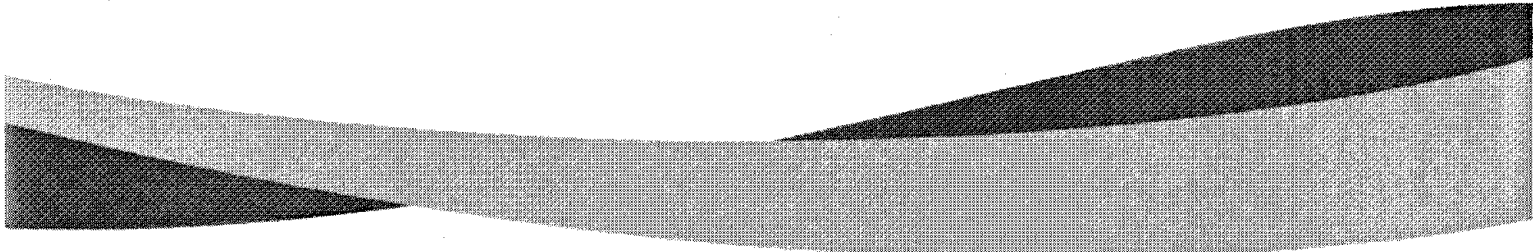




Report of: **Service Director, Public Protection**

Meeting of	Date	Agenda Item	Ward(s)
Licensing Sub-Committee	8 th March 2012	B1	Bunhill

Delete as appropriate		Non-exempt
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Subject: PREMISES LICENCE NEW APPLICATION

RE: Ladbrokes, 1-5 Cyrus Street, London EC1V 0BE

1. Synopsis

1.1. This is an application by **Ladbrokes Betting & Gaming Limited** for a licence to permit the premises to operate as a betting shop under section 159 of the Gambling Act 2005.

2. Background

2.1. The Gambling Act 2005 gives the Licensing Authority the ability to regulate gambling activities through the premises licensing regime. In discharging its responsibilities the Licensing Authority must have regard to the three licensing objectives:

- i. Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime;
- ii. Ensuring that gambling is conducted in a fair and open way; and
- iii. Protecting children and other vulnerable persons from being harmed or exploited by gambling.

2.2. The Licensing Authority must make its decision in the context of the licensing objectives, any relevant code of guidance or guidance issued by the Gambling Commission and Islington's Gambling Policy. The Licensing Authority is expressly prohibited from taking into account expected demand for gambling facilities or whether the premises has planning or building regulations approval.

2.3. The council has received one representation from a local resident whose principal objection concerns the suitability of the proposed location for a gambling establishment and the potential for antisocial behaviour.

- 2.4. The council's Gambling Policy 2010-2013 recognises that the location of a premises is an important factor when determination new applications. Licensing Policy 44 sets out the types of existing premises in an area, such as schools and parks, which will lead to an application being given very careful consideration.
- 2.5. Premises licences are subject to four types of conditions:
- i. **Mandatory** – these apply to all betting shops (see appendix 3)
 - ii. **Default** – which specify opening times and may be removed by the Licensing Authority
 - iii. **Individual** – in addition to the above, the Licensing Authority can impose extra conditions, however they must not affect the lawful right to provide gaming machines. Betting shops can provide up to four gaming machines, with a maximum stake of £100 and prize payout of £500.
 - iv. **Incorporated** – these reflect requirements of the primary legislation which prohibit the provision of gambling facilities on Christmas Day and require door supervisors to be appropriately registered.
- 2.6. In addition to a premises licence, betting shop operators are also required to hold an operating licence and personal management licence. These licences are administered by the Gambling Commission and are subject to various conditions. The Gambling Commission is also responsible for issuing codes of practice which require licensees to put into place various policies for example to promote socially responsible gambling and prevent underage gambling.
- 2.7. Papers are attached as follows:
- Appendix 1: application form;
 - Appendix 2: representation;
 - Appendix 3: mandatory and default conditions;
 - Appendix 4: map of premises location.

3. **Recommendations**

- 3.1. The Committee shall determine the application on its merits taking into account:
- i. the licensing objectives;
 - ii. Islington Council's Gambling Policy; and
 - iii. any relevant codes of practice and guidance issued by the Gambling Commission under section 25.
- 3.2. If the committee grants the application it will be subject to:
- i. mandatory and default conditions issued under the Gambling Act 2005 and contained in appendix 3 for reference purposes; and
 - ii. any additional individual conditions imposed by the licensing authority.

4. **Planning Implications**

- 4.1. The planning department have confirmed that the premises may lawfully be used as a betting shop with no time or day restrictions.

5. **Conclusion and reasons for recommendations**

- 5.1. The Council is required to consider this application in the light of all relevant information, and if approval is given, it may attach such conditions necessary to promote the licensing objectives.

Background papers:


The Council's Statement of Gambling Policy 2010-13

Gambling Act 2005

Secretary of States Guidance

Final Report Clearance

Signed by


Service Director – Public Protection

Date 28/2/12

Received by

Head of Scrutiny and Democratic Services

Date

Report author: Simon Gallacher

Tel: 020 7527 3879

Fax: 020 7527 3430

E-mail: simon.gallacher@islington.gov.uk

Our ref: MS/225/NL/0785

1st December 2011

Licensing Service
Public Protection Division
Islington Council
222 Upper Street
London
N1 1XR

Dear Sirs

Premises Licence Application 1-5 Cyrus Street London EC1V 0BE

Please find attached an application for a full premises licence for Betting (Other) and a cheque in respect of the licensing fee.

I can confirm that Ladbrokes Betting & Gaming Limited complies with the requirements of section 159 of the Gambling Act 2005, including that it:

holds an operating licence which authorises him to carry on the activity in respect of which the premises licence is sought [s159(3)(a)]

and has a right to occupy the premises to which the application relates [s159(5)].

The proposed premises are located on the ground floor of a newly developed building at the corner of Cyrus Street and Percival Street, London EC1. The main entrance is at the corner of the building and there is a secondary fire exit on to Percival Street. The upper floors are for residential use.

In support of our application I enclose details of those policies and procedures employed in Ladbrokes' shops that promote the Licensing objectives and deal with the issue of social responsibility, along with details of "standard measures" operated within Ladbrokes shops, making reference to this specific site where appropriate. I also enclose a copy of the "Safe Bet Alliance" document; a national voluntary code of safety and security for Licensed Betting premises drawn up in conjunction with the Police and other agencies aimed at promoting minimum standards, for your consideration.

The measures detailed in the above-mentioned documentation demonstrate that the premises if granted Licence satisfy the Licensing Objectives and all measures and policies referred to meet the requirements of the Gambling Commission's Licence Conditions and Codes of Practice and are subject to regular monitoring, both by the Commission and by independent 3rd party testing in the case of underage gambling prevention.

Shop fitting will only commence once the licence has been granted. In due course, we would be happy to invite the Licensing Authority to visit the premises, prior to

opening, so that they are satisfied that the premises have been built in accordance with the plans.

Please note that a Notice of our application has also been forwarded to the following today:-

Chief Officer of Police, Islington Police Station
Planning Division Islington Council
Licensing Service Public Protection Division
Islington Safeguarding Children Board
London Fire & Emergency Planning Authority
HM Revenue & Customs
Gambling Commission

If you require notification of our application to be served on any further body, please contact me as soon as possible on 020 8515 5250 or mark.stephens@ladbrokes.co.uk

I would be obliged if you would acknowledge receipt of our application in writing.

Yours faithfully



Mark Stephens
Regional Licensing & Development Manager

Tel. 0208 515 5250

OK to process
TL
5/12/11

**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): _____
[Use the names given in the applicant's operating licence or, if the applicant does not hold an operating licence, as given in any application for an operating licence]

3. Applicant's address (home or business – *[delete as appropriate]*):

ISLINGTON COUNCIL LICENSING			
Date	5/12/11	Fee Paid	1,645.50
Cash/Cheque Number (please circle)	608208		
Receipt Number	50179		
Received By	JLS		

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.

[Where there are further applicants, the information required in questions 1 to 4 should be included on additional sheets attached to this form, and those sheets should be clearly marked "Details of further applicants".]

Section B

Application on behalf of an organisation

6. Name of applicant business or organisation: Ladbrokes Betting & Gaming Limited

[Use the names given in the applicant's operating licence or, if the applicant does not hold an operating licence, as given in any application for an operating licence.]

7. The applicant's registered or principal address:

Imperial House

Imperial Drive

Rayners Lane

Harrow

Postcode: HA2 7JW

8(a) The number of the applicant's operating licence (as given in the operating licence):

003-001611-N-102408-001

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.

[Where there are further applicants, the information required in questions 6 to 8 should be included on additional sheets attached to this form, and those sheets should be clearly marked "Details of further applicants".]

Part 3 – Premises Details

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

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

1-5 Cyrus Street

London

Postcode: SW1V 0BE

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.

Premises will occupy the ground floor of a 6-storey building on the corner of Cyrus St. & Percival St. EC1 with main corner entrance and secondary exit to Percival St. Upper floors residential.

14(a) Are the premises situated in more than one licensing authority area?

No *[delete as appropriate]*

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 *[delete as appropriate]* *[Where the relevant kind of premises licence is not subject to any default conditions, the answer to this question will be 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	<i>hh:mm</i>	<i>hh:mm</i>	
Tue			
Wed			
Thurs			
Fri			
Sat			
Sun			

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): TBC (dd/mm/yyyy)

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 [delete as appropriate]

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? Yes [delete as appropriate]

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

Please see attached list

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.

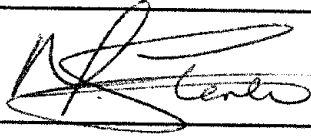
Checklist:

- 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: Mark Stephens

Date: 01/12/2011 (dd/mm/yyyy) Capacity: Ladbrokes Regional Licensing & Development Manager

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: _____

[Where there are more than two applicants, please use an additional sheet clearly marked "Signature(s) of further applicant(s)". The sheet should include all the information requested in paragraphs 21 and 22.]

[Where the application is to be submitted in an electronic form, the signature should be generated electronically and should be a copy of the person's written signature.]

Part 8 – Contact Details

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

Mark Stephens

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

020 8515 5250

24. Postal address for correspondence associated with this application:

Ladbrokes
Imperial House
Imperial Drive
Rayners Lane
Harrow

Postcode: HA2 7JW

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:

mark.stephens@ladbrokes.co.uk

LADBOKES BETTING AND GAMING LTD. -LONDON BOROUGH OF ISLINGTON

London Borough of Islington	121/123 Newington Green Road	London	
London Borough of Islington	7 Lever Street	London	
London Borough of Islington	187 Seven Sisters Road	London	
London Borough of Islington	330 Holloway Road	London	
London Borough of Islington	124/128 City Road	London	
London Borough of Islington	502 Holloway Road	London	
London Borough of Islington	310 St. Paul's Road	Highbury	London
London Borough of Islington	62 St. Peter's Street	Islington	London
London Borough of Islington	38/39 Chapel Market	Islington	London
London Borough of Islington	65/67 Junction Road	London	
London Borough of Islington	718 Holloway Road	London	
London Borough of Islington	37/39 Exmouth Market	London	
London Borough of Islington	154/156 Holloway Road	London	
London Borough of Islington	93 Turnmill Street	London	
London Borough of Islington	75/77 Green Lanes	Stoke Newington	London
London Borough of Islington	289/291 Caledonian Road	London	

1. PREVENTION OF GAMBLING FROM BEING A SOURCE OF CRIME AND DISORDER, BEING ASSOCIATED WITH CRIME OR BEING USED TO SUPPORT CRIME

Key Principles

We recognise the fact that given our multi site structure, high frequency of customer visits and volume of cash transactions that risk assessment is key to the protection of our business and the safety of our staff and customers.

We are corporate members and active participants of the Crime Stoppers organisation. Our Security & Safety staff are involved in liaison groups with local police forces including the Metropolitan Police Robbery Squad and our Head of Security & Safety is a member of the Association of British Bookmakers Security Group. Ladbrokes are a founder member of the Safe bet Alliance; a collaborative initiative whose members include the Association of British Bookmakers (ABB), Metropolitan and Regional police services, Local Authorities, DWP and others. The alliance aims to reduce the risk of robbery, other forms of violence (e.g. assault or abuse of staff) and anti-social behaviour in Licensed Betting premises in England, Wales and Scotland through the voluntary adoption of agreed minimum standards.

We

- take a risk based approach
- regularly review our Security Equipment Specification
- invest in technology that improves monitoring and audit processes
- incorporate Anti Money Laundering procedures into our operation
- employ experienced and qualified personnel to advise our employees
- provide training and regular updates for our staff
- design out crime when investing in our premises and developing our systems

Risk Assessment

In keeping with an expanding estate we have developed a risk-based approach across our business in order that we focus our highest levels of prevention activity in the right areas. We have in fact had a formal and measurable proactive personal safety risk assessment process in place since 1992, which assists us in prioritising investment in our security products and services and identify any further training needs for our employees. As crime trends and gambling technology changes we adapt our methods of risk assessment accordingly.

Security Equipment & Technology

All of our shops are remotely linked to our security control centre allowing our shop staff to raise the alarm at the press of a button in an emergency situation. Our shops are fitted with digital CCTV, which is also remotely linked to our security control centre. As well as acting as a deterrent this system has produced images that have led to the arrest and conviction of many offenders and provided evidence to the police of those involved in crime elsewhere. Our Central Security Control Centre is a 24/7 operation and members of our field Security & Safety teams are on duty whenever we trade.

Anti Money Laundering

We have a fully computerised till system in all of our shops which allows us to capture data that assists us in monitoring the business of those who might attempt to launder money through our shops. We have a team of two people on a full time basis to deal with Anti Money Laundering. They have established links with the Serious Organised Crime Agency and regional Financial Investigations Units throughout the country. Suspicious Activity Reports are made in accordance with the current guidelines and they continue to develop further monitoring techniques as our business expands and changes.

practical giving clear view into the customer area. Where appropriate we install a counter security screen and electronic door locks on the main entrance and possibly customer toilet doors to improve access control.

2. ENSURING THAT GAMBLING IS CONDUCTED IN A FAIR AND OPEN WAY

Key Principles

All transactions and bets placed with Ladbrokes are covered by our Rules and Terms & Conditions. We advise our customers across all betting channels using the most appropriate method available and ensure that they are easily accessible and understandable.

We

- make available rules and information on our products appropriate to the customers betting channel
- have a rules committee that monitors the fairness of our rules and accommodates change
- advise our customers of changes as they happen
- provide training and updates for our staff
- continually explore new ways to improve the provision of betting information to our customers
- have procedures to deal with complaints and disputes
- are registered with the Independent Betting Arbitration Service (IBAS)

Rules

The key points of our Rules and Terms & Conditions are displayed in all of our shops. Our rules website www.Ladbrokes.com/rules contains full details and is updated as changes occur. Rules listed on our betting slips, shop screens, websites, marketing posters or printed in the press supersede those detailed in the current edition of our rules on display in shops or printed in our rules booklets. Both are updated periodically and when necessary temporary amendments or inclusions are made in the short term.

Customers can obtain a copy of our latest Rules and Terms & Conditions by contacting our Customer Service department or on the website should they have access to the internet. We have a link on our EPOS system that also gives access to our shop staff and we continue to look at ways of displaying this information for customers in our shops electronically.

We do operate a discretionary payment process but should we decide to waive a rule this does not set a precedent for future transactions and all subsequent bets are settled in accordance with our Rules in operation at the time of acceptance.

Customer Disputes

We look to resolve any query as quickly and fairly as possible. If a customer is unhappy with any aspect of the service in our shops efforts are made by our staff to rectify this in the shop concerned. If a customer is not happy with the outcome then they are informed that they should contact our Customer Services Department. Our Customer Service Department telephone number, which is a free phone number, is readily available in our shops, on the website and features in our marketing & advertising. Customers can contact this number at any time.

All internet and telephone queries are referred directly to our Customer Services Department.

Ladbrokes is registered with the Independent Bookmakers Arbitration Service (IBAS) and customers are able to use this service in the event that a betting dispute cannot be satisfactorily resolved between us.

- Operation of A "Think 21" age verification scheme
- Publicising and operating a Government recommended proof of age scheme – Citizencard
- Having clear written staff instructions and training with regard to the policy and procedure to be followed should someone who appears to be under the age of 18 attempt to enter one of our shops
- Applying full disciplinary procedures to members of staff who fail to apply our underage policies
- Not making the window displays or exterior appearance of our premises attractive to children.

To support our shop staff and reduce the likelihood of underage gambling in our shops we operate a strict "Think 21" procedure across the shop estate and notices are displayed in-shop to this effect. All shop staff receive relevant training which is updated periodically. Individuals challenged are required to provide either a UK Driving Licence, Passport or Proof of Age card bearing the "Pass" hologram symbol to verify age. A record of refusals is maintained on site. This policy is monitored regularly via independent 3rd party testing.

Our property teams when designing our shop layouts also take into account the need for our shop staff to monitor the situation with regard underage gambling and always attempt to give a clear line of sight to the shop entrance and the location of the FOBT machines in the shop.

Our website carries warnings regarding the legal age of gambling and we use an industry-recognised standard and supplier in relation to electronic account registration age verification.

Problem Gamblers

In 2004 we introduced a display area in each of our shops dedicated to social responsibility messaging. We based our 'Stay in Control' area and wording on the guidelines developed by the Association of British Bookmakers (ABB), which has since been adopted by many other bookmakers who are members of the ABB. This area is in addition to the information we display near in our gaming machine zones.

Dealing with a suspected problem gambler is a delicate matter and Ladbrokes appreciates that a sensitive approach is needed when dealing with this and as such our policy includes:

- Rules and procedures regarding problem gamblers written and incorporated into the day-to-day operation of our shops
- All of our staff advised on how to deal with situations that might require them to give help and advice
- A positive response, including communicating sources of help and the possibility of self-exclusion to any customer who admits to having lost control of their gambling or seeks help showing signs of distress which may be caused by their gambling
- A 'self-exclusion' policy, supported by written instructions for our staff, for any customer who wishes to be barred from a Ladbrokes shop or shops
- A minimum self exclusion period of six months in all circumstances up to a maximum period of 5 years
- A written statement, accepting the terms of exclusion, that is signed and retained by the customer as well as the staff of the shop concerned (and supported by a photograph of the customer if possible) and notification to all shops that the customer wishes to be excluded from
- Where a relative of a problem gambler expresses concern, staff draw their attention to the information leaflet – Staying In Control, indicating that the gambler is able to request self exclusion and sources of help available
- A company policy that clearly states that staff must not collude with customers who ask staff to lie on their behalf
- Supply of a helpline number to anyone who requests assistance with problem gambling

4. SOCIAL RESPONSIBILITY

Key Principles

As one of the world's leading betting and gaming companies we are committed to leading the industry in social responsibility. Our focus relates to awareness and support for problem gamblers, staff training on social responsibility and prevention of underage gambling.

We

- aim to continue to be one of the leading companies on tackling problem gambling
- encourage others to take a socially responsible approach when operating their business
- support organisations involved in research, education and treatment relating to problem gambling
- employ the services of experienced and qualified personnel to advise us
- provide appropriate training for our employees

Tackling Problem Gambling

Ladbrokes has helped address the issues of problem gambling by being involved with the establishment of support organisations and contributing towards the funding of existing organisations. We adopt their codes of practice and staff training programs and through the industry trade associations, of which we are members, encourage others in the industry to do likewise.

Ladbrokes began working with GamCare over ten years ago and along with the rest of the industry has contributed towards their funding on a regular basis. Through this relationship and our own commitment our management teams have been trained in the basics of understanding the issues surrounding problem gambling.

Staff Training and Establishing the Code of Social Responsibility

Working closely with GamCare the ABB drafted the Code of Social Responsibility for Licensed Betting Offices and Ladbrokes became one of the first bookmakers to adopt and implement the code, which gives guidance to the industry for dealing with problem gambling.

Our staff are trained in their responsibilities regarding problem gambling. They know how to inform problem gamblers where they can get help and can also implement requests for self-exclusion, so that customers who experience problems with their gambling can be excluded from further betting at their own request.

We continue to ensure our employees are applying the code by including checks in our Mystery Shopper programs. Self-exclusion is logged and monitored centrally for both shops and the online business.

Industry Charitable Trust

Since 2003 Ladbrokes has contributed towards the GREaT Foundation (Gambling Research Education and Treatment) formerly known as the Responsibility in Gambling Trust (previously the Government supported Gambling Industry Charitable Trust) and we support their current activity and will contribute towards its funding and future development. We have in the past sponsored the Responsibility in Gambling Trust (RIGT) anniversary lunch.

Supporting social responsibility initiatives

We recognise that the most effective way forward is for the industry and organisations concerned with social responsibility issues is to work together. We aim to achieve this by:

The following are measures currently in practice as standard within all shops in the Ladbrokes estate and will be applied to our Licence application in Cyrus Street EC1 unless otherwise stated.

CRIME PREVENTION

Risk Assessment Process

We follow the Health & Safety Executive guidance to determine what preventative or crime reduction measures are appropriate. Home office statistics as well as shop incident and local crime statistics are used. Each shop is risk assessed prior to the first day of opening and then either on an annual basis or following a serious crime incident in the shop. The assessment is conducted by a member of the Security & Safety Department who is trained to Institute of Occupational Safety & Health standard.

Safe Bet Alliance

We are founder members of the Safe Bet Alliance which is a collaborative initiative whose members include the Association of British Bookmakers (ABB), representatives of the Metropolitan and regional police services, local authorities, Department of Work and Pensions (DWP), Community Union, the Institute of Conflict Management and the Scottish centre for Healthy working lives. The alliance aims to reduce the risk of robbery and other forms of violence or anti social behaviour in betting offices. The main points cover violence in the workplace, risk assessment, key principles of crime prevention, security and safety measures and training required for implementation of the standards. Ladbrokes can confidently state that they positively exceed the expected levels on all of these standards.

Crime Recording & Monitoring

The company has a comprehensive crime and incident reporting process and collates and monitors these levels. All incidents occurring in the shops are reported to central security control room which is manned 24/7/365 days per year. Ladbrokes also have a secure security database where every incident after investigation is recorded and analysed to determine trends and take preventative action.

Audit

Shop audits are carried out to determine the level of compliance covering Health and Safety, Robbery & Crime Prevention, Fraud Prevention and Gambling Act. The audits are conducted by our IOSH trained Security and Safety Investigators and areas of concern are reported to Line Management for remedial action.

Central Security Control Room

The central security control room is staffed 24 hours a day, 365 days a year and is directly linked by digital CCTV, intruder and panic alarms to all our shops.

The control room staff are able to advise staff, or police on any incidents and can view the CCTV in real time, within seconds of an incident occurring.

When panic alarms are activated by shop staff an urgent message is received in central security who contacts the shop immediately and view live CCTV images which can be sent to the Police Investigating officer within minutes.

- Security mirrors
- Prevention Signs as appropriate

Gaming Machines

Gaming machines in new premises are sited as close to the counter for ease of monitoring. In this case the greatest distance between the counter and any gaming machine is less than 3 metres. The machines are able to be switched off by staff from behind the counter allowing the staff to manage and control usage.

Primary Authority

Ladbrokes is in partnership with Liverpool City Council who acts as its Primary Authority - for health and safety issues affecting its outlets all over the UK.

The primary authority provides the single point of contact for all local authority Environmental Health Officers, and uses its in-depth understanding of Ladbrokes business to resolve issues more efficiently and ensure consistency.

By assessing the feedback from inspections conducted across the UK, our primary authority provides other councils with evidence of compliance and recommendations about how best to tackle broad issues quickly and effectively at a local level, whilst retaining the need to adapt to local circumstances

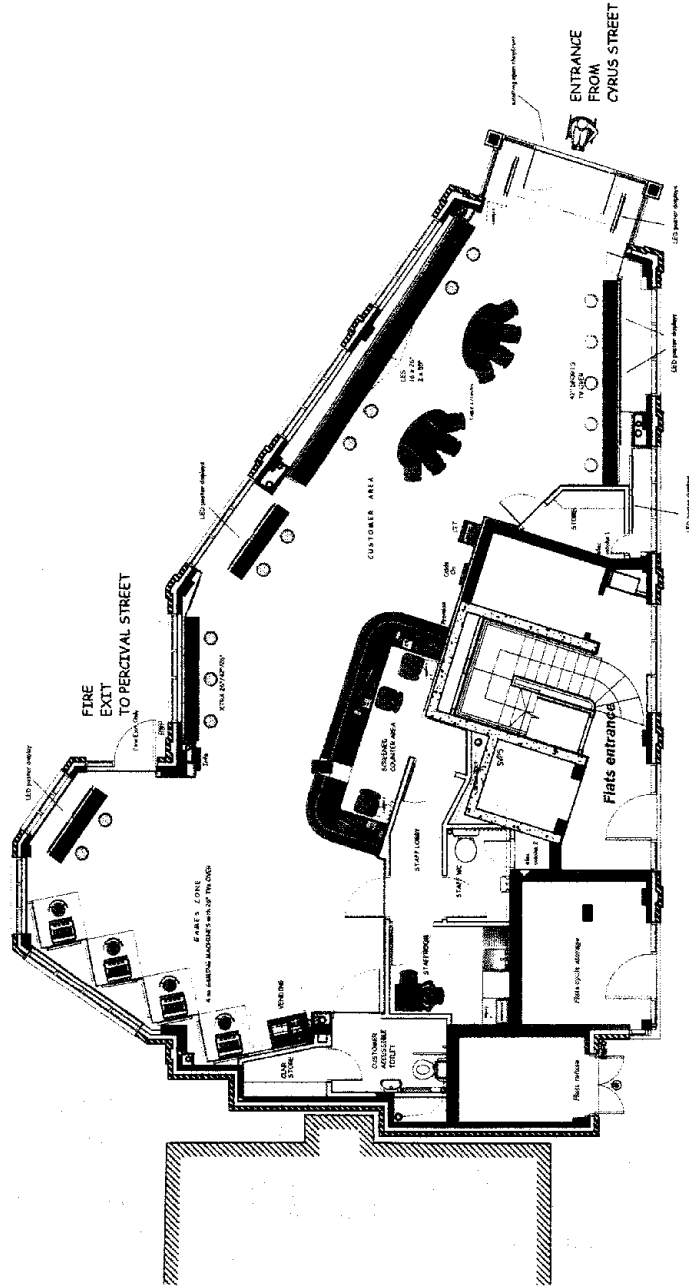
Computer Based Training (CBT, s)

Staff training via Computer Based Training Modules which can be accessed by staff at any time via the EPOS system covers a series of compliance, robbery, fraud and crime prevention training. These CBT's a mandatory requirement and are completed throughout the year.

THE PLAN IS INDICATIVE ONLY OF THE INTERNAL LAYOUT OF THE PREMISES AND MAY CHANGE FROM TIME TO TIME. ALL PUBLIC AREAS TO BE LICENSED FOR THE PROVISION OF FACILITIES FOR GAMBLING.

All dimensions shall be indicated on any work to be carried out and shall be subject to the approval of the Licensing Authority. Where necessary, dimensions shall be indicated on the drawings. The drawings shall be prepared in accordance with the provisions of the Licensing Act 2003. The drawings shall be prepared in accordance with the provisions of the Licensing Act 2003. The drawings shall be prepared in accordance with the provisions of the Licensing Act 2003.

NB - Glass columns not shown



GROUND FLOOR PLAN

SCALE
0 1 2 3 4 M

NOT TO SCALE
FOR REFERENCE ONLY
SEE DRAWING 2/1

Drawn By	Scale	Date
225	1:50 at A3	19/03/11
07/BS	Location	1-5, Cyrus Street, Clerkenwell, London EC1V 0BE.
CYR/07	Regulation	Licensing & Development

Ladbrokes

1-5, Cyrus Street, Clerkenwell,
London EC1V 0BE.

LICENCE PLAN

Drawn By	Scale	Date
225	1:50 at A3	19/03/11
07/BS	Location	1-5, Cyrus Street, Clerkenwell, London EC1V 0BE.
CYR/07	Regulation	Licensing & Development

The Licensing Support Team
Public Protection Division
222 Upper Street
London N1 1XR

**Re: Gambling Act 2005 – Application for a premises license
1-5 Cyrus Street, London EC1V0BE**

Dear Sir/Madam,

I would like to register my objection to the issuing of the above license on the grounds of both the proposed location and the nature of the business being conducive to antisocial behaviour as well as conducive to antisocial behaviour in an area close to a primary school and frequented by children at play.

My experience is that businesses involving gambling are often frequented by people whom have been drinking and that the premises promote loitering in the area whilst waiting for the events that are the subject of the bets to complete. The location of the application is a quiet side street rather than a High street in which such businesses are normally located. This means that there is not the normal visibility of behaviour around the premises so the usual incentive not to loiter is not there. My concern is that this lack of visibility, combined with groups of people possibly having been drinking and gathering in the dark street, will lead to antisocial behaviour.

As shown in references [1] and [2] below there is a history of antisocial behaviour in the area that the council and tenants have been trying to address. So the area is susceptible to such behaviour hence another source of such should not be encouraged. From [1] "The above proposed elements of the scheme must ensure that improvements also address security, crime and anti-social behaviour issues on the estate." And [2] "Lack of maintenance contributes to the overall feeling of neglect of the garage area thus encouraging antisocial behaviour."

The location is within one block of St. Peters and St. Pauls Primary School. School children pass by the proposed location to and from the school so could be exposed to any antisocial behaviour as well as to advertising which promotes gambling.

Being a quiet residential street in a residential area there are also usually children playing in Cyrus Street or in the driveway leading to the carpark of The

Triangle. They too would be exposed to the business as well as the patrons and their behaviour.

I will not feel safe having to walk down a dark street where such a business is located and into my secluded lift lobby opposite it. I do not object to Ladbrokes itself but the location is away from other shops and definitely in a residential area and I do object to this. I propose they instead locate on a High Street or Goswell Road where there are no such issues.

Regards,

References:

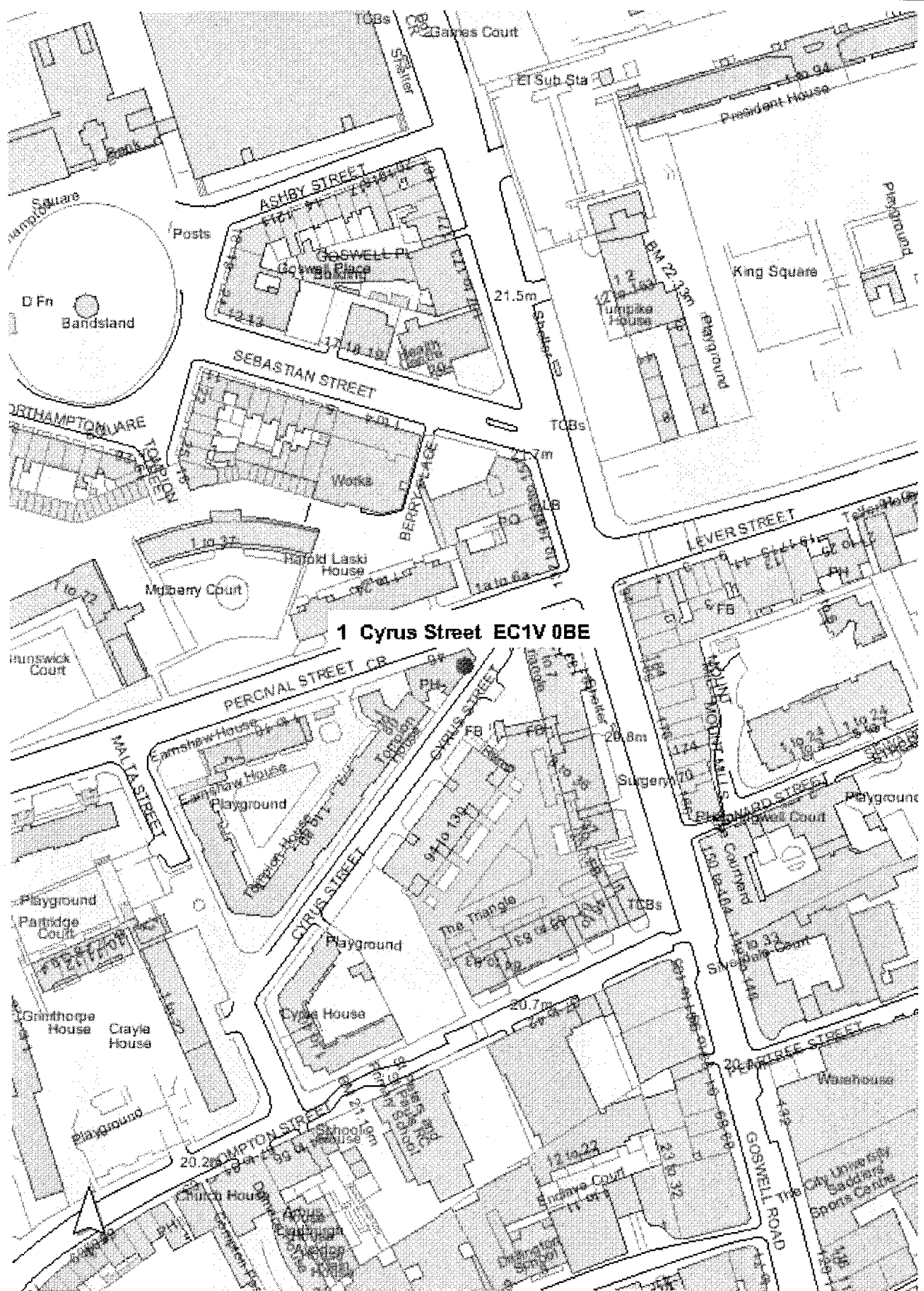
- [1] http://www.islington.gov.uk/DownloadableDocuments/Environment/Pdf/Planning/Major_Schemes_Kings_Cross/pt_area_framework_small_pt3.pdf
- [2] http://www.islington.gov.uk/DownloadableDocuments/CommunityandLiving/Pdf/ward_bunhill_wip.pdf

**Mandatory conditions attaching to betting premises licences
(other than track premises licences)**

1. 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.
2. (1) Access to the premises shall be from a street or from other premises with a betting premises licence.
(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.
3. Subject to anything permitted by virtue of the 2005 Act, or done in accordance with paragraphs 4, 5, 6 and 7 below, the premises shall not be used for any purpose other than for providing facilities for betting.
4. 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.
5. 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—
 - (a) communicating information about, or coverage of, sporting events, including—
 - (i) information relating to betting on such an event; and
 - (ii) any other matter or information, including an advertisement, which is incidental to such an event;
 - (b) communicating information relating to betting on any event (including the result of the event) in connection with which betting transactions may be or have been effected on the premises.
6. No publications, other than racing periodicals or specialist betting publications, may be sold or offered for sale on the premises.
7. No music, dancing or other entertainment shall be provided or permitted on the premises, save for entertainment provided in accordance with paragraph 5.
8. (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.
(2) A notice stating the condition in sub-paragraph (1) shall be displayed in a prominent place at every entrance to the premises.
9. 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.

**Default conditions attaching to betting premises licences
(other than in respect of tracks)**

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



1 Cyrus Street EC1V 0BE

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