

# Appendix A

**Our Ref:** AY/AGC/DEWSBURY

**Your Ref:**

**Email:** info@liberty-solicitors.co.uk

11 December 2023

Dear Sirs

By e-mail to [licensing@kirklees.gov.uk](mailto:licensing@kirklees.gov.uk)

**Gambling Act 2005 ("the Act")**

**Application for an Adult Gaming Centre Premises Licence ("AGC") for Royal Amusements, 23 Northgate, Dewsbury, WF13 1DS ("the Premises")**

**Applicant** – [REDACTED]

We write on behalf of the above named Client and enclose an application for an Adult Gaming Centre ("AGC") premises licence to operate an AGC at 23 Northgate, Dewsbury, WF13 1DS ("the "Premises").

Our Client is a regional operator and has been operating Adult Gaming Centres since the mid 1980's. Our client currently has 10 operational premises in and around West Yorkshire and Greater Manchester. None of our Clients AGC licences have ever suffered complaint from any Police Force or review from any Licencing Authority, nor has our Clients operating licencing, issued by the Gambling Commission, suffered a review. This demonstrates the ability to uphold and comply with the licensing objectives and run premises with due diligence over a 40 year period.

Our Client has in place a strong management team which he heads and is very much 'hands on.'



# **LIBERTY SOLICITORS**

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**Regulatory body**

Authorised and Regulated by the Solicitors Regulation Authority (No. 655161)

**Legal Aid Agency**

Contracted with the Legal Aid Agency to provide Criminal and Civil Legal Aid

**Principal**

Alias Yousaf

**Branch Office:**

37 Grattan Road, Bradford, BD1 2LU

**Tel:** 01274 744 899

**Fax:** 01274 718 689

**24Hr:** 07888 444 999

Our Client and his management team have always worked in partnership with licencing authorities and police forces and listened carefully to any concerns expressed.

Our Client takes very seriously the importance of appropriate induction and refresher training for staff who work in his licenced premises and who manage the estate.

In addition, the grant to our Client of his operating licence by the Gambling Commission confirms their satisfaction with his integrity, competence, finances and operating model.

As with all of our Clients other licenced AGCsites, the operation of the Premises will be fully compliant with:

1. The Gambling Act 2005,
2. The relevant mandatory and default conditions set out in the Gambling Act 2005 (Mandatory and Default Conditions) Regulations 2007 and
3. The Gambling Commission's Licence Conditions and Codes of Practice.

Our Clients operations at the Premises will, as a matter of course, promote and comply with the licensing objectives, particularly in the following ways: -

**1. Prevent gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime;**

a) A Local Area Risk Assessment (enclosed) has been prepared for the Premises using;

- local knowledge,
- the Gambling Commission Statement of Principles for Licensing and Regulation,
- the Gambling Licencing Policy of the Local Authority
- area vulnerability maps and
- Geofutures Gambling Research

b) The Premises (no different to all our Clients other premises) will have a digital and high definition CCTV system installed to Home Office Guidance standards (with extensive coverage as can be seen from the enclosed plan) and maintained in a good working condition to ensure continuous quality of image capture and retention where

- Cameras are sited to observe the entrance doors from the outside and inside

- Cameras on the entrances capture full frame shots of the heads and shoulders of all persons entering the premises and are capable of identification
- Cameras will be sited to cover all areas to which the public have access including any outside smoking area
- Cameras will record 24/7 regardless of premises opening hours
- CCTV system will provide a linked recording of the date, time of any image
- CCTV system will have a monitor to review images and recordings
- A member of staff trained in operating CCTV will always be on site at the venue during times open to the public
- CCTV footage will be kept for 31 days
- CCTV equipment will have a suitable export method, e.g. CD/DVD writer / USB
- CCTV footage will be available to the Police, on request

c) The operating model of our Client is such that

- Staffing levels are set following a security risk assessment
- Multiple staff members circulate throughout the premises and actively supervise and interact with customers rather than sitting behind a counter
- Customer levels are low, with usually only a handful of customers in the premises
- Double digit numbers occur very rarely - this means that problem behaviour is immediately identified, recorded and dealt with
- All staff are induction and refresher trained in recognising individuals who might be under the influence of drink or drugs
- The layout of the premises (being rectangular and without support pillars) facilitates effective supervision, such that there is always clear lines of sight – the layout is not suited for groups to gather
- The premises are well lit both inside and out
- Staff are provided with portable alarm activators if required
- Good quality CCTV is used throughout and customers are aware they are monitored
- Staff members do not carry floats
- Safes are time-delayed
- Anti-money laundering systems are used on the machines
- the cash handling processes are detailed, safe and secure
- The locational and social context is part of induction training for all staff
- Staff are also trained in how to deal with difficult customers
- Any incidents are logged and reviewed by the management team
- Premises are fitted with maglocks, enabling entry to be controlled when necessary
- Our Client maintains good liaison with local Neighbourhood Policing Teams, Police officers with designated licencing duties, Police Forces and local authority licencing departments and local authority licencing officers

- Our Client is always happy to liaise with the Police and Licencing Department to discuss his local security risk assessment

d) Staff training at induction and by way of refresher is an important part of the way our Client operates. Training covers a wide range of areas including legislative and licence requirements and matters of social responsibility (eg stakes and prizes, age verification procedures; identification of and interaction with vulnerable persons; and signposting) and is provided face to face.

## **2. Ensure that gambling is conducted in a fair and open way**

As the Local Authority will be aware, compliance and promotion of this licensing objective is primarily a matter for the Gambling Commission and the operator. The Gambling Commission granted our Client an operating licence in 2007 following the Gambling Act 2005 coming into force. As set out above, our Clients operating licencing, issued by the Gambling Commission has not suffered a review.

In addition, our Client, across his estate operates in an open and transparent fashion having a hands on approach to management and working alongside an experienced senior management team.

## **3. Protect children and other vulnerable persons from being harmed or exploited by gambling**

a) A Local Area Risk Assessment (enclosed) has been prepared for the Premises using;

- local knowledge,
- the Gambling Commission Statement of Principles for Licensing and Regulation,
- the Gambling Licencing Policy of the Local Authority
- area vulnerability maps and
- Geofutures Gambling Research

b) The Premises (no different all of our Clients other premises) have the following internal and external layouts where

- The premises are well lit both inside and out
- The exterior contains no advertising or marketing which might be attractive to children
- The entrance to the premises leads into a foyer and so gambling cannot be seen from the outside unlike, say, in betting offices and pubs
- The exterior - and the interior - contain prominent messaging stating that Under 18's are prohibited from entering
- The layout of the premises (being rectangular and without support pillars) facilitates effective supervision, as there are always clear lines of sight to all parts of the premises

c) The operating model of our Client is such that

- Staffing levels are set following a security risk assessment and multiple staff members circulate throughout the premises and actively supervise and interact with customers on arrival into the premises
- Those entering are greeted by staff members, so that their appearance is checked immediately
- Customer levels are low, with usually only a handful of customers in the premises
- Alcohol is not permitted in any of our Clients premises
- All staff are induction and refresher trained in recognising individuals who might be under the influence of drink or drugs
- Those who are intoxicated through alcohol or drugs are not permitted on the premises
- The layout of premises across the AGC estate (being rectangular and without support pillars) facilitates effective supervision, as there is always clear lines of sight to all parts of the premises
- Children are not allowed in the applicant's premises
- A Challenge 25 policy will operate at the Premises (as is the standard across our Clients estate of AGC's) and training on this policy is given at induction and refreshed to all members of staff
- All promotional material is specifically designed such that it will not appeal to nor encourage the use of the premises by children or young people
- "Stay in Control" posters and leaflets with the GamCare helpline number are located both prominently and discretely in the premises
- All machines display responsible gambling messages with helpline contact details
- Customers are encouraged to access clearly advertised resources to assist them with managing their gambling behaviour
- As required by the Gambling Commission's Licence Conditions and Codes of Practice, there are systems, policies and procedures in place for customer interaction and self-exclusion, operated by staff who are induction and refresher trained, overseen by an experienced management team
- Staff are trained in recognising customers who may be experiencing difficulties or stress and are able to signpost individuals to external support services as part of such an interaction.
- Self-exclusion is offered to customers who experience difficulties with gambling (in accordance with our Clients operating licence)
- With our Client being a member of a multi-operator self-exclusion scheme for AGCs administered by BACTA (the trade body which represents the amusement and gaming machine industry in the UK) and with all sites in the estate having access to a tablet / ipad and so staff across the estate receive alerts in relation to self-exclusions from other parts of the country and from other operators and are therefore able to identify any person who has self- excluded with another operator
- In the event a customer who has self-excluded makes a request to return to gambling, a meeting will first be held with a trained member of staff before re-admittance is agreed

d) Staff training at induction and by way of refresher is an important part of the way our Client operates. Training covers a wide range of areas including legislative and licence requirements and matters of social responsibility (eg stakes and prizes, age verification procedures; identification of and interaction with vulnerable persons; and signposting) and is provided face to face.

Having had regard to the information provided, please find enclosed;


- 1 The application form ;
- 2 The Local Area Risk Assessment for the premises;
- 3 A plan of the premises – showing the proposed locations of CCTV cameras, where the CCTV cameras are in purple and the gaming machines are in red

We confirm;

- 1 I that within 7 days of the date on which the application is made the Responsible authorities (details of which have been kindly confirmed by your licensing officers) will be served with notice of the application in statutory form.
- 2 The required press notice will be published in the Rotherham Advertiser within 10 working days, starting on the day after the date the application is made
- 4 the required site notice will, from the date on which the application is made, be displayed for 28 consecutive days

We look forward to your acknowledgement of receipt of the application and whether any further information is required from us.

Yours faithfully

  
**Liberty Solicitors**

**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 <input type="checkbox"/> | Large Casino <input type="checkbox"/>                   | Small Casino <input type="checkbox"/>                |
| Bingo <input type="checkbox"/>           | Adult Gaming Centre <input checked="" type="checkbox"/> | Family Entertainment Centre <input type="checkbox"/> |
| Betting (Track) <input type="checkbox"/> | Betting (Other) <input type="checkbox"/>                |  |

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]*):

Postcode:

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

**000-002568-N-102210-009**



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:

*[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:

Postcode:

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

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): **ROYAL AMUSEMENTS**

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

**23 NORTHGATE**

**DEWSBURY**

Postcode: **WF13 1DS**

12. Telephone number at premises (if known):

**Rox Javid**

---

**Subject:** FW: Royal Amusements AGC Licence

**From:** >  
**Sent:** Wednesday, December 13, 2023 4:13 PM  
**To:** Rox Javid <[Rox.Javid@kirklees.gov.uk](mailto:Rox.Javid@kirklees.gov.uk)>

**CAUTION:** External email. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Rox Javid

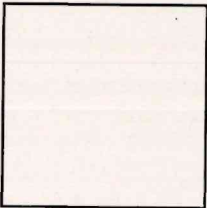
**Our Client      Royal Amusements**  
**Application for AGC Licence**

Thank you for your call earlier today – we tried to call you on 01484 221000 EXT 70545 but we were unable to reach you.

The answer at Part 4, Question 15a is NO.

I would be grateful if this could be endorsed accordingly on our behalf.

Regards



LEEDS: 0113 2448857  
BRADFORD: 01274 744899  
**FREE 24HR ADVICE LINE**  
TEL: 07 888 444 999

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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 OF 23 NORTHGATE, DEWSBURY, WF13 1DS**

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

~~Yes~~/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? Yes/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.

	<i>Start</i>	<i>Finish</i>	<i>Details of any seasonal variation</i>
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): (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? Yes/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/ No [*delete as appropriate*]

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:

Please see attached covering letter with the 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:

Date:

(11/12/2023) ✓

Capacity: OWNER

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:

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

24. Postal address for correspondence associated with this application:

Postcode:

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:

**Personal Data**

We have recently updated our Privacy Notice about how we use personal data provided to the Council. Further information can be found at:

<http://www.kirklees.gov.uk/beta/information-and-data/pdf/privacy-notice-licensing-gambling-act.pdf>

# Adult Gaming Centre Local Risk Assessment

Premises Name:	Royal Amusements
Premises Address:	23 Northgate, Dewsbury
Premises Post Code:	WF13 1DS
Premises Licence Number:	TBC
Category of Premises:	AGC

## Organisation

Operating Company:	Royal Amusements
Operating Licence Number:	TBC

## Assessment Writer

Name of Person Writing this Assessment:	Alison Vainard
Position within Company or Name of Authorised Agent:	
Date of this Assessment	
Date that Original Assessment was Written	

## The Gambling Act 2005 – The Licensing Objectives

The Gambling Act 2005 sets out three licensing objectives:

- (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

In compliance with the Gambling Commission Licence Conditions and Codes of Practice 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

This document seeks to identify and assess the risk to the licensing objectives that the operation may pose in accordance with Code Provision 10.1.1 of the Gambling Commission's License Conditions and Codes of Practice. This risk assessment will also set out measures designed to mitigate the identified risks

This Local Area Risk Assessment has been prepared for the Premises using;

- local knowledge,
- the Gambling Commission Statement of Principles for Licensing and Regulation,
- the Gambling Licensing Policy of the Local Authority
- Local Risk Profile Document as prepared by the Local Authority
- area vulnerability maps and
- Geofutures Gambling Research

### Local Area and Site Profile

The Adult Garming Centre is situated in Northgate and occupies a prominent position, in between the junctions of Corporation Street and Halifax Road in the centre of Dewsbury. The surrounding area is predominantly retail with Dewsbury Train Station being within 250 metres.

The venue has a single door entrance/exit at street level to the front on to Northgate. A CCTV monitor situated at the premises allows staff to view and monitor internally as well as the street level entrance.

#### **Dewsbury – The Town**

Dewsbury is a minster and market town in the Metropolitan Borough of Kirklees in West Yorkshire, England. It is to the west of Wakefield, east of Huddersfield and south of Leeds.

English is spoken as the main language by 90% of people in Dewsbury while the other top languages spoken are Gujarati, Panjabi, Urdu, Bengali, Polish, Pakistani Punjabi, Arabic and Kurdish.

The median average age in Dewsbury in 2021 was 39, with over 18s representing 69.2% of the population. The sex ratio was 49.5% males and 50.5% females.

The largest religious group in Dewsbury is Muslims who account for 46% of the population.

#### **The Local Area**

The subject property is located on Northgate in the Town Centre.

The property occupies a trading location in between The Time Piece Public House (currently closed) and the Pioneer Higher Skills Centre campus of Kirklees College where there is a mix of both independent traders along with national multiples along with other local and regional traders.

#### **Unemployment**

Around 2% of the working age population in Dewsbury and Mirfield claim Jobseekers Allowance; This figure is consistent across Kirklees and at its lowest level since 2007. Over half of the adult population is in employment, with a further one in five people being retired and one in 50 in education.

#### **Deprivation**

Dewsbury is one of the most deprived towns in the UK and Dewsbury is among the 10% most deprived towns in England. Many of its residents face worryingly high levels of deprivation and ill-health, while skill levels and incomes are also below average. According to the Dewsbury Town Fund Investment Plan Socio-economic assessment of Dewsbury prepared on 24 September 2020 relative deprivation is severe in almost all aspects of life: education, crime, employment, incomes and the quality of the local environment. Only in relation to access to housing and local services is Dewsbury less deprived than average.



### **Establishments of Note**

Although there are not any gambling premises on Northgate the closest is an Admiral AGC around 100m away at 5-7, Queensway Arcade, Dewsbury WF13 1DY

There is a school uniform shop at 7 Northgate, Dewsbury WF13 1DS

The Pioneer Higher Skills Centre campus of Kirklees College is a few yards away from the premises

### **Adjoining Premises**

The property is a detached property and separate by a roads / streets from the adjoining properties – across the road to the left is The Time Piece Public House (currently closed) and across the road to the right is the Pioneer Higher Skills Centre campus of Kirklees College. The building itself is split into 2 units, the AGC and a currently vacant retail unit.

### **Crime Statistics – see *Crime Statistics Map at end of document***

Dewsbury is the second safest major town in West Yorkshire, but is among the top 20 most dangerous overall out of West Yorkshire's 118 towns, villages, and cities. The overall crime rate in Dewsbury in 2022 was 139 crimes per 1,000 people. This compares poorly to West Yorkshire's overall crime rate, coming in 10% higher than the West Yorkshire rate of 126 per 1,000 residents. For England, Wales, and Northern Ireland as a whole, Dewsbury is among the top 20 most dangerous major towns, and the 276th most dangerous location out of all towns, cities, and villages.

### **Population**

The population of Dewsbury is 63,722 according to 2021 census figures. Dewsbury covers an area of 15.58 square kilometres and has a population density of 4,090 people per square kilometre (km<sup>2</sup>), based on the latest population estimates taken in mid-2021.

### **Culture**

The town has a large Muslim community. Savile Town and Ravensthorpe are populated mainly by Muslims of Indian and Pakistani origin. In recent years, there has also been an immigration of Iraqi Kurds and Hungarians into the town. According to the 2021 census, White British people comprised 50% of Dewsbury's population. Asian British were 44% of the population, with the majority of them being Pakistani and Indian origin or descent. Others (Black, Arab and other ethnic groups) constitute 6% of the population.

**Schools/Educational Establishments – see Schools / Educational Establishments map at end of document**

*There are a number of such premises in and / or around the town centre, including but not limited to*  
The Pioneer Higher Skills Centre campus of Kirklees College is across the road and to the right of the Premises.  
The Kirklees College Springfield Sixth Form Centre on Halifax Road is approximately ¾ mile away  
The following schools are close to the town centre  
Dewsbury Learning Quarter, Westtown, Dewsbury WF13 2TJ  
Ethos College, Knowles Hill Rd, Dewsbury Moor, Dewsbury WF13 4QS  
Ravenshall School, 3 Ravenssthorpe Rd, Dewsbury WF12 9EE  
Al-furqaan Preparatory School, Drill Hall House, Bath St, Dewsbury WF13 2JR  
Boothroyd Primary Academy, Temple Rd, Dewsbury WF13 3QE  
Eastborough Junior Infant & Nursery School, Rockley St, Dewsbury WF13 1NS  
Kirklees & Wakefield Pre-school Learning Alliance, Wood St, Dewsbury WF13 1QU  
Madni Academy, 40-42 Scarborough St, Dewsbury WF12 9AY

It is not unusual to see young adults frequenting the college and / or school children in the town shopping after school hours and / or using the bus and train / tram links. The risk of these children gambling is mitigated by the processes as detailed in the Risk Assessment. It should also be noted that there will be no visibility of gambling through the entrance or windows of the premises.

**Community Centres and Youth Centres**

*There are a number of such premises in and / or around the town centre, including but not limited to*  
Thornhill Lees Community Centre, 53 Brewery Ln, Dewsbury WF12 9DU  
Taleem Training & Community Centre, 36 Orchard St, Saville Town, Dewsbury WF12 9LT  
Ravenssthorpe Community Centre Ltd, 24 Garden St, Ravenssthorpe, Dewsbury WF13 3AR  
Lewisham Park Youth Centre, Clough St, Morley, Leeds LS27 8DH  
Dewsbury West Community Centre, Church St, Ravenssthorpe, Dewsbury WF13 3LA

**Parks, Play Grounds and Sports/Leisure Facilities - see Parks / Play Grounds map at end of document**

Although there are a number of such venues across Dewsbury there are not any parks / playgrounds in the immediate vicinity of the premises

*There are a number of such premises in and / or around the town centre, including but not limited to*  
Crow Nest Park Dewsbury, Heckmondwike Rd, Dewsbury WF13 2SG  
Holroyd Park Bowling Pavilion, Holroyd Park, The Crescent, Dewsbury WF13 3AY  
Reclory Park Play area, Dewsbury WF12 0JY  
Dewsbury Country Park, Park Rd, Dewsbury WF13 3TH  
Staincliff Park Playground, Staincliffe, Dewsbury WF13 4DG  
Dewsbury Sports Centre, Longcauseway, Dewsbury WF12 8EN (however this is temporarily closed as of September 2023)

### **Gambling Premises**

It is noted that the following gambling premises are within the town centre

#### Licensed Bookmakers

Cargills, 12 Corporation Street, Dewsbury WF13 1QL  
Ladbrokes, 11-12 Market Place, Dewsbury WF13 1QQ  
William Hill, 42 Market Place, Dewsbury WF13 1DW  
Betfred, 16-20 Westgate, Dewsbury WF13 1BL

#### Adult Gaming Centres

Admiral 5-7, Queensway Arcade, Dewsbury WF13 1DY  
Admiral 2 Longcauseway, Dewsbury WF12 8EN  
Merkur 38-40, Market Place, Dewsbury WF13 1DW  
Storeys Amusement's 29 Westgate, Dewsbury WF13 1JQ

### **Public Houses & Licensed Premises**

*There are a number of such premises in and / or around the town centre, including but not limited to Time Piece Public House (currently / temporarily closed), The Black Bull, Wellington Tavern, West Riding Refreshment Rooms and Beehouses*

All of these premises operate at least 2 x gaming machines.

### **Banks & ATM machines**

*There are a number of such premises in and / or around the town centre, including but not limited to*

#### Banks

NatWest 2 Northgate, Dewsbury WF13 1EA  
Lloyds Bank, 20 Market Place, Dewsbury WF13 1DF  
Barclays Bank, Market Pl, Dewsbury WF13 1PT  
Halifax, 37 Westgate, Dewsbury WF13 1JH  
Virgin Money, 46 Market Pl, Dewsbury WF13 1DN

#### ATM Machines

ATM machines are available widely in the town centre, eg  
Money Matters Pawn Shop, 1a Bradford road  
Post Office, 10 Corporation St and  
The Train Station, Railway Street

### **Pawnbrokers and Loan Shops**

*There are a number of such premises in and / or around the town centre, including but not limited to*  
N&n, Pawnbrokers, 10 Northgate, Dewsbury, WF13 1DT  
Money Penny's, Pawnbrokers, 18 Corporation St, Dewsbury, WF13 1QL  
Money Matters, Pawnbrokers, 1A Bradford Road, Dewsbury, West Yorkshire, WF13 1EL  
Gold Buying Centres, Pawnbrokers, 10 High St North, Dewsbury, WF13 1DT

### **Medical Centres, Care Homes and Mental Health facilities - see Medical centres, Care Homes and Mental Health Facilities map at end of document**

*There are a number of such premises in and / or around the town centre, including but not limited to*  
Manor Health Clinic, Savile Manor, Savile Rd, Dewsbury WF12 9LN  
Thomas Owen House, Lees House Rd, Dewsbury WF12 9BP  
Oak Park Care Home, Walnut Ln, Dewsbury WF12 8NJ  
Ashworth Grange Care Home, Ashworth Grange, Ashworth Green, Dewsbury WF13  
Manorcroft Care Home, 153 Old Bank Rd, Dewsbury WF12 7AH  
Aston Manor, 69-73 Moorlands Rd, Dewsbury WF13 2LF  
Eightlands Surgery, Wellington Rd, Dewsbury WF13 1HN

### **Churches/Meeting Places for Vulnerable People - see Places of Worship map at end of document**

*At the time of this Assessment the following centres were noted as being close to / in the town centre. It is likely that most if not all of these premises will provide services and support for the vulnerable. The list is not exhaustive:*  
Anchor Ministries Dewsbury, Unit 2, Eshald Mills, off Bradford Rd, Dewsbury WF13 2DU  
Dewsbury Gospel Church, 20 W Park St, Dewsbury WF13 4LA  
Dewsbury Evangelical Church, Central Offices, Central St, Westtown, Dewsbury WF13 2LZ  
Dewsbury Community Outreach, 74 Daisy Hill, Dewsbury WF13 1LS  
Dewsbury Minster - Mother Church of West Yorkshire, Vicarage Rd, Dewsbury WF12 8DD

### **Vulnerability and Addiction Support Services - see Vulnerability and Addiction Support Services map at end of document**

*At the time of this Assessment the following centres were noted as being close to / in the town centre. It is likely that most if not all of these premises will provide services and support for the vulnerable. The list is not exhaustive:*

CHART Kirklees / Choices For Health In Addiction Recovery & Treatment - Change, Grow, Live, 3 Wellington St, Dewsbury WF13 1LY  
Family Support Services, 2 Quarry Rd, Dewsbury WF13 2RZ  
Dewsbury Community Outreach, 74 Daisy Hill, Dewsbury WF13 1LS  
Priority Hospital Dewsbury, York Rd, Dewsbury WF12 7LB

### **Homeless Shelters and Food Banks**

*At the time of this Assessment the following centres were noted as being close to / in the town centre. It is likely that most if not all of these premises will provide services and support for the vulnerable. The list is not exhaustive:*

Batley Homeless Project, 4 Bond Street Dewsbury WF13, 4 Bond St, Dewsbury WF13 1AG  
Fusion Giving Food Bank, Empire House, Wakefield Rd, Dewsbury WF12 8DJ  
Dewsbury South Community Support, 22 Brewery Ln, Thornhill Lees, Dewsbury WF12 9DZ.

### **Residential Areas & Transport Links**

There are residential areas close to the town centre as well as residential premises within the town centre. The accommodation in the area around the town centre consists of a great deal of terraced housing as well as Local Authority built housing. A significant number of houses in the housing stock is rented from the local authority / private landlords with some owned with a mortgage. Properties are occupied by a mixture of single persons and families.

Dewsbury Bus Station is the only bus station serving the town. It is located next to Aldams Road and can be accessed there and from South Street – it is a short walking distance from the premises, around 400 yards. It is the main hub for bus services in the town centre.

Dewsbury Train Station is the only train station serving the town. It is located on the A638 ring road and can be accessed there and from the top of bond Street – it is a short walking distance from the premises, around 200 yards. It is the main hub for train services in the town centre.

**Further Considerations:**

The Kirklees Local Area Profile

We have noted from the Kirklees Local Area Profile there is a particular Lower layer Super Output Area (LSOA) in Dewsbury, which is considered to be very high risk - that being the area and streets around Saville Road, Mill Street East and Mill Street West.

This Local Area Risk Assessment takes into account that there will be closer scrutiny of applications where they fall within, or near to, the areas highlighted as high risk - we note the subject premises of this Local Area Risk Assessment falls near to the highlighted area as the highlighted is less than a mile away from Northgate.

This Local Area Risk Assessment will therefore demonstrate that the risks identified have been considered and we have taken the necessary and appropriate steps to mitigate those risks.

We have taken note of the information and date in the following maps from the Kirklees Local Area Profile

- Dewsbury Gambling Local Area Profile - All Risk Factors Combined
- Dewsbury Gambling Local Area Profile - Index of Multiple Deprivation 2015
- Dewsbury Gambling Local Area Profile - Percentage Unemployment
- Dewsbury Gambling Local Area Profile - Percentage Ethnic Minorities
- Dewsbury Gambling Local Area Profile - Percentage 11-24 Year Olds
- Dewsbury Gambling Local Area Profile - Crime and Anti-Social Behavior Incidence

Kirklees Gambling Act 2005 Statement of Principles 2022 – 2025

Local Area Risk Assessment

In undertaking this local risk assessment, we understand and appreciate Kirklees Council will expect us to take into account:

- whether the premises is in an area of deprivation
- whether the premises is in an area subject to high levels of crime and/or disorder
- the ethnic profile of residents in the area
- the demographics of the area in relation to vulnerable groups
- the location of services for children such as schools, playgrounds, toy shops, leisure centres and other areas where children will gather
- health information and data relating to gambling related harm

Areas of consideration can be broken down as follows

## **The Local Area**

### Matters relating to children and young persons including but not limited to the below examples

The football in the local area, Significant presence of young children, Institutions, places or areas where the presence of children and young persons should be expected, any premises where children congregate, areas that are prone to issues of youths participating in anti-social behavior, recorded incidents of attempted underage gambling, transport links and parking facilities, community centres, high crime areas and other gambling premises in the vicinity

### Matters relating to vulnerable adults including but not limited to the below examples

Information held by the licensee regarding self-exclusions and incidences of underage gambling, Gaming trends, Arrangement for localised exchange of information regarding self exclusions and gaming trends, Proximity of premises which may be frequented by vulnerable people Homeless or rough sleeper shelters, hostels and support services, Transport links and parking facilities, Community centres, High crime areas, High unemployment areas, Pawn broker / pay day loan businesses in the vicinity, Other gambling premises in the vicinity and

### The Gambling Operation including but not limited to the below examples

How the gambling operation will relate to how the business is conducted, What gambling products will be provided in the premises  
The facilities to enable gambling within the premises, The staffing levels within the premises, The level and requirement for staff training  
Whether loyalty or account cards are used, The policies and procedures it has in place in relation to regulatory requirements of the Gambling Act 2005 or to comply with the LCCP, The security and crime prevention arrangements, How advertising will be conducted locally and on the premises, The marketing material within the premises, The display and provision of information, etc.

### The Design of Premises including but not limited to the below examples

Whether the premises has anything which would obstructing the view of the gaming machines from the cashier counter, The design of the entrance to the premises and its impact on identification, Premises which are located within an area which has a high number of children and young people present throughout the day may, Identify that the standard external design means that children and young people can see into the premises and see gambling taking place

### Local Area Risk Profile including but not limited to the below examples

Aim to include data and maps which show the distribution of gambling premises and sensitive locations and vulnerable communities  
For example, Educational establishments, Relevant leisure facilities, Medical facilities, care homes, and temporary accommodation  
Places of worship, Hot spot areas combining the educational establishments/leisure facilities / medical facilities, Areas of deprivation, Areas of unemployment, Areas where residents claim working age benefits, Areas of poor mental health, Violence hot spots, Drug and alcohol hot spots

Licensing Objective	Local Risk	Risk Management
<p><b>Preventing Gambling From Being a Source of Crime or Disorder, Being Associated With Crime or Disorder or Being Used to Support Crime</b></p>	<p>Anti-social behavior            Poor security            increase vulnerability to crime and disorder and failing to protect employees and customers from harm</p> <p>Money Laundering (Dye-stained notes, fake notes, foreign coins, criminal spend etc)</p> <p>Commission of criminal offences to fund problem gambling</p>	<ul style="list-style-type: none"> <li>- The premises will be fitted with a high quality CCTV system with coverage of all public areas including all entry and exit points</li> <li>- CCTV will be clearly advertised to customers with screens visible to staff and the capability for remote viewing by a dedicated team at head office and provide footage to relevant authorities as required</li> <li>- The layout of the premises is designed to avoid blind spots and continuous observation of the single entry / exit point, machines and the toilet with staff remaining on the floor at all times to interact with customers and identify underage or vulnerable persons</li> <li>- We have reviewed the police.uk hot spot mapping for Northgate and are aware of the crime map, the statistics, the different types of recorded crime, vulnerable people, vulnerable places and we are alive to the issue of problem gambling. It is our intention to make efforts to liaise with West Yorkshire Police to ensure our involvement as a business does not play any part in criminal activity in the area</li> <li>- Staff training includes the ability to identify problematic situations and aggressive customers</li> <li>- Royal Amusements will participate with any local / city centre scheme and actively seek to support and be involved with local initiatives aimed towards reducing crime and disorder and if necessary share information with other local stakeholders to further this aim</li> </ul>



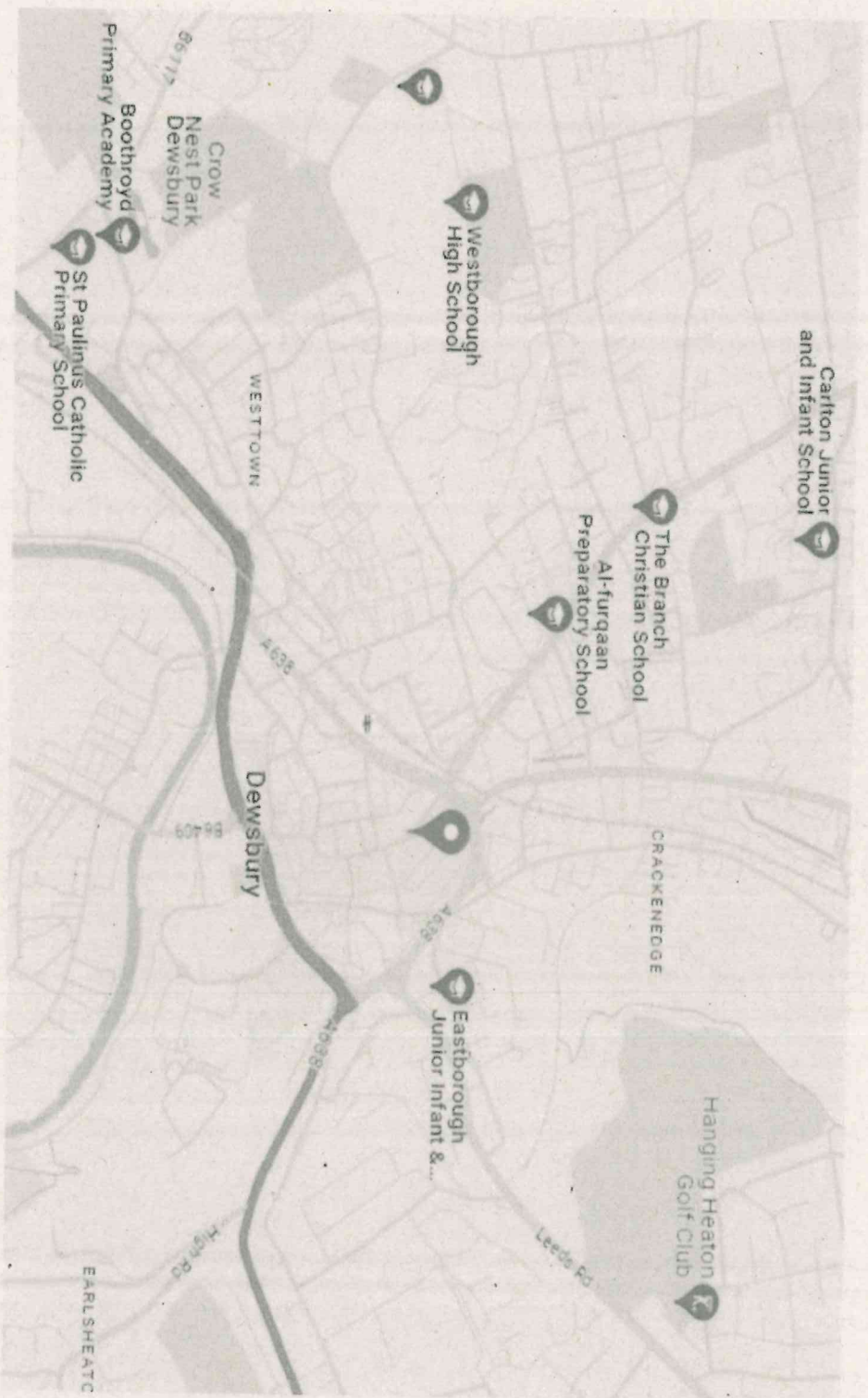
		<ul style="list-style-type: none"><li>- Whilst public nuisance is not a Licensing Objective and the Gambling commission makes clear that disorder means serious disorder, we recognize the risks and potential escalation and therefore will work in partnership with West Yorkshire Police and Kirklees Council to reduce this risk</li><li>- Staff are trained to monitor the outside of the premises and surrounding areas (as well as the inside of the premises) and take appropriate steps to minimise risks - the CCTV monitor allows for viewing of the exterior and interior of the premises</li><li>- The organisation has a designated Money Laundering Reporting Officer and anti money laundering policies with which staff will be trained</li><li>- Adequate staff levels will always be maintained and subject to regular review and risk assessment</li><li>- Antisocial behavior caused by alcohol is not tolerated within the premises and there are policies and procedures in place to deal with any issues - in addition there is the "No Alcohol" signage</li><li>- Drugs misuse is not tolerated on the premises and in those locations where there is a heightened risk, toilets are locked with access monitored and controlled by staff</li><li>- Staff are trained to refuse access to any person who is or appears to be under the influence of alcohol or drugs or</li><li>- Staff are trained to be extra vigilant where there are an issue of street drinking and the business encourages a partnership approach with local stakeholders and authorities</li></ul>
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Licensing Objective	Local Risk	Risk Management
<p><b>Ensuring That Gambling is Conducted in a Fair and Open Way</b></p>	<p><b>Advertising Standards and Marketing</b></p> <p><i>Failure to deal with customers making complaints about the outcome of gambling</i></p> <p><i>Failure to display Terms and Conditions</i></p>	<ul style="list-style-type: none"> <li>- All advertising and marketing by the business is compliant with legal obligations in the UK and does not amount to or involve misleading statements</li> <li>- All advertising and marketing is legal, decent, honest, and truthful</li> <li>- All advertising is prepared with a sense of responsibility to our customers and society at large</li> <li>- All advertising and marketing is respectful to the principles of fair competition generally accepted in business</li> <li>- All advertising and marketing is checked to ensure it does not contain anything that is likely to lead people to adopt styles of gambling that are unwise</li> <li>- All advertising and marketing is socially responsible and does not encourage excessive gambling</li> <li>- All advertising and marketing is prepared with care so as not to exploit the young, the immature or those who are mentally or socially vulnerable</li> <li>- All advertising and marketing is prepared with care so as not to be directed at those under the age of 18 years</li> <li>- All advertising and marketing is prepared with care such that there is honesty at all times with regard to the chances of winning, the likelihood of a big win, and the odds or payout ratio that applies to the gambling on offer</li> </ul>

		<ul style="list-style-type: none"><li>- All advertising and marketing carries a reference for the need to keep gambling under control</li><li>- All advertising and marketing is prepared with care such that it is never suggested or implied that gambling is a means of getting out of financial difficulty</li><li>- Advertising and marketing material should not appear on any primary web page/screen or micro-site that provides advice or information on responsible gambling</li><li>- Machines are only purchased from licensed suppliers</li><li>- Machine compliance checks and maintenance conducted by a qualified technician when installing new machines</li><li>- Customer complaints policies and procedures in place</li><li>- Complaints policy and procedure displayed prominently in each site</li><li>- Complaint forms will be available at the premises</li><li>- Terms and Conditions will be displayed prominently within the premises</li></ul>
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Licensing Objective	Local Risk	Risk Management
<p><b>Protecting Children and Other Vulnerable People From Being Harmed or Exploited by Gambling</b></p>	<p>Children entering the site unnoticed</p> <p>Children enter site with adult</p> <p>Children enter site and play before being noticed</p> <p>Children enter site and play where age is misjudged</p> <p>Children enter site and play where age is misjudged</p> <p>Age verification is not sought</p> <p>Young person wearing face covering is not challenged for verification of age</p> <p>Children knowingly allowed to play</p> <p>Children vulnerable to sexual exploitation by customers</p> <p>Those who are vulnerable through abuse of drugs and/or alcohol having access to gambling. Those considered to be vulnerable, having access to gambling (where</p>	<ul style="list-style-type: none"> <li>- Layout of premises considered in staff numbers - a minimum of 2 staff are on duty at any one time. Breaks and shift changes are planned to take account of school closing times to ensure there is always supervision of the gaming area</li> <li>- Staff deployed to specific areas for which they have responsibility</li> <li>- Machine layout takes into consideration lines of site to the entrance</li> <li>- CCTV cameras positioned to cover all parts of the premises but specifically the entrance</li> <li>- We will operate a 'Challenge 25' policy in which all staff are trained at induction and they receive regular refresher training</li> <li>- All staff are trained in social responsibility as part of their induction and are provided with regular refresher training</li> <li>- Clear 'Over 18' signage is displayed, visible from outside and also in the entrance to the premises</li> <li>- Staff are trained to look for the signs of CSE</li> <li>- Staff log all attempts to enter by young persons on the appropriate log</li> <li>- Staff have been trained to ask a customer to lower a face covering if necessary, this has the effect of allowing staff to adjudge the apparent age of all customers and if necessary challenge for verification by the presentation of ID.</li> </ul>

	<p>'vulnerable' to include but not limited to those suffering from mental illness, recently bereaved, suffering from long-term or terminal illness, difficulty communicating, learning disability, substance misuse or addiction, breakdown of close personal relationships etc)</p> <p>Failure to provide information to players on responsible gambling</p> <p>Failure to provide information in a suitable format</p> <p>Failure to recognise signs of problem gambling</p> <p>Failure to interact with customer displaying signs of problem gambling</p> <p>Failure to sign-post customer to help and support</p> <p>Failure to properly administer self-exclusion</p> <p>Failure to impose exclusion in locality and in same types of establishments</p> <p>Customer breaches of self-exclusion</p> <p>Customer breaches self-exclusion by using another to gamble on their behalf</p>	<ul style="list-style-type: none"> <li>- Responsible Gambling messages are displayed prominently</li> <li>- Posters/Leaflets with online links for GAMCARE, Playnice.org and Gambleaware are displayed</li> <li>- Responsible Gambling information stickers on all machines</li> <li>- Policies and procedures in place for customer interaction and staff intervention where necessary</li> <li>- Staff training includes policies and procedures for self-exclusion</li> <li>- Digital cameras or appropriate devices are provided across the estate to take an image of customers wishing to self-exclude so that the exclusion can be effectively enforced</li> </ul>
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**Schools / Educational Establishments**

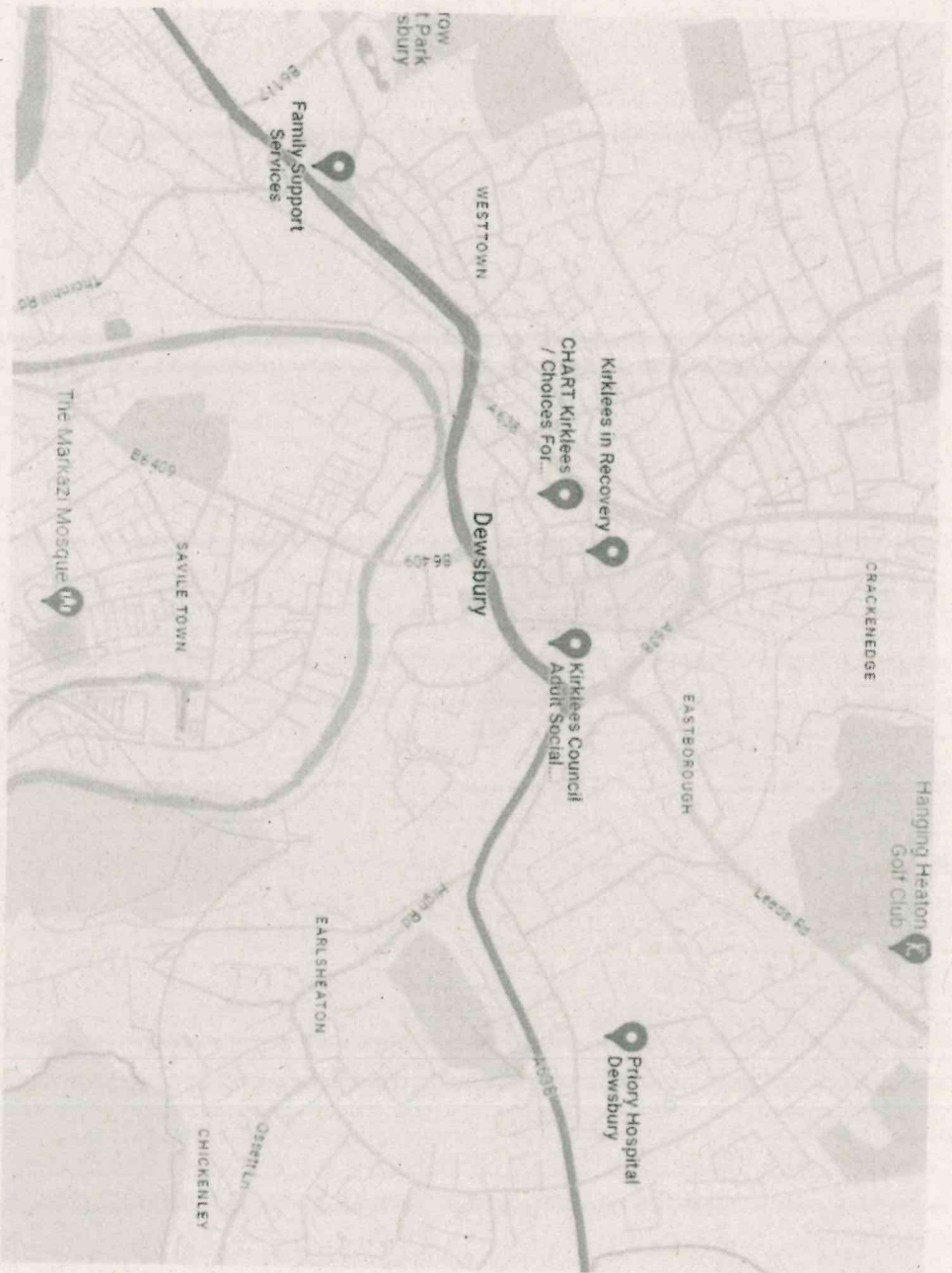
Carton Junior and Infant School, Upper Rd, Dewsbury WF13 2DQ  
 Al-furqaan Prep School, Drill Hall House, Bath St, Dewsbury WF13 2JR  
 Eastborough Junior & Nursery School, Rockley St, Dewsbury WF13 1NS  
 Boothroyd Primary Academy, Temple Rd, Dewsbury WF13 3QE

The Branch Christian School, W Park St, Dewsbury WF13 4LA  
 Westborough High School, Stockhill St, Dewsbury WF13 2JE  
 St Paulinus Catholic Primary School, Temple Rd, Dewsbury WF13 3QE  
 St. John's C.E. (C) Infant School, Boothroyd Ln, Dewsbury WF13 2LP



**Parks / Playgrounds**

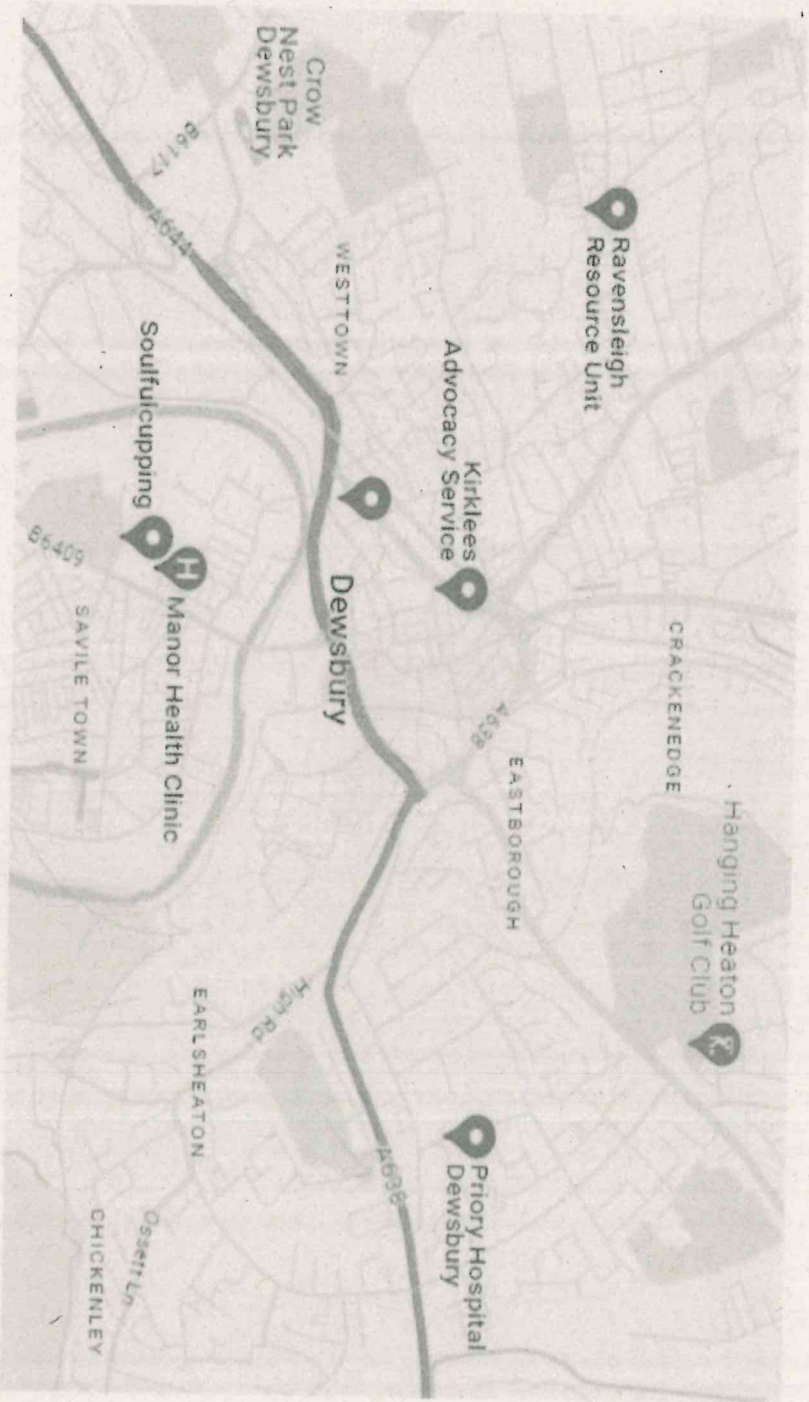
- Crow Nest Park Dewsbury, Heckmondwike Rd, Dewsbury WF13 2SG
- Reactory Park Play area, Dewsbury WF12 0JY
- Staincliffe Park Playground, Staincliffe, Dewsbury WF13 4DG
- Dewsbury Sports Centre, Longcauseway, Dewsbury WF12 8EN (however this is temporarily closed as of September 2023)
- Holroyd Park Bowling Pavilion, The Crescent, Dewsbury WF13 3AY
- Dewsbury Country Park, Park Rd, Dewsbury WF13 3TH
- The Park, Iilahi Park, Krazy Kingdom Ltd



**Vulnerability and Addiction Support Services**

- Kirklees in Recovery, 10 Union St, Dewsbury WF13 1BH
- CHART Kirklees / Choices For Health In Addiction Recovery & Treatment, 3 Wellington St, Dewsbury WF13 1LY
- The Luke & Marcus Trust, 7 Wellington St, Dewsbury WF13 1LY





**Medical Centres, Care Homes and Mental Health facilities**

- Ravensleigh Resource Unit, 28 Oxford Rd, Dewsbury WF13 4LL
- Kirklees Advocacy Service, Dewsbury Ring Rd, Dewsbury WF13 1HQ
- Soulfulcupping, Park Rd, Savile Town, Dewsbury WF12 9LW
- Manor Health Clinic, Savile Manor, Savile Rd, Dewsbury WF12 9LN
- Priory Hospital Dewsbury, York Rd, Dewsbury WF12 7LB



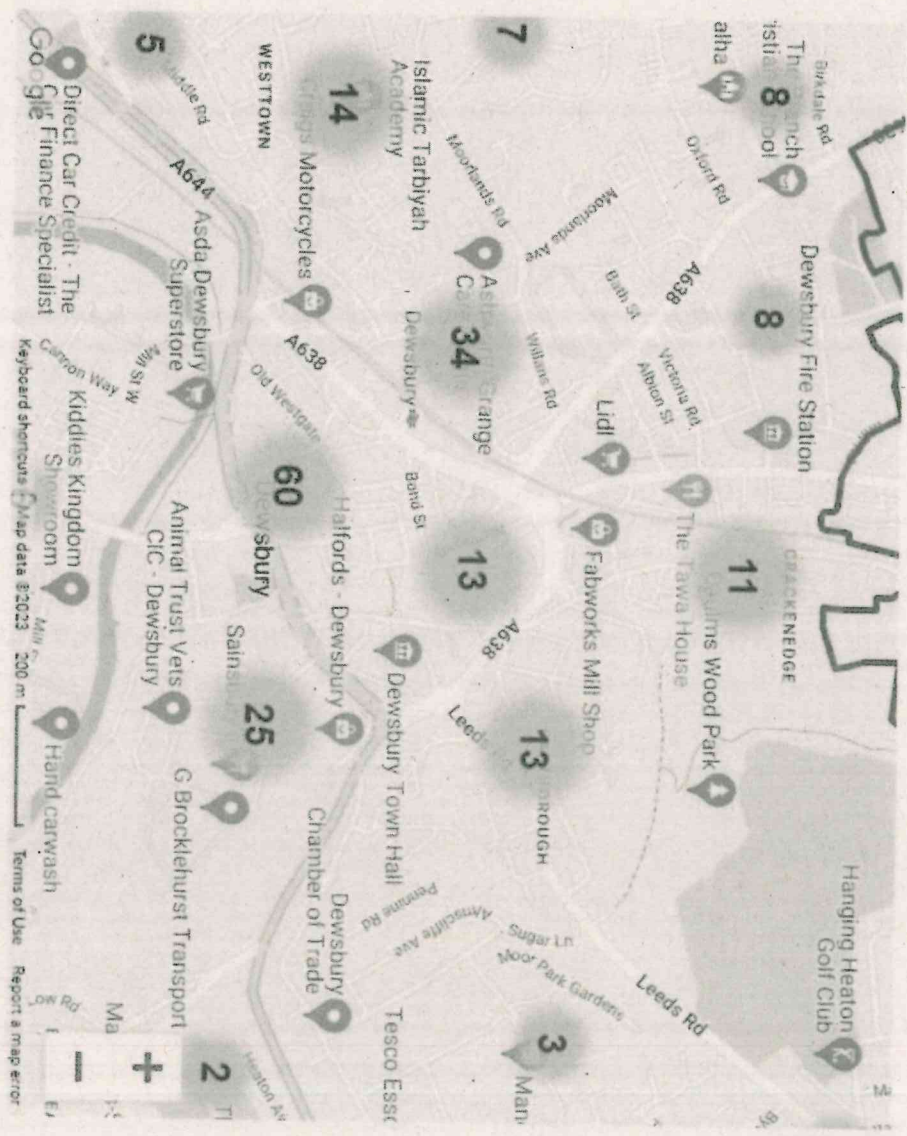
**Places of Worship**

The Church of Jesus Christ, 86 Halifax Rd, Dewsbury WF13 4JD  
 Longcauseway Church Princess of wales precinct, Dewsbury WF13 1NH  
 St. Joseph's Catholic Church Naylor St, Dewsbury WF13 2DF  
 Saint John the Evangelist 140B Boothroyd Ln, Dewsbury WF13 2LP  
 Westborough Methodist Church 5 Brunswick St, Dewsbury WF13 4ND  
 Dewsbury Team Parish 16A Oxford Rd, Dewsbury WF13 4JT

Anchor Ministries Eshald Mills, off Bradford Rd, Dewsbury WF13 2DU  
 Dewsbury Evangelical Church, Central St, Westtown, Dewsbury WF13 2LZ  
 Dewsbury Baptist Church Manor St, Dewsbury WF12 8ED  
 Our Lady & St Paulinus Cemetery Rd, Dewsbury WF13 2SE  
 Dewsbury Minister Vicarage Rd, Dewsbury WF12 8DD  
 Dewsbury Gospel Church 20 W Park St, Dewsbury WF13 4LA



Local Crime Map

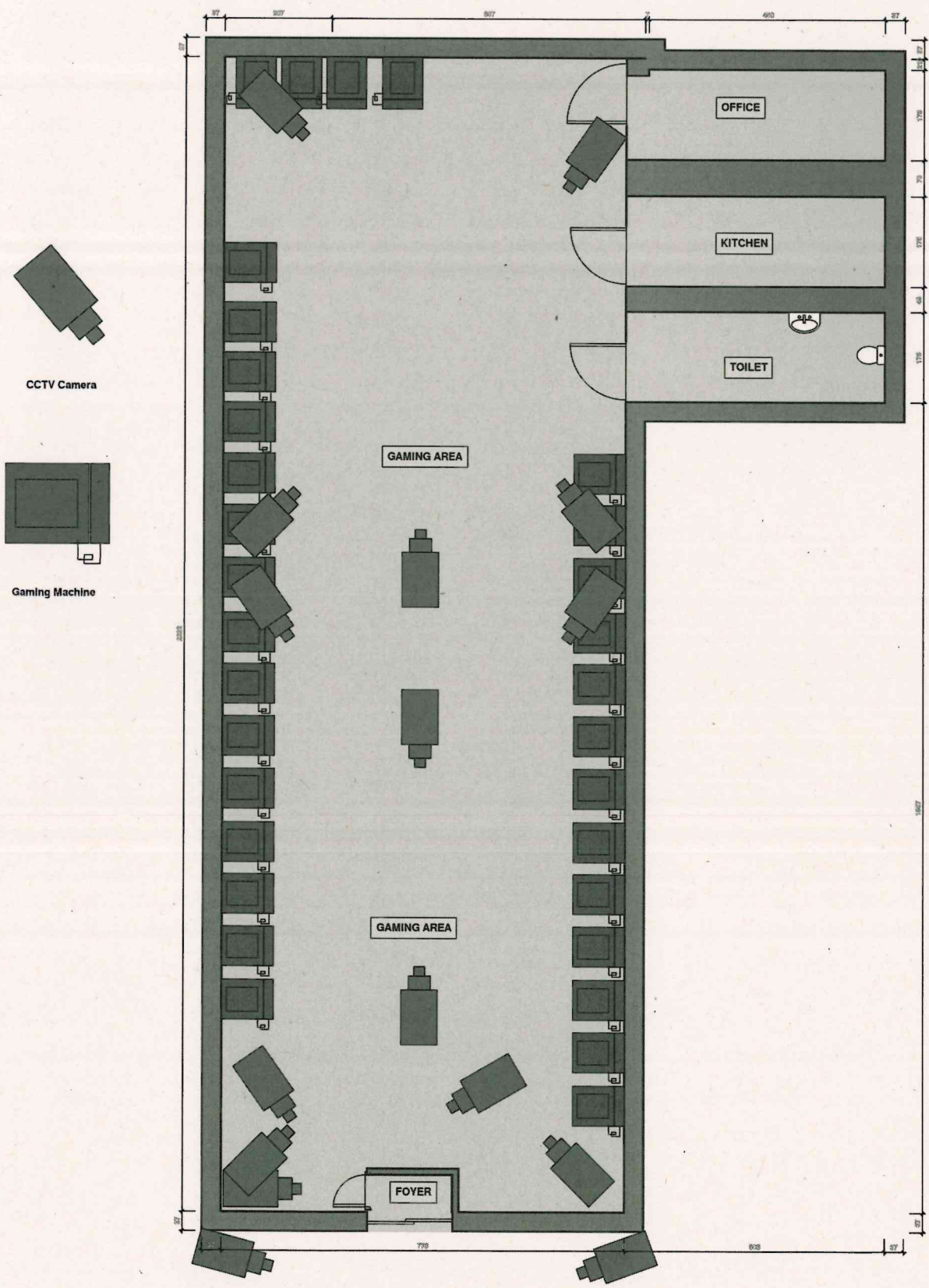


All Crimes (948)
<b>All Crimes (948)</b>
Anti-social behaviour (106)
Burglary (36)
Criminal damage and arson (97)
Drugs (22)
Other theft (60)
Possession of weapons (5)
Public order (93)
Robbery (3)
Shoplifting (29)
Theft from the person (10)
Vehicle crime (42)
Violence and sexual offences (424)
Other crime (21)

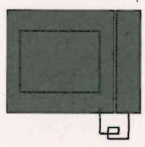
View crime definitions

Download area crime data

Map data ©2023 200 m Terms of Use Report a map error



CCTV Camera



Gaming Machine

GAMING AREA

GAMING AREA

OFFICE

KITCHEN

TOILET

FOYER

Northgate