staff when a customer wants to enter the premises. This will also be used when the machines are being emptied and refloated when the Premises will be closed. The Company is a participant of the Boomerang SmartEXCLUSION multi-operator self-exclusion scheme, a member of the Bacta the trade body representing industry members.

The site is in Ashford Surrey, 3 miles from Heathrow Airport, located on the corner of Church Road and Dudley Road, with a single entrance off Church Road and a fire exit onto Dudley Road. Church Road (B378) is a primary route through Ashford and is lined with a variety of typical high street businesses, often with residential above. To the West side of Church Road behind the commercial development is mainly low density residential bounded by the A308, London Road to the north and Ashford Golf club to the south. To the east of Church Road is also mainly residential with a mixture of houses and purpose built flats bounded to the north by the railway line, Bedfont Lakes Country Park to the east and the A308. At the time of the 2011 census there were 2,388 detached house, 4,380 semi-detached, 1,672 terraced houses and 2,618 apartments.

Immediately next door is a Wimpy restaurant and a furniture store; Dudley Road is an entrance to a large residential area. Church Road comprises of a mixture of retail, food outlets, personal care salons and public amenities. There are 2 Betting shops on Church Road – Coral and William Hill within 500 feet of the location on either side of the road. Both are part of large national chains with robust compliance policies in place particularly around social responsibility. The nearest Adult Gaming Centre is Casino Slots in Feltham nearly 3 miles away as is the nearest Bingo Hall Buzz Bingo. Public community buildings include Ashford Library almost across the road.

**Demographics**

Ashford is located in Spelthorne District Council with a population of circa 23k (2021 census) with over half being of working age and predominantly white British ethnicity. The average debt per person is £670 (Local Gov Reports 2023) and child poverty in Ashford is circa 10%, which is below the national average of 22%. Spelthorne is the most deprived borough in Surrey (<https://www.surreyi.gov.uk/census-2021/census-2021-household-deprivation/>) with 7.9% of the population income deprived. However the area of Ashford where the Premises are located is in one of the least deprived wards and is in the 20 percent least income deprived neighbourhoods in England (fig 1)

Spelthorne has a low rate of unemployment being sited close to Heathrow: 1.4% of those economically active aged 16 to 64, compared to the South East (2.2%) and UK as a whole (3.5%). Average wages are slightly above regional averages at £827 per week for full-time employees (ONS).

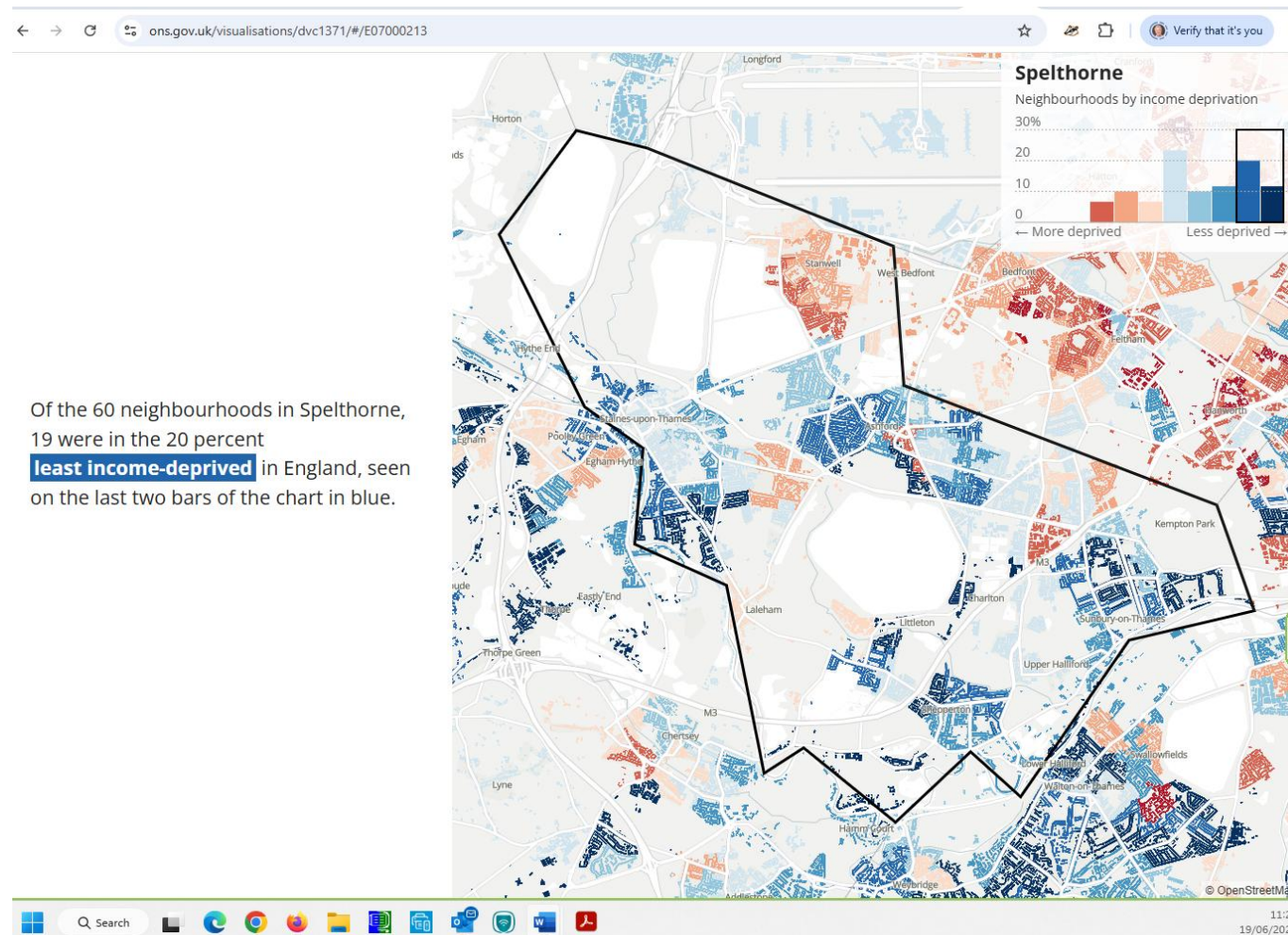


Fig 1

The health of people in Spelthorne is generally better than the England average. About 12.6% (2,225) children live in low-income families. Life expectancy for both men and women is higher than the England average. Life expectancy is 5.6 years lower for men and 6.0 years lower for women in the most deprived areas of Spelthorne than in the least deprived areas such as Ashford (Public Health England).

### **Crime**

The nearest police station is Staines Police Station 22 Kingston Road Staines TW18 4LQ open Monday to Sunday during the hours of 08:00-22:00. Alternate Hounslow Police Station 3-5 Montague Road TW3 1LB open 24/7

Ashford is the reported as the most dangerous medium-sized town in Surrey, and in the top 10 most dangerous of all communities in Surrey. The overall crime rate in was 102 crimes per 1,000 people which compares poorly to Surrey's overall crime rate, of 61 per 1,000 daytime population. For England, Wales, and Northern Ireland as a whole, Ashford is the 87th most dangerous medium-sized town, and the 995th most dangerous location out of all towns, cities, and villages (crimerae.co.uk/surrey/ashford)

In January – April 2025 nearly 700 crimes were committed in Ashford, the most common crimes in Ashford are violence and sexual offences, and anti social behaviour (police.uk/surrey/ashford)

### **Schools**

- **Primary**

- Clarendon Primary School (01784 253379) 0.2 miles
- St Michael's Primary School (01784 253333) 0.4 miles
- Fordway Centre SSS (01784 243365) 0.4 miles
- Ashford Primary School (01784 253310) 0.8 miles
- The Echelford Primary School (01784 253233) 1.0 mile
- Ashford Park Primary School ((01784 250305) 1.0 mile
- The Matthew Arnold School (01784 457275) 1.4 miles

- **Secondary**

- St James Senior Boys School (01784 266930) 0.3 miles
- Thomas Knyvette College (01784 243824) 0.6 miles

**Banks & ATMs**

|                           |                     |
|---------------------------|---------------------|
| Tesco ATM                 | less than 0.1 mile  |
| Sainsbury's ATM           | less than 0.1 miles |
| NatWest Bank              | 0.2miles            |
| Stanwell Road Post Office | 0.4 miles           |
| Lloyds                    | 1.7 miles           |

**Pawn Shops - nil****Pubs and Bars**

Kings Head (0.4 miles)  
Kings Fairway (0.5 miles)  
The District Arms (0.8 miles)

**Churches**

Ashford Congregational Church – Clarendon Road (<0.1 mile)  
St Michael's Fordbridge Road (0.2 miles)  
Ashford Baptist Church (0.2 miles)  
Woodthorpe Methodist Clarendon Road (0.2 miles)  
St Matthew - Church Road 0.3 miles  
St Hilda's – Stanwell Road/Woodthorpe Road - (0.4 miles)  
Salvation Army Woodthorpe Road (0.5 miles)  
There are no known mosques or temples in the vicinity

**Care Homes**

|                                     |           |
|-------------------------------------|-----------|
| Cedars Care Home (01784 242356)     | 0.2 miles |
| Echelforde Care Home (01784 819505) | 0.2 miles |
| Acacia Lodge (01784 452855)         | 1.8 miles |

**Transport Hubs**

Bus stop Dudley Road

Bus stop Church Road Car Park

Ashford Railway Station

**Area of general interest to children**

The Kub Club 0.2 miles

Ashford Youth Club 0.9 miles

Woodthorpe Road Play Area 0.9 miles

Hengrove Park 1.1 miles

**Centres for vulnerable people**

Studholme Medical Centre (0.1 mile)

Clarendon Family Centre (0.2 miles)

| RISKS   | LEVEL | IMPACT                                    | RISK MANAGEMENT  | DATE REVIEWED |
|---|-------|---|--|---------------|
| Children entering the site unnoticed or unchallenged particularly after school and during school holidays | Low   | Severe to Business<br><br>Severe to Child | <p>The latest gambling participation survey (2024) reports the most common types of gambling activity that young people participated in were legal such as penny pushers or claw grab machines (20%), 4% played on fruit or slot machines and did not feature age restricted products, but only.</p> <p>There is only one entrance/exit from Church Road which is effectively monitored by staff at all times from the customer service desk and by the floor walkers.</p> <p>The site frontage is designed to obscure the interior so as not to be attractive to children and there is no advertising that is designed to be attractive to children at the entrance.</p> <p>Over 18s notices are clearly displayed at entrance to the Premises</p> <p>The site is strictly 18+ and the Operator has a Think 25 policy in place; anyone appearing to be under 25 will be asked to provide photographic ID . The Operator will only accept passports photo card driving licences and HM Forces ID cards. Anyone unable to verify their age is asked to leave immediately.</p> <p>Staff age verification training is delivered, with staff receiving training on induction and at least annually. Additional/remedial training is given when considered necessary. All training is recorded and stored electronically and in paper format on staff files.</p> <p>Gaming machines are clearly labelled as 18+ and set out so that players are not obscured from view. CCTV cameras and monitor screens are in use around the premises in the gaming area to monitor players at all times. CCTV is recorded, backed up by equipment in the back office and is available to download for 30 days.</p> <p>Stakes are returned to anyone who has played a category C or B gaming machine and unable to verify their age</p> |               |

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|   |     |  | Age test purchasing is undertaken at least annually and the results are reported to the Gambling Commission on an annual basis. Any failure will be reviewed by senior management and additional training put in place. Further testing will be arranged within a week.  |  |
| Out of control gambling by other vulnerable people and failure to recognise signs associated with problem gambling or substantial changes in gambling behaviour | Low | <p>Moderate to business</p> <p>Severe to Vulnerable people</p> | <p>The Operator has a robust customer interaction policy &amp; procedure</p> <p>Staff receive training on induction and at least annually on how to identify customers who are or may be at risk of harm from gambling and how to interact with them.</p> <p>Customers are offered a number of self-help tools including timers, time outs and self-exclusion.</p> <p>Customer interactions are reviewed and assessed weekly for effectiveness. Where appropriate further and alternative interactions are used if no change in behaviour is seen.</p> <p>Operator led exclusions are used as a last resort where a customer displaying problems refuses to engage in customer interactions and continues to display signs of extreme problem gambling</p> <p>The site is designed to have effective monitoring of all customers at all times. CCTV cameras and monitor screens are in use around the premises in the gaming area to monitor players at all times. CCTV is recorded, backed up by equipment in the back office and is available to download for 30 days.</p> <p>The results of all customer interactions are recorded on SmartEXCLUSION tablet and reported to the Gambling Commission quarterly</p> <p>Marketing and advertising complies with the LCCPs, the CAP and BCAP standards and is not designed to attract vulnerable persons or encourage gambling beyond means</p> |  |



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| Failure to provide information on responsible gambling to players   | Low      | Severe to business<br><br>Severe to customers | <p>The Operator has stay in control posters displayed prominently</p> <p>The Cat B gaming machines display safer gambling messages and are programmed with reality checks</p> <p>Stay in control leaflets are made available in racks &amp; discreet locations</p> <p>Regular audit of poster &amp; leaflets to maintain stock levels</p>   |  |
| Failure to properly administer the self-exclusion process & maintain its effectiveness, including breaches & reinstatements | Low      | Severe to business<br><br>Severe to customer  | <p>At least two members of staff are employed at any given time on the basis of a max 1:4 ratio.</p> <p>Staff are required to review the self-exclusion data before starting each shift so they are familiar with those who have recently self-excluded from the site and other local AGCs.</p> <p>The site layout is designed for effective monitoring of customers entering premises from the customer service desk and by floor walkers</p> <p>CCTV at entrance to the premises and monitors on the walls aid identification of known excluders</p> <p>Use of on-site &amp; SmartEXCLUSION self-exclusion schemes</p> <p>Use of group WhatsApp to notify staff of customers attempting to, or actual breaches of self-exclusions</p> |  |
| Failure to deal with customers making complaints about the gaming machines  | Moderate | Moderate to business                          | <p>All gaming machines are sourced from licensed suppliers only</p> <p>All gaming machines are regularly maintained and switched off immediately where the outcome of a gambling fault is identified.</p>   |  |

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|   |     | Severe to customers                                  | <p>Terms and conditions displayed at premises provide details of how to make a complaint</p> <p>Paper copies of complaints procedure and complaints form are available</p> <p>Staff are trained on induction on how to deal with customer disputes, including referrals to IBAS the ADR provider</p>  |  |
| Failure to identify attempts by third parties to launder money through the business | Low | <p>Severe to business</p> <p>Low to customers</p>    | <p>There are no pawn shops identified in the local vicinity</p> <p>Effective monitoring of customers' behaviour by good line of sight from customer service desk and CCTV with monitors sited on the walls</p> <p>Staff are regularly trained to identify counterfeit money</p> <p>Staff are trained to identify unusual customers behaviour such as anonymous large spenders and customers trying to cash out without playing</p> <p>Change machines &amp; note takers are regularly inspected</p> <p>Incidents of concern including money lending are reported through the SmartEXCLUSION system and to the MRLRO</p> |  |
| Poor security increasing vulnerability to crime                                     | Low | <p>Severe to business</p> <p>Severe to customers</p> | <p>Cash float and money for banking are retained in a locked safe and deposited at the bank as soon as possible.</p> <p>Toilets are locked and can only be accessed by asking a member of staff to unlock them .</p> <p>Liaison with local police teams as appropriate</p> <p>Effective CCTV with monitors sited on the walls, with data recorded and stored for 30 days and available to download.</p>   |  |

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|  |     |   | <p>Toughened glass windows and doors with mag-lock fitted and in operation during hours of 2200-0800 and when refloats and empties are in progress</p> <p>All incidents recorded in incident log and reported to the Gambling Commission quarterly</p> <p>Intruder alarm installed and regularly serviced; staff will be issued with personal attack alarms if the need is identified</p>   |  |
| Anti-social behaviour outside the premises | Low | <p>Moderate to business</p> <p>Low to customers</p> | <p>The Operator acknowledges its public responsibility to ensure its Premises are not a source that public nuisance and disorder. It will work closely with the police and other local partnerships to reduce the risk of any impact.</p> <p>Staff are trained to monitor the external area around the entrance for any anti-social behaviour and to take appropriate steps. Anyone seen loitering around the entrance will be asked to move away.</p> <p>Where an incident appears to be escalating the staff will use the mag-lock to lock the door and engage with local partnerships to minimise the risk</p> |  |

