

# LOCAL RISK ASSESSMENT

## Premises

Premises Name:	Dabbers
Premises Address:	18-22 Houndsditch, London
Premises Post Code:	EC3A 7DB
Premises Licence/Permit Number:	Application in Progress
Category of Premises:	Bingo Premises

Referred to within this Site Risk Assessment as "this Site"

## Company

Operating Company: (the "Company")	Bingo Forever Limited t/a Dabbers Social Bingo
Operating Licence Reference Number:	000-049081-N-326872-001
Registered Office Address:	██████████ Cranwood Street, London, United Kingdom, EC1V 9EE

## Company Statement:

The Company understands its responsibility to:

1. Assess the local risks to the licensing objectives posed by the provision of gambling facilities at each of its premises, and to have policies, procedures and control measures in place to mitigate those risks;
2. Take into account relevant matters identified in the licensing authority's statement of licensing policy when making site risk assessments;
3. Review and update (as necessary) site 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 our premises that may affect local risks;
  - c. when applying for a variation of a premises licence; and
  - d. when applying for a new premises licence.

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4. Share its site risk assessment with licensing authorities when applying for a premises licence or applying for a variation to existing licensed premises, or otherwise on request.

### Local Area Profile for This Site

The City of London is the financial district of London and has a unique demography in which the number of workers significantly outnumber the number of residents. Due to this demography, the City of London's Local Area Profile highlights that those who work in the financial services industry are of particular concern for gambling-related harm, in addition to those groups identified as most vulnerable to gambling-harm, including young people/children, persons with low income, homeless persons and those affected by alcohol/drug-related influences or addictions.

The premises is located close to Aldgate Underground Station and the City of London's Local Area Profile identifies several neighbouring premises that may raise concern with regard to demographic characteristics associated with higher risk of harm. In particular:-

- Homeless Support:
  - *Homeless Link, 2-5 Minories, EC3N 1BU*
- Religious Institution:
  - *St Botolph's Without Aldgate Church of England, Aldgate High Street*
- Gambling Licensed Premises:
  - *William Hill, 55/56 Aldgate High St;*
  - *Ladbroke's, 76 Aldgate High St;*
  - *Betfred, 48-51 The Minories;*
  - *Coral, 65-68 Leadenhall Street & Fenchurch Street*
- Schools / Education Establishments:
  - *St John Cass's Foundation Primary School, St James' Passage, Duke's Place;*
  - *Cass Nursery Centre, St James's Pass*
- Healthcare Services:
  - *City of London Medical Centre, 11-13 Crosswall*

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### Three Licensing Objectives of the Gambling Act 2005

This Site Risk Assessment considers risk to the Three Licensing Objectives posed by the provision of gambling facilities at This Site, and will refer to the Licensing Objectives as follows:

Reference	Licensing Objective
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
C	Protecting children and other vulnerable people from being harmed or exploited by gambling

Reference A/B/C	Risk Assessment	Level of Risk High/Med/Low	Risk Management Operational Procedures as at October 2018	Local Risks	Recommended Further Controls
A	Use of gambling to facilitate money laundering and/or to use or hide proceeds of crime.	Low	<ol style="list-style-type: none"> <li>The Company has an appointed Money Laundering Officer and has Policies and Procedures in place which are regularly reviewed, are implemented and monitored in respect of Money Laundering and Suspicious Transactions including a Disclosure Procedure for use by staff and reporting to the National Crime Agency using Suspicious Activity Reports.</li> <li>The Company considers that traditional products represent a low risk of money laundering and criminal spend.</li> <li>Staff receive training on money laundering and suspicious transactions including being given practical examples of money laundering including the need to observe player spend and patterns of play.</li> </ol>	Those working in the financial sector often have opportunities to misappropriate funds.	<ol style="list-style-type: none"> <li>Existing measures address local risk</li> <li>Establish reporting lines with local Police</li> </ol>
A	Vulnerability to crime and disorder	Low	<ol style="list-style-type: none"> <li>Employees receive Social Responsibility training at induction and</li> </ol>	Level of crime recorded by the police associated with	<ol style="list-style-type: none"> <li>Existing measures address local risk</li> <li>Establish reporting lines with local</li> </ol>

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			<ul style="list-style-type: none"> <li>receive regular refresher training</li> <li>2. Training provided with regard to the identification of crime and disorder and appropriate recording processes and reporting lines.</li> <li>3. Social Responsibility and incident recording manual available to all staff</li> <li>4. Premises is equipped with CCTV that is monitored 24 hours a day and digital recording is retained for 31 days.</li> <li>5. The premises operates a personal alarm system.</li> <li>6. Staff are trained on the clear reporting lines to management, key personnel and police.</li> <li>7. Intruder alarm.</li> <li>8. Crime prevention and monitoring advice and training provided to staff members.</li> </ul>	gambling licensed premises.	Police
B	Gambling provided is not fair and open.	Low	<p>Clear contractual terms and rules of play for Bingo is made available to customers in plain and intelligible language.</p> <ul style="list-style-type: none"> <li>1. Information in respect of Customer Complaints and Disputes is readily available within the premises detailing dispute resolution processes.</li> <li>2. The Company is registered with an ADR entity approved by the Gambling Commission.</li> </ul>		Existing measures address local risk
B	Failure to deal with Consumers making complaints about the outcome of gambling.	Low			Existing measures address local risk
C	Children and young person's entering site unnoticed or unchallenged.	Medium/high	<ul style="list-style-type: none"> <li>1. The Company has policies in place relating to access by children and young persons.</li> <li>2. The premises will display signage stating that no person under the age of 18 years is permitted to play bingo on the premises.</li> <li>3. Staff are trained on age verification procedures.</li> <li>4. Age verification incident report is maintained and reviewed on regular</li> </ul>	Proximity of schools in the area.	<ul style="list-style-type: none"> <li>1. Existing measures address local risk</li> <li>2. Establish reporting lines with local schools to protect against truancy</li> </ul>

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			<p>basis by member of management team.</p> <p>5. Premises entrance effectively monitored for underage individuals.</p> <p>6. No gaming machines are offered on the premises.</p>		
C	Failure to provide information to customers on responsible gambling.	Low	<p>1. Responsible gambling posters are displayed prominently in strategic locations.</p> <p>2. Responsible gambling leaflets are available throughout the premises in strategic locations.</p>	Proximity of institutions associated with vulnerable persons.	<p>1. Existing measures address local risk</p> <p>2. Establish lines of communication with local homeless shelters and neighbouring gambling premises to help identify vulnerable persons</p>
C	Non identification of and lack of interaction with problem gamblers and other vulnerable persons.	Medium	<p>1. Training and guidance provided to staff as to identifying behavioural indicators of problem gambling, interaction techniques and recording processes.</p> <p>2. All staff receive at induction and refresher training on an annual basis.</p>	Proximity of institutions associated with vulnerable persons.	<p>1. Existing measures address local risk</p> <p>2. Establish lines of communication with local homeless shelters and neighbouring gambling premises to help identify vulnerable persons</p>
C	Failure to offer an effective Self-Exclusion facility to persons seeking such support.	Low	<p>1. The Company has policies and procedures in respect of Self Exclusion in place which are regularly reviewed, implemented and monitored.</p> <p>2. The Company implements the Bingo Association's multi-operator self-exclusion system for bingo premises.</p> <p>3. Information regarding self-exclusion is available in discreet locations throughout the premises.</p>	Proximity of institutions associated with vulnerable persons.	<p>1. Existing measures address local risk</p>
C	Non identification of self-excluded persons accessing gambling facility and accessing gambling.	Medium	<p>1. Copies of self-exclusion forms with photos are retained in confidential folders in areas reserved for staff only and are used to help staff identify and monitor self-excluded persons' access and potential breaches.</p> <p>2. The Company will receive details and photographs of self-excluded persons wishing to extend their self-exclusion to this site via the Bingo Association multi-operator self-exclusion system.</p>	Proximity of institutions associated with vulnerable persons.	<p>1. Existing measures address local risk</p>
A/B/C	Failure to implement Company	Low	The Company conducts compliance		<p>1. Existing measures address local risk</p>

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controls in place as described above.		checks to ensure compliance with their policies, responsibilities and maintenance of standards.		
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## Hewitt, Andre

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**From:** David Inzani <[REDACTED]>  
**Sent:** 18 December 2018 12:31  
**To:** Hewitt, Andre; 'Holmes Paul'  
**Cc:** 'LicensingOffice@city-of-london.pnn.police.uk'; M&CP - Licensing  
**Subject:** Dabbers, 18-22 Houndsditch - Bingo Premises Licence Application  
**Attachments:** Dabbers Social Bingo Marketing Strategy.compressed.pdf

Dear Andre and Paul

In relation to your queries regarding my client's application for a new bingo premises licence, please see my client's responses below:-

1. Details of anticipated income from each revenue source for first year.

My client has advised that the anticipated breakdown of each revenue source is: 43% beverages, 22% food, 21% entertainment, 12% bingo.

Please note that my client's Gross Gambling Yield (GGY) will be monitored in line with their current Operating Licence category, which permits up to £200,000 GGY per annum. This represents the maximum my client can make on all participation fees and stakes, less prizes, in respect of bingo.

2. The target demographic and details of the marketing plan for that audience.

Marketing will be focussed through promotion on social media including Facebook and the company's website.

Dabbers will be a versatile social bingo venue that will appeal to a broad target market tailored to different nights of the week. Dabbers follows in the recent success of bingo pop ups across London, which have predominantly been carried out as Exempt Gaming in accordance with Section 279 of the Gambling Act 2005, and have driven the renaissance of bingo among young adults. Dabbers Social Bingo will provide secondary entertainment alongside its licensed bingo activities, which includes the provision of comedy and music entertainment.

For more information, please see the attached marketing strategy for Dabbers. You will see in this document that the earlier marketing efforts will be focussed on female millennial professionals, corporate party organisers and special occasion planners.

3. What activities will be regularly taking place during the opening hours of the premises, inclusive of what times Bingo is being offered

The primary focus of the venue will be social bingo. Themed nights will also be offered, which will include the additional provision of quiz, comedy and music entertainment, which will all be provided in accordance with the applicant's alcohol and entertainment premises licence.

A standard evening's activity would consist of:-

- 5pm - premises opens for drinks at the upstairs bar.
- 6.30pm - downstairs bingo hall area opens for food.
- 7.30pm - show starts with the first game (3 prizes)
- 8pm - first game finishes
- 8.15pm - second games begins (3 prizes)
- 8.50pm - second game finishes
- 9.10pm - third game begins (3 prizes)
- 10pm - show winds down. Music and additional entertainment continues.

4. Details of the outward appearance of the premises including signage in order to ensure customers are fully aware that the premises is a bingo premises.

There will be two large signs at the front of the premises reading "Social Bingo".

5. Any other such premises operated currently or have in the recent past, particularly where there is the Bingo in operation and experience of operating a licenced premises.

Ed Wethered, Managing Director of Bingo Forever Limited, is the co-founder of the American Bingo Club pop-up, which was a very similar concept to that proposed at Dabbers and took place nearby, on Shoreditch High Street, once a week for eight weeks. Bingo activities were provided in accordance with the Exempt Gaming provisions of the Gambling Act 2005. Ed is also the founder of events company Raise Your Hand, running pop-up restaurants, events and parties across London. The Chairwoman of Bingo Forever Limited is Lyn Goleby, who founded Picture House Cinemas, which she grew to be a nationwide cinema franchise before selling to Cineworld. The team also includes Luke Bishop, Head of Operations, who is the former MD of Pulpo and Johnny Unknown, Head of Entertainment, who is the founder of events agency It's Unknown with 10 years of entertainment experience. Johnny is also the creator of Musical Bingo and has extensive experience in creating interactive entertainment shows.

I hope the above assists with your assessment of my client's application and should you have any further queries then please do not hesitate to contact me.

Kind regards

David

David Inzani | Solicitor

**Poppleston Allen**

London Office: The Stanley Building, 7 Pancras Square, London, N1C 4AG

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