



Alcohol and Entertainment Licensing Sub-Committee – Supplementary 1

Thursday 17 October 2024 at 10.00 am

Members Suite - 4th Floor, Brent Civic Centre,
Engineers Way, Wembley, HA9 0FJ

Please note that this meeting will be held in person with members of the Sub-Committee required to attend in person.

The press and public are also welcome to attend this meeting in person. Please note the meeting is not scheduled for live webcast

Membership:

Members

Councillors:

Ahmed (Chair)
Long (Vice-Chair)
Mahmood

Substitute Members

Councillors:

Ahmed, Ethapemi, Hack, Hylton, Lorber, Mahmood,
Rajan-Seelan

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If a Member is aware they have a Personal Interest** in an item of business, they must declare its existence and nature at the start of the meeting or when it becomes apparent.

If the Personal Interest is also significant enough to affect your judgement of a public interest and either it affects a financial position or relates to a regulatory matter then after disclosing the interest to the meeting the Member must leave the room without participating in discussion of the item, except that they may first make representations, answer questions or give evidence relating to the matter, provided that the public are allowed to attend the meeting for those purposes.

***Disclosable Pecuniary Interests:**

- (a) **Employment, etc.** - Any employment, office, trade, profession or vocation carried on for profit gain.
- (b) **Sponsorship** - Any payment or other financial benefit in respect of expenses in carrying out duties as a member, or of election; including from a trade union.
- (c) **Contracts** - Any current contract for goods, services or works, between the Councillors or their partner (or a body in which one has a beneficial interest) and the council.
- (d) **Land** - Any beneficial interest in land which is within the council's area.
- (e) **Licences**- Any licence to occupy land in the council's area for a month or longer.
- (f) **Corporate tenancies** - Any tenancy between the council and a body in which the Councillor or their partner have a beneficial interest.
- (g) **Securities** - Any beneficial interest in securities of a body which has a place of business or land in the council's area, if the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body or of any one class of its issued share capital.

****Personal Interests:**

The business relates to or affects:

- (a) Anybody of which you are a member or in a position of general control or management, and:
 - To which you are appointed by the council;
 - which exercises functions of a public nature;
 - which is directed is to charitable purposes;
 - whose principal purposes include the influence of public opinion or policy (including a political party or trade union).
- (b) The interests a of a person from whom you have received gifts or hospitality of at least £50 as a member in the municipal year;

or

A decision in relation to that business might reasonably be regarded as affecting the well-being or financial position of:

- You yourself;
- a member of your family or your friend or any person with whom you have a close association or any person or body who is the subject of a registrable personal interest.

Agenda

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Date of the next meeting: Date Not Specified



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Agenda Item 3

MERKUR SLOTS, 67 HIGH STREET, HARLESDEN

LICENSING SUB-COMMITTEE HEARING – 27 AUGUST 2024

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BRENT COUNCIL LICENSING SUB-COMMITTEE
APPLICATION FOR BINGO PREMISES LICENCE
67 HIGH STREET, HARLESDEN, LONDON NW10 4NS

SKELETON ARGUMENT ON BEHALF OF APPLICANT

Introduction

1. This is an application by Merkur Slots UK Limited (“the applicant”) for a bingo premises licence.
2. The applicant is the largest operator of such premises in the UK, with over 230 licensed gambling premises, principally in town and city centres. It is a highly competent and conscientious operator that has satisfied authorities across the UK that it can be trusted to operate premises in such a way as to promote the licensing objectives.
3. One mark of its competence is that it has been granted licences in every premises for which it has made an application. Furthermore, none of its licenses has ever been reviewed. While sometimes representations are made, its record demonstrates that after licences are granted it operates in full conformity with the licence objectives, and the concerns expressed by those making representations do not materialise. The applicant has no reason to believe that, if this licence is granted, its premises at 67 High Street will be any different.
4. Representations against the application have been made by ward councillors and a number of local residents. In response to their concerns, the applicant has:
 - a. filed a substantial bundle setting out in detail how the applicant promotes the licensing objectives, and responding to the matters raised;
 - b. proposed a list of 25 conditions to promote the licensing objectives.
5. The applicant takes representations seriously. In order to do justice to them and respond adequately, it has been necessary to file extensive evidential and other material to show how the applicant promotes the licensing objectives, and the high standards to which it holds itself. The purpose of this skeleton argument is to help the Sub-Committee navigate the material by setting out some of the background to the application, explaining the legal context under the Gambling Act 2005, and making brief submissions dealing with the written representations.

6. In considering the application, the Committee may be particularly assisted by looking at the following documents:
 - Witness statements:
 - Amanda Kiernan, Head of Compliance (page 28-36)
 - Steve Ambrose, Operations Director (page 37-39)
 - Nigel Davies, Head of Gaming (page 40-41)
 - Observation reports re Merkur Premises by Leveche Associates (page 58-333)
 - Legal obligations to promote licensing objectives:
 - Gambling Commission's Licence Conditions and Codes of Practice applicable to non-remote bingo licences (page 642-697)
 - Mandatory and default conditions attaching to bingo premises licences (page 710-711)
 - The individual conditions proposed (page 26-27)
 - Operational standards (pages 334-335)

Background

7. The applicant is part of the Gauselmann group, which is one of the most experienced providers of gaming premises on the high street across the UK, including adult gaming centres and bingo premises. Players in high street bingo premises access bingo games through the use of tablets, which are increasingly replacing paper bingo cards as provided in large, flat-floor bingo clubs.
8. As one would expect, the applicant and its sister companies have detailed systems for compliance with the law and promotion of the licensing objectives, which they *implement* through staff training and management programmes, and *supervise* through area and national management oversight and independent audit.
9. Bingo premises are subject to a high degree of regulation in order to support the licensing objectives, including the following:
 - Premises and their management and operation are subject to the Gambling Commission's extensive Licence Conditions and Codes of Practice applicable to non-remote bingo operating licences.
 - Premises licences are subject to mandatory and default conditions set by the Secretary of State with the approval of Parliament.

- The number of machines, the way they operate and their stake and prize limits, are strictly regulated through the Gambling Act 2005 (by Parliament), regulations (by the Secretary of State) and technical standards (by the Gambling Commission). For example, at least 80% of the machines in bingo premises have the same stake and prize limits as pub fruit machines, with 20% governed by the same limits as other high street gambling establishment (AGCs and betting offices).
- Individual premises are sometimes subject to additional premises licence conditions. In this case, the applicant has offered 25 further conditions.

The nature of high street bingo premises

10. Gambling on the high street in Great Britain is dominated by betting offices, both numerically and in terms of environmental impact. As to numbers, betting offices outnumber bingo premises 9:1 (5.995 v 650¹). As to impact, betting offices can bring with them certain social issues. Hence, when an application is made for a bingo premises licence, it is sometimes feared that it will bring with it the same kind of issues as can arise at high street betting offices.
11. In fact, in terms of local impact, high street bingo premises in general and the applicant's in particular are materially different from betting offices.
12. It is therefore important to give a careful explanation of why the applicant's premises trade without regulatory concern.

On arrival

It is noticeable that groups do not loiter or gather outside high street bingo premises smoking, drinking, littering or importuning passers-by. The absence of such activity is not only observable but is explained by several facts:

- The customer demographic is different from betting offices. It is older and up to 50% female with customers coming in alone or with partners rather than in groups.
- There are no "events" in bingo premises such as football matches or horse races and therefore no reason to hang around, and nowhere to cluster or socialise.
- There are no general seating areas for people to gather inside. The premises are not fitted out for groups.
- Alcohol is not only 'not sold' but is strictly prohibited.
- Those under the influence of drugs or alcohol are not admitted.

¹ Gambling Commission industry statistics.

- Good quality CCTV systems are fitted to the exterior of the premises and are monitored. Those outside know they are under surveillance. In the rare occasion that loitering occurs, it is quickly dealt with.
- Unlike in betting offices, staff are not behind the counter taking or paying out bets. They are on the shop floor, greeting customers as they enter, which also means controlling who is permitted to enter and effectively supervising the premises.
- The numbers of customers inside high street bingo premises are very low. This makes the premises easy to supervise. Staff numbers are adjusted to ensure adequate service and supervision.

The effect on the streetscape is important. Those passing high street bingo premises do not have to walk past groups of people standing or misbehaving in the street. Consistent and authoritative evidence on this topic is given by company witnesses and also independently by Stuart Jenkins of Leveche Associates.

Exterior appearance

- The facades of high street bingo premises are smart, well-maintained and spotlessly clean. It is not possible to see gambling taking place inside, unlike (for example) betting offices, or pubs. The exterior contains signage explaining that Think 25 is operated, that alcohol is not permitted, and that CCTV is in operation, alongside responsible gambling messaging.

Upon entry

- Those entering are greeted face to face by a uniformed member of staff. This is an opportunity to observe whether the customer appears to be under 25 (in which case Think 25 is triggered), or whether there may be any other issue such as inebriation, in which case the customer will politely be asked to leave. The staff member checks whether the customer needs any other form of assistance.

This important interaction means that staff are aware of who is using their premises. Again, this is in marked contrast with betting offices, where staff are behind a counter taking and paying out bets.

Interior Appearance

- The interiors are clean, well-lit, comfortable and carpeted.
- Toilet facilities are provided.
- Responsible gambling messaging is prominently displayed throughout the premises and on the machines.
- Customer information leaflets are also prominently displayed, explaining where and how to obtain help with problem gambling.

Participation

- Customers have an opportunity to play bingo on tablets (including being linked to a national game) and to play machines, the limits for which are set by law.
- During their stay they will be offered tea/coffee and snacks and will often chat with the friendly staff. When they are finished playing, they simply leave - with zero impact on the locality.

Protection of vulnerable people from being harmed or exploited by gambling

- a) Alcohol is not permitted in the applicant's bingo premises.
- b) Those who are intoxicated through alcohol or drugs are not permitted on the premises.
- c) As required by the Gambling Commission's Licence Conditions and Codes of Practice, the applicant's systems include processes for customer interaction and self-exclusion, operated by trained staff. Interventions are recorded electronically so that they can be overseen by independent compliance auditors.
- d) Customers may set deposit and time limits on machines to assist them with managing their gambling behaviour.
- e) "Stay in Control" posters and leaflets with the GamCare helpline number are located prominently in the premises, including the WC.
- f) All machines display responsible gambling messages with helpline contact details.

Protection of children from being harmed or exploited by gambling

- g) Although children are entitled to enter bingo premises as a matter of law, Merkur does not allow children to enter their premises.
- h) The exterior contains no advertising or marketing which might be attractive to children.
- i) Gambling cannot be seen from the outside - as it frequently can in betting offices and sometimes pubs.
- j) The exterior and interior display prominent messaging stating that Think 25 is applied.
- k) Those entering are greeted by staff members, so that their appearance is checked immediately.
- l) Staff are required to log all Think 25 events electronically, with premises data checked by the applicant's audit department to ensure that the system is being properly operated.
- m) Third party age verification testing is conducted.

13. The applicant's experience, and it is confirmed by independent evidence, is that the outward appearance, interior ambience (a rather sedate lounge), supervision, layout and product in its bingo premises are not attractive to children; and the applicant's systems have proved more than effective to ensure that underage gambling is simply not an issue in its premises.
14. It is also right to mention that, when trading on busy high streets nationally, Merkur's premises are almost always in close proximity to retail and service outlets attractive to children, but this has not proved problematic.

Security

15. The applicant does not suffer significant issues with crime and disorder. That is a function, cumulatively, of the customer demographic, the ban on alcohol, and the nature of the product; but it is also because of the specific measures taken by the applicant to prevent it crime and disorder:
 - a) Staffing levels are set following a security risk assessment. There is no pre-planned single staffing after 8 p.m.
 - b) Customer numbers are low, with usually only a handful of customers in the premises. Double digit numbers occur very rarely. This means that miscreant behaviour is easily (and immediately) identified, recorded, and dealt with.
 - c) The layout of the premises facilitates effective supervision. There is no space for groups to gather.
 - d) Staff members are on the trading floor, not behind a counter.
 - e) Good quality CCTV is used throughout (inside and out) and customers are aware they are monitored.
 - f) The use of 'Staff Guard', which enables staff to use a portable alarm to liaise with a central security hub with audio and visual feeds to the premises. Staff can then speak directly with customers who therefore know they are being overseen. 'Staff Guard' personnel can liaise directly with local Police if necessary.
 - g) Staff members do not carry floats.
 - h) Safes are time-delayed.
 - i) Anti-money laundering systems are used on the machines.
 - j) The locational and social context of licensed premises is part of induction training for all staff.
 - k) Staff are also trained in how to deal with difficult customers (there is a 6-week training course at the outset followed by regular refresher training).
 - l) Any incidents are logged electronically and reviewed at national level.

- m) Premises are fitted with maglocks, enabling entry to be controlled when necessary.
- n) Panic alarms are installed giving direct contact with the Police.
- o) Venues are subject to ongoing security risk assessments, so that any further measures needed are periodically assessed and undertaken.
- p) The applicant maintains good liaison with local Police.

The regulatory record of the applicant

16. The previous section summarised the standard controls used by the applicant to provide a safe, welcoming, and pleasant environment for customers, while also promoting the licensing objectives. That it does all of this to a standard of excellence is demonstrable:
- It has over 230 licences. It has been granted licences in every premises for which application has been made.²
 - None of its trading licences has ever been reviewed.³
17. This is despite the range of areas in which the applicant operates, including those with high social deprivation. Its systems, staff training, compliance monitoring and audit have proved effective in ensuring that the licensing objectives are promoted, including in its 24-hour premises.
18. It is a record of which the applicant is proud and guards with care. In the very rare event of any kind of issue, it will always liaise with relevant authorities to ensure that it is resolved promptly and effectively.

The Law

19. As the Committee will be aware, each piece of licensing legislation sets out a different approach to the question of grant. The approach relevant to gambling is in section 153 of the Gambling Act 2005:

In exercising their functions under this Part, a licensing authority shall aim to permit the use of premises for gambling in so far as the authority thinks it:

- (a) in accordance with any relevant code of practice [issued by the Gambling Commission]*
- (b) in accordance with any relevant guidance issued by the Commission*

² For completeness, there was one refusal in Blackpool but this was granted on re-application three months later following submission of further information.

³ In 2021, applications for review were commenced in Enfield but were rejected without a hearing by the licensing authority under section 198 Gambling Act 2005, since they were in substance objections to gambling in general rather than to the operator or the premises.

*(c) reasonably consistent with the licensing objectives
(subject to (a) and (b))*

*(d) in accordance with the [authority's statement of licensing policy]
(subject to (a) to (c)).*

20. The gambling licensing objectives are:

(a) preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime,

(b) ensuring that gambling is conducted in a fair and open way, and

(c) protecting children and other vulnerable persons from being harmed or exploited by gambling.

21. It is not open to an authority to refuse a licence on the basis that it is generally 'inappropriate' to licence an operation or a further operation, in its area. The Commission's Guidance says:

5.34 Licensing authorities should be aware that other considerations such as moral or ethical objections to gambling are not a valid reason to reject applications for premises licences. In deciding to reject an application, a licensing authority should rely on reasons that demonstrate that the licensing objectives are not being, or are unlikely to be, met, and such objections do not relate to the licensing objectives. An authority's decision cannot be based on dislike of gambling, or a general notion that it is undesirable to allow gambling premises in an area.

22. As the paragraph makes clear, a refusal to licence premises needs to be justified by *evidenced* reasons which demonstrate that the licensing objectives would not be met if the licence were granted.

23. The following points should be noted:

a) The section 153 test is mandatory: "*a licensing authority shall*"

b) The obligation to "*aim to permit*" where (a) – (d) are satisfied is described by the Gambling Commission in its Guidance as "*the licensing authority's primary obligation.*"

c) The leading textbook 'Paterson's Licensing Acts' explains that the expression "aim to permit *the use of premises for gambling*" -

"... creates a presumption in favour of granting the premises licence, since it is only if the licence is granted that the premises may lawfully be used for gambling. But the duty seems to go further than that. The verb 'to aim' is defined by the OED as meaning 'To calculate one's course with a view to arrive (at a point); to direct one's course, to make it one's object to attain.

Hence to have it as an object, to endeavour earnestly....’ A person who ‘aims’ to achieve a result will usually take active steps to bring it about. The provision appears to place a duty upon the licensing authority to exercise their powers so far as is lawfully possible to achieve a position in which they can grant the premises licence and thus permit the premises to be used for gambling.” [underlining added]

The Gambling Commission’s Guidance says:

“Licensing authorities should not turn down applications for premises licences where relevant objections can be dealt with through use of conditions.”

- d) In the hierarchy of considerations in section 153, the licensing objectives come third, and the policy comes fourth - expressly subject to the considerations in (a), (b) and (c). As the Guidance states (para 5.21):

“In the unlikely event that a licensing authority perceives a conflict between a provision of a Commission code of practice or this guidance, and its own policy statement or view as to the application of the licensing objectives, the structure of s.153 makes it clear that the Commission’s codes and this guidance take precedence.”

- e) Conditions should only be added where it is necessary to do so, and even then, such conditions need to be proportionate to the circumstances requiring a response, relevant, directly related, fair and reasonable. (Conditions include any conditions limiting hours to less than the default hours set by Parliament.)
- f) The following considerations are legally irrelevant to the determination of an application for a premises licence (see Gambling Commission Guidance):
- i. Nuisance.
 - ii. A dislike of gambling.
 - iii. A general notion that it is undesirable to allow gambling premises in an area.
 - iv. Moral or ethical objections to gambling.
 - v. The demand for gambling premises (see s 153 Gambling Act 2005). Objections which state that there are enough (or too many) gambling establishments in a locality may be relevant to planning, but they are irrelevant to licensing.
 - vi. Planning issues generally.

24. It is therefore necessary to consider:

- a) whether there is evidence which *demonstrates* that the licensing objectives would not be met by granting the application;
- b) bearing in mind the controls on the applicant, including the further conditions offered as set out above, whether it is *necessary* to refuse or only partially grant the application?
- c) whether any further conditions could be added, to enable the Sub-Committee to grant the application, consistently with the Gambling Commission’s guidance: see paragraph 23(c) above.

The Representations

25. In the course of pre-hearing consultations with the responsible authorities, the applicant was asked by the Police to agree eleven licence conditions. These are now conditions 1, 9, 10, 11, 12, 13, 18, 19, 20, 24 & 25 on the “consolidated schedule of proposed conditions” and are agreed. The police have withdrawn their initial representation.
26. In the same consultation period, the Licensing Authority requested that the applicant amend the wording of conditions 1, 2, 3, 4 7 5 (the CCTV conditions), which amendment was accordingly made. The Licensing Authority also asked the applicant to agree ten new conditions, which are accepted and are conditions 6, 7, 8, 14, 15, 16, 17, 21, 22 & 23 on the consolidate schedule. The Licensing Authority has likewise withdrawn its initial representation.
27. There are outstanding representations from some ward councillors and local residents.
28. Putting to one side planning issues such as whether a Merkur Bingo premises ‘*will contribute positively to the area’s development*’, and whether ‘*there is no need for further gambling premises*’, the material representations may be summarised:
 - A concern that additional gambling premises may cause an increase crime and disorder.
 - A concern that additional premises may lead to increased anti-social behaviour, including loitering, public drinking and drug-related activity.
 - The area has high levels of poverty and deprivation, putting vulnerable people at risk of gambling-related harm.
 - The area is frequented by young people. There is a school nearby. The exposure to gambling may increase an interest in gambling among young people.
29. The applicant is very familiar with concerns such as the above. They are frequently expressed by local people when a new Merkur Bingo licence is applied for. Its experience, however, is that when premises have been licensed and are up-and-running, it is invariably the case that what was *feared* would happen hasn’t in fact transpired.

The applicant is respectful of the local concerns, however, and takes this opportunity to respond to them.

The applicant's submissions on the principal areas of concern

Crime and disorder

30. As stated above and evidenced by independent covert observations (paragraphs 42-45 below) the applicant's premises do not suffer significant crime and disorder. This is a function of the premises' management, customer demographics, levels of customer usage and security measures.
31. Furthermore, the applicant has extensive experience of operating in town and city centres with high levels of crime and anti-social behaviour. It also carries out security risk assessments before opening and periodically thereafter to ensure that its security measures (including staffing levels) are sufficient and responsive to local issues. The applicant's *ongoing* security risk assessment will ensure adequate mitigation of any emerging risks arising due to behaviours of those in the immediate vicinity.
32. In order further to mitigate the risk of crime and disorder, the applicant has offered additional conditions, including:
 - a) the installation and maintenance of CCTV (conditions 1-5);
 - b) staff training, including in issues related to the local area, problem gambling, self-exclusion and interactions (conditions 22 & 22);
 - c) there shall be no pre-planned single staffing after 8 p.m. (condition 11);
 - d) reasonable steps must be taken to prevent nuisance and/or drinking outside the premises (condition 23), supplemented by banning notices (condition 24);
 - e) a 'maglock' to be installed and maintained, which must be available for use at all times (condition 10);
 - f) installation of intruder alarm and panic button (conditions 16,17)
 - g) 'Staff Guard' or similar to be installed/maintained, allowing direct contact with a central monitoring station by audio and CCTV communication (condition 12).

Community Impact - noise, nuisance, and anti-social behaviour

33. As was mentioned in paragraph 23(f)(i), 'nuisance' is not a relevant consideration in the determination of a bingo premises licence application. The prevention of 'crime and disorder' arising from *gambling* is of course a licensing objective: but that is a different matter from nuisance associated with *premises*. In rejecting a proposed amendment to the Gambling Bill, which was to add the prevention of nuisance as a licensing objective, The Minister for Sport and Tourism (Richard Caborn MP) said –

“The relevant risks associated with licensing of pubs, bars and other premises on which alcohol is sold include noise and anti-social conduct, particularly at night... there is no intention of allowing [premises other than casinos and bingo clubs] such as ... machine arcades, to sell alcohol, and there is no reason to apply to them a nuisance test over and above the law on noise and other nuisance.”

34. Merkur has nonetheless offered conditions requiring the installation of comprehensive external CCTV to mitigate the risks of nuisance outside its premises.

High levels of poverty and deprivation; vulnerable people at risk

35. The applicant is fully aware of the level of deprivation in this area and has taken it into account both its risk assessment and proposed licence conditions, which in turn will inform its staff training. Merkur has proposed a series of measures for the protection of vulnerable people which go beyond its already thorough national measures. We respectfully suggest this is precisely what the process of local risk assessment is designed to achieve.
36. The Gambling Commission’s Guidance does not suggest that the mere presence of a higher than average ratio of vulnerable people should result in a refusal. That is because the statutory obligation is to aim to permit and to frame conditions to respond to identified local risks. In its guidance the Commission refers to matters such as physical layout, supervision of premises, use of floor-walkers etc., to mitigate the risks of harm to vulnerable people. The applicant has taken account of the Guidance in its proposals and designed them accordingly
37. A recurring concern raised in the representations is that some people who engage in gambling experience gambling-related harms. That is undoubtedly correct, which is why the licensing objectives include the protection of vulnerable people from being harmed or exploited by gambling; why the system of regulation imposes extensive obligations on operators to mitigate against such harm; and why, in the case of the applicant, it prioritises player protection, as extensively explained in the evidence served. The applicant has not previously been criticised by the Gambling Commission or any licensing authority, for any inadequacy in its policies and procedures for the protection of vulnerable people.
38. The question is not whether there is a potential for gambling-related harm locally but whether it has been demonstrated *by evidence* that a grant would harm or exploit vulnerable people in a way which cannot be protected by licence conditions. The evidence before the Sub-Committee, in particular the independent reports from Leveche Associates (42-45 below), suggests that the applicant operates robust systems which we submit are more than ‘reasonably consistent’ with the licensing objective for the protection of vulnerable persons.

39. As is always the position, Merkur welcomes participation in its staff training by the licensing authority and relevant local care providers if they so wish, which underpins its local liaison.

Protection of children

40. The Act does not seek to prevent children from seeing gambling at all: for example children in Harlesden walk past and can see into betting offices, they can go into pubs and see gaming machines, they can see lottery terminals and scratch cards in convenience stores, newsagents etc. Rather, the Act is structured around preventing children gambling (other than in limited ways, e.g. family entertainment centres) and preventing advertising being attractive to them

41. The licensing objective is preventing children being harmed or exploited by gambling. Despite the right to admit children to bingo premises the applicant does not admit children to its high street bingo premises at all. Children do not come in, let alone gamble in, the applicant's premises. Nor can they see in, nor are they exposed to advertising or imagery attractive to them. This not only promotes the licensing objective but is also compliant with the interpretation/treatment of the objective by the Gambling Commission in its guidance and Licence Conditions and Codes of Practice.

42. The applicant's experience is that under 18-year-olds do tend even to *try* to enter its premises. They are not seaside arcades, and youngsters in Merkur licensed premises would 'stick out like a sore thumb'. If they were to enter, they would quickly be identified and challenged.

43. Merkur's venues are subject to 3 external age tests per year with a compliance rate of over 94% for the last 3 years, compared with other leisure and gambling sectors that sit around 80%. However, no failure is acceptable. If there is a failure on test purchasing, action is taken immediately, including staff retraining, as necessary. The applicant operates 230 premises: it has never been suggested that underage gambling is a concern in any of them. This is despite many of its premises being near or next to premises attractive to children such as fast food outlets, or close to schools and bus stops.

The Evidence

44. In order to assist licensing sub-committees and demonstrate by evidence that this is the case, Merkur commissioned independent observation reports of its premises (Leveche Associates Limited) in eight different locations, at different times of the day and night, during August and September 2022.

45. The key findings from all 8 observation reports, organised by the relevant licensing objectives and operational considerations, were:

Prevention of crime and disorder:

- There was no evidence of crime, disorder, anti-social behaviour, street drinking, drug dealing, or youth groups congregating in or around any of the observed Merkur Slots premises.
- All venues had CCTV and time-delay locks, to control entry and deter criminal activity.
- Merkur Slots operates under "Secured by Design" crime prevention standards recommended by UK Police.
- Customers arrived and departed from the premises promptly without loitering or causing disturbances in the surrounding area.

Protection of children and vulnerable persons:

- Merkur Slots operate a strict "Think 25" age verification policy requiring valid photographic ID to gain entry.
- There is clear signage at entrances stating no under 18s allowed.
- The demographic of Merkur Slots premises is an older age group: the low-key environment does not attract or appeal to children and young people.
- Door supervisors and staff vet customers upon entry to prevent access by juveniles, drunken, or otherwise vulnerable individuals.
- Staff conduct regular patrols to ensure no underage or vulnerable persons are on the premises.
- Responsible gambling information is provided via leaflets from GamCare and other organisations.

Sufficiency of staffing:

- All venues were sufficiently staffed with attentive, trained personnel carrying out key roles:
 - Door supervisors controlling entry, vetting customers, and patrolling outside.
 - Reception staff welcoming guests, offering assistance, providing information on responsible gambling.
 - Roaming staff monitoring the premises, checking and assisting customers, as well as cleaning.
 - Merkur Slots has developed a detailed training programme for all staff members including its own City and Guilds accredited training developed in partnership with YGAM and Betknowmore.
- The premises were well run, with staff successfully upholding the licensing objectives.

Community Impact - Noise, nuisance, and anti-social behaviour:

- There was no evidence that the Merkur Slots premises negatively impacted the local environment, infrastructure, or community.
 - No excessive noise, anti-social behaviour, or other public nuisance issues were observed in the vicinity of the premises.
 - Venues had a relaxed, low-key atmosphere with only small numbers of customers at any time.
 - Customers arrived and left in an orderly manner without congregating or causing disturbances outside.
 - A 24-hour operation did not lead to noise complaints or anti-social behaviour in the surrounding area.
46. In summary, the observations provide consistent evidence that Merkur Slots operates responsibly in accordance with the gambling objectives and does not adversely affect the surrounding area in terms of crime, underage gambling, public nuisance, or anti-social behaviour.
47. The full reports (with photographs) comprise 276 pages and are pages 58-333. A premises-by-premises summary of the reports is at Appendix 1 of this skeleton.

Staffing and management

48. There will be a minimum of 1 member of staff on duty at all times; and between 20:00 and closing there will be no single-staffing unless due to circumstances beyond the applicant's control.
49. The applicant staffs its premises according to the need to exercise appropriate supervision and to service customers. These are dynamic assessments according to customer usage at particular times of day and days of the week.
50. It is right to say that bingo premises do not experience the kind of peaks as are experienced by betting offices, for example at racing times. The pattern tends to be low numbers which remain steady throughout all trading hours. Nevertheless, the applicant has offered a double-staffing condition after 8 p.m. and of course its staffing levels at other times will be appropriate to the need.
51. The applicant provides sufficient staff to perform all requisite tasks, including greeting, checking customers, supervising and other duties. It analyses customer patterns during the week and staffs accordingly. For example, there will be parts of the day when there is normally no more than a very small handful of customers in the premises. Ten customers would be regarded as very busy. Authorities in general tend not to micro-manage staffing levels but leave it to the applicant's experience to provide sufficient staff to maintain security, provide a customer service and meet regulatory obligations.

Conclusions

52. In conclusion:

- a) The applicant is a highly competent organisation, regulated by the Gambling Commission, and one whose corporate systems, staff training, management and audit are directed towards promotion of the licensing objectives.
- b) It is part of a group which operates 230 licensed gambling premises in a wide variety of locations of higher and lower crime, deprivation and population density.
- c) Despite that, it has never been subject to a review of a trading venue, or prosecution.
- d) The type of premises, their layout, their customer demographic, the low numbers of customers simultaneously using premises and the quality of management, mean that issues of crime and disorder are rare.
- e) The premises, if licensed, will be subject to strict regulatory requirements, deriving from: the Licence Conditions and Codes of Practice; machine stake, prize and numbers limits, and mandatory and default premises licence conditions.
- f) In addition, the applicant has offered licence conditions specifically drafted to meet local concerns.
- g) The applicant has a strong track record of co-operation with local statutory bodies. In the unlikely event of an untoward consequence, it will work to resolve the issue promptly and efficiently.
- h) The applicant will keep all security and other protective measures under review post-opening and will take any further measures as may be needed from time to time.

53. For these reasons, it is submitted that the test in section 153 is fully met.

54. Conversely, taking into account the calibre of the applicant, its experience, systems, training, supervision, audit, and regulatory record (nationally and locally); its legal obligations under the Act, Regulations and codes; and the conditions it is offering; the Sub-Committee is invited to conclude that it has not been demonstrated by any evidence that the premises would undermine the licensing objectives.

55. Accordingly, the Sub-Committee is respectfully invited to grant the application.

Gerald Gouriet KC

**Francis Taylor Building
Inner Temple**

Wednesday 14 August 2024

Appendix 1

Edgware Road Report – pages 58-92

Preventing crime and disorder:

1. No evidence of crime and disorder, anti-social behaviour, street drinking, drug dealing or youth groups hanging around the premises or area (para 70)
2. Area felt safe with the public going about normal business (para 14)
3. Premises were well-run with no issues on each observation (para 2)

Protecting children and vulnerable persons:

1. Signage on door stating no under 18s and CCTV in operation (para 37)
2. Think 25 policy in place requiring ID checks (para 73ii)
3. Staff monitor customers to ensure no underage or vulnerable persons (para 45; para 63)
4. People entering vetted to prevent access by drunken or vulnerable people (para 71)
5. Demographic is older, not attracting young people or children (para 75)

Staffing and management:

1. Two staff on duty dressed in smart uniforms, one with an SIA badge (para 40-41; para 56)
2. Staff welcomed customers, offered assistance, and provided free soft drinks (para 57, 60-61)
3. Staff regularly patrolled, checking on customers and cleaning (para 45; para 63)

Community Impact - Noise, nuisance, or anti-social behaviour:

1. Customers arriving went straight in, customers leaving left the area immediately (para 46; para 65)
2. No groups hanging around outside the premises (para 46; para 65)
3. No anti-social behaviour seen in vicinity of premises (para 66)

In summary, the observations provide evidence that Merkur Slots is a responsibly operated business that upholds the licensing objectives without negatively impacting the local area. The full report contains further relevant details.

Edmonton Green Report – pages 93-117

Prevention of crime and disorder

1. No evidence of anti-social behaviour or criminality linked to the Merkur Slots premises during the observation period (para 55)
2. People entering are supervised to prevent access by heavily intoxicated individuals (para 59)
3. Operates in support of 'Secured by Design' crime prevention standards (para 63)

Protection of children and vulnerable persons

1. Strict Over-18 policy and "Think 25" age verification using photographic ID (para 62)
2. Staff are trained to protect players, including a City & Guilds accredited program (para 62)
3. Premises entry is supervised to prevent access by juveniles or vulnerable people (para 59-60)
4. Responsible gambling messaging and information is provided to customers (para 62)

Staffing and management

1. Employs sufficient staff to effectively manage age restrictions and fair gambling
2. Security staff control entry and the premises had multiple staff members on duty (para 43 & para 48)
3. Company implements a "Merkur 360" player protection and responsible gambling program (para 62)

Community Impact - Noise, nuisance, or anti-social behaviour

1. Does not contribute to noise or other nuisance and anti-social behaviour. No evidence of the premises causing noise issues or anti-social behaviour (para 55, & para 64)
2. Evidence of some anti-social behaviour in the area was not linked to Merkur Slots (para 56-57)
3. As a "low-key carpeted style lounge" the premises do not attract young people or cause disturbances like a "loud busy arcade" (para 61)

In summary, the evidence throughout of the observation report indicates that this Merkur Slots operates to a high standard in preventing crime, protecting the vulnerable, ensuring sufficient staffing, and avoiding public nuisance issues. The observer concludes these premises are well-run and do not negatively impact the local area (para 64).

Hatfield Report – pages 118-146

Prevention of Crime and Disorder:

1. Area felt safe with no signs of criminality, begging, anti-social behaviour (para. 11)
2. No issues seen at premises during covert visit, well run (para. 30)
3. No one hanging around outside premises, customers arrived and left promptly (para. 45)
4. Premises has smart, professional frontage (para. 50)
5. No evidence of crime, disorder, anti-social behaviour, street drinking, drug dealing, groups of youths hanging around (para. 50)

Protection of Children and Vulnerable Persons:

1. The demographic is much older and doesn't attract young people or children (para 55)
2. Signage on door stating no under 18s (para. 32)
3. Think 25 policy in place requiring ID checks (para. 53)
4. Staff complete low-profile patrols to check customers aren't underage or vulnerable (para. 3)
5. People entering vetted to ensure drunken or vulnerable persons don't gain access (para. 42)
6. Responsible gambling information provided via leaflets and posters (para. 53)

Staffing and management:

1. Male staff member at reception to greet customers (para. 35)
2. Female staff member at reception desk (para. 37)
3. Staff seen cleaning, patrolling, meeting customer needs during visit (para. 43)
4. Professional, attentive staff managing the premises (para. 54)

Community Impact - Noise, nuisance, or anti-social behaviour:

1. Music playing at background level, relaxed welcoming atmosphere (para. 50)
2. Low-key environment, only a handful of mature customers at any time (para. 55)
3. No excessive noise, street drinking or anti-social behaviour seen (para. 50)
4. Premises don't impact the local environment, infrastructure, or community (para. 58)

Holloway Road Report – pages 147-176

Prevention of crime and disorder

1. Well-run premises with no signs of crime, disorder, antisocial behaviour, street drinking or drug dealing in or around the venue (para 57, 59)
2. Proactive patrols by door supervisor to deter criminal behaviour (para 57)
3. Operates in support of 'Secured by Design' principles recommended by UK Police for crime prevention (para 63)

Protection of children and vulnerable persons

1. Strict Think 25 policy requiring ID to prevent underage gambling (para 60ii)
2. Customers vetted on entry to ensure no drunken or vulnerable persons gain access (para 58)
3. Responsible gambling information provided via leaflets and posters (para 60iii)
4. Attracts an older demographic, not young people or children (para 62)

Staffing and management

1. Door supervisor controlling entry and conducting external patrols (para 40, para 55)
2. Two staff members on duty serving customers and monitoring the premises (para 42, &, paras 45, 46)

Community Impact - Noise, nuisance, or anti-social behaviour

1. Customers do not loiter outside premises or stay in the area longer than planned (para 59)
2. No noise or antisocial behaviour issues from the venue or customers (para 57)
3. Low-key atmosphere with only a handful of customers at a time (para 62)

In summary, the evidence indicates that Merkur Slots operates responsibly to uphold the gambling objectives without negatively impacting the surrounding area. The full observation report provides more detail to support these key points.

Hounslow Report – pages 177-207

Prevention of crime and disorder:

1. No observed signs of crime and disorder, anti-social behaviour, street drinking, drug dealing, or groups of youths in or around the premises. (para. 53)
2. Entry controlled with time-delay lock and security system. (para. 2)
3. SIA licensed door supervisor vets customers before entry. (para. 3)

Protection of children and vulnerable persons:

1. Signage states no under 18s. (para. 2)
2. Door supervisor ensures drunken or vulnerable people don't gain access. (para. 38)
3. Staff conduct regular patrols to check no underage or vulnerable persons are on the premises. (paras. 47, 54)
4. Gamcare leaflets and information on responsible gambling available. (para. 48)

Staffing and management:

1. Three staff members on duty, including door supervisor, to assist customers and monitor premises. (paras. 39, 42)
2. Staff trained on responsible gambling policies like 'Think 25' age verification. (para. 56)

Community Impact - Noise, nuisance, or anti-social behaviour:

1. Well-lit, professional, carpeted premises with relaxed atmosphere and small number of customers. (para. 53)
2. Customers arrived and departed without loitering or causing disturbances. (para. 49)
3. No noise or anti-social behaviour issues observed from 24-hour operation. (para. 51)

Streatham Report – 208-241

Prevention of crime and disorder:

- Observations showed the premises are well run with no issues. (para. 2)
- From observations, Merkur Slots operating 24-hours does not create anti-social behaviour, noise or any other crime and disorder. (para. 3)
- During observations, no illegal activity or anti-social behaviour was seen taking place. (para. 35)
- No begging, street drinking, or drug dealing was observed around the premises. (para. 36)
- Customers arriving went straight into the premises and customers leaving left the area straight away. (para. 59)

Protection of children and vulnerable persons:

- People entering were vetted before being allowed admission to ensure vulnerable people didn't gain access. (para. 82)
- Strict Over 18 Policy in place, with photographic ID required to gain entry under Think 25 policy. (para. 84ii)
- The demographic is much older and doesn't attract young people or children. (para. 86)
- Staff complete patrols to check customers aren't underage or vulnerable. (para. 57, para 75)

Sufficiency of staff:

- Two staff members were on duty managing the premises during covert visits. (paras. 69, 74)
- Staff welcomed customers, offered refreshments, provided information on machines. (para. 52)
- Staff seen cleaning, patrolling, checking on customers' needs. (para 57)

Community Impact - Noise, nuisance, or anti-social behaviour:

- Merkur Slots operating 24-hours does not negatively impact nearby residents, environment, local infrastructure, or wider community. (para. 3)
- No groups of youths hanging around the premises or nearby streets. (para. 41)
- Customers arriving went straight in and leaving left the area straight away. (para. 59)
- No evidence of anti-social behaviour, excessive noise, or littering in vicinity of premises. (para. 81)

Tottenham Court Road Report – 242-276**Prevention of crime and disorder:**

- No evidence of crime, disorder, anti-social behaviour, excessive noise, littering, street drinking, drug dealing, begging or groups of youths hanging around in the vicinity of the premises (para 64).
- People entering the premises are vetted before or immediately upon entry to ensure drunken or vulnerable people don't gain access (para 65).
- Merkur Slots takes safer gambling seriously as evidenced by their responsible gambling programs and policies: (para 67).

Protection of children and vulnerable persons:

- Merkur 360 Program to achieve higher player protection standards (para 67i)
- Strict "Think 25" policy requiring photo ID for entry (para 67ii)
- Responsible gambling messaging and info from GamCare available inside venue (para 67iii; images A33-34)
- Detailed staff training on responsible gambling, accredited by City & Guilds (para 67iv)

Sufficiency of staff:

- Professional and attentive staff manage the premises; venues are well-run with systems to operate in support of the gambling objectives and avoid taking advantage of juveniles or vulnerable persons (para 68-69).

Community Impact - Noise, nuisance, or anti-social behaviour:

- During covert visits, staff were observed cleaning, completing low-profile patrols to check on customers' needs and ensure no underage or vulnerable customers (para 46; para 61).
- The atmosphere inside the venue was relaxed, welcoming, low-key - very different from a loud busy arcade. Only a handful of mature customers inside at a time, not attracting young people or children (para 69).

In summary, the observations provide substantial evidence that Merkur Slots Cashino on Tottenham Court Road is a responsibly operated venue that has policies and practices in place to prevent crime and disorder, protect vulnerable people, ensure sufficient staffing, restrict underage access, and avoid being a noise or anti-social behaviour nuisance to the surrounding area. The overall finding was that the premises does not negatively impact the local environment or community (para 72).

Upton Park Report – 277-306

Prevention of crime and disorder:

- Observations in the area around Merkur Slots from 21:00 to 06:10 hours showed no evidence of crime, disorder, anti-social behaviour, street drinking, drug dealing, or youths loitering (p. 55 & 59)
- The premises has good security lighting and external CCTV cameras (p. 54)
- Customers entering and leaving did not hang around outside causing problems (p. 57)
- Merkur Slots operates in support of Secured by Design crime prevention standards (p. 61)

Protection of children and vulnerable persons:

- Photographic ID is required to gain entry under Merkur's "Think 25" age verification policy (p. 58ii)
- Staff monitor customers to ensure underage or vulnerable persons do not gain access (p. 47)
- The customer demographic is older and the environment is low-key, not attracting children or youths (p.60)
- Literature on responsible gambling is available, like GamCare leaflets (image A36)

Sufficiency of staff:

- Two staff members were on duty and welcoming at reception during the 02:31 visit, with one explaining the lack of alcohol and offering free refreshments (p. 39-42)
- Staff proactively monitor customers regarding age and vulnerability while on patrol (p. 47)

Community Impact - Noise, nuisance, or anti-social behaviour:

- Observations over the course of the night showed Merkur Slots does not lead to customers staying in the area longer or hanging around outside causing issues (p. 57)
- No anti-social behaviour, noise or other nuisance was witnessed in the vicinity of the premises (p. 55)

In summary, the evidence indicates that Merkur Slots has policies and procedures in place to uphold the licensing objectives regarding crime, underage gambling, responsible gambling, public nuisance and anti-social behaviour. The observational findings suggest the venue does not negatively impact the local area in relation to these factors.

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1. A comprehensive CCTV system shall be installed and maintained on the premises as required by the Metropolitan Police Licensing Team. CCTV should cover the following:
 - a) All entry and exit points to and from the premises enabling frontal identification of every person entering under any light conditions
 - b) The areas of the premises to which the public have access (excluding toilets)
 - c) Gaming machines and the counter area
2. The CCTV shall continue to record activities 24 hour a day for 31 days.
3. CCTV shall be made available for the police viewing at any time with minimum delays when requested.
4. The premises shall display notices near the entrance of the venue stating that CCTV is in operation.
5. A monitor shall be placed inside the premises above the front door showing CCTV images of customers entering exiting the premises.
6. The Licensee shall maintain a 'Challenge 25 Refusals' register at the premises. The register shall be produced to the police or licensing authority forthwith on request.
7. Prominent signage and notices advertising the Challenge 25 will be displayed showing the operation of such policy.
8. Third party testing on age restricted sales systems purchasing shall take at least twice a year and the results shall be provided to the Licensing Authority upon request.
9. A Challenge 25 proof of age scheme shall be operated at the premises where the only acceptable forms of identification are recognised photographic identification cards, such as a driving licence, passport or proof of age card with the PASS Hologram.
10. A magnetic locking device, commonly referred to as a Maglock, will be installed and maintained on the main entrance/exit to the premises and will be available for use at all times.
11. There shall be no pre-planned single staffing at the premises from 20:00 until closing.
12. The licensee's Staff Guard system shall be installed and maintained at the premises, which allows direct communication with a central monitoring station permitting audio and CCTV communication.
13. The Licensee shall implement a policy of banning any customers who engage in crime or disorder within or outside the premises
14. The licensee will refuse entry to customers who appear to be under the influence of alcohol or drugs
15. The licensee shall ensure that all seating within the premises are either secured to the floor or are weighted to prevent lifting.
16. The licensee shall install and maintain an intruder alarm on the premises.
17. The premises shall install and maintain a panic button behind the service counter.
18. The licensee will ensure that customer toilets are checked every hour for evidence of drug taking. Toilet checks are to be documents stating the time and member of staff who made the checks.
19. Toilet doors remain locked and access is permitted by staff members.
20. Signs to be displayed alerting customers to the following;
 - a) No alcohol
 - b) No smoking
 - c) No persons under 18 Years
 - d) Persons will be prosecuted for causing criminal damage
 - e) Prominent GamCare documentation will be displayed at the premises

21. The licensee shall:
 - a) provide training on the specific local risks to the licensing objectives that have been identified for these premises as part of the staff induction training programme.
 - b) periodically provide refresher training to all of its staff working at these premises on the specific local risks to the licensing objectives.
 - c) Participation in this training shall be formally recorded on each member of staffs training records which, if requested will be presented to the Licensing Authority as soon as practicable.
22. New and seasonal staff must attend induction training and receive refresher training every six months.
23. The Licensee shall take all reasonable steps to prevent street drinking of alcohol directly outside the premises and to ban from the premises those who do so.
24. The Licensee shall place a notice visible from the exterior of the premises stating that customers drinking alcohol outside the premises is not permitted and those who do so will be banned from the premises.
25. An incident log shall be kept for the premises and made available on request to an authorised officer of the Council or the Police which will record the following;
 - a) All crimes reported to the venue;
 - b) Any complaints received regarding crime and disorder;
 - c) Any incidents of disorder;
 - d) Any faults in the CCTV system; and
 - e) Any visit by a relevant authority or emergency service.
 - f) Details of any person(s) banned from the premises.

LICENSING SUB - COMMITTEE HEARING – 27 AUGUST 2024

SUPPLEMENTAL STATEMENT – AMANDA KIERNAN

1. I am a Chartered Institute of Internal Auditors (IIA) Qualified Internal Risk and Corporate Governance Auditor with over 25 years' experience working in risk-based customer facing environments within various industries, including High Street Retail and Optical Health. In 2011 I started working in the Gambling Industry occupying the role of Internal Audit Manager for Praesepe (the parent company of MERKUR Slots UK Limited), responsible for all internal and external audit policies and procedures. During 2018 a merger of the Audit and Compliance departments created the role of Head of Compliance, I now hold this position and am responsible for Internal Audit, Risk/Fraud Management and the Regulatory Compliance of the MERKUR organisation.
2. MERKUR operates a national estate of over 230 licensed bingo, adult gaming centre and family entertainment centre premises. Over 140 of MERKUR's premises operate with a 24-hour premises licence.
3. MERKUR is a leading national operator of bingo premises with clear policies to promote the Gambling Licensing Objectives. We always endeavour to liaise with Responsible Authorities concerning the operation of our premises and pre-consult with the police prior to making new applications.
4. MERKUR has authority to provide bingo facilities through the grant of an Operating Licence issued by the Gambling Commission, which has approved the measures which MERKUR has put in place to ensure that it implements effective player protection, anti-money laundering procedures and security procedures, and trades responsibly in accordance with gambling legislation, the Licensing Objectives and the Gambling Commission's Licence Conditions and Codes of Practice ("LCCP").
5. MERKUR Slots UK Limited, has never had a review of a trading premises licence, which evidences the high standard of operation applied across the Company's licensed estate.¹
6. MERKUR holds key positions within the Bingo Association and BACTA (the trade association for the amusement and gaming machine industry in the UK) Executive and Social Responsibility Committees, working closely with these groups to innovate and promote Compliance and Social Responsibility within the industry.
7. MERKUR has over 50 Personal Management Licence Holders throughout its operational structure, all of whom are aware of their roles and responsibilities in regard to the LCCP. Legal obligations are placed upon personal licence holders to promote the Licensing Objectives whilst undertaking their respective duties.
8. MERKUR has appointed a dedicated team of compliance auditors that work independently of its Operations Team to continually assess premises' compliance with the governing legislative standards and Company Policy and Procedure. The Company conducts a compliance audit in each venue annually. Audits include Regulatory Compliance, Customer Interaction, Incidents, Self-exclusion breaches and Age Verification records. During the audits, premises staff are tested on their level of knowledge and understanding of all relevant criteria. Venues may be re-visited and any additional training needs addressed. Records of incidents, interactions, self-exclusion breaches and age verification

¹ Two non-trading premises licences were subject to review applications in Enfield in 2021, but both applications were rejected by the Authority without a hearing, as the substance of both applications was based on objections to gambling in principle rather than identifying any concerns with the proposed operation at the premises.

checks are collated on a central hub, which is regularly reviewed and monthly reports are provided to Operations Teams.

9. MERKUR operates a strict marketing and promotional guidelines policy, which has been developed in accordance with the LCCP and the Advertising Standards Authority's Committee of Advertising Practice (CAP) and Broadcast Committee of Advertising Practice (BCAP) Codes. A copy of the Company's Marketing Code of Practice and sample window displays can be seen in the supporting documents.
10. Venue window displays are designed in consideration of premises' location, particularly in busy high street areas where children and young persons may pass by, and maintain the Company's focus that all gambling should be carried out in a socially responsible manner. Direct line of sight into premises is blocked by appropriate window displays and barriers adjacent to entrances, which minimise exposure of underage individuals to ambient gambling.

Relationship with the Responsible Authorities and Interested Parties

11. MERKUR takes its duty to operate safe and Gambling Act 2005 compliant premises seriously. To this end, the Company has always sought to maintain good relations with local police and licensing authority teams.
12. For the purposes of this application for a new bingo premises licence, the local Licensing Authority and Police were initially contacted on 12 February 2024.
13. An initial response was received on the from both the Police and Licensing and a teams call was organised with our instructed solicitor to discuss the application in depth.
14. Two teams calls were held the with our solicitor, one with the Police and one with Licensing to discuss the application. Vital invaluable local information was provided to our solicitor which was relayed to myself and used to inform and update the local area risk assessment, which was submitted with the application.
15. Following the teams meeting, eleven conditions were included within the application. representations were then received from the Licensing Authority and Police, requesting some slight amendments to the conditions, which were agreed. Both the Licensing Authority and the Police withdrew their representation and confirmed they were happy that the proposal upheld the licensing objectives.
16. No concerns were raised by the Child Protection Team and the Gambling Commission regarding MERKUR's bingo premises licence proposals and did not object to the application.
17. MERKUR's detailed policies and procedures are designed to ensure that all gambling in Company premises remains responsible, controlled and that the Licensing Objectives are continually promoted.
18. MERKUR has considered local police crime statistics and the premises location along with the Council's Statement of Licensing Principles under the Gambling Act 2005 and all additional information provided during the due diligence stage of the application.
19. An updated informed local area risk assessment has been submitted to support the application.
20. We understand that the local area suffers with general crime and disorder and nuisance, albeit not always specifically associated with gambling premises. We do not generally experience the kind of difficulties sometimes experienced by betting offices in terms of crime and disorder and nuisance, due to our different clientele, customer numbers, product,

layout and management. We carry out security risk assessments which are periodically reviewed and will adjust staffing levels, including the provision of security, to maintain an orderly presence in the places where we trade. Lines of communication are, and will continue to be, maintained with the local police and the Licensing Authority to ensure that local knowledge is continuously shared and that the premises adapt to any emerging risks or local concerns identified.

21. We have identified local providers of vulnerability support services within the local area risk assessment and we will endeavour to contact any relevant organisations and invite feedback on any local concerns that can be incorporated into premises training and evaluation. The Company is also committed to working with all Responsible Authorities to ensure that any emerging risks are identified, incorporated into the premises risk assessment and effectively addressed.

MERKUR Compliance – Protection of Children and Vulnerable

22. MERKUR was selected by the Gambling Commission as one of the first top 40 licensees to prepare an annual assurance statement due to its size and scale of operation. Annual Assurance Statements enable a comprehensive review of the business, completed at Board level, involving consideration of the effectiveness of the Company's governance and risk management arrangements designed to facilitate positive consumer protection, address gambling-related harm and assess crime prevention measures. This process ensures that the highest standards are implemented across the Company's estate from Board through to premises level.
23. In August 2020, Praesepe Limited, MERKUR's parent Company, and MERKUR's brand premises obtained G4 Global Gambling Guidance Group accreditation, which can be seen in the supporting documents. G4 is a group of international experts in the field of problem gambling and responsible gambling and accreditation is awarded to responsible operators. Audit reports identified that *'Customer care is of an exemplary standard in all MERKUR Venues, regulatory compliance policies and procedures are excellent...and provide a strong foundation for consistent approaches to Responsible Gambling across the (Company's) estate'*.
24. In February 2022, MERKUR were subject to the G4 follow up audit where it retained its accreditation status. The auditor commended the senior management training regarding gambling harm and social responsibility, noted that MERKUR's Safer Gambling ethics shine through as priority and customer care is a strong focus of the business. The auditor further noted that staff loyalty, enthusiasm and knowledge were all of a high standard.
25. MERKUR has been praised by one of the country's leading safer gambling and gaming experts for 'championing innovation' in social responsibility. Lee Willows, who founded ESG Gaming following his tenure launching and establishing Ygam, highlighted the work of MERKUR. He said: *"MERKUR is specifically supporting ESG Gaming with a two-year RET (research, education, treatment) funding commitment which has been transformational and enabled us to not only establish robust foundations but also contribute to crucial safer-gambling research."* The year one donation was used to support academic research into safer gambling and gaming and focused on what would be appropriate customer protection considerations in an immersive environment. The academic research was carried out by Bournemouth University.
26. MERKUR operates training upon recruitment and then 6-monthly refresher training programmes for all employees. Training modules include 'The Essentials of Compliance and Social Responsibility' which covers the Gambling Act 2005, LCCP, the Licensing Objectives under the Gambling Act 2005 and 'Safeguarding Children & Vulnerable People', which focus on assisting staff to recognise and respond to indicative behaviours of potential problem gambling and vulnerability and how to conduct effective customer

interaction. Initial six-week, classroom based, induction training is completed for all new venue teams and includes customer interaction role play and exposure to operation and customers in live venues. Following site opening, new teams are provided regular follow up and support. The Company also incorporates accredited Social Responsibility and Interaction training for its premises management teams. Excerpts from the Company's training platform are provided in the supporting documents.

27. MERKUR have a National Training Centre where venue teams receive face to face training which includes identifying signs of potential problem gambling and other vulnerabilities such as homelessness. Staff are trained to take appropriate action, such as offering support such as managing time spent playing (time outs) and controlling stake limits, providing information on gambling support agencies such as GambleAware, offering participation in the Bingo Association's national self-exclusion scheme and refusing service, where deemed necessary.
28. MERKUR ensures that all staff continue to promote responsible gambling through customer behaviour observation and interaction. As part of this process, customer play, duration and spend is monitored and customer interactions are triggered to ensure play remains responsible.
29. Following a customer interaction, customers may be offered a variety of self-help measures to control and monitor spend and time spent gambling, time outs, information regarding gambling support services and self-exclusion. For customers deemed to be at risk who do not agree to self-exclusion we reserve the right to bar customers, should the need arise. Staff members are provided detailed training to ensure that interaction is completed in a sensitive manner whilst ensuring that the Company's policies and procedures are effectively implemented.
30. MERKUR has also undergone Gambling Commission inspection. It ensures that its training and compliance policies and procedures comply with the LCCP attached to the Company's Operating Licence.
31. Examples of some of MERKUR's responsible gambling information have been provided in the supporting documents.
32. As part of MERKUR's continuing commitment to high standards of staff training and compliance, the Company engaged the services of the charities YGAM (Young Gamers & Gamblers Education Trust) and Betknowmore to assist with the development and provision of additional Safer Gambling training and resources for venue and area managers. This training has been designed to complement our existing face-to-face training, is City and Guilds accredited and has been delivered to over 200 venue and area managers to date.
33. In addition, a series of focus groups has been held over the past 2 years, with both high street gaming and pub customers, with the participants being selected on the basis of being regular users of MERKUR Slots or pub machines. The aim of the project was to provide MERKUR with a snapshot of the business through the eyes of the customer. Focused on the key areas of customer engagement, product and service and understanding customer spending and gaming habits.
34. All MERKUR's bingo premises are adult only and operate a strict Think 25 policy. Age verification procedures are embedded in Company training platforms and responsible gambling policies. Age verification test purchasing and mystery shopper visits are frequently carried out by third party companies (Serve Legal and Store Checker) and test results can be provided to the Licensing Authority upon request. MERKUR prides itself on its high standard of venue compliance and its test purchase success rates nationally.

35. A copy of MERKUR Slots Social Responsibility, Operational Compliance and Training Documents have been included within our hearing documentation, which highlight the priority given to responsible gambling and the provision of responsible gambling information to our customers and staff members.

Site location

36. A detailed local area risk assessment has been supplied in the supporting documentation, designed to take account of the council's Gambling Statement of Licensing Principles, local crime statistics, local demographics and establishments that may impact on potential customer vulnerability and local crime and disorder. The local area risk assessment has been prepared and updated with specific consideration to the site's location.
37. Local analysis is an invaluable tool to direct local resources and assists with the identification of potential risks and the development of local training and partnership to ensure that potential risks are mitigated and that gaming in MERKUR Slots premises remains responsible.
38. MERKUR is an experienced operator with premises in many large cities and towns across the country, each with their own local profiles and risk. MERKUR effectively and responsibly operates in these areas, some of which are subject to greater and lower levels of general crime and disorder and deprivation. The Company's responsible gambling safeguards, security measures and strictly controlled marketing practices are proven to be effective and management will always adapt to local circumstances.
39. As a result of the Company's commitment to responsible operation and the resources directed to responsible play, none of MERKUR's operational premises licences have been subject to review proceedings or revocation.

Underage Gambling

40. MERKUR's detailed policies and procedures are designed to ensure that all gambling in Company premises remains responsible, controlled and that the Licensing Objectives are continually promoted.
41. By law, licensed bingo premises can permit under 18s on the premises and can also apply for a premises licence under the Licensing Act 2003. However, MERKUR's premises are strictly adult only, operate Think 25 and will not obtain a licence under the Licensing Act 2003.
42. Unlike many other licensed operators, such as some licensed betting premises and adult gaming centres, the MERKUR Slots venue will apply our strict marketing and advertising policy, ensuring that advertising is not appealing to underage individuals and that line of site into the venue is restricted. This will ensure that children and young person's cannot see into the premises, preventing exposure to ambient gambling with all gaming activities hidden from view.
43. MERKUR Slots customer demographics are up to 50% female with an average age over 30.
44. Staff training and company policy is designed to mitigate the potential risk of underage gambling and exposure to ambient gambling.
45. To ensure the effectiveness of the Company's Think 25 policy, venues regularly undergo random test purchasing and details can be provided to local authorities upon request.

In our experience, our venues are not attractive to underage individuals due to the ambience of our venues, the nature of our gaming services and customer demographics. This is consistently seen across our licensed estate. Our products are not designed for children, and do not appeal to them.

46. The Company's partnership approach and high standard of staff training, customer monitoring and interaction has continued to ensure that all potential risks are mitigated and the occurrence of incidents remains minimal.

Crime and Vulnerability

47. It is rare for our premises to be associated with serious anti-social behaviour or crime and disorder but our staff training procedures and security measures, including external CCTV, are designed to monitor customer behaviour and external areas for anti-social behaviour. Company policy ensures that appropriate steps are taken to minimise any risks and we record and report any incidents or concerns to Company management, for internal review and assessment, and local authorities.
48. MERKUR is an experienced operator with a proven history of operating premises in some challenging areas and serious incidents relating to crime and disorder are rare.
49. In addition, all staff training is developed to consider local area characteristics and MERKUR Slots operates on the basis that its controls and best practice are adopted at all times.
50. Local premises management will always work with local authorities under the Act, other authorities, trade groups and vulnerability support services to reinforce any local concerns and identify any emerging local risks within premises' training and operation.
51. The kind of people who come to our premises (including their age and general behaviour) is not such as to threaten the peace of the neighbourhood.
52. Furthermore, unlike pubs and clubs, one does not find groups of people loitering outside our premises smoking or creating a disturbance. Our customers arrive, play the machines and leave. That is one reason why none of our premises have faced a review hearing.
53. Unlike betting offices, there is no ongoing entertainment such as a sporting event and no communal places for crowds to gather. Similarly, unlike betting offices, our premises do not experience significant peaks and troughs of customers. Our customer numbers are almost always in single figures. This is a further reason why we do not experience conflicts with our residential neighbours.
54. In general, it is rare for our venues that operate late at night to attract customers leaving alcohol licensed venues or fast-food venues as the entertainment offering is significantly different. MERKUR's late night operation appeals to shift workers and employees of the late-night economy and our detailed policies, procedures and safeguards are designed to ensure that premises operation remains safe and secure for both staff and our customers.
55. MERKUR operate a business-wide Anti-Money Laundering (AML) policy, which is reviewed annually, and ensures that the risks of money laundering in these premises are low. The premise layout is designed to allow customer supervision at all times. All machines within the premises are linked to a central machine data capture system, which identifies and sends alerts of suspicious activity and allows the venues to individually analyse live transactional activity for money laundering. All AML incidents, rare as they are, are reported by the venue staff via a tablet which also provides an automated email alert to myself, as the dedicated AML manager.

56. All MERKUR Slots venues operate a strict zero tolerance drugs policy and refuse service to individuals who are deemed to be under the influence of alcohol. The company's extensive training, which incorporates Gamcare approved social responsibility and customer interaction tools, are designed to ensure minimal conflict and successful implementation of our strict policies. In our experience, incidents of customers attempting to enter our venues whilst intoxicated or attempting to consume alcohol within our venues remains low across the Company's licensed estate regardless of premises location.
57. As an Operating Licence holder, MERKUR Slots UK Limited provides details of incident records and self-exclusion to the Gambling Commission as part of its Regulatory Returns and compliance process. All records are regularly evaluated to ensure that premises operate safely and responsibly.

Local Concerns

58. The representations received from the and local residents and Councillor identify the potential for increased anti-social behaviour and the increased risk to vulnerable people and children in the area should the Licensing Sub-Committee be minded to grant the current premises licence application. I have already touched on some of the concerns expressed.
59. All comments made within the representations were reviewed. We are confident that the proposed conditions are more than sufficient to alleviate these concerns.
60. MERKUR has provided a detailed local area risk assessment, reviewed local area statistics and demographics and reviewed the Council's detailed policies in order to effectively identify any potential risks to the proposed operation.
61. MERKUR will implement robust security policies and procedures to monitor customer behaviour both within the premises and immediately outside the venue, refuse service to individuals who may be under the influence of alcohol or drugs and work in partnership with the local police in the event that any incidents of crime or disorder occur.
62. MERKUR Slots premises, from experience, are not attractive to young persons and sites rarely have issues with young person's attempting to gain access. All our premises are over 18s and operate a Challenge 25 policy.
63. MERKUR Slots premises usually only have low numbers of customers within the premise at any one time, with members of staff continually walking around. This means that in the rare event that a young person attempts to enter the premises, they would be intercepted and challenged for their ID at the earliest opportunity.
64. The Company's detailed training procedures and evaluation tools have been designed to mitigate any local risk to the Licensing Objectives, with a particular focus on the protection of children and the vulnerable from harms associated with gambling. As part of MERKUR's Socially Responsible Gambling Policy, customers are continually monitored and interactions completed where concerns are identified. As part of the interaction process, customer play is assessed to trigger customer affordability and source of funds enquiries to ensure that all gaming remains controlled. I have described the Company's approach above, and it will of course be implemented in these premises.
65. Should the Committee members be minded to grant the application applied for, we believe all potential operational risks will be effectively mitigated.
66. MERKUR understands that local risk assessment and staff training is a live matter, which is regularly assessed and adapts to any emerging or changing risks in the locations in which it operates. This premises will be no exception.

67. Due to the nature of the gaming that is provided at MERKUR venues, it is rare for customers to congregate outside, unlike betting premises, as there is no ongoing entertainment such as a sporting event. It is also rare for our venues to have significant customer numbers at any one time with total customer numbers almost always in single figures. Customers leaving our premises rarely cause concern to our local neighbours.
68. MERKUR is committed to partnership working and will always engage with local Betwatch, Pubwatch, or other similar schemes to share best practice and local knowledge of venue operation or identified risks, whether or not they strictly relate to gambling premises.
69. Our staff are under instructions to record every incident, however minor. Our staff are trained in conflict management, and in the overwhelming majority of cases handle matters themselves. They are equipped not only with panic alarms, but also with a "Staff Guard" fob, which enables them to call up assistance from a central hub staffed with SIA-personnel who can view the CCTV, speak and be heard in the premises. When Staff Guard staff become involved, it usually resolves the incident rapidly. In a small number of cases, the Police are summoned, and the action of summoning them usually brings the incident to a halt.
70. I have no reason to believe, based on our record elsewhere, that this premises will cause a significant uptick in crime and disorder at the venue or place a significant additional burden on the Police.

Premises Operation

71. The premises will be managed by an experienced shop manager, who will in turn be supported by a complement of staff who will all have received the comprehensive level of training appropriate to their specific role. Training focuses on the promotion of the Licensing Objectives and a copy of our Policies and Procedures has been provided as part of our hearing bundle.
72. The MERKUR Slots premises layout has been developed to facilitate customer observation and all staff members provide regular sweeps of the premises to ensure positive engagement with our customers and facilitate continuous observation and customer interaction.
73. MERKUR Slots staff members are not restricted to counter positions that may be found in other licensed venues, such as betting premises. Our staff are actively encouraged to move throughout the premises and proactively engage with all customers, particularly on entry, not only to implement our Think 25 policy, but to build customer relationships and ensure effective identification of potentially vulnerable individuals.
74. All MERKUR's staff members actively monitor and manage the area immediately outside their premises and record all incidents should they occur. Reporting lines are set up with local police teams to ensure that any potential local issues are identified and addressed.
75. All MERKUR premises operate extensive CCTV throughout customer facing areas and also external areas to assist with monitoring customer behaviour and that of other individuals in the immediate vicinity of the premises. CCTV displays are appropriately situated to ensure that all customer areas are monitored.
76. Staff numbers and premises operation are regularly risk assessed, incorporating monitoring of premises operation, internal compliance audit completed by our field-based compliance team, evaluation of customer numbers and feedback from Responsible Authorities and Interested Parties. These effective measures ensure that premises are able to quickly adapt to any emerging risk or local concern. Staff numbers and rotas are

continuously reviewed to adapt to customer numbers and cognisance is taken of police advice.

77. MERKUR Slots premises do not play any music above background level, and in addition due to the low footfall of customers at any one time, are rarely a cause of neighbourhood nuisance.

Conclusion

78. The business of MERKUR is the provision of safe and pleasant gaming environments. It remains crucial to the business that customers feel safe and welcome in MERKUR Slots premises. This principle is fundamental to Company management strategy from head office to premises level. It is a principle which as a company we have achieved in all of our venues, which provide safe, welcoming and congenial environments for our customers.
79. In the rare case that issues do arise, the resources and commitment are in place to ensure that they are speedily resolved. For obvious reasons, MERKUR does not wish to run licensed venues which cause regulatory issues, and the Company devotes a great deal of time and resources to ensuring that there are none.
80. In my experience a good manager and their team will know regular customers well and new customers will always attract raised awareness.
81. Although nuisance is not a licensing objective under the Gambling Act, our premises do not cause nuisance to neighbours.
82. MERKUR continues to take very seriously any issue which its presence creates, both out of respect for the local community and because its licence and commercial reputation depends upon it.

Ms Amanda Kiernan, Head of Compliance, MERKUR Slots UK Limited

Date: 16/08/2024

LICENSING SUB - COMMITTEE HEARING – 27 AUGUST 2024

SUPPLEMENTAL STATEMENT – STEVE AMBROSE

1. I am the Operations Director for Merkur having held this position since December 2016 responsible for all day to day operations across our estate of Adult Gaming Centres, High Street Bingo premises, Bingo Halls and Casino.
2. I am a Director of the Bingo Trade Association "The Bingo Association" and a member of the Gaming Council of the Amusement Trade Association "BACTA" covering High Street Gaming Centres across Great Britain.
3. I started in the Gaming Industry in 1992 and have held a multitude of positions ranging from Customer Service Assistant right up to my present position of Operations Director, this experience has enabled me to gain an understanding of the complexities of operating in gaming businesses both big and small, in rural and city centre locations.
4. Through my years of working in the gambling industry I can state categorically that it is rare for Merkur Slots UK Limited's venues, and specifically its high street bingo premises, to be associated with crime and disorder, anti-social behaviour or local nuisance.
5. Whilst I appreciate this may be different to perceived risks that may be associated with other licensed gambling venues, such as betting premises, I believe this reflects the type of gaming operated by Merkur and its customer demographic, which is approximately 50% female with an average age of over 30.
6. Due to the nature of the gaming services provided at our high street bingo venues, customers do not congregate outside our venues, unlike betting premises that may show sporting events over long periods of time. In our high street venues, there is no 'event' taking place.
7. Across the high street bingo estate, average customer numbers at any one time remain relatively low, in single figures, and customer numbers between 5 and 10 at any one time, would be considered an exceptionally busy period.
8. Customer numbers do not vary significantly throughout the hours of premises operation and due to the relatively low numbers, later hours of operation are often sought, with the majority of Merkur premises operating into the early hours. Later hours of opening appeal to shift workers and employees of the late-night economy and Merkur Slots policies, procedures, safeguards, and security measures are designed to ensure that premises operate securely and safely at all hours of operation.
9. We operate premises throughout the UK in busy high street locations that have a high footfall of Children and Young persons. Due to the nature of our gambling premises, customer demographic and presentation of our venues on the high street, we do not see a significant number of underage individuals seeking to gain access to our premises regardless of location. In our experience, Merkur's product does not appeal to the younger generation.
10. Merkur's Think 25 policy and its implementation are effective tools ensuring that our venues operate responsibly. By strictly controlling our marketing and advertising and limiting line of site into venues, individuals that pass by our venues are not exposed to ambient gambling, which may be visible in other operator's venues, such as some betting premises and public houses that provide gaming machines.
11. All our venues operate CCTV throughout, which is designed to not only assist with monitoring all customer facing areas but to cover the area immediately in front of our venues, which provides additional security in the high street areas in which we operate.

10. Our venue teams seek to form genuine relationships with local police, town centre groups, support services and Betwatch or Pubwatch schemes should they be available. Our staff are proud of the areas in which they live and work and do not wish to see any level of anti-social behaviour.
11. We set out to provide a comfortable and convivial atmosphere. Our premises are carpeted, well-appointed and spotlessly clean. Our staff are smart and friendly. They are not positioned behind a counter, but are present on the trading floor, circulating and interacting with customers and offering tea and snacks.
12. Staff levels are continually risk assessed to ensure that sufficient numbers are maintained not only to enable effective premises management but also to ensure that customers can be continually monitored and assisted where necessary. As part of our commitment to working with local authorities, we will always liaise with local police licensing teams to ensure that where local police concerns are identified, sufficient staff members are on site during premises hours of operation.
13. Customer monitoring, interaction and any incidents including implementation of our Think 25 policy are recorded on electronic IHL tablets. This technology enables all recording to be logged whilst staff are present in customer facing areas and it is rare for staff to be called away to back office areas during their shifts. IHL tablets are linked through a central system so that Merkur Slots UK Limited's independent audit team can regularly monitor all records.
14. The Company's audit department collates and evaluates monthly reports on venue operations and management to allow continued assessment of operational compliance, including monitoring self-exclusions, under-age checks and any untoward behaviour. The monitoring process allows venues to adapt to any emerging risks and staff training requirements.
15. Our venues operate a ticket in ticket out system, which minimises the need for cash handling on site during opening hours.
16. Machine emptying is only carried out when customer numbers are low and security systems implemented, which include activating the premises maglock and ensuring sufficient staff remain on duty.
17. Merkur Slots UK Limited's venues also operate time delay safes where keys are stored. All cash is retained within the GeWeTe change machine on the venue floor.
18. Venues are equipped with our staff guard system. The system allows direct communication with a central monitoring station through audio and CCTV. The central monitoring station would then contact the relevant emergency services in case of incident.
19. The entrance to all venues are fitted with a magnetic door locking system. This allows staff members working to manage the entrants to the venue when in use. The use of maglock must be constant if the premises operates past midnight.
20. The use of door supervision at any premises is decided on a risk assessment basis based on a multitude of factors per premises, with cognisance always taken of local Police and Licensing knowledge and advice.
21. We have considered the local concerns raised by the Interested Parties and believe that should the Committee members be minded to grant the new premises licence as all perceived operational risks and fears should have been effectively addressed.
22. Within the application, 11 safeguarding conditions have been offered to be attached to the premises licence. These include extensive safeguards surrounding CCTV, the use of StaffGuard, staff numbers, a Challenge 25 scheme and operating a Maglock on the premises entrance door.

23. In our local area risk assessment we have identified local organisations that provide support services to local vulnerable individuals. Merkur is committed to working in partnership with local authorities and any organisations identified to discuss local concerns, ensuring that local risks are identified and incorporated into our risk assessment and management training..
24. All of these features mean that our premises provide safe and congenial environments and do not impact on their localities. In my experience, while concerns are sometimes expressed by local residents and authorities with regard to theoretical risks and the potential impact when applications are made, such concerns vanish once premises begin to operate as permitted.

Mr Steve Ambrose, Operations Director, Merkur Slots UK Limited

Date: 16/08/2024

LICENSING SUB-COMMITTEE HEARING – 27 AUGUST 2024

SUPPLEMENTAL STATEMENT – NIGEL DAVIS

1. I am the Head of Gaming Machines for Merkur, and have held this position since 2010, and have continual service for the company since leaving school in 1980 some 44 Years' Service.
2. During this time I have held various roles, including Venue Manager, Area Manager, Group Technical Service Manager this experience has given me great depth of knowledge of our Business, and the Industry as a whole.
3. I am the Midlands Chairman of the Amusement Trade Association BACTA, and sit on National Council, Divisions 1 & 3, and various Committees. I'm also the Chairman of the Gambling Business Group's Machines Sub-Group, and take a very active role with the Machines Committee of the Bingo Association. I have held a Gambling Commission PML since 2007, when they first came into force.
4. Merkur Slots UK Limited operates over 230 'High Street Bingo' premises, bingo clubs, Family Entertainment Centres and Adult Gaming Centres throughout Great Britain.
5. The development of High Street Bingo has occurred because customers are becoming less interested in attending large, sub-regional bingo halls and increasingly wish to play bingo with a portable electronic terminal rather than marking numbers off a card. Accordingly the High Street Bingo model has evolved, with a customer offer of live and automated bingo played on terminals, as well as on paper, with gaming machines in accordance with the permission provided by a bingo premises licence. The Gambling Commission is fully aware of the presentation of bingo in our high street premises.
6. In our premises, customers can move around with the terminal, choosing to play while standing or in seating provided around the premises.
7. As for gaming machines, the governing legislation provides strict limits on the types of machines that may be made available in bingo premises, which is the same as that permitted in licensed Adult Gaming Centres.
8. High Street Bingo premises operate a combination of category B3 and C gaming terminals with stakes ranging from 10p through to £2.
9. Across Merkur Slots UK Limited's venues the average stake placed is between 30p and 40p. Only 20% of the gaming machines provided may be category B3s. The remainder, being the category C gaming machines, have the same stake and prize levels as those offered in pubs.
10. Details of the gaming content provided in the bingo tablets has been provided in the supporting documentation.
11. All Merkur Slots UK Limited premises are sufficiently staffed to ensure effective implementation of the Company's Think 25 policy and all staff are fully trained on the three Licensing Objectives under the Gambling Act 2005, with particular focus on the protection of vulnerable persons from being harmed or exploited by gambling. Full written details of the training and the Company's operating procedures have been provided in the hearing bundle.
12. As stated above, electronic bingo is a natural evolution of 'traditional bingo' and has been operated nationally for many years since the inception of the Gambling Act 2005 and is approved and understood by the Gambling Commission.

13. The LCCP also require that the internal and/or external presentation of the premises are such that a customer can reasonably be expected to recognise that the premises are licensed for the purposes of providing bingo facilities. We comply with this requirement by a notice on the façade of the premises, which states prominently "bingo played here", and by a similar notice inside the premises.
14. Our bingo offer is the same as it is in all of our high street bingo premises across the country. It is simply an extra offer to our customers, which is long established awful and giving rise to no regulatory concerns of the Gambling Commission. We have no evidence that the provision of electronic bingo is harmful to any of the licensing objectives.

Mr Nigel Davis, Head of Product, Merkur Slots UK Limited

Date: 16/08/2024

Merkur Slots, 67 High Street, Harlesden, NW10 4NS

Local Area Risk Assessment

Trading Name:	Merkur Slots
Premise	67 High Street, Harlesden, NW10 4NS
Local Authority:	Brent Council
Premise Licence No:	New application
Operator Licence No:	000-003266-N-103444-031 (Merkur Slots UK Limited)
Company Details:	Merkur Slots UK, Second Floor Matrix House, North Fourth Street, Milton Keynes, MK9 1NJ
Name and Title of Assessor:	Ewelina Lesner – Internal Compliance Auditor and Amanda Kiernan – Head of Compliance
Date of Assessment:	07/04/2024
Review Date:	15/08/2024 and upon opening in conjunction with local staff

Local Area Profile Risk Factors

Local Risk Profile:	67 High Street, a former Shoezone is located at a road junction on the busy High Street in Harlesden. Other businesses on the road include retail shops, supermarkets, convenience stores, coffee shops, restaurants, takeaways, banks, supermarkets, hair and beauty salons, betting shops, pawnbrokers, pharmacies, property agencies, etc.
Establishments of note:	Iceland Supermarket is located two units away, Tesco Supermarket 2 minutes' walk away. Ladbrokes is located opposite.
Adjoining premises:	Merkur Slots will be located between 'Holland & Barrett' and across the road 'Surprise Surprise'.
Crime statistics:	In the year ending December 2023 the crime rate in NW10 4NS was higher than the average crime rate across similar areas, with the highest reported crimes relating to Anti-social Behaviour (28.5%) and Violence and Sexual Offence (25.5%). During the last 12 months the most commonly recorded crimes were Anti-social behaviour (28.9%), Violence & Sexual Offences (25.8%), Vehicle crime (7.8%), Public Order (6.5%), Other Theft (6.3%) and 9 Burglary (5%). (<i>police.uk</i>). During due diligence checks the Licensing Team have highlighted this area as a high crime spot.
Population:	Across the UK as a whole, the gender split is roughly equal at 49% male, 51% female. This address in Brent Central constituency is broadly in line with those figures, with 44% male. The majority of the population are in the age bracket 30-34 yrs, 11.7% are within the vulnerable age group below 25 years of age. The average figures are approximately as follows for relationship statuses: 33% married, 54% single, 7% divorced, 3% widowed, and 3% separated. (<i>Brent Borough Council Profile and streetcheck.co.uk</i>)
Culture:	Harlesden High Street, Brent, London can be considered more ethnically diverse than the UK average. As whole, the UK population claims itself as approximately 82.2% white, with residents of this area being 32% so. Other sizable ethnic groups are: Black African 19%, Other Asian 16%, Other 8%, Arab 7%, Black Caribbean 5%. (<i>streetcheck.co.uk</i>)
Unemployment:	Economically active in employment (including full-time students) stands at 55.4%, unemployed (including full time students) 5.9%. Unemployed is 3.4% and Economically inactive is at 39.4% (<i>Brent Borough Council Profile and ONS Census 2021</i>)
Deprivation:	In the latest Index of Multiple Deprivation (IMD) this area was ranked 2,026 out of 32,844 (6%) in England, where 1 was the most deprived and 32,844 the least. 89.8% of English postcodes are less deprived than NW10 4NS. This is broken down further by income 4%; employment 10%; health 41%; education 25%; barriers to services 2%; living environment 7%; and crime 5%. (<i>UK Local Area.com</i>)
Local Police:	Metropolitan Police Service – Harlesden and Kensal Green division. Acton Police Station (Metropolitan Police), 250 High Street, W3 9B. Current Policing Priorities include: to Increase patrols to reduce the number of robberies taking place in the Harlesden Town Centre, specifically Tavistock Square and the Jubilee Clock locality; to Reduce VAWG and ASB incidents in the Harlesden Town Centre Locality and to increase the number of joint operations between council and police to reduce the Street drinking and open drug dealing in the Craven Park Road and Craven Park locality. (<i>Police.uk</i>)
Independent Security Reviews	MERKUR Slots UK appointed Leveche Associates Ltd to conduct independent covert visits on numerous AGC/Bingo venues that operate throughout the UK 24-hrs, 7 days a week including six venues in and around the London area. Key comments from the reports include: 'Visits to these premises established that they are well run and that there are clearly defined systems in place to ensure the premises operate in support of the gambling objectives and do not attract or take advantage of juveniles or other vulnerable persons. The visits also established that MERKUR Slots customer do not cause crime or anti-social behaviour.' 'MERKUR Slots UK and their premises operate in support of the principles of Secured by Design, the company recommended by the Chief Officers of UK Police Forces for Crime Prevention standards'. 'The presence of MERKUR Slots does not lead to or result in people, who have been on a night out, staying in the area any longer than they had planned to'.

The Gambling Act 2005 sets out the three licensing objectives (LO), which are:

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

Localised Risks to the Licensing Objectives

This Local Area Risk assessment takes into consideration Brent Council local authority Statement of Gambling Principles 2022-2025, reference section 8.5 for Bingo Centres and Brent Council Ward Profile (2021 Census).

Environmental Factors

In preparing this assessment Merkur Slots has considered the relevance of environmental factors. In this context, environmental factors include the physical location of schools, playgrounds, residential areas, other retail premises and locations (bus stations, tube stations) which influence footfall. We have set out below our position on risk in this area:

Licensing Objectives	Local Risks	Control Measures
Protecting children and other vulnerable people from being harmed or exploited by gambling Page 44	<p>Unemployment: Economically active in employment (including full-time students) stands at 55.4%, unemployed (including full time students) 5.9%. Unemployed is 3.4% and Economically inactive is at 39.4% (Brent Borough Council Profile and ONS Census 2021)</p> <p>Deprivation: In the latest Index of Multiple Deprivation (IMD) this area was ranked 2,026 out of 32,844 (6%) in England, where 1 was the most deprived and 32,844 the least. 89.8% of English postcodes are less deprived than NW10 4NS.</p> <p>This is broken down further by income 4%; employment 10%; health 41%; education 25%; barriers to services 2%; living environment 7%; and crime 5%. <i>(UK Local Area.com)</i></p> <p>Schools and Education John Keble Church of England Primary School, Crownhill Road, NW10 4DR Maple Walk School, 62A Crownhill Rd, NW10 4EB Furness Primary School, Furness Rd, NW10 5YT Harlesden Primary School, Acton Ln, NW10 8UT St Claudine's Catholic School for Girls, Crownhill Rd, NW10 4EP Newman Catholic College, Harlesden Rd, NW10 3RN The Stonebridge School, Shakespeare Ave, NW10 8NG St Joseph's Roman Catholic Primary School, Goodson Road, NW10 9LS FOCUS English School - English Classes, 2nd floor, Park Parade, NW10 4HT Harris Lowe Academy Willesden, Doyle Gardens, NW10 3ST Leopold Primary School, Hawkshead Rd NW10 9UR</p>	<p>Age Verification <i>Ensuring Under 18's do not have access to licensed premises</i></p> <p>All Merkur Slots venues are strictly adult only (over 18's only).</p> <p>Gambling is an age restricted product and Merkur Slots operates a 'Think 25' policy.</p> <p>Age verification is embedded in training platforms and responsible gambling policies.</p> <p>Over 18's notices are displayed on the entrance.</p> <p>Think 25 advertising is prominently displayed throughout the premise.</p> <p>Merkur Slots Harlesden Premise frontage will be of a style which obscures the interior with no advertising depicting images that may appeal to children.</p> <p>Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</p> <p>Merkur Slots operate a comprehensive Think 25 Policy, age verification checks are carried out and recorded, any person unable or unwilling to verify their age with appropriate ID will be told to leave, if they have managed to play machines, their staked money will be returned to them.</p> <p>Age verification test purchasing, and mystery shopper visits are frequently carried out by third party companies - ServeLegal and Store Checker. Age verification tests for 2023 current pass rate of 89% is higher than the industry average, all venues receive 2 or 3 random test visits per year.</p>

Kenmont Primary School, Valliere Rd, NW10 6AL
 Little Angels Nursery, 25 High St, NW10 4NE
 Nicoll Road Nursery, 40 Nicoll Rd, NW10 9AB
 Iqra Islamic Academy, 109 High St, NW10 4TS
 Newfield Primary School, Longstone Ave, NW10 3UD
 Our Lady of Lourdes Catholic Primary School Brent, Wesley Rd, Hillside, NW10 8PP
 St Mary's C E Primary School, Garnet Rd, NW10 9JA
 Wetherby House Montessori Kensal Rise, 29-31 Purves Road, NW10 5SX
 Excelsior Nursery Ltd, St Albans Rd, NW10 8UG

Community Centres and Youth Centres

Brent Hub Community Enterprise Centre, 6 Hillside, NW10 8BN
 Harlesden Ummah Community & Wellbeing Centre, 21 Craven Park Road, NW10 8SE
 Church End and Roundwood Unity Centre, 103 Church Road, NW10 9EG
 Faynuus Hope Community, 49 Craven Park Rd, London NW10 8SE
 Hazel Road Community Centre, Community Centre, Hazel Rd, 5PP
 Tavistock Hall, 25 High St, London NW10 4ND
 Brent Cultural Centre, 107 High St, NW10 4TS
 Roundwood School and Community Centre, 49 Longstone Ave, NW10 3UN
 COMMUNITY CHURCH HARLESDEN, 32 Manor Park Rd, NW10 4JJ
 Diverse Youth Club LTD, 25 High St, NW10 4NE

Parks, play grounds and sports/leisure facilities

Roundwood Park, Harlesden Rd, London NW10 3SH
 Bramshill Road Open Space, Bramshill Rd, London NW10 8BD
 Wesley Playing Fields, London NW10 6PH
 King Edward VII Park Children's Playground, London NW10 3QX
 Willesden Sports Centre, Donnington Rd, London NW10 3QX
 Stonebridge Recreation Ground, London NW10 8LW

Vulnerable and addiction support services

EACH Brent, Design works, Park Parade, London NW10 4HT

Homeless shelters and food banks

Crisis Skylight Brent, 1-2, Bank Buildings, High St, NW10 4LT
 The Salvation Army (Harlesden), Salvation Army Upper Hall, 32 Manor Park Rd, London NW10 4JJ

Medical Centres, Care Homes and Mental Health facilities

Freuchen Medical Centre, 190 High St, London NW10 4ST
 Murakami Medical Centre - Private GP Clinic, 7 Craven Park Rd, London NW10 8SE
 Roundwood Park Medical Centre, Willesden Centre for Health & Care, Robson Ave, London NW10 3RY
 Willesden Centre for Health & Care, Robson Ave, NW10 3RY
 Greenhill Park Medical Centre, Greenhill Park, London NW10 9

Test purchase fails are reviewed within 48 hours by the Area Manager, this involves reviewing CCTV footage of the incident and implementing appropriate training or where necessary disciplinary action.

All age verification checks are recorded on the IHL SMART Tablet AV App, this data is collated centrally and regularly reviewed by an independent team of compliance auditors.

Results of age verification checks and third-party results are shared with the Gambling Commission.

Proof of Age scheme in place with application forms available in the venue.

The children and young persons gambling participation survey shows that the number of 11-16 years olds that say they have gambled on fruit machines of whatever kind in an arcade, pub or club is around 2%. Of those around a half to two-thirds do so legally on Category D fruit machines which are located in FECs or holiday parks, where any play will be of short duration (as families will be on a day trip or holiday), in venues which they can only access with their parents, and in premises licensed to offer Category Ds which are as a result tightly-regulated.

We also know from a study by Professor David Forrest and Dr Ian McHale that whilst adolescents at the coast are more likely to participate in gambling activities than those that do not, they are no more likely to be problem gamblers than those that do not live at the coast. This is an important finding. Many people cite early exposure to gambling as a cause of later gambling problems. There is no evidence of a causal link. As David Forrest stated at conference in Toronto in 2012 'marginal gamblers induced to participation by ease of access do not appear prone to problem gambling and more children gambling does not carry through to more children being problem gamblers. Panic about arcades does not appear justified'
<https://www.gamblingcommission.gov.uk/PDF/Young-People-Gambling-Report-2019>

Vulnerability

Training and guidance are given to Merkur Slots staff on vulnerability (the inability or limited ability of people to control their actions). This includes addictive gambling, mental health, alcohol or drugs issues.

Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).

All staff complete on boarding and 6 monthly refresher training which includes Safeguarding Children and Vulnerable People and Customer Interaction.

Staff are trained how to deal with vulnerable customers and how to make effective interactions, any difficult cases are referred to our compliance team for review and resolution.

	<p>Hilltop Medical Practice, 150 Hilltop Ave, London NW10 8RY St Andrews Medical Centre, At Greenhill Park Medical Centre, London, NW10 9AR The Stonebridge Practice, Hillside Primary Care Centre, 150 Hilltop Ave, London NW10 8RY The Law Medical Group Practice, 9-11 Wrotesley Rd, NW10 5UY Dr K S Mathew, Buckingham Rd, London NW10 4RR Aksyr Medical Practice, 150 Hilltop Ave, London NW10 8RY Harlesden Healthcare Centre, 150 Hilltop Ave, London NW10 8RY Craven Park, 1 Craven Rd, London NW10 8RR Franklin Lodge, 58 Kings Rd, London NW10 2BN London Care Ltd - Rosemary House, Rosemary House, Uffington Rd, London NW10 3TD Wells House Care Ltd, 2 Wells House Rd, London NW10 6EE MMR Homecare Ltd, 115 High St, London NW10 4TR Tower House, 11-12 Tower Rd, London NW10 2HP ANA Nursing, Willesden Centre for Health & Care, Robson Ave, London NW10 3RY Lifelong Home Care Services, 78 Craven Park Rd, NW10 4AE Brent Cove Drop-in Service, Brent Hub Community Enterprise Center 6, Hillside, London NW10 8BN EACH Brent, Design works, Park Parade, London NW10 4HT Trybs Health, Old Oak Ln, London NW10 6DG</p> <p>Pawnbrokers and Loan Shops H&T Pawnbrokers, 72 High St, London NW10 4SJ Cash Converters, 36 High Street Harlesden, London NW10 4LS TGS Pawnbrokers, 89 High Street Harlesden, London NW10 4NT</p> <p>Gambling premises William Hill, 6/8 High Street, London NW10 4LT Silvertime, Harlesden, 10 High St, London NW10 4LT Silvertime, 53 High St, London NW10 4NJ Ladbroke's, 74 High St, London NW10 4SJ Ladbroke's, 59 Craven Park Rd, London NW10 8SH Paddy Power, 120 High St, London NW10 4SP</p> <p>Public Houses and Alcohol Licensed Premise Royal Oak, 95 High St, London NW10 4TS Triangle Bar & Night club, 252 High St, London NW10 4TD Segen Bar and Restaurant, 129 High St, London NW10 4TR The Mason's Arms, 665 Harrow Rd, London NW10 5NU The Fishermans Arms, 50 Old Oak Ln, London NW10 6UB Rising Sun, 25 Harlesden Rd, London NW10 2BY Grand Junction Arms, Acton Ln, London NW10 7AD Sportsman's, 58 Station Rd, London NW10 4UA Angies, 129 High St, London NW10 4TR The Shawl, 25 High Street Harlesden, London NW10 4NE The Green Man, 109 High St, London NW10 4TS</p>	<p>Merkur Slots take 'know your customer' seriously including affordability checks, engaging with customer on products to enabled an informed choice and take a risk-based approach to harm minimization.</p> <p>Customer Interaction Merkur Slots provide comprehensive customer interaction training, instruction and supporting policies to all staff in this area (via training platforms, training centres and Compliance Manual).</p> <p>Staff are provided with the training to enable them to provide guidance on safer and responsible gambling.</p> <p>Staff are trained on conducting effective customer interactions, identifying behavioural changes and how to identify and interact with players who exhibit signs of developing problems with their gambling.</p> <p>Staff are trained to monitor and record customer behaviour, spend and time spent gambling and customer interactions are used to assess customer source of funds/income where relevant.</p> <p>Customer interactions may result in the customer being guided to gambling support services such as Gamcare encouraged to use a self-help tool to assist them with managing their gambling behaviour, such as Self-Exclusion.</p> <p>All customer interactions are recorded on the IHL SMART Tablet Interaction App, this data is collated centrally and regularly reviewed by an independent team of compliance auditors.</p> <p>Player Protection <i>To identify signs associated with problem gambling and people who may be at risk of gambling related harm</i> <i>Failure to provide information to customers on responsible gambling</i> <i>Failure to maintain and administer the self-exclusion process, including breaches and reinstatement reviews</i></p> <p>Staff are aware of the importance of social responsibility and are trained to advise customers on gambling responsibly and the identification of potential gambling harm.</p> <p>'Stay in Control' Posters and Leaflets containing the Gamcare helpline number are in prominent locations within the premise and in private areas, such as customer toilets.</p> <p>Merkur Slots will actively seek to support and be involved in any local initiatives targeted at reducing harm caused by gambling.</p> <p>Socially Responsible messaging is implemented on all digital B3 and Cat C machines. All machines display Gamble Responsibly stickers with helpline contact details.</p>
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	<p>Residential Areas The area containing High Street, Brent, London consists predominantly of flats. There is a higher-than-average level of rented housing (excluding social housing) - 77% of household spaces.</p> <p>Bus stops and other Transport links Buckingham Road Harlesden (Stop B), London NW10 4NT Harlesden Jubilee Clock (Stop X), London NW10 4LS Tavistock Road, London NW10 4JJ Willesden County Court (Stop T), London NW10 8TS Park Parade (Stop F), London NW10 4SP Harlesden Jubilee Clock (Stop W), London NW10 4UJ Willesden County Court, London NW10 8SB Park Parade (Stop C), London NW10 4JH Acton Lane Harlesden (Stop R), London NW10 4UB Park Parade (Stop D), London NW10 4JB</p> <p>Locally Identified Premises Aspect Property, 41 Park Parade, London NW10 4JE Jai Electronics, 155 High St, London NW10 4TR Cash Converters, 36 High Street Harlesden, London NW10 4LS High Crown Bakery & Take-Away, 2 Craven Park Rd, London NW10 4AB Taste of Lahore, 1 Manor Park Rd, London NW10 4JW One Stop Caribbean, 17-19 High Street Harlesden, London NW10 4NE Sparks, Bank Buildings, 5 High St, London NW10 4LT Local Food Express, 16 Park Parade, London NW10 4JH Harlesden High Street, 57 High St, London NW10 4NJ Harlesden Fresh Fish, 90 High St, London NW10 4SL Halal Butchers, 92 High St, London NW10 4NT Iceland Supermarket Harlesden, 71-75 High St, London NW10 4NS</p>	<p>Senior Management are members of the BACTA Divisional and Socially Responsible Committees and Bingo Association Executive and Socially Responsible Committees. They take the opportunity to actively participate with these trade bodies, collaborating with other operators to promote responsible gambling initiatives including the development of an Accredited Gamcare training programme and the Machine Messaging trial and evaluation.</p> <p>The Gamcare Helpline Annual Statistics 2020 reported that calls received from people experiencing problems with their gambling were low in High Street Arcade Gaming Machines at 3% compared to Betting Shop Gaming Machines at 15%. The vast majority of calls were received from people within the on-line sector.</p> <p>Deprivation Whilst the premise may be near or in an area of relative deprivation, Merkur Slots takes the view that individual customers must be treated holistically, and the information provided in this document are designed to identify individuals that could potentially be at risk of gambling related harm</p> <p>Merkur Slots operates on the basis that its controls and best practice is always adopted therefore, it is not a question of degrees of vigilance being implemented in different areas.</p> <p>Homelessness Some premises are used by the homeless for warmth and company. Merkur Slots treats all customers with dignity and has a clear policy on begging.</p> <p>Staff are trained to deal with vulnerable people in a sympathetic manner, any difficult cases are referred to our compliance team for review and resolution.</p> <p>Staff are trained how to manage situations with homeless people seeking refuge.</p> <p>A line of contact will be created with local high-risk premises, homeless shelters, foodbanks to provide social responsibility information.</p> <p>MERKUR staff are aware of where rough sleepers sleep and beggars loiter in the local area and actively prevent them from entering the premise, including close monitoring of individuals spending coins/low level amounts on a frequent basis.</p> <p>Should loitering increase due to extended hours additional notices will be added about loitering without play not being tolerated.</p>
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<p>Preventing gambling being a source of crime or disorder, being associated with crime and disorder or being used to support crime</p>	<p>Crime statistics: In the year ending December 2023 the crime rate in NW10 4NS was higher than the average crime rate across similar areas, with the highest reported crimes relating to Anti-social Behaviour (28.5%) and Violence and Sexual Offence (25.5%). During the last 12 months the most commonly recorded crimes were Anti-social behaviour (28.9%), Violence & Sexual Offences (25.8%), Vehicle crime (7.8%), Public Order (6.5%), Other Theft (6.3%) and 9 Burglary (5%). <i>(police.uk)</i> During due diligence checks the Licensing Team have highlighted this area as a high crime spot.</p> <p>Local Police: Metropolitan Police Service – Harlesden and Kensal Green division. Acton Police Station (Metropolitan Police), 250 High Street, W3 9B. Current Policing Priorities include: to Increase patrols to reduce the number of robberies taking place in the Harlesden Town Centre, specifically Tavistock Square and the Jubilee Clock locality; to Reduce VAWG and ASB incidents in the Harlesden Town Centre Locality and to increase the number of joint operations between council and police to reduce the Street drinking and open drug dealing in the Craven Park Road and Craven Park locality. <i>(police.uk)</i></p> <p>Public Houses and Alcohol Licensed Premise Royal Oak, 95 High St, London NW10 4TS Triangle Bar & Night club, 252 High St, London NW10 4TD Segen Bar and Restaurant, 129 High St, London NW10 4TR The Mason's Arms, 665 Harrow Rd, London NW10 5NU The Fishermans Arms, 50 Old Oak Ln, London NW10 6UB Rising Sun, 25 Harlesden Rd, London NW10 2BY Grand Junction Arms, Acton Ln, London NW10 7AD Sportsman's, 58 Station Rd, London NW10 4UA Angies, 129 High St, London NW10 4TR The Shawl, 25 High Street Harlesden, London NW10 4NE The Green Man, 109 High St, London NW10 4TS</p> <p>Pawnbrokers and Loan Shops H&T Pawnbrokers, 72 High St, London NW10 4SJ Cash Converters, 36 High Street Harlesden, London NW10 4LS TGS Pawnbrokers, 89 High Street Harlesden, London NW10 4NT</p> <p>Gambling premises William Hill, 6/8 High Street, London NW10 4LT SILVERTIME Harlesden, 10 High St, London NW10 4LT Silvertime, 53 High St, London NW10 4NJ Ladbrokes, 74 High St, London NW10 4SJ Ladbrokes, 59 Craven Park Rd, London NW10 8SH Paddy Power, 120 High St, London NW10 4SP</p>	<p>Premise Security and violence in the workplace <i>Poor security control measures which may increase vulnerability to crime</i> <i>Failure to protect employee and customers from harm during the hours of late-night opening</i></p> <p>Merkur Slots Harlesden is subject to a separate security risk assessment, local factors are considered, and proportionate control measures/physical security measures are installed.</p> <p>Merkur Slots Harlesden will be fitted with a HD CCTV system with coverage of all public areas including all entry and exits points, CCTV will be clearly advertised to customers with screens visible by staff when working in the service area. Ability to review CCTV remotely and provide footage to relevant parties when required.</p> <p>Floor layout will be designed to avoid blind spots to enable the active management and observation of customers entering and leaving the premises, from the central service area the entrances, machines and toilets can be observed and staff will regularly patrol the gaming floor to supervise and interact with customers to identify underage or vulnerable persons.</p> <p>General Crime and Disorder <i>To identify aggressive customers to prevent crime and disorder</i> <i>Awareness of local crime issues in the local area</i></p> <p>We have reviewed the Police.UK hot-spot mapping for the local policing neighbourhood and are aware of the areas of Recorded Crime, Vulnerable People and Vulnerable Places and are very mindful of the potential damage associated with problem gambling. We will make every effort to liaise with local Police over reducing our involvement in any incident.</p> <p>Staff are trained to identify suspicious activity and have the ability to interrogate real-time machine data to identify criminal activity and fraudulent incidents which are logged and escalated where appropriate.</p> <p>All incidents are recorded on the IHL SMART Tablet Incident App inc. crime reference number where applicable.</p> <p>Staff are trained on how to deal with aggressive customers and situations which may also require police assistance.</p> <p>The company operate an internal security alert system and are registered with trade associations for crime bulletins (BACTA and Association).</p> <p>Machine data is captured in real-time and full secure cash reconciliation is completed on a weekly basis, the machine exceptions are monitored by a centrally based income protection team and all exceptional cash losses are investigated by the internal audit compliance team.</p> <p>Merkur Slots Harlesden will participate with any local/town centre scheme and actively seek to support and be involved with any local initiatives</p>
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targeted at reducing crime and/or disorder and will engage in the sharing of information with other businesses to support the local community.

Anti-social behaviour outside the premise

Whilst Public Nuisance is not a Licensing Objective and the Gambling Commission has made clear that 'disorder' means serious disorder, Merkur Slots recognise that public nuisance can escalate in certain circumstances and as a corporate citizen, it has a responsibility to work in partnership with local residents and authorities to reduce environmental impacts.

Staff are aware to monitor the outside of the premise and surrounding area for anti-social behaviour and take appropriate steps within reason to minimise the risks. The CCTV monitor on the central desk allows staff to view the exterior at all times.

Incidents of anti-social behaviour are recorded on the IHL SMART Tablet Incident App.

Staff are trained to be extra vigilant where there is clear evidence of continued anti-social behaviour occurring in the vicinity and encourages a partnership approach with local authorities.

Where short term risk is created by young people congregating nearby or attempting to enter the premise staff are trained to closely monitor the entrance. In extreme cases the maglock system would be deployed.

Should there be an increase in people congregating outside the premise due to extended trading hours, appropriate signage will be displayed to deter people from loitering.

Additional signage 'leave quietly' signage will be added to advise customers to respect local residents.

Money Laundering

Failure to identify the occurrence to launder money on our premises (e.g. dyed stained notes, fake notes, foreign coins) and to adhere to reporting policies and procedures.

Merkur Slots has a designated Anti Money Laundering Officer (AMLO) and AML polices with clear escalation and reporting processes.

Where there are pawnbrokers and loan shops in the vicinity, staff are trained to monitor and record customer behaviour, spend and time spent gambling and customer interactions are used to assess customer source of funds/income where relevant, enhanced scrutiny will be implemented where concerns of criminal activity or association of are suspected. Any suspicious activities are reported to the nominated officer who will report to NCA where appropriate.

IHL SMART Tablet AML App is used to record AML incidents with emails alerts sent directly to the AMLO.

Security alerts and photos of suspects are shared with other operators. CCTV systems available for additional monitoring of activity and MARS (machine data capture system) provides individual transactions and fraud alerts for suspicious activity.

Anti-fraud analysis on MARS (machine data capture system) identifies suspicious gaming activity.

Adequate staff will always be maintained and subject to regular review and risk assessment.

Merkur Slots, in line with many businesses on the high street will at times operate with a single staff member. Such times when Merkur Slots choose to single man is strictly controlled and are never planned to happen from 10pm until 6am.

In considering when it is appropriate for a venue to operate with one member of staff Merkur Slots will primarily consider the security of the employees by reviewing customer levels, cash control needs and the activity within the local area such as licensed premises closing times.

Any period of single-staffing is managed by the lone-working policy, locked door policy, remote monitoring of CCTV and keeping in touch policy.

Merkur Slots Harlesden will operate TiTo machines with a central redemption change machine GeWeTe, the GeWeTe is fitted with a duress code facility and built in time delay. Staff do not carry cash floats and only management can open the gaming machines and change machines.

As such staff are based predominately on the venue floor and have very little need to work in a back area, any back office work is planned when the venue is closed (cash collections) or where customer numbers are low and sufficient staff available.

Venue and machine keys are secured in a time delay safe accessible only by Duty Management who require very limited access due to the TITO and GeWeTe management of cash within the venue.

Operating 24hrs removes the risk of venue staff opening and closing the venue. MERKUR operate a 'refresh period' in all 24hr venues that allows for any cash empties and refills to take place when the venues is closed to the public.

The premise and staff will be protected by a Staffguard security system, Maglock and intruder alarms will be installed. Staffguard provides instant access to live security support and there are panic alarms giving direct contact with the Police.

Venue and machine keys are secured in a time delay safe accessible only by Duty Management.

Staff are trained to deal with incidents of a criminal nature and aggressive persons. There are support mechanisms available to staff, including counselling and an Employee Assistance Programme.

Alcohol and Drugs

Anti-social behaviour caused by alcohol is not tolerated within our premises and there are comprehensive security and reporting processes to escalate, report and deal with any issues as they arise.
'No Alcohol Allowed' signage on the door.

Drug misuse is not tolerated within the premise and in locations where there is heightened risk, the toilets are locked with access monitored and controlled by the staff.

Staff are aware to refuse access to any person who is or appears to be under the influence of alcohol or drugs, or adopting anti-social behaviour, any such incident will be logged on the IHL SMART Tablet Incident App and depending on severity will be reported to the police.

Staff are trained to be extra vigilant where there is clear evidence of street drinking in the vicinity and encourages a partnership approach with local authorities.

Maglock systems will be deployed during times of public houses closing.

Money Lending

Money lending is not tolerated within our premises.

Suspicious of organised money lending by illegal money lenders are escalated to the audit compliance team and onwards to local authority money lending teams.

Late Night Operation

Maglock systems are often made available for staff to deploy at any point in time to protect against crime or disorder and are always deployed during times of public houses closing.

Dedicated Regional Night Managers are employed to support venues with security incidents.

Area Manager's operate a late night rota system to ensure the 'late night contact number' is monitored so venues always have an Operational Manager to call upon for support with any issues during late night operation.

The premise and staff are protected by a Staffguard security system, Maglock where available and intruder alarms are installed. Staffguard provides instant access to live security support and there are panic alarms giving direct contact with the Police.

Ensuring that gambling is conducted in a fair and open way

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Gaming Machine and Supervision

The premise operates under a Bingo Licence, with proprietary bingo equipment, and a range of category B3 (max stake £2/prize £500), C (max stake £1/prize £100) and D (max stake 10p/prize £5) machines (company average stake is 30/40p).

Bingo is available by means of Bingo tablets offering a range of Bingo products and Live calling. Bingo Tablets are linked to Merkur venues and other operators across the country and allow customers to play Bingo including the National Game which is played twice per day in the venue when customer numbers are as low as one. Tablet systems now account for most of the bingo play in venues of all sizes.

Customer Complaints

Failure to prevent customers complaints and disputes regarding gambling within our premises. Failure to resolve customer's complaints and disputes regarding our gambling premises.

Merkur Slots operate a clear customer complaints policy both within venues and via a customer complaints link on the website. Complaints management policy in place for written, telephone and complaints received via the 'customer complaints' link on company website.

The Company Code of Practice and Complaints and Disputes Policy will be displayed on the Customer Information Board at the entrance with leaflets available within the premise - ADR provider is IBAS.

Complaints portal used to collate and manage responses.
4 stage complaints procedure with ADR entity Independent Betting Adjudication Service Ltd (IBAS) for unresolved complaints. Staff are trained and encouraged to use positive discretion to resolve customer complaints in venue.

Marketing

Merkur Slots promote responsible gambling and social responsibility throughout all marketing campaigns. Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).

External windows will have digital marketing screens which will display safer gambling messages, No Under 18's allowed, Think 25, opening times and promotional activity.

All marketing campaigns are reviewed for appropriateness before being launched. No advertising is used that depicts images that may appeal to children.

Other

Places of worship and Religious Buildings

Harlesden Methodist Church, 25 High St, London NW10 4NE
 All Souls Parish Church, Station Rd, London NW10 4UJ
 Harlesden Church of God 7th Day, 9 Station Rd, London NW10 4UJ
 St Margaret's & St Georges Church, 67 Nicoll Rd, Craven Park Rd, London NW10 9AX
 Harlesden Baptist Church, 23A Acton Ln, London NW10 8UX
 Christ Church, St Albans Rd, London NW10 8UG
 Pentecostal Church, 4NE, 25 High St, London
 COMMUNITY CHURCH HARLESDEN, 32 Manor Park Rd, London NW10 4JJ
 Kidane Mihiret Church of Eritrean Orthodox, Willesden, 224 High St, London NW10 4TD
 St Matthew's, St Mary's Rd, London NW10 4AU
 St Margaret's & St Georges Church, 67 Nicoll Rd, Craven Park Rd, London NW10 9AX
 Harlesden Baptist Church, 23A Acton Ln, London NW10 8UX
 Pentecostal Church, 4NE, 25 High St, London
 Living Stone Church, 25 High Street Harlesden, London NW10 4NE
 Our Lady Of Willesden Rc Church, 1 Nicoll Rd, London NW10 9AX
 Beulah Apostolic Church, 130 Church Rd, London NW10 9NH
 Rhema Winners Citadel, Craven Park Rd, London NW10 4AG
 The Salvation Army (Harlesden), Salvation Army Upper Hall, 32 Manor Park Rd, London NW10 4JJ
 Rebirth Tabernacle, 33 Leghorn Rd, London NW10 4PN
 The Five Precious Wounds Catholic Church, The Presbytery Stonebridge Park, Brentfield Rd., London NW10 8ER
 Parish of Saint Michael and All Angels Stonebridge, 17 Hillside, London NW10 8LB
 River of Life Elim Pentecostal Church. Willesden, 1 Gifford Rd, London NW10 9ED
 Fountain of Life Christian Church, 6 Chase Rd, London NW10 6HZ
 Roundwood Gospel Assembly, Roundwood gospel assembly, Longstone Avenue, London NW10 3UE
 Dominion Christ Church, 57 Craven Park Rd, Greater, London NW10 8SH
 Restoration Revival Fellowship Apostolic Church, 50 Church Rd, London NW10 9PY
 MFM Willesden, Challenge Cl, London NW10 4BF
 Assembleia de Deus de Londres / ADLondres, 155 Acton Ln, London NW10 7NJ
 French Christian Community Bethel, Unit 38 Design Works Park Parade, London NW10 4HT
 Maranatha Christian Church, 1054 Harrow Rd, London NW10 5NL
 International Plenitude Ministries, Cumberland House, 80 Scrubs Ln, London NW10 6RF
 St Mark's Kensal Rise, Bathurst Gardens, Kensal Rise NW10 5HX

Ethnicity and Local Area Demographic

Merkur Slots does not discriminate on the ground of ethnic or social demographic.

Local area profiles which detail deprivation, social, ethnic or population may be used as part of the risk assessment in relation to gambling related harm in conjunction with the company standard controls.

Merkur Slots takes a holistic approach to customers and is aware that the Equality Act precludes the exclusion of any group for generalised reasons.

Merkur Slots will participate with any local/town centre scheme and actively seek to support and be involved with any local initiatives targeted at reducing deprivation (crime/employment/health) and engage in the sharing of information.

Training & Social Responsibility

Merkur Slots take responsible gambling and social responsibility seriously, ensuring all staff are fully trained to carry out their roles in a responsible manner.

Merkur Slots have attained Responsible Gambling Accreditation from the G4 Global Gambling Guidance Group.

Merkur Slots work with YGAM (Young Gamers and Gamblers Education Trust) to deliver City and Guilds accredited training on vulnerable and gambling harm to all levels of management.

Merkur Casino has a dedicated Learning and Development Team and a Safer Gambling team that deliver face to face social responsibility training. The Safer Gambling Team review and evaluate the effectiveness of training.

Gamcare Accredited training completed by members of management.

All staff complete on boarding and 6 monthly refresher training: The Essentials of Compliance, Safeguarding Children and Vulnerable People Age Verification and Customer Interaction.

Staff are aware of the importance of social responsibility, trained to advise customers of gambling responsibly and identifying potential problem gamblers.

Compliance and Social Responsibility Folder and Player Protection Framework containing policies and procedures is available to all staff. Venue Mangers review compliance logs monthly, Area Managers Bi monthly and Compliance Auditors annually.

Merkur Slots 67 High Street, Harlesden, NW10 4NS – Premise Layout

Premise level:	67 High Street is a ground floor premises.
Premise frontage:	Merkur Slots Harlesden will be a property of a style which obscures the interior with digital Marketing Screens displaying safer gambling messages, no under 18's, opening times. Marketing and promotions will comply with LCCP and standards set by the Committee of Advertising Practice (CAP) and Broadcast Committee of Advertising Practice (BCAP).
Counter Position:	<p>Merkur Slots Harlesden floor layout will be of the design to avoid blind spots and enable supervision of entrances and machines from the central service area and staff will regularly patrol the gaming floor to supervise and interact with customers and identify underage or vulnerable persons.</p> <p>The central service area serves as the main support area for staff to manage the venue without having to leave the floor:</p> <ul style="list-style-type: none"> - TiTo machines with a central redemption change machine GeWeTe, the GeWeTe is fitted with a duress code facility and built in time delay. Staff do not carry cash floats and only management can open the gaming machines and change machines. - Beverage and snacks are provided from the service area - IHL SMART Tablet located on the service desk provides the facility to record age verification checks, customer interactions, incidents, self-exclusions, reinstatements, track and trace and general venue management checklists - The CCTV monitor on the central desk allows staff to view the exterior at all times.
Floor layout:	Merkur Slots Harlesden floor layout will be designed to avoid blind spots to enable the active management and observation of customers entering and leaving the premises, from the central service area the entrances, machines and toilet can be observed and staff will regularly patrol the gaming floor and interact with customers allowing identification of underage and vulnerable persons. 'Stay in Control' Posters and Leaflets will be located in prominent locations within the premise.
Machine Positions:	<p>Merkur Slots Harlesden will operate under a Bingo Licence, with proprietary bingo equipment, and a range of category B3 (max stake £2/prize £500), C (max stake £1/prize £100) and D (max stake 10p/prize £5) machines (company average stake is 30/40p).</p> <p>Bingo will be available by means of Tablets offering a range of Bingo products and Live calling. Bingo Tablets are linked to Merkur bingo venues and other operators across the country and allow customers to play Bingo including the National Game which is played twice per day in the venue when customer numbers are as low as one.</p>
Hidden Areas:	Merkur Slots Harlesden will be fitted with a HD CCTV system with coverage of all public areas including all entry and exits points, CCTV will be clearly advertised to customers with screens visible by employees when working in the service area.

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Additional Comments


Merkur Slots has attained the prestigious Global Gaming Guidance Group (G4) accreditation for Responsible Gambling. This is only awarded after a rigorous audit of the company's safer gambling measures. Furthermore, ongoing accreditation requires reassessment every 18 months.

MERKUR Slots UK have operated other premises within the local authority area at 304 Neasden Lane, NW10 0AD and 478 High Road, Wembley, HA9 7BH since 2007 and Merkur Slots, 51-55 High Road, Willesden, NW10 2SU premise since 2021. During the last 12 months all of these premises have achieved 100% pass rate for Age Verification test visits. None of the venues have received a Local Authority or Gambling Commission inspection.

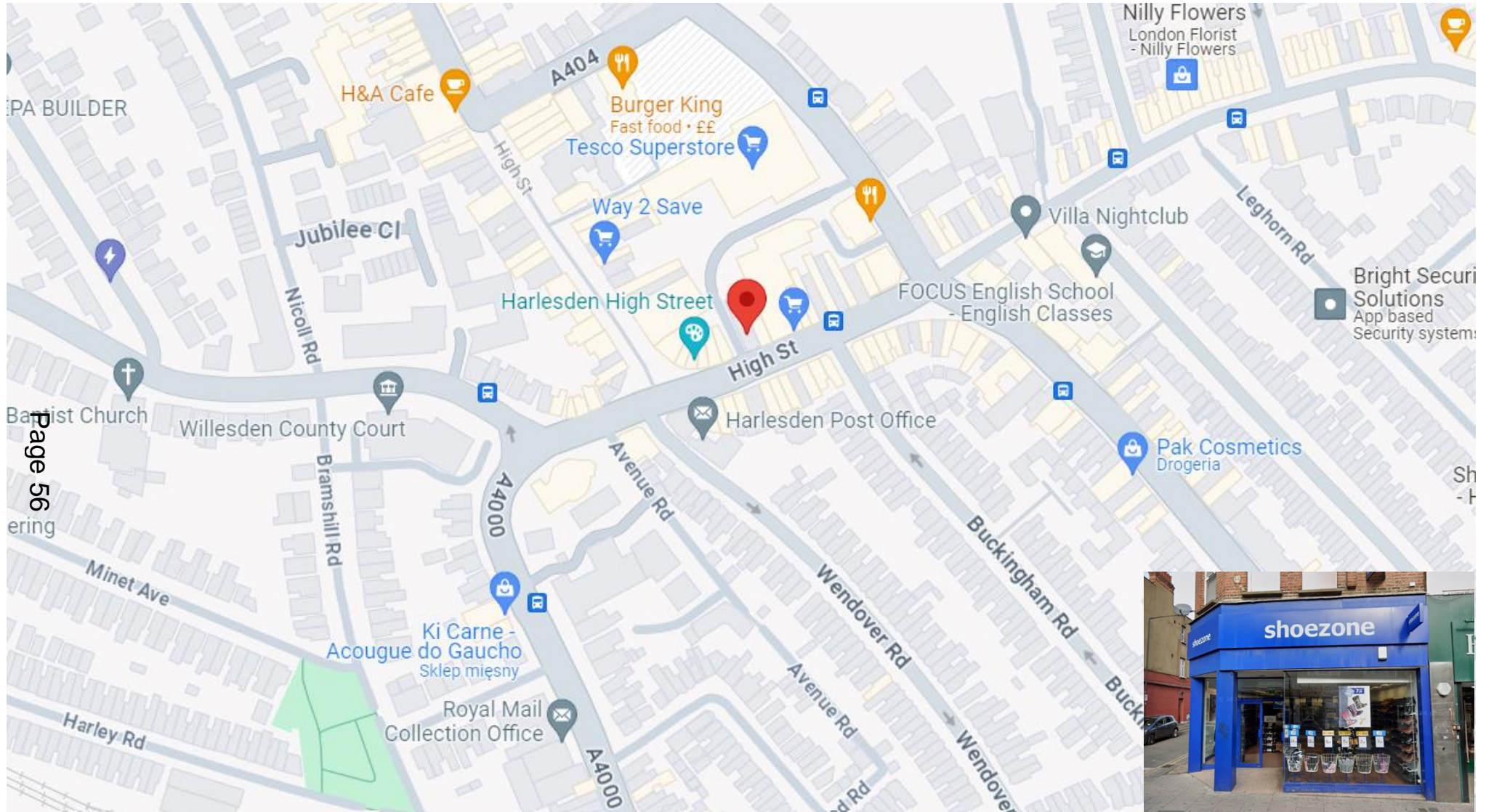
None of our operational venues have been subject to review proceedings.

This document provides an assessment of risk at premise level relating to the provision of these facilities for gambling. Merkur Slots is a national operator and employs several standard policies, procedures and control measures across all premises. These issues are clearly articulated in the "Compliance Manual" to be found in the premise and in our Player Protection Framework. The company also carries out premise's security risk assessments (available on request) and health and safety risk assessments which inter alia relate to the objective of keeping crime out of gambling.

Where relevant, Merkur Slots has also considered any substantive local risks identified in a wide range of policy statements related to gambling and local area profiles specifically related to gambling. However, the company does not operate discriminatory policies against any identified groups based on social demographic or ethnic origin. Therefore, identification of issues relating to gambling related harm are based on individual customer behaviour even where particular groups are identified through research at being at greater risk of gambling related harm.

Assessors Name:	Ewelina Lesner and Amanda Kernan
Signature:	
Date:	15/08/2024

Merkur Slots, 67 High Street, Harlesden, NW10 4NS



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Merkur Slots – Shop frontage example



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Full Observation Report

Stuart Jenkins – Licensing Consultant

Leveche Associates Limited

Merkur Slots

182-184 Edgware Road London W2 2DS

Executive Summary

1. Observations were conducted on Merkur Slots premises at 182-184 Edgware Road London W2 2DS and the surrounding area between 21:00 hours on Thursday 1st September 2022 and 06:15 hours on Friday 2nd September 2022, then again between 22:50 hours and 23:35 hours on Thursday 15th September 2022.
2. Two covert visits were made to the site and the surrounding area. The observations showed the premises are situated on a busy high street within a parade of shops on the A5 Edgware Road. The visits showed the premises to be well run with no issues on each occasion.
3. There are two other operators in the area with a similar business model to Merkur Slots which are Little Vic Casino 156 – 158 Edgware Road W2 2DS and Reel Time 212 Edgware Road W2 1DH which are advertised as being open 24-hours a day. From the observations and my visits to the area, it is clear that Merkur Slots operating 24-hours a day would not create anti-social behaviour, noise or any other crime and disorder and does not have a negative impact on nearby residents, the environment, local infrastructure, or wider local community.

Introduction

4. I have been instructed to conduct independent observations on the Merkur Slots premises at 182-184 Edgware Road London W2 2DS and the surrounding areas.

5. These premises are licenced under the Gaming Act 2005 and are open Sunday to Thursday 07:00 to 01:00 hours and Friday and Saturday 07:00 hours to 02:00 hours.
6. The premises come under the jurisdiction of Westminster City Council.

Personal – Stuart Jenkins

7. I am a former Police Officer having retired from the Metropolitan Police after completion of over 30 years exemplary service.
8. Throughout my police career the majority of my service was spent on specialist units engaged on proactive operations :- 1993–1997 Central Territorial Support Group (TSG) - Level 1 Public Order, firearms officer and dedicated surveillance officer; 1997–1998 CO14 Clubs & Vice Unit – test purchase officer and street offences investigations; 1998-2000 Charing Cross Division on promotion – overt and covert licensing operations; 2000-2008 CO14 Clubs & Vice Unit – lead officer for the investigation of serious criminal offences within licensed premises across London, test purchase officer, Pan-London licensing tactical advisor, Licensing Policy Development and Implementation for the Metropolitan Police Service (MPS) and intelligence unit supervisor; 2008-2018 Marine Policing Unit (MPU) – licensing lead for the MPU; licensing tactical advisor Notting Hill Carnival, covert licensing operations and intelligence unit supervisor. Marine intelligence and accreditation lead for the Queens Diamond Jubilee River Pageant and intelligence lead for the London Olympics 2012.
9. I have worked as an Independent Consultant in the Licensing and Security Industry for the last 5 years.
10. I was a Home Office qualified Crime Prevention Design Advisor.
11. I am the holder of the BTEC Level 3 Certificate (Security Industry Authority) – Close Protection Operative in the Private Security Industry.
12. I am the holder of a Personal Licence under the Licensing Act 2003.

Observations

13. I carried out my observations of Merkur Slots premises at 182-184 Edgware Road and the surrounding area between 21:00 hours on Thursday 1st September 2022 and 06:15 hours on Friday 2nd September 2022, and again between 22:50 hours and 23:35 hours on Thursday 15th September 2022.
14. The area felt safe with members of the public going about their business, working, shopping, and socialising.
15. The area is well lit and illuminated from street lighting and shop front lights. I had clear and unobstructed views throughout the observations.

16. During observations I concentrated on the pedestrian footfall, signs of criminality, begging, anti-social behaviour including any additional noise, vulnerable persons, other persons at risk and the general environment.
17. The area of observations is densely populated with many retail premises, licensed bars, and restaurants. Edgware Road is well served by public transport with regular bus routes, taxis, and trains. There was ample car parking available in a nearby pay and display car park and restricted parking in the side roads. There are London Underground Stations located at Edgware Road to the north of the premises and Marble Arch to the south. These transport mediums allow the public to arrive and leave the area safely and quickly.
18. The area has a diverse community living together in a mixture of privately owned and rental accommodation. The area also has several hotels and bed and breakfast establishments.
19. The premises is situated on the A5 a busy road running North to South. The southern end finishes at one of London's iconic tourist venues, Marble Arch and Hyde Park with the exclusive premises of Park Lane close by. To the north is the Marylebone Flyover which connects to the A40 a main arterial route into London. The road has two-way vehicular traffic passing the venue.
20. Running off Edgware Road, east to west are numerous residential hotel and commercial premises. On either side of Edgware Road there are many retail outlets including independent shop premises, licensed premises, gaming premises, betting shops, restaurants, estate agents, supermarkets, mini-supermarkets, hairdressers, barber shops, chemists and fast-food premises.
21. Immediately north of the premises is an empty shop then the junction with Crawford Place. Immediately south of the premises is a McDonalds Restaurant and then a large Waitrose Supermarket. Opposite there are a number of small independent shops including a mobile phone sales and service premises (Mr Tech and Linku), a Salon (Baghdad Salon) and a Pharmacy.
22. Pedestrian and vehicular traffic varied during the times of the observations. There was zoned parking in local side roads and additional underground parking for some of the residential apartment premises.
23. The area of observations was from Chapel Street in the north and George Street in the south.
24. There are seven other gambling premises in the Edgware Road W2 area of observations. The four bookmaker premises were all closed by 22:00 hours, the other gaming premises were open 24-hours:
 - i. Coral Bookmakers 214 Edgware Road W2 1DH – Image A16
 - ii. Ladbrokes Bookmakers 113-115 Edgware Road W2 2HX – Image A18
 - iii. Paddy Power Bookmakers 242 Edgware Road W2 1DS – Image A15
 - iv. William Hill Bookmakers 95 Edgware Road W2 2HX – Image A19
 - v. Little Vic Casino 156 – 158 Edgware Road W2 2DS – Image A10

- vi. Reel Time 212 Edgware Road W2 1DH – Image A16
- vii. The Victoria - Grosvenor Casino 150-162 Edgware Road W2 2DS – Image A11

25. These premises can be divided into three main types:

- i. Casino premises that serve alcohol.
- ii. Betting premises not licensed to serve alcohol.
- iii. Gaming premises – Adult Gaming Centres (AGC) and Bingo Premises not licensed to serve alcohol.

26. There are two gaming premises that have a similar business model to Merkur Slots – Little Vic Casino 156-158 Edgware Road and Reel Time 212 Edgware Road which are both able to open 24-hours a day 7-days a week.

27. Throughout my observations in and around Edgware Road I saw no street drinkers, drug dealing, anti-social behaviour or other criminal activity around the premises or the area. There was begging taking place and homeless sleeping in doorways however this was well away from Merkur Slots and not linked to the premises in anyway – Image A8, A9.

28. Photographic images of what was seen during the observations were taken to support my findings and are documented in Appendices A and B.

Covert Observations

Deployment One

29. I conducted my covert observations from 21:00 hours on Thursday 1st September 2022 to 06:15 hours on Friday 2nd September 2022.

30. At 21:00 hours I arrived in the area of the Merkur Slots premises 182-184 Edgware Road W2 2DS and started my observations by monitoring the venue, the immediate area around it and the pedestrian footfall – Image A1.

31. Pedestrian and vehicular traffic passing the premises was constant throughout my observations but varied dependent on the time of night. Most of the shops had closed when I arrived. The bookmakers were still open but soon closed without any issues – Image A2, A3, A4, A5, A6.

32. At 21:28 hours I saw a female engaged in begging outside Lloyds Bank Edgware Road with a homeless person sleeping nearby – Image A8.

33. At 21:30 hours I saw a homeless male and female couple asleep outside Barclays Bank Edgware Road – Image A9.

34. Between 22:00 hours and 01:00 hours a continuous flow of pedestrians walked past the venue transiting the area or visiting the shops, restaurants and late-night

takeaway shops. During this time there were no groups of youths hanging around the premises or in the nearby streets. Pedestrians and vehicles made their way along Edgware Road with purpose – Images A21, A22, A23, A24.

35. Between 00:11 hours and – 00:21 hours I conducted a covert visit to the Merkur Slots Edgware Road – Images A25, A26.
36. The front display of the premises was clean, well maintained and looked professional. The signage was clear and bright.
37. At 00:11 hours I went to the entrance door which was closed. I saw that entry was controlled by using a bell security entry system. On the glass of the door, I saw signage stating no under 18's, CCTV in operation, no alcohol and that a time delay lock was in use.
38. I pushed the door and entered. On entry I saw to the right was a display board with the rules, policies and licences on show for customers and the authorities.
39. On entering this main area, the room opened into a large deep room. I saw it was on one level which was carpeted and there were gaming machines of various types throughout the premises.
40. About half way down on the left I saw a reception area where refreshments were also prepared. At the reception desk I saw two male members of staff dressed in smart corporate clothing.
41. One of the males approached and informed me that the premises was due to close in about 10 minutes. I stated I thought it closed at 1am and he stated it did, but they were closing early to allow staff to thoroughly clean the gaming machines and room. I saw that he had an SIA door supervisor badge clearly displayed. The other member of staff then spoke to me confirming I only had 10 minutes to use the machines until the premises closed, I replied that would be fine.
42. I saw there was one other customer in the premises. He was male about 27 years of age and casually dressed. No other customers came into the venue during my visit.
43. I found a gaming machine to play and sat down. I asked the second male if there were drinks available. He stated there were only soft drinks available as they were about to close. I declined the offer and carried on playing the machine.
44. There was a facility to prepare hot and soft drinks at the reception desk area which was clean and tidy.
45. Whilst I was in the venue, I saw the staff cleaning, wiping down surfaces and completing a low-profile patrol checking on customers' needs and making sure they weren't underage or vulnerable. I felt safe, I was not pressurised to use the machines or to spend money. The staff were friendly, polite, informative and I found the premises clean and tidy.

46. After 10 minutes in the premises, I was informed by staff that they were now closed, and I needed to leave. At no time during my observations did I see anyone hanging around the premises. Customers arriving went straight into the premises and customers leaving left the area straight away. I left the premises at 00:21 hours – Image A26.
47. At 01:00 hours Merkur Slots Edgware Road formally closed without any issues or incidents.
48. Throughout my continuing observations I recorded further photographic images that demonstrate there was no anti-social behaviour in the vicinity of the Merkur Slots premises – Images A27, A28, A29, A30, A31, A32, A33, A34, A35, A36, A37, A38, A39, A40, A41.
49. I remained in the area until 06:15 hours when I concluded my observations.

Deployment Two

50. I conducted my covert observations from between 22:50 hours to 23:35 hours on Thursday 15th September 2022.
51. At 22:50 hours I arrived in the area of the Merkur Slots 182-184 Edgware Road W2 2DS and started my observations by monitoring the venue and the immediate area around it – Image B1.
52. Pedestrian and vehicular traffic passing the premises was constant but varied as is typical with Edgware Road 24-hours 7-days a week.
53. Between 22:56 hours and 23:28 hours I conducted a covert visit to the Merkur Slots 182-184 Edgware Road W2 2DS – Image B2.
54. At 22:56 hours I went to the entrance door which was closed. The front of the premises was as I have described previously.
55. I pushed the door and entered the premises. In front of me was the board with the premises policies, rules and licences on display. I passed the policies board and entered the main area which was the same as when I visited previously.
56. I saw there were two male staff on duty who were dressed in smart corporate clothing. One of the males was also wearing an SIA door supervisor badge.
57. The member of staff without the SIA badge approached me, welcomed me to the venue and asked if I needed any help with choosing a gaming machine to play. I stated I was fine and looked around the premises.
58. I saw there were five other customers in the venue at the time of my visit. All five were male aged between 28 years and 55 years and casually dressed.

59. I found a gaming machine beyond the reception desk. The staff left me to enjoy playing the machines. I was not pressurised or encouraged to spend money.
60. Whilst I was playing the machine the male member of staff who spoke to me originally asked if I would like a soft drink, water, coffee, tea or a snack. I asked if I could get an alcoholic drink and he explained the premises weren't licensed for alcohol but the non-alcoholic drinks they provided were free for customers. I accepted his offer of a coffee.
61. After a couple of minutes, the staff member brought over my coffee and stated if I needed any help to ask him or his colleague.
62. The hot and soft drinks were prepared at the reception desk area which was clean and tidy.
63. As before whilst I was in the venue, I saw the staff cleaning, wiping down surfaces and completing a low-profile patrol checking on customers' needs and making sure they weren't underage or vulnerable. I felt safe, I was not pressurised to use the machines or to spend money. The staff were friendly, polite, informative and I found the premises clean and tidy.
64. Before leaving I used the toilets which were clean and tidy. The toilets were regularly checked as shown by the toilet check sheet and there were Gamcare leaflets available for customers to take away – Image B3, B4.
65. At no time during my observations did I see anyone hanging around the premises. Customers arriving went straight into the premises and customers leaving left the area straight away. Prior to me leaving two male customers left and did not return. I left the premises at 23:28 hours – Image B5.
66. Throughout my continuing observations I recorded a further photographic image that demonstrated there was no anti-social behaviour in the vicinity of the Merkur Slots premises – Image B6.
67. I remained in the area until 23:35 hours when I concluded my observations.

Summary

68. I found Merkur Slots in Edgware Road to have a smart, well-lit, and professional looking frontage. The premises were carpeted, with music playing in the background and the atmosphere was relaxed and welcoming.
69. At the time of my visits to the location, I saw mature females engaged in begging and homeless people sleeping in doorways on Edgware Road. However, this activity took place well away from Merkur Slots and was not linked to the premises in any way.
70. I saw no evidence of crime and disorder, anti-social behaviour, excessive noise, littering, street drinking, drug dealing or groups of youths hanging around.

71. People entering these premises were vetted before entering or immediately upon entry to ensure drunken or other vulnerable people didn't gain access to the premises.
72. It is clear the presence of Merkur Slots in Edgware Road does not lead to or result in people, who have been on a night out, staying in the area any longer than they had planned to.
73. Merkur Slots UK takes safer gambling seriously. This can be evidenced with the use of safeguarding programs such as:
- i. Merkur 360 Program - To achieve higher standards of player protection Merkur have worked with G4 Global Gambling Guidance Group, which focuses on the provision of responsible gambling and has also implemented its own 360 responsible gambling program.
 - ii. Think 25 Policy – Strict Over 18 Policy. All venues operate a Think 25 Policy whereby photographic ID is required to gain entry.
 - iii. In View Tools – Staying in control is a key part of messaging in the Merkur venues. Leafleting and posters such as BeGambleAware and GamCam, can be found in the venues main area and in private places such as toilets.
 - iv. Staff Training – Merkur Slots has developed a detailed training programme for all staff members including its own City and Guilds accredited training developed in partnership with YGAM and Betknowmore.
74. From my visits to many Merkur Slots Premises, I have found professional and attentive staff managing them. The premises are well run and there are clearly defined systems in place to ensure the premises operate in support of the gambling objectives and don't attract or take advantage of juveniles or other vulnerable persons.
75. The demographic is much older and doesn't attract young people or children. The environment is very different to a loud busy arcade, it is a low-key carpeted style lounge with no more than a handful of mature customers in at any one time.
76. Merkur Slots UK and their premises operate in support of the principles of Secured by Design, the company recommended by the Chief Officers of UK Police Forces for Crime Prevention standards.
77. In conclusion, from my visits it is my opinion Merkur Slots UK Limited are well run, and their operation significantly reduces the risk of crime and disorder and vulnerable people being taken advantage of. It is clear that the Merkur Slots premises do not impact on the environment, infrastructure, or local community.

78. I believe the facts in my report are honest and true. The opinions I have expressed are made in good faith and in my best judgement. The fee for this report is not conditional on the outcome of any future case, application or finding.

Stuart Jenkins
Licensing Consultant
Leveche Associates Limited
20/09/2022



LEVECHE
ASSOCIATES LIMITED

Appendix A

Observation Images

1st - 2nd September 2022

Merkur Slots

182-184 Edgware Road

London

W2 2DS

Leveche Associates Ltd

Nightingale House

46-48 East Street

Epsom

Surrey KT17 1HQ

Merkur Slots
Merkur Slots 182-184 Edgware Road London W2 2DS
1st - 2nd September 2022



Image A1

21:21hrs

Merkur Slots 182-184 Edgware Road London W2 2DS



Image A2

21:21hrs

Edgware Road looking south

Mercur Slots
Mercur Slots 182-184 Edgware Road London W2 2DS
1st - 2nd September 2022



Image A3

21:21hrs

Edgware Road looking north



Image A4

21:26hrs

McDonalds 178 - 180 Edgware Road W2 2DS

Merkur Slots
Merkur Slots 182-184 Edgware Road London W2 2DS
1st - 2nd September 2022



Image A5

21:26hrs

Waitrose Supermarket
168 - 176 Edgware Road W2 2DX



Image A6

21:27hrs

Edgware Road looking north

Merkur Slots
Merkur Slots 182-184 Edgware Road London W2 2DS
1st - 2nd September 2022



Image A7

21:27hrs

Pharmacentre 149 Edgware Road
(opposite Merkur Slots)



Image A8

21:28hrs

Female engaged in begging Edgware Road
looking north

Mercur Slots
Mercur Slots 182-184 Edgware Road London W2 2DS
1st - 2nd September 2022



Image A9

21:30hrs

Rough Sleeper Edgware Road looking north

Image A10

21:30hrs

The Little Vic Casino 156 Edgware Road W2 2DS

Merkur Slots
Merkur Slots 182-184 Edgware Road London W2 2DS
1st - 2nd September 2022



Image A11

21:31hrs

Victoria Casino 150 -162 Edgware Road W2 2DT



Image A12

21:32hrs

Female engaged in begging Edgware Road

Mercur Slots
Mercur Slots 182-184 Edgware Road London W2 2DS
1st - 2nd September 2022



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Image A13

21:32hrs

Congestion Charge Restrictions Signage Edgware Road



Image A14

21:40hrs

Edgware Road j/w Chapel Street and Praed Street looking south

Merkur Slots
Merkur Slots 182-184 Edgware Road London W2 2DS
1st - 2nd September 2022



Image A15

21:40hrs

Paddy Power 242 Edgware Road W2 1DS



Image A16

21:42hrs

Coral Bookmakers 214 Edgware Road W2 1DH

Merkur Slots
Merkur Slots 182-184 Edgware Road London W2 2DS
1st - 2nd September 2022



Image A17

21:43hrs

Reel Time 212 Edgware Road W2 1DH



Image A18

21:47hrs

Ladbrokes Bookmakers
113 - 115 Edgware Road W2 2HX

Merkur Slots

Merkur Slots 182-184 Edgware Road London W2 2DS

1st - 2nd September 2022



Image A19

21:49hrs

William Hill Bookmakers 95 Edgware Road W2 2HX



Image A20

21:50hrs

Edgware Road looking north

Merkur Slots
Merkur Slots 182-184 Edgware Road London W2 2DS
1st - 2nd September 2022



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Image A21

23:53hrs

Merkur Slots 182 - 184 Edgware Road W2



Image A22

23:55hrs

Edgware Road j/w Sussex Gardens looking north

Merkur Slots
Merkur Slots 182-184 Edgware Road London W2 2DS
1st - 2nd September 2022



Image A23

23:55hrs

Edgware Road looking south



Image A24

23:58hrs

Edgware Road looking north

Merkur Slots
Merkur Slots 182-184 Edgware Road London W2 2DS
1st - 2nd September 2022



Image A25

00:10hrs

Merkur Slots 182 - 184 Edgware Road



Image A26

00:22hrs

Merkur Slots 182 - 184 Edgware Road

Merkur Slots
Merkur Slots 182-184 Edgware Road London W2 2DS
1st - 2nd September 2022



Image A27

02:40hrs

Merkur Slots 182 - 184 Edgware Road



Image A28

02:40hrs

Edgware Road looking south

Merkur Slots
Merkur Slots 182-184 Edgware Road London W2 2DS
1st - 2nd September 2022



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Image A29

02:40hrs

Edgware Road looking north



Image A30

02:41hrs

Al Mustafa Express 135 Edgware Road W2 2HR



Image A31

02:42hrs

Little Vic Casino Edgware Road



Image A32

02:42hrs

Edgware Road looking south

Merkur Slots
Merkur Slots 182-184 Edgware Road London W2 2DS
1st - 2nd September 2022



Image A33

04:37hrs

Merkur Slots 182 - 184 Edgware Road



Image A34

04:37hrs

Edgware Road looking north

Merkur Slots
Merkur Slots 182-184 Edgware Road London W2 2DS
1st - 2nd September 2022



Image A35

04:37hrs

Edgware Road looking south



Image A36

04:38hrs

Rough Sleepers Edgware Road looking north

Merkur Slots
Merkur Slots 182-184 Edgware Road London W2 2DS
1st - 2nd September 2022



Image A37

04:39hrs

The Little Vic Casino Edgware Road



Image A38

06:04hrs

Merlur Slots 182 - 184 Edgware Road

Merkur Slots
Merkur Slots 182-184 Edgware Road London W2 2DS
1st - 2nd September 2022



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Image A39

06:04hrs

McDonalds Edgware Road



Image A40

06:05hrs

Edgware Road looking north

Merkur Slots
Merkur Slots 182-184 Edgware Road London W2 2DS
1st - 2nd September 2022



Image A41

06:05hrs

Edgware Road looking south



Appendix B

Observation Images
15th September 2022

Merkur Slots

182 -184 Edgware Road
London
W2 2DS

Leveche Associates Ltd

Nightingale House
46-48 East Street
Epsom
Surrey KT17 1 HQ

Merkur Slots
182-184 Edgware Road London W2 2DS

15th September 2022



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Image B1

22:54hrs

Edgware Road looking north



Image B2

22:55hrs

Merkur Slots 182 -184 Edgware Road W2 2DS

15th September 2022

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Image B3

23:22hrs

Toilet Check Sheet
Merkur Slots 182 - 184 Edgware Road



Image B4

23:22hrs

Staying in Control Literature / Gamcare Leaflets
Toilets Merkur Slots 182-184 Edgware Road

Merkur Slots
182-184 Edgware Road London W2 2DS

15th September 2022



Image B5

23:28hrs

Merkur Slots 182 - 184 Edgware Road

Image B6

23:28hrs

Edgware Road looking south



Full Observation Report

Mr Nicholas Mason – Consultant

Leveche Associates Limited

Merkur Slots

19 The Concourse

Edmonton Green N9 0TQ

Executive Summary

1. Observations were conducted on Merkur Slots premises at 19 The Concourse Edmonton Green N9 0TQ and the surrounding area between 20:45hrs on Thursday 22nd September 2022 and 05:45hrs on Friday 23rd September 2022. The premises are situated in a pedestrianised area of Edmonton Green.
2. One covert visit was made to the Merkur premises and the surrounding area. Observations showed the premises to be well run and operating correctly with no issues.
3. There are no other gaming premises with a similar business model to Merkur Slots in the immediate area. From the observations, it is clear that Merkur Slots operating 24-hours a day does not create anti-social behaviour, noise or any other crime and disorder and does not have a negative impact on nearby residents, the environment, local infrastructure, or wider local community.

Introduction

4. We are instructed to conduct independent observations at Merkur Slots premises at 19 The Concourse Edmonton Green Shopping Centre N9 0TQ and the surrounding area.
5. The premises has a 24-hour licence under the Gaming Act 2005 and is open 24-hours a day 7-days a week.
6. The premises come under the jurisdiction of the London Borough of Enfield Council and the Edmonton Green Ward for the Metropolitan Police.

Personal Summary – Nicholas Mason

7. I am a Director of Leveche Associates Limited, an independent company dealing with Licensing and Security in the private sector. I am a former Police Officer having retired from the MPS upon completion of over 30 years exemplary service.
8. Throughout my police career the majority of my service was as a Detective at different ranks. I attained the rank of Detective Chief Inspector with responsibility for the risk assessment and management of intelligence led operations by covert means, including the disruption of organised crime groups infiltrating the licensing industry.
9. For a number of years, I performed the role of 'On Call Senior Investigating Officer' for the MPS Serious Crime Directorate with responsibility for advising 'fast time' best practice and investigation strategy in the most serious of incidents.
10. As a senior Detective of the MPS Crime Reporting & Investigation Bureau I had responsibility for the strategic overview of all recorded crime for London and the Management of Investigations transferred into MPS through other UK crime authorities / Police forces.
11. I have worked as an Independent Consultant in the Licensing and Security Industry for the last 5 years.
12. I am the holder of the Chartered Management Institute level 5 Certificate in Police Management.
13. I am a Registered Close Protection Operative - Level 3 Certificate (Security Industry Authority - SIA).
14. I hold the UK Award for Personal Licence Holders (APLH) under the Licensing Act 2003.

Observations

15. Observations were carried out at Merkur Slots premises at 19 The Concourse Edmonton Green Shopping Centre N9 0TQ and the surrounding area on Thursday 22nd September 2022 into the early hours of Friday 23rd September 2022.

16. The premises are situated in a pedestrianised area of Edmonton Green. The footway in front of the Merkur Slots premises runs generally east to west. Immediately next door and to the east is the Betfred Bookmakers and to the west is a large Lidl Supermarket – Image A1 .
17. Betfred is the only bookmaker premises in the vicinity of Merkur Slots. The Betfred premises trades Monday to Sunday 07:30hrs to 22:00hrs. There are other Bookmakers within Edmonton Shopping Centre but they are some distance away and unlikely to impact on the operation of the Merkur Slots premises.
18. There are no other Adult Gaming Centres at this location and no other premises that operate a similar business model to Merkur Slots premises.
19. There are only a small number of other shops in the vicinity of the Merkur Slots premises which include a Pharmacy, Café , Barbers, Chinese Medical Centre, Opticians, a Clothing Shop and a Western Union Money transfer premises. All of these premises were closed for the period of observations.
20. Opposite the Merkur Slots premises are fast food shops, The Lime Tree Café, Hi Wok take away and the Baraja Bakery. The Hi Wok was open when observations commenced but had closed by 21:30hrs, as had all the other premises.
21. At the eastern end of the pedestrian area is Edmonton Green Market which has numerous market stall premises and leads into Edmonton Green Shopping Centre though all of this area was closed at the time of observations – Image A2, A3, A4.
22. Parking in the surrounding streets is restricted by double yellow lines and residents parking permits. There is a large car park available that serves Edmonton Shopping Centre.
23. The location is well served for public transport with the main bus station only 100 metres from the Merkur premises at Edmonton Green providing transport away from the town centre. Edmonton Rail Station is within 150 metres of the Merkur premises and provides another transport option both locally and with a connection to Central London. During the course of observations numerous licensed taxis / Ubers were seen serving the locality – Image A5, A8.
24. Opposite the Bus Station there is an additional transport option with a 24hr Mini cab office – Image A10, there are also a number of fast food take away / restaurant premises and a mini-supermarket – Image A11.
25. On the roundabout opposite the war memorial at 29 The Concourse is BIMs Burger Shop. This was a focal point for Deliveroo delivery riders to congregate with their motorcycles, though the pavement is wide enough at this point for them not to impact on passing pedestrians – Image A6, A7.
26. Away from the pedestrianised area the location has multiple side streets with privately owned and rented residential accommodation including some tower blocks that overlook the pedestrian area – Image A12.

27. In front of the Lidl Supermarket and near the Merkur Slots premises the paved area extends and a number of benches are located.
28. There are no public houses or bars in the immediate vicinity of the Merkur Slots premises.
29. There are no religious premises or schools in the immediate vicinity of the Merkur Slots premises and no children were seen in the area at the time of these overnight observations.
30. The area is well lit and illuminated from street lighting, lighting from the Bus Station and shop front lights. I had clear and unobstructed views throughout the observations.
31. Photographic images of what was seen were obtained to support my findings. These images are documented in Appendix A.

Covert Observations

32. On Thursday 22nd September at 20:45hrs observations commenced and went through the night until 05:45 hours on Friday 23rd September 2022.
33. The Merkur Slots premises were open as were the adjacent premises, the Betfred Bookmakers and Lidl supermarket. The Merkur premises had a smart corporate and professional looking frontage that was well maintained and clean. There was no evidence of anti-social behaviour – Image A1.
34. From around 21:50hrs I positioned myself in the vicinity of the Betfred Bookmakers as it was closing for the evening. There was no evidence of criminality, additional noise or anti-social behaviour as the premises closed – Image A13.
35. At 22:01hrs 5 customers, 4 men and 1 woman left Merkur Slots premise. They walked past where I was standing and I could hear them talking. There was no disturbance or anti-social behaviour – Image A14.
36. At 22:06hrs the staff from Betfred Bookmakers left the premises, locked the front door and walked away in the direction of the bus station. Again, there was no disturbance or anti-social behaviour – Image A15 .
37. At 22:11hrs a group of young men were seated or standing by the benches outside Lidl Supermarket, some were drinking from what I believed to be beer cans and were occasionally shouting. None of these men were linked to the Betfred Bookmakers or the Merkur Slots premises – Image A16.
38. At 23:24hrs I was in the vicinity of the Merkur Slots premises and surrounding area, there was no evidence of additional noise or anti-social behaviour – Image A17, A18, A19.

39. At 23:25hrs I saw a white male in a blue casual track-suit approach the front door of the Merkur premises. I heard the buzz of the security bell and the man then walked into the premises and out of sight – Image A19.
40. At 00:47hrs I was in the vicinity of the Merkur Slots premises and surrounding area, there was no evidence of additional noise or anti-social behaviour – Image A20, A21, A22.
41. Between 01:00hrs and 01:40hrs I conducted a covert visit to the Merkur Slots premises at 19, The Concourse. As I approached I could see signage on the front door that stated no smoking on the premises, over 18' only, no alcohol and that CCTV was in use.
42. The design of the frontage meant I was unable to see into the premises from the street. The premises were advertised as being open for 24-hrs per day.
43. The front door was locked, there was a CCTV camera to my left with a push button that I pressed. The door was unlocked and opened by a member of security staff who was wearing a blue blazer saying security and had a lanyard around his neck that held an SIA badge. He greeted me and I walked in.
44. Once inside the entrance I saw there was an information board on my right. On this board were Merkur Slots information documents, premises rules, policies and licenses. The documents displayed included:
- i. The premises licence.
 - ii. The company codes of practice.
 - iii. It was a no smoking venue.
 - iv. Think 25 poster.
 - v. GamCare poster.
45. I walked through the premises and could see there was a series of gaming machines going from the front to the back of the premises along both walls. The floor was carpeted providing a lounge style effect and at the rear of the premises was a reception area. Behind a Perspex shield was an area for preparing drinks, this area appeared clean and tidy. Two other members of staff, wearing Merkur liveried black shirts with black trousers were standing there.
46. I walked around the premises looking for a machine to play. There were 3 other customers playing machines, each was about 35 years old, they were all male casually addressed and each appeared to be on their own. I selected a machine along the left-hand wall near the front of the premises and sat down.
47. I began to play a machine when I was approached by a member of staff who I had seen at the rear of the premises. He asked if I would like a drink and I asked what

was available. He explained that there were soft drinks or coffee and I asked for a black coffee. He walked off returning with the coffee a few minutes later.

48. I continued to play the machine and noted that both staff I had seen at the rear of the premises were cleaning, one with spray, wiping down the machines while the staff member I had spoken to had a hand-held vacuum and was cleaning the carpet in different areas.
49. I paused playing my machine and spoke to the member of staff who had brought my coffee and asked if the toilet was at the rear of the premises. He confirmed that it was but then explained that it was out of order, there had been a leak, a plumber had been to look at it and would be returning in the morning.
50. I returned to playing the machine, neither I or any of the other 3 customers were pressurised or encouraged to spend money and I did not see anyone who was vulnerable or drunk. The staff were friendly and polite and the premises clean and tidy.
51. During the course of my visit no other persons entered the premises. I stood up to leave and as I did so the security guard walked to the front door and unlocked it. I thanked him and walked out of the premises at 01:19hrs. As I went out through the door there was no one loitering outside or looking to gain entry. There was no anti-social behaviour inside or outside in the vicinity of the premises – Image A23.
52. At 01:41hrs I saw an elderly male and female couple standing at the paved area in front of the Lidl Supermarket. The female was shouting at the male who was clearly very drunk. They were joined by another elderly couple and stood by the scaffolding close to Domino's Pizza delivery shop opposite the bus station. None of these people were linked to the Merkur Slots premises and after a short while walked away towards the bus station and out of my sight – Image A24.
53. As the night progressed there was some footfall and local traffic but nothing out of the ordinary. I obtained images from the vicinity of the Merkur Slots premises which demonstrate there was no evidence of any anti-social behaviour or criminality – Image A25, A26, A27, A28, A29, A30, A31.
54. At 05:45hrs I concluded my observations – Image A32.

Summary

55. During the observation periods I found no evidence of anti-social behaviour or criminality at the Merkur Slots premises or linked to it.
56. Early on during my observations at 22:11hrs I witnessed a group of young men at the benches outside Lidl Supermarket, some were drinking from what I believed to be beer cans and were occasionally shouting. None of these men were linked to the Betfred Bookmakers or the Merkur Slots premises.
57. At 01:41hrs I saw the elderly drunk male with his wife and another couple. None of these people were linked to the Merkur Slots premises.

58. During the course of my observations I saw no other evidence of anti-social behaviour, begging, crime and disorder, drug dealing or other groups of youths loitering in the area.
59. People entering the Merkur Slots premises were supervised on entry and whilst on the premises to ensure that anyone heavily intoxicated, juveniles or other vulnerable people didn't gain access.
60. The visit to these premises established that they are well run and that there are clearly defined systems in place to ensure the premises operate in support of the gambling objectives and don't attract or take advantage of juveniles or other vulnerable persons.
61. At Merkur Slots premises the demographic is much older and doesn't attract young people or children. The environment is very different to a loud busy arcade, it is a low-key carpeted style lounge with no more than a handful of mature customers in at any one time.
62. Merkur Slots UK takes safer gambling seriously. This can be evidenced with the use of safeguarding programs such as:
- Merkur 360 Program - To achieve higher standards of player protection Merkur have worked with G4 Global Gambling Guidance Group, which focuses on the provision of responsible gambling and has also implemented its own 360 responsible gambling program.
 - Think 25 Policy – Strict Over 18 Policy. All venues operate a Think 25 Policy whereby photographic ID is required to gain entry.
 - In View Tools – Staying in control is a key part of messaging in the Merkur venues. Leafleting and posters such as BeGambleAware and GamCam, can be found in the venues main area and in private places such as toilets.
 - Staff Training – Merkur Slots has developed a detailed training programme for all staff members including its own City and Guilds accredited training developed in partnership with YGAM and Betknowmore.
63. Merkur Slots UK and their premises operate in support of the principles of Secured by Design, the company recommended by the Chief Officers of UK Police Forces for Crime Prevention standards.
64. In conclusion, from this visit and my visits to other Merkur premises it is my opinion these types of 24-hour gaming premises are well run and do not increase anti-social behaviour, noise or any other crime and disorder that would have a negative impact on nearby residents, the environment, local infrastructure or wider local community.

65. I believe the facts in my report are honest and true. The opinions I have expressed are made in good faith and in my best judgement. The fee for this report is not conditional on the outcome of any future case, application or finding.

Nick Mason - Consultant
Leveche Associates Limited
23rd September 2022



Appendix A

Observation Images

22nd - 23rd September 2022

Merkur Slots

19 The Concourse
Edmonton Green
N9 0TQ

Leveche Associates Ltd

Nightingale House
46-48 East Street
Epsom
Surrey KT17 1HQ

Merkur Slots
19 The Concourse Edmonton Green N9 0TQ
22nd -23rd September 2022



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Image A1

20:55hrs

Merkur Slots 19 The Concourse Edmonton Green



Image A2

20:57hrs

Edmonton Green Market

Merkur Slots
19 The Concourse Edmonton Green N9 0TQ
22nd -23rd September 2022

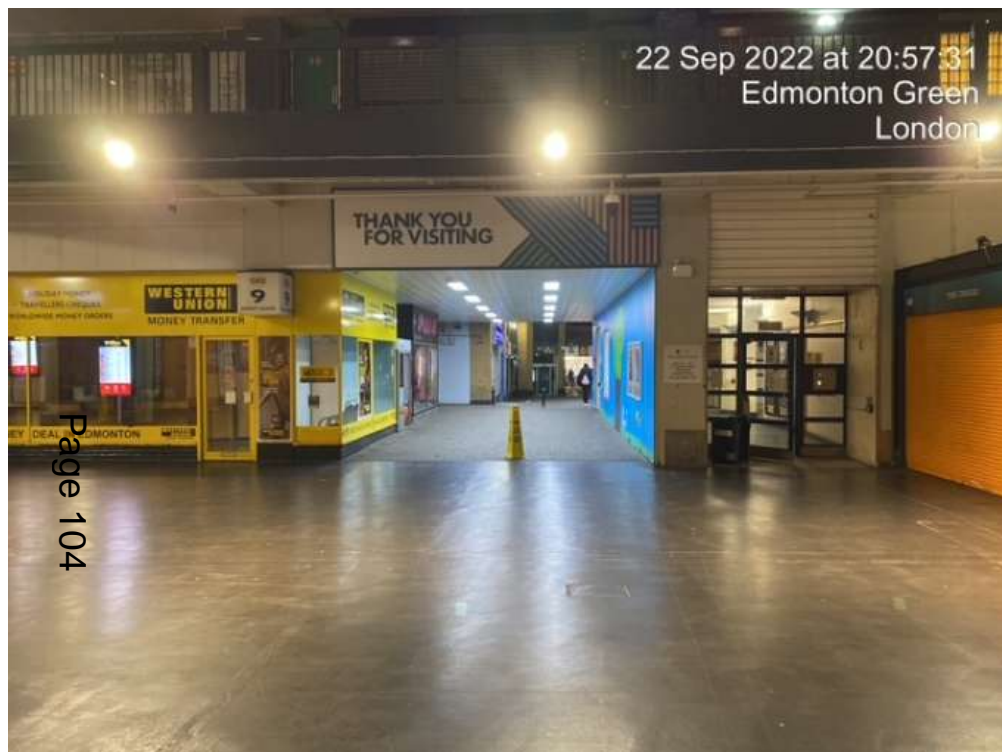


Image A3

20:57hrs

Edmonton Green Market looking towards Merkur Slots

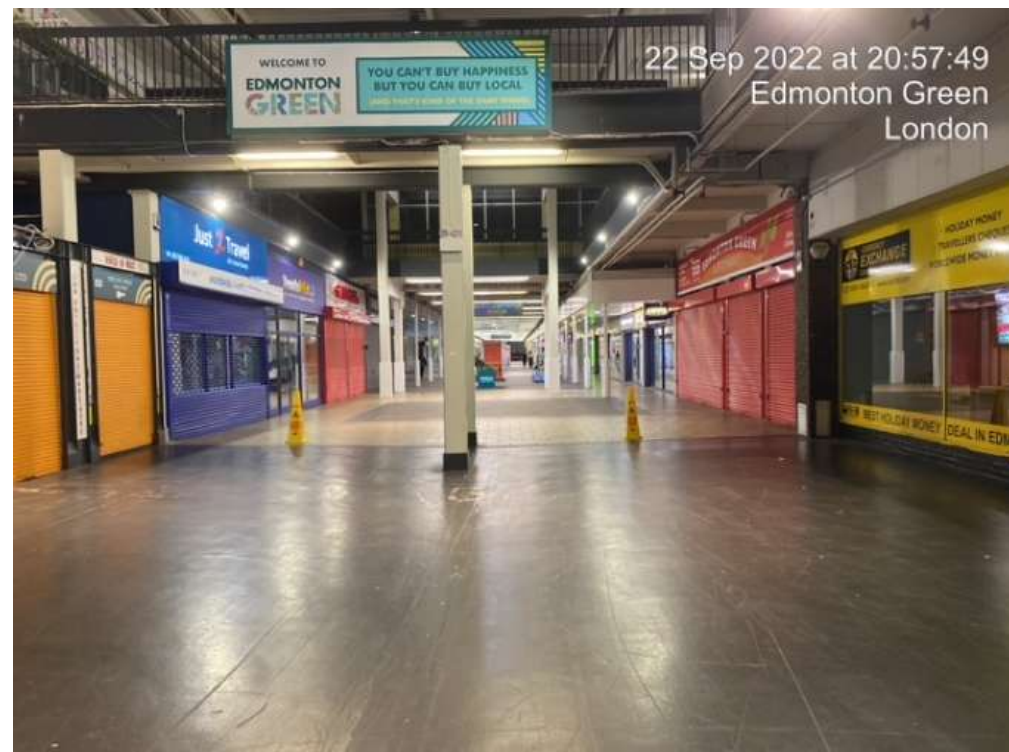


Image A4

20:57hrs

Edmonton Green Market looking towards Shopping Centre

Mercur Slots
19 The Concourse Edmonton Green N9 0TQ
22nd -23rd September 2022



Image A5
21:00hrs
Edmonton Bus Station



Image A6
21:02hrs
Deliveroo riders outside BIMS Burger shop

Merkur Slots
19 The Concourse Edmonton Green N9 0TQ
22nd -23rd September 2022

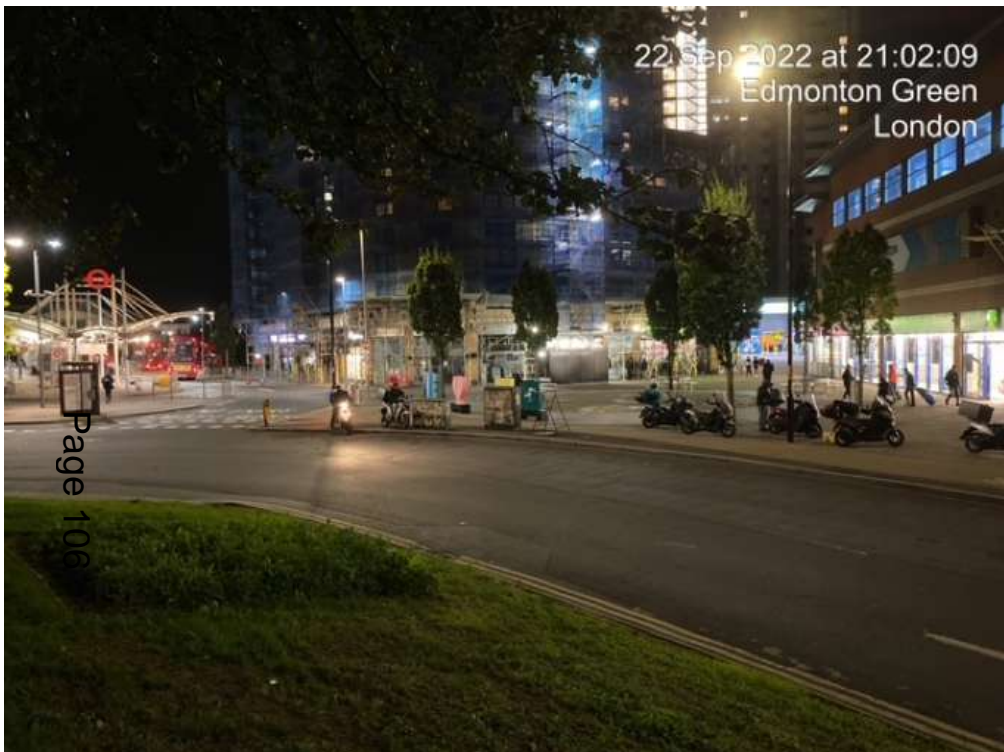


Image A7

21:02hrs

Deliveroo riders outside BIMS Burger shop

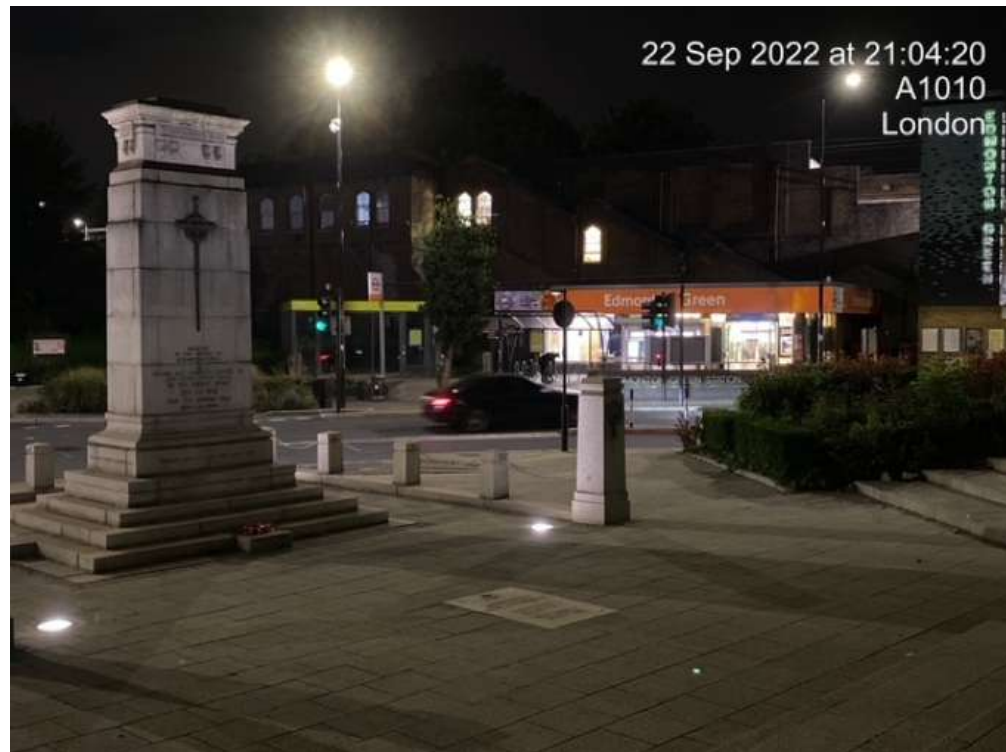


Image A8

21:04hrs

Edmonton Green Rail Station

Merkur Slots
19 The Concourse Edmonton Green N9 0TQ

22nd -23rd September 2022



Image A9

21:08hrs

Merkur Slots 19 The Concourse Edmonton Green



Image A10

21:10hrs

24hr Mini Cabs opposite Bus Station

Merkur Slots
19 The Concourse Edmonton Green N9 0TQ
22nd -23rd September 2022

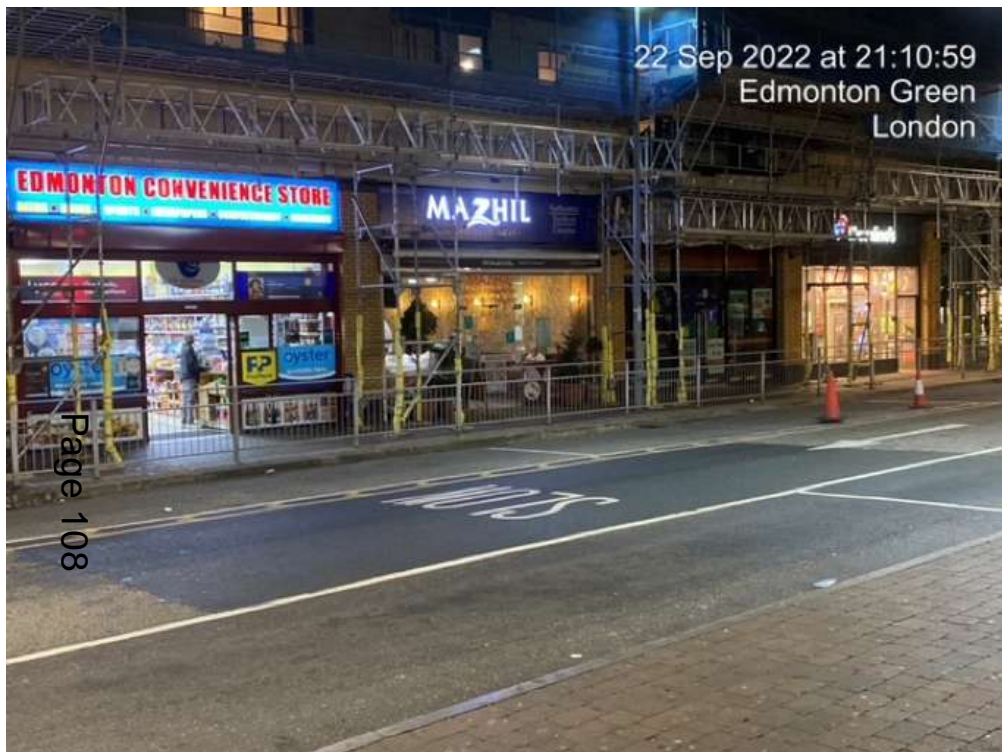


Image A11

21:10hrs

Food premises / Mini Supermarket opposite Bus Station



Image A12

21:53hrs

Residential Tower Blocks Edmonton Green

Merkur Slots
19 The Concourse Edmonton Green N9 0TQ
22nd -23rd September 2022



Image A13

21:56hrs

Betfred Bookmakers

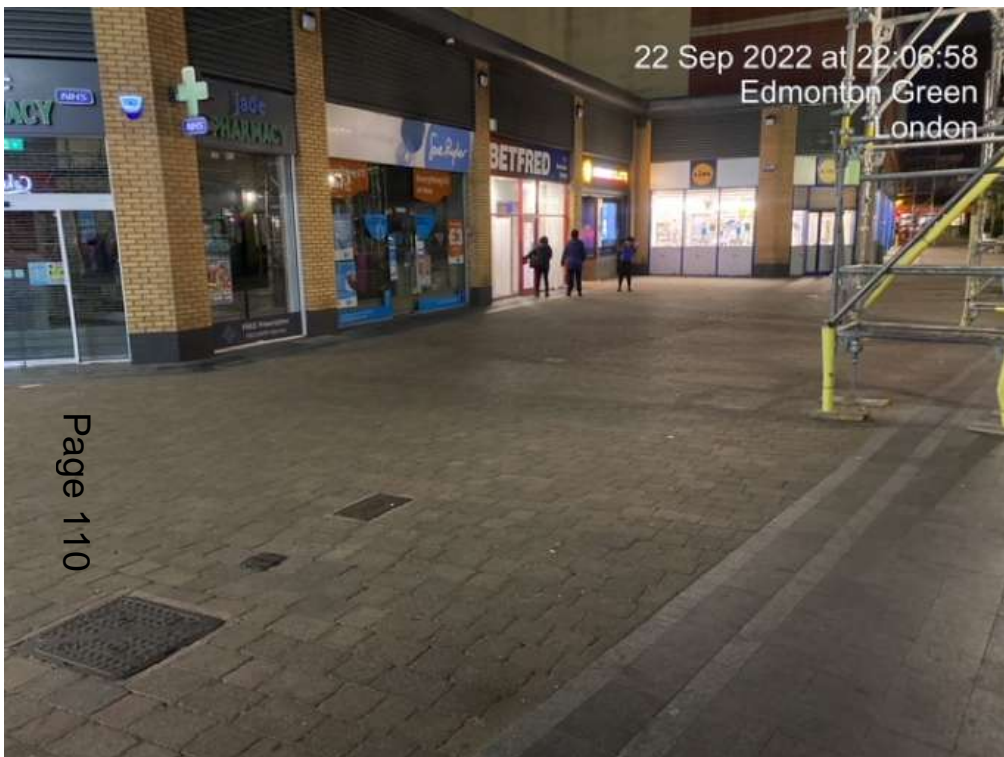


Image A14

22:01hrs

Customers leave Merkur Slots Edmonton Green

Merkur Slots
19 The Concourse Edmonton Green N9 0TQ
22nd -23rd September 2022



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Image A15

22:06hrs

Betfred Bookmakers closing time

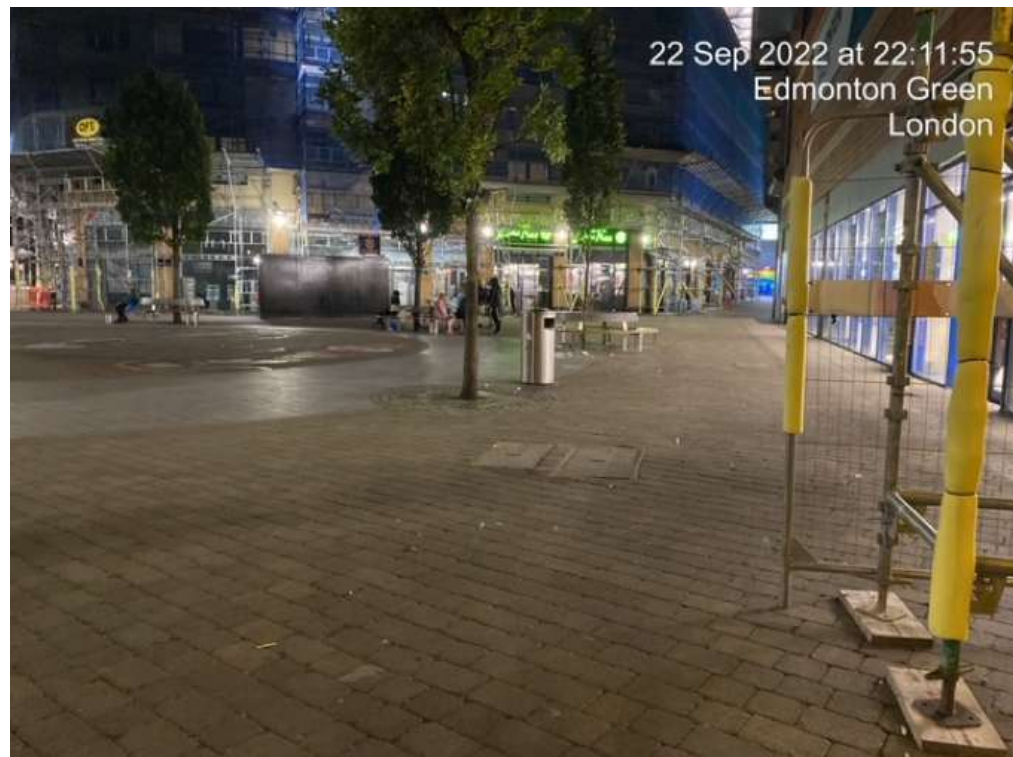


Image A16

22:11hrs

Paved area outside Lidl Supermarket

Merkur Slots
19 The Concourse Edmonton Green N9 0TQ
22nd -23rd September 2022



Image A17

23:24hrs

Paved area outside Lidl Supermarket



Image A18

23:24hrs

Edmonton Bus Station

Merkur Slots
19 The Concourse Edmonton Green N9 0TQ
22nd -23rd September 2022

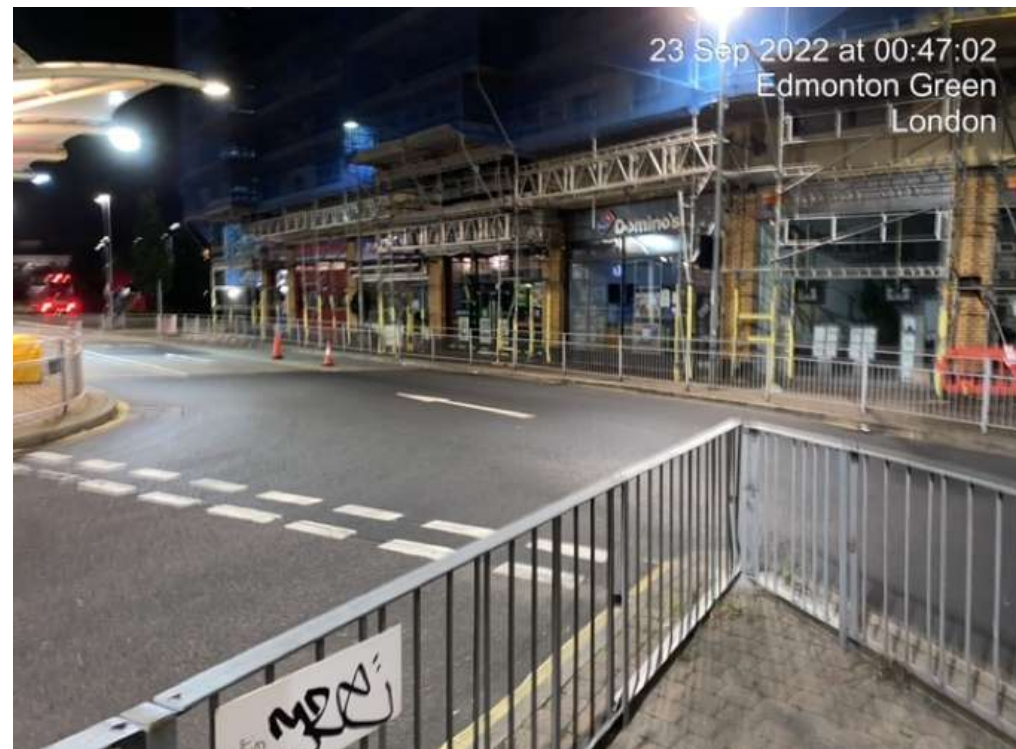


Image A19

23:25hrs

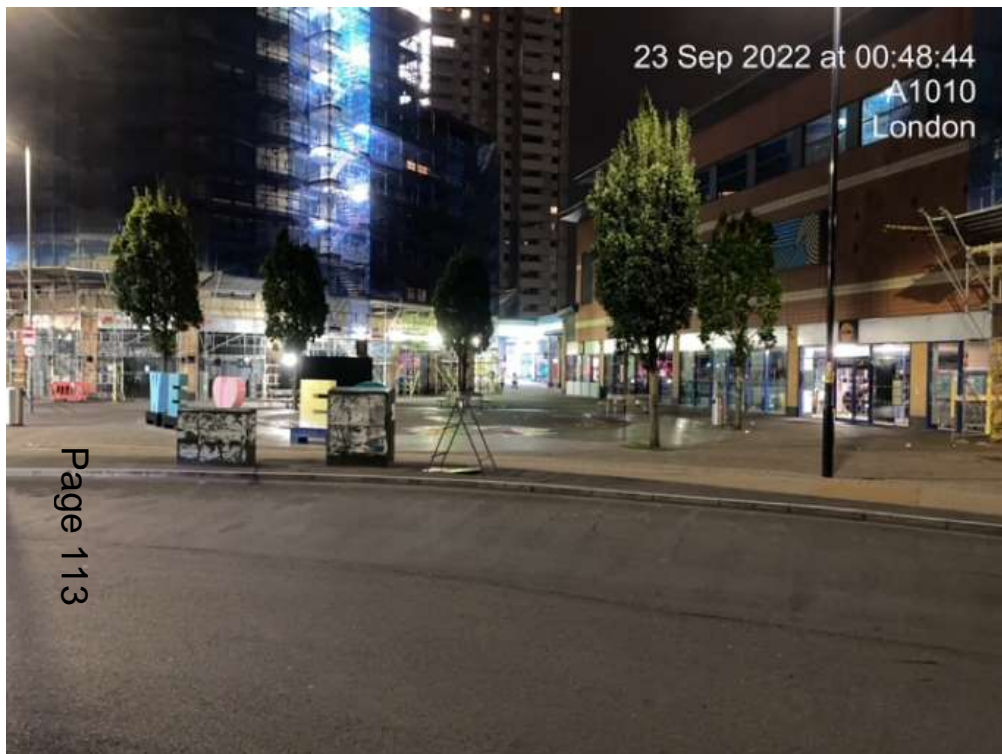
Merkur Slots 19 The Concourse Edmonton Green

Image A20

00:47hrs

Food premises / Mini Supermarket opposite Bus Station

Merkur Slots
19 The Concourse Edmonton Green N9 0TQ
22nd -23rd September 2022



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Image A21

00:48hrs

Paved area outside Lidl Supermarket



Image A22

00:52hrs

Merkur Slots 19 The Concourse Edmonton Green

Merkur Slots
19 The Concourse Edmonton Green N9 0TQ
22nd -23rd September 2022



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Image A23

01:19hrs

Merkur Slots 19 The Concourse Edmonton Green

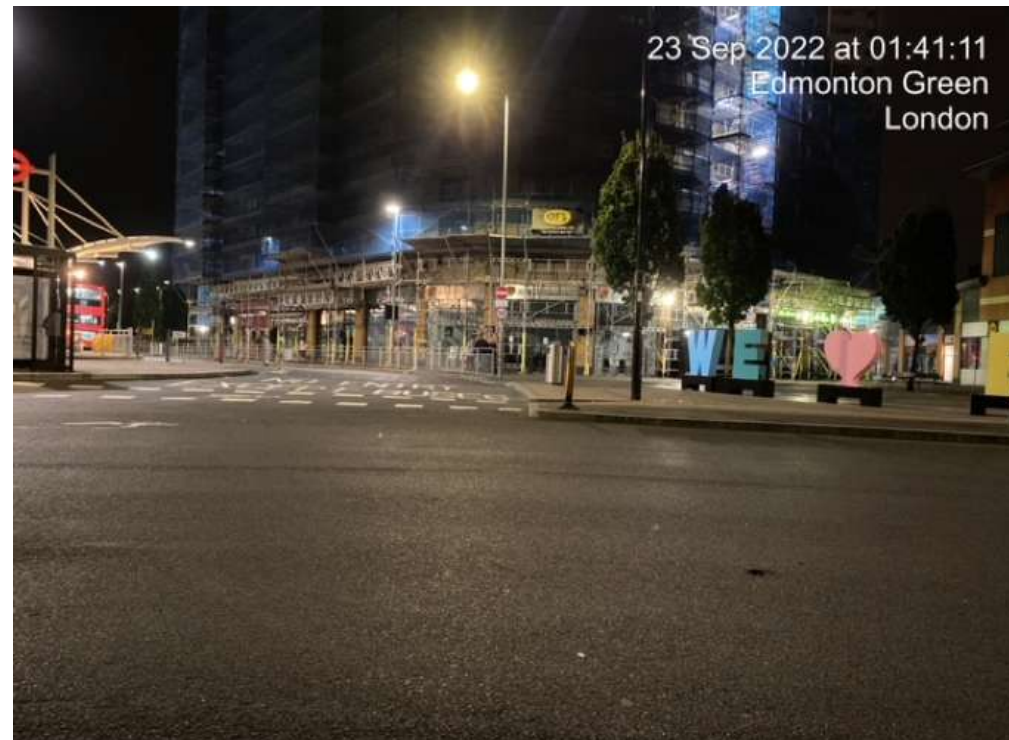


Image A24

01:41hrs

Paved area outside Lidl Supermarket

Merkur Slots
19 The Concourse Edmonton Green N9 0TQ
22nd -23rd September 2022



Image A25

02:11hrs

Paved area outside Lidl Supermarket



Image A26

02:11hrs

Merkur Slots 19 The Concourse Edmonton Green

Merkur Slots
19 The Concourse Edmonton Green N9 0TQ
22nd -23rd September 2022



Image A27

03:30hrs

Merkur Slots Edmonton Green

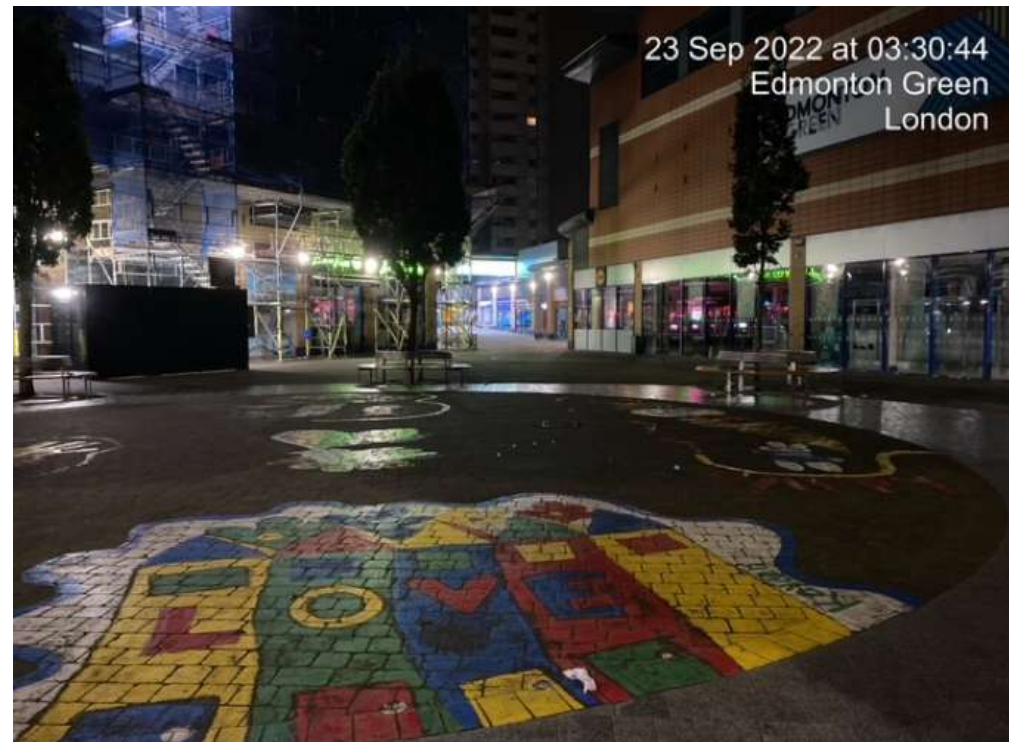


Image A28

03:30hrs

Paved area outside Lidl Supermarket

Merkur Slots
19 The Concourse Edmonton Green N9 0TQ
22nd -23rd September 2022



Image A29

04:42hrs

Paved area outside Lidl Supermarket



Image A30

04:42hrs

Merkur Slots Edmonton Green

Merkur Slots
19 The Concourse Edmonton Green N9 0TQ
22nd -23rd September 2022



Image A31

05:44hrs

Merkur Slots Edmonton Green

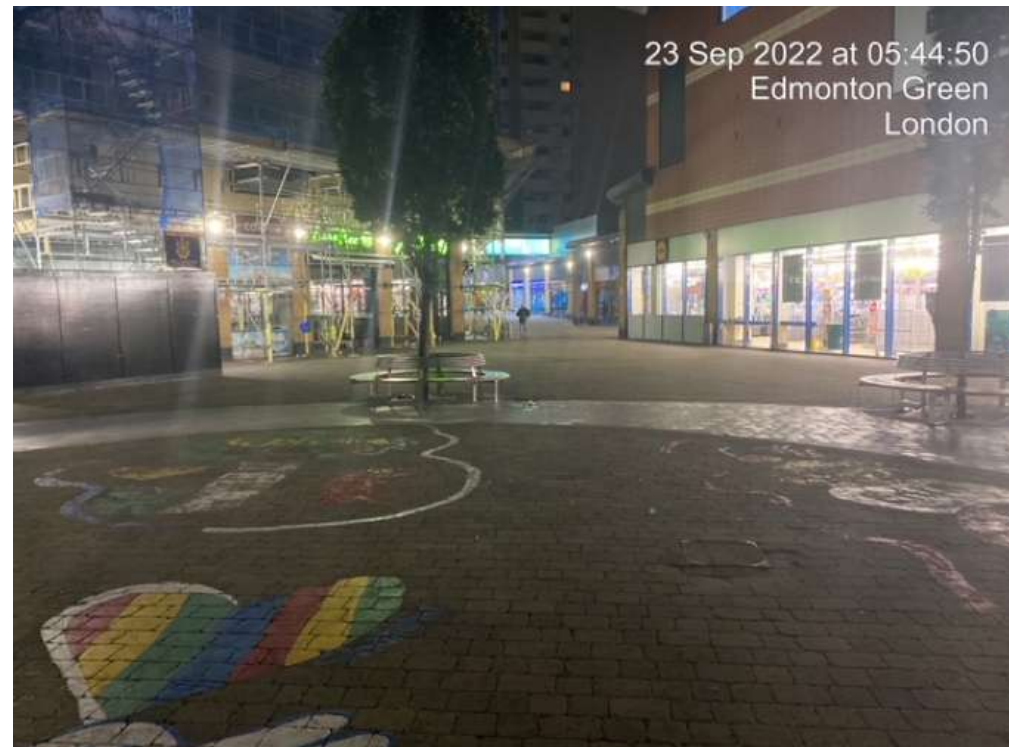


Image A32

05:44hrs

Paved area outside Lidl Supermarket



Full Observation Report

**Stuart Jenkins – Licensing Consultant
Leveche Associates Limited**

Merkur Slots

33 Town Centre Hatfield AL10 0JX

Executive Summary

1. Observations were conducted on Merkur Slots 33 Town Centre Hatfield AL10 0JX and the surrounding area between 20:00 hours on Wednesday 10th August 2022 and 06:45 hours on Thursday 11th August 2022. One covert visit was made to the site and the surrounding area. The observations showed the premises are in a quiet pedestrianised shopping area in the Town Centre of Hatfield with some residential accommodation above the shops. The covert visit showed the premises to be well run with no issues. There are no other gaming premises with a similar operation to Merkur Slots in the area. From the observations, it is clear that Merkur Slots operating 24-hours a day does not create anti-social behaviour, noise or any other crime and disorder that would have a negative impact on nearby residents, the environment, local infrastructure, or wider local community.

Introduction

2. I have been instructed to conduct independent observations on the Merkur Slots premises at 33 Town Centre Hatfield AL10 0JX and the surrounding area.
3. Merkur Slots UK operate the venue which has a 24-hour licence under the Gambling Act 2005.
4. The premises come under the jurisdiction of the Hatfield Central Ward of Welwyn Hatfield Borough Council.

Personal – Stuart Jenkins

5. I am a former Police Officer having retired from the Metropolitan Police after completion of over 30 years exemplary service.
6. Throughout my police career the majority of my service was spent on specialist units engaged on proactive operations :- 1993–1997 Central Territorial Support Group (TSG) - Level 1 Public Order, firearms officer and dedicated surveillance officer; 1997–1998 CO14 Clubs & Vice Unit – test purchase officer and street offences investigations; 1998-2000 Charing Cross Division on promotion – overt and covert licensing operations; 2000-2008 CO14 Clubs & Vice Unit – lead officer for the investigation of serious criminal offences within licensed premises across London, test purchase officer, Pan-London licensing tactical advisor, Licensing Policy Development and Implementation for the Metropolitan Police Service (MPS) and intelligence unit supervisor; 2008-2018 Marine Policing Unit (MPU) – licensing lead for the MPU; licensing tactical advisor Notting Hill Carnival, covert licensing operations and intelligence unit supervisor. Marine intelligence and accreditation lead for the Queens Diamond Jubilee River Pageant and intelligence lead for the London Olympics 2012.
7. I was a Home Office qualified Crime Prevention Design Advisor.
8. I am the holder of the BTEC Level 3 Certificate (Security Industry Authority) – Close Protection Operative in the Private Security Industry.
9. I am the holder of a Personal Licence under the Licensing Act 2003.

Observations

10. I carried out my observations of 33 Town Centre, Hatfield AL10 0JX and the surrounding area between 20:00 hours on Wednesday 10th August 2022 and 06:45 hours on Thursday 11th August 2022.
11. The area felt safe with members of the public going about their business, working, shopping, and socialising.
12. The area is well lit and illuminated from street lighting and shop front lights. I had clear and unobstructed views throughout the observations.

13. During observations I concentrated on the pedestrian footfall, signs of criminality, begging, anti-social behaviour including any additional noise, vulnerable persons, other persons at risk and the general environment.
14. The Merkur Slots premises is situated in the main pedestrianised Town Centre in Hatfield which encompasses pedestrianised shopping streets and a large square. Many of these shops have residential properties above them too. The section of the Town Centre that Merkur Slots is in, runs generally east to west. No vehicular traffic pass the venue but pedestrians can pass the premises in either direction – Image A1.
15. Mainstream shops line the pedestrian Town Centre, Town Square and Market Place.
16. During the observations pedestrian traffic passing the Town Centre and Market Place was varied. Vehicular traffic varied and passed Hatfield Town Centre via the B6426 Bypass, Wellfield Road, The Common and Lemsford Road - Image A2 and A3.
17. East of and next to the premises is Jade Pharmacy 31 Town Centre AL10 0JT. To the west of and next to the premises is an empty shop. Other shops line the Town Centre, Town Centre Square and Market Place.
18. Hatfield Mainline Train Station is a 15-minute walk from the Town Centre.
19. The area of observations is densely populated with many retail premises, that include supermarkets, mini supermarkets, department stores, pubs, nightclubs, cafes, hairdressers, estate agents, charity shops, bookmakers, restaurants, fast-food shops, and pawn brokers which service the transient and residential population alike.
20. The area has a diverse community living together in a mixture of privately owned and rental accommodation.
21. The Town Centre is well served by public transport with a variety of bus routes, mainline rail and taxis. There was ample car parking available in a nearby pay and display car park and restricted parking in the side roads. These transport mediums allow the public to arrive and leave the area safely and quickly.
22. There are three other gambling premises in the Town Centre area, all of which close by 22:00 hours. Namely:
 - i. Betfred 19 Town Centre Hatfield AL10 0JT
 - ii. Bet Zone 88 Town Centre Hatfield AL10 0JT
 - iii. Ladbrokes The Common Hatfield AL10 0LU
23. These premises can be divided into two main types:
 - i. Betting premises not licensed to serve alcohol.

- ii. Gaming premises – Adult Gaming Centres (AGC) and Bingo Premises not licensed to serve alcohol.
24. There are no other gaming venues in Hatfield Town Centre with a similar business model to Merkur Slots UK.
 25. There is one public house in the Town Centre called The White Hart, which is advertised as operating Monday, Tuesday and Wednesday 11:00 hours – 23:00 hours, Thursday 11:00 hours – 00:00 hours, Friday and Saturday 11:00 hours – 02:00 hours and Sunday 12:00 hours – 22:00 hours. At the time of my visit, it appeared to be well run and closed on time.
 26. Throughout my observations in the Town Centre, Market Place and The Common I saw no begging taking place in the street, no street drinkers, vagrants, or drug dealing around the premises or the area.
 27. Photographic images of what was seen during the observations were taken to support my findings and are documented in Appendix A.

Covert Observations

Deployment

28. I conducted my covert observations from 20:00 hours on Wednesday 10th August 2022 to 06:45 hours on Thursday 11th August 2022.
29. At 20:00 hours I arrived in the area of the Merkur Slots premises 33 Town Centre Hatfield and started my observations by monitoring the venue, the immediate area around it and the pedestrian footfall.
30. There was little pedestrian traffic in and around the Town Centre and Market Place. There were only a couple of shops open at the time of my arrival which included a hairdresser shop, large Asda Supermarket and takeaway / eat in premises. All of these remaining closed at various times between 21:00 hours and 00:00 hours. They were well run and had no issues.
31. Between 20:00 hours and 00:00 hours small groups of residents and visitors to the area sat in the Town Centre Square socialising with some using the public table tennis tables in the square. By 01:00 hours pedestrian activity was reduced to single people cycling or walking past Merkur Slots and through the Town Centre Square.
32. Between 00:10 hours and 00:25 hours I counted the pedestrian footfall that passed the Merkur Slots premises in a 15-minute period. On this occasion a total of 4 pedestrians passed the venue.

33. Between 02:16 hours and 02:41 hours I conducted a covert visit to the Merkur Slots 33 Town Centre Hatfield.
34. At 02:16 hours I went to the entrance door. Entry was controlled by using a bell security entry system. On the glass of the door, I saw signage stating no under 18's, CCTV in operation, no alcohol and that a time delay lock was in operation.
35. After a short time, the door was opened and I was greeted by a male member of staff who invited me into the premises. This male was wearing a smart corporate clothing – Image A28.
36. He escorted me into the premises. I saw it was on one level which was carpeted and there were gaming machines of various types throughout the premises.
37. There was a reception desk to one side with a female member of staff behind it. She was smartly dressed in corporate clothing.
38. The male staff member asked me if I needed any help with the gaming machines or choosing one to play. I stated I was fine and chose a machine to play, towards the back of the premises.
39. He then asked if I would like a soft drink, water, coffee, or tea. I asked if I could get an alcoholic drink and he explained the premises weren't licensed for alcohol but the non-alcoholic drinks they provided were free for customers. I accepted his offer of a coffee.
40. After a couple of minutes, the male staff member brought over my coffee and stated if I needed any help to ask him or his colleague.
41. The staff member then left me to enjoy playing the machines. I was not pressurised or encouraged to spend money.
42. The hot and soft drinks were prepared at a reception desk area which was clean and tidy. During my visit no other customers came into the venue.
43. Whilst I was in the venue, I saw the staff cleaning, wiping down surfaces and completing a low-profile patrol checking on customers' needs and making sure they weren't underage or vulnerable. I felt safe, I was not pressurised to use the machines or to spend vast sums of money. The staff were friendly, polite, informative and I found the premises clean and tidy.
44. Before leaving I used the toilets which were clean and tidy. The toilets were regularly checked as shown by the toilet check sheet and there were Gamcare leaflets available for customers to take away.
45. At no time during my observations did I see anyone hanging around the premises. Customers arriving went straight into the premises and customers leaving left the area straight away. I left the premises at 02:41 hours – Image A29.

46. Between 02:45 hours and 03:00 hours I counted the pedestrian footfall that passed the Merkur Slots premises in a 15-minute period. On this occasion a total of 0 pedestrians passed the venue.
47. Between 04:08 hours and 04:23 hours I counted the pedestrian footfall that passed the Merkur Slots premises in a 15-minute period. On this occasion a total of 0 pedestrians passed the venue – Images A40, A41 and A42.
48. At around 06:00 hours shop traders started to arrive to prepare and open their premises ready for the day ahead – Images A33, A34, A35, A36 and A37.
49. I remained in the area until I completed my observations at 06:45 hours when I left.

Summary

50. I found Merkur Slots Hatfield to have a smart, well-lit, and professional looking frontage. The premises were carpeted, with music playing in the background and the atmosphere was relaxed and welcoming. At the time of my visits to the location, I saw no evidence of crime and disorder, anti-social behaviour, excessive noise, littering, street drinking, drug dealing, begging or groups of youths hanging around.
51. People entering these premises were vetted before being allowed entry to ensure drunken or other vulnerable people didn't gain access to the premises.
52. It is clear the presence of Merkur Slots in the Town Centre does not lead to or result in people, who have been on a night out, staying in the city centre any longer than they had planned to.
53. Merkur Slots UK takes safer gambling seriously. This can be evidenced with the use of safeguarding programs such as:
 - Merkur 360 Program - To achieve higher standards of player protection Merkur have worked with G4 Global Gambling Guidance Group, which focuses on the provision of responsible gambling and has also implemented its own 360 responsible gambling program.
 - Think 25 Policy – Strict Over 18 Policy. All venues operate a Think 25 Policy whereby photographic ID is required to gain entry.
 - In View Tools – Staying in control is a key part of messaging in the Merkur venues. Leafleting and posters such as BeGambleAware and GamCam, can be found in the venues main area and in private places such as toilets.
 - Staff Training – Merkur Slots has developed a detailed training programme for all staff members including its own City and Guilds accredited training developed in partnership with YGAM and Betknowmore.

54. From my visits to many Merkur Slots Premises, I have found professional and attentive staff managing them. The premises are well run and there are clearly defined systems in place to ensure the premises operate in support of the gambling objectives and don't attract or take advantage of juveniles or other vulnerable persons.
55. The demographic is much older and doesn't attract young people or children. The environment is very different to a loud busy arcade, it is a low-key carpeted style lounge with no more than a handful of mature customers in at any one time.
56. Merkur Slots UK and their premises operate in support of the principles of Secured by Design, the company recommended by the Chief Officers of UK Police Forces for Crime Prevention standards.
57. In conclusion, from my visits it is my opinion Merkur Slots UK Limited are well run, and their operation significantly reduces the risk of crime and disorder and vulnerable people being taken advantage of.
58. From my observations it is clear that the Merkur Slots premises do not impact on the environment, infrastructure, or local community.
59. I believe the facts in my report are honest and true. The opinions I have expressed are made in good faith and in my best judgement. The fee for this report is not conditional on the outcome of any future case, application or finding.

Stuart Jenkins
Licensing Consultant
Leveche Associates Limited
20/08/2022



LEVECHE
ASSOCIATES LIMITED

Appendix A

Observation Images

10th August 2022

Mercur Slots

33 Town Centre
Hatfield
AL10 0JX

Leveche Associates Ltd

Nightingale House
46-48 East Street
Epsom
Surrey KT17 1HQ

Merkur Slots
33 Town Centre Hatfield AL10 0JX

Wednesday 10th August 2022



Image A1

20:02hrs

33 Town Centre Hatfield AL10 0JX



Image A2

20:02hrs

Merkur Slots looking east along
Town Centre Pedestrian Street



Page 128

Image A3

20:03hrs

Merkur Slots looking east towards
Town Centre Square



Image A4

20:03hrs

Betfred 19 Town Centre Hatfield AL10 0JT



Image A5

20:05hrs

Hatfield Town Centre Pedestrian Square



Image A6

20:06hrs

Hatfield Town Centre Pedestrian Square
looking north

Wednesday 10th August 2022



Image A7

20:08hrs

Hatfield Town Centre Pedestrian Square looking west



Image A8

20:08hrs

Hatfield Town Centre looking west
towards Merkur Slots



Page 131

Image A9

20:16hrs

Hatfield Town Centre looking east
towards Merkur Slots



Image A10

20:17hrs

Asda Supermarket Hatfield Town Centre

Wednesday 10th August 2022



Image A11

20:17hrs

Asda Supermarket Car Park Hatfield Town Centre



Image A12

21:31hrs

Ladbrokes 44 The Common Hatfield AL10 0LU

Wednesday 10th August 2022



Image A13

21:32hrs

The Common looking towards Asda Supermarket



Image A14

21:33hrs

The Common looking towards Asda Car Park

Wednesday 10th August 2022



Image A15

21:55hrs

Hatfield Town Centre Square looking west
towards Merkur Slots



Image A16

21:55hrs

Hatfield Town Centre Square looking north



Image A17

21:56hrs

Hatfield Town Centre Square looking south



Image A18

21:56hrs

Shops off Hatfield Town Centre Square
southern end looking south

Merkur Slots
33 Town Centre Hatfield AL10 0JX

Wednesday 10th August 2022



Image A19

21:57hrs

Merkur Slots Hatfield Town Centre



Image A20

21:59hrs

Hatfield Town Centre looking east



Page 137

Image A21

23:55hrs

Mercur Slots Hatfield Town Centre



Image A22

23:55hrs

Town Centre Hatfield looking east

Wednesday 10th August 2022



Image A23

23:55hrs

Town Centre Hatfield looking west



Image A24

00:08hrs

Rear of Merkur Slots Hatfield

Wednesday 10th August 2022



Image A25

00:11hrs

Hatfield Town Centre Square looking north



Image A26

00:20hrs

Hatfield Town Centre Square looking north

Wednesday 10th August 2022



Image A27

02:14hrs

Hatfield Town Centre looking east



Image A28

02:15hrs

Merkur Slots Hatfield



Image A29
02:41hrs
Merkur Slots Hatfield



Image A30
02:42hrs
Hatfield Town Centre Square looking north

Wednesday 10th August 2022



Image A31

02:42hrs

Hatfield Town Centre Square looking east



Image A32

04:06hrs

Hatfield Town Centre looking east
towards Merkur Slots

Wednesday 10th August 2022



Image A33

04:08hrs

Merkur Slots Hatfield



Image A34

04:09hrs

Hatfield Town Centre Square looking north



Image A35

04:09hrs

Hatfield Town Centre Square looking west
towards Merkur Slots



Image A36

04:09hrs

Shops off Hatfield Town Centre Square
southern end looking south

Wednesday 10th August 2022



Image A37

04:11hrs

Shops in Market Place Hatfield



Image A38

04:12hrs

The White Hart Public House Queensway
Hatfield AL10 0LW

Merkur Slots
33 Town Centre Hatfield AL10 0JX

Wednesday 10th August 2022



Page 146

Image A39

06:20hrs

Hatfield Town Centre looking east



Image A40

06:21hrs

Merkur Slots Hatfield



Page 147

Image A41

06:23hrs

Hatfield Town Centre Square looking west



Image A42

06:23hrs

Hatfield Town Centre Square looking north



Full Observation Report

**Stuart Jenkins – Licensing Consultant
Leveche Associates Limited**

Merkur Slots

456 Holloway Road London N7 6QA

Executive Summary

1. Observations were conducted on Merkur Slots premises at 456 Holloway Road London N7 6QA and the surrounding area. The premises are situated on the crossroad junction of Holloway Road (A1) Seven Sisters Road (A503) and Parkhurst Road (A503) and are in a parade of shops on a busy crossroads. The premises operates 24-hours a day 7-days a week.
2. One covert visit was made to the site and the surrounding area. The covert visit showed the premises to be well run with no issues. There was one other gaming premises with a similar business model to Merkur Slots in the area, Admiral Casino 3 Seven Sisters Road N7 6AJ.
3. From the observations, it is clear that Merkur Slots, operating 24-hours a day does not create anti-social behaviour or any other crime and disorder that would have a negative impact on nearby residents, the environment, local infrastructure, or wider local community.
4. Photographic images support these observations and the conclusions reached.

Introduction

5. We are instructed to conduct independent observations at Merkur Slots premises 456 Holloway Road London N7 6QA and the surrounding area.

6. Merkur Slots UK operate the venue which has a 24-hour licence under the Gambling Act 2005.
7. The premises come under the jurisdiction of Islington Council.

Personal – Stuart Jenkins

8. I am a Director of Leveche Associates Limited, an independent company dealing with Licensing and Security in the Private Sector. I am a former Police Officer having retired from the Metropolitan Police after completion of over 30 years exemplary service.
9. Throughout my police career the majority of my service was spent on specialist units engaged on proactive operations :- 1993–1997 Central Territorial Support Group (TSG) - Level 1 Public Order, firearms officer and dedicated surveillance officer; 1997–1998 CO14 Clubs & Vice Unit – test purchase officer and street offences investigations; 1998-2000 Charing Cross Division on promotion – overt and covert licensing operations; 2000-2008 CO14 Clubs & Vice Unit – lead officer for the investigation of serious criminal offences within licensed premises across London, test purchase officer, Pan-London licensing tactical advisor, Licensing Policy Development and Implementation for the Metropolitan Police Service (MPS) and intelligence unit supervisor; 2008-2018 Marine Policing Unit (MPU) – licensing lead for the MPU; licensing tactical advisor Notting Hill Carnival, covert licensing operations and intelligence unit supervisor. Marine intelligence and accreditation lead for the Queens Diamond Jubilee River Pageant and intelligence lead for the London Olympics 2012.
10. I have worked as an Independent Consultant in the Licensing and Security Industry for the last 5 years.
11. I was a Home Office qualified Crime Prevention Design Advisor.
12. I am the holder of the BTEC Level 3 Certificate (Security Industry Authority) – Close Protection Operative in the Private Security Industry.
13. I am the holder of a Personal Licence under the Licensing Act 2003.

Observations

14. Observations were carried out at Merkur Slots premises 456 Holloway Road London N7 6QA and the surrounding area between 21:00 hours on Saturday 3rd September 2022 and 06:00 hours on Sunday 4th September 2022.
15. The area felt safe with members of the public going about their business, working, shopping, and socialising.

16. The area is well lit and illuminated from street lighting and shop front lights. I had clear and unobstructed views throughout the observations.
17. During observations I concentrated on signs of criminality, begging, anti-social behaviour, vulnerable persons, other persons at risk and the general environment.
18. Merkur Slots is situated on the crossroad junction of Holloway Road (A1) Seven Sisters Road (A503) and Parkhurst Road (A503). The premises are in a parade of shops on a busy crossroads and operates 24-hours a day 7-days a week. There are shops and commercial businesses on either side of Holloway Road. Many of these shops have residential properties above them – Image A1.
19. Holloway Road generally runs north to south and Seven Sisters Road east to west. The premises had two entrances in use, the main one on the Holloway Road junction with Seven Sisters Road and a second one in Seven Sisters Road. There was a third entrance on Holloway Road but this did not appear to be in use. Holloway Road is a main arterial 'A' road with two and sometimes three traffic lanes in each direction. Seven Sisters Road is a two-lane one-way road with the traffic travelling northbound.
20. Immediately outside the venue is a wide footpath then the roads themselves. During the observations vehicular and pedestrian traffic never stopped but was varied – Image A2.
21. East of and next to the premises is Vodaphone 454 Holloway Road N7 6QA. To the west of, next to the premises and the other side of the junction with Seven Sisters Road is Three (Phone Shop) 458 Holloway Road N7 6HT. To the north and next to the premises is Photo 7 Studio, 2 Seven Sisters Road N7 6AH. Other shops line the Holloway Road and Seven Sisters Road on both sides of the roads.
22. The area of observations was Holloway Road from Camden Road in the east and Hercules Road in the west and Seven Sisters Road to the junction with Salterton Road in the north.
23. This area is densely populated with many retail premises, that include supermarkets, mini supermarkets, small food shops, pub, cafes, hairdressers, barbers, estate agents, slots casinos, bookmakers, restaurants, fast-food shops and pawn brokers which service the transient and residential population alike.
24. The area has a diverse community living together in a mixture of privately owned, local authority and rental accommodation.
25. Holloway Road and the immediate area are well served by public transport with a variety of bus routes, taxis, underground and mainline trains. There was ample car parking available in a nearby pay and display car park and restricted

parking in the side roads. These transport mediums allow the public to arrive and leave the area safely and quickly.

26. Tufnell Park and Caledonian Road Underground Stations are nearby and Drayton Park Mainline Station 19 minutes' walk (0.9 miles).
27. There are five other gambling premises in the immediate area, all of which close by 22:00 hours except Admiral Casino:
 - i. Admiral Casino 3 Seven Sisters Road N7 6AJ– Image A3
 - ii. Betfred 10-12 Seven Sisters Road N7 6AH – Image A6
 - iii. Paddy Power 42-44 Seven Sisters Road N7 6AA - Image A8
 - iv. Ladbrokes 502 Holloway Road N7 6JA– Image A21
 - v. William Hill 37 Seven Sisters Road N7 6AX – Image A9
28. These premises can be divided into two main types:
 - i. Betting premises not licensed to serve alcohol.
 - ii. Gaming premises – Adult Gaming Centres (AGC) and Bingo Premises not licensed to serve alcohol.
29. Admiral Casino has a similar business model to Merkur Slots UK which operates 24-hours, 7-days a week.
30. There were three public houses in the vicinity of the gaming premises – The Enkel Arms 34 Seven Sisters Road N7 6AA, Big Red 385 Holloway Road N7 0RY and The Hercules Public House 505 Holloway Road N7 6JA. At the time of my visit, they all appeared to be well run and there were no issues – Images A7, A18, A22.
31. Throughout my observations in and around the area I saw no street drinkers, vagrants, or drug dealing around the premises. However, on two occasions I saw a female engaged in begging, approaching customers as they left McDonalds Restaurant 13-15 Seven Sisters Road N7 6AJ. There was no begging taking place anywhere near Merkur Slots premises.
32. Photographic images of what was seen during the observations were taken to support my findings and are documented in Appendix A.

Covert Observations

Deployment

33. I conducted covert observations from between 21:00 hours on Saturday 3rd September 2022 and 06:00 hours on Sunday 4th September 2022.
34. At 21:00 hours I arrived in the area of the Merkur Slots premises 456 Holloway Road N7 6QA and started observations by monitoring the venue and the immediate area around it.

35. Between 21:00 hours and 22:15 hours McDonalds in Seven Sisters Road was busy with customers. Delivery riders were parked on the road and footpaths outside McDonalds and other restaurants waiting to service fast food deliveries – Image A5.
36. There was a good volume of pedestrian traffic in and around shops that were open in Holloway Road and Seven Sisters Road. At this time most of the shops had closed. The bookmakers were still open but soon closed without any issues. After 22:00 hours the only premises open close to Merkur Slots were fast-food take aways, Admiral Casino, the pubs and some restaurants. They were well run and had no issues.
37. Between 22:15 hours and 01:00 hours a continuous flow of pedestrians walked past the venue transiting the area or visiting the 24-hour mini supermarkets and fast-food shops – Images A8, A9, A10, A11, A12, A13, A14, A15, A16, A17, A18, A19, A20, A21, A22, A23, A24, A27, A28, A29.
38. Between 01:00 hours and 02:46 hours pedestrian and traffic numbers reduced but there was still traffic in the area – Images A30, A31, A32, A33, A34.
39. Between 02:47 hours and 03.18 hours I conducted a covert visit to the Merkur Slots 456 Holloway Road– Image A35.
40. At 02:47 hours I went to the main central entrance door which was open, but I could see there was a male door supervisor just inside controlling the entrance. I saw that entry could be controlled by using a bell security entry system. On the glass of the door I saw signage stating no under 18's, CCTV in operation, no alcohol and that a time delay lock was in operation.
41. On entering I looked at the door supervisor and saw he was smartly dressed with his SIA badge clearly displayed. He acknowledged me and waved me through into the premises.
42. Once inside I found myself in a large carpeted room on one level and there were gaming machines of various types throughout the premises. In front of me was a reception desk area. This area was used for the preparation of refreshments with a facility to make hot drinks. Behind the desk was a female member of staff dressed smartly in corporate clothing who welcomed me to the premises.
43. As I walked through the premises and saw it went round to the right where there were further machines, past the toilets on the right and leading out into an open aired space at the back of the premises where customers could smoke.
44. I saw there were eight other customers in the venue. All were male aged between 28 years and 50 years. I found a machine and started to play it.

45. In front of and to the left of the reception desk was an office door. The door opened and another female member of staff came out into the main gaming area. She was smartly dressed in corporate clothing.
46. After a short period of time the second female staff member approached me and asked if I would like a soft drink, water, coffee, tea or a snack. I asked if I could get an alcoholic drink and she stated they didn't sell alcohol but the non-alcoholic drinks they provided were free for customers. I accepted her offer of a coffee and after a couple of minutes, she brought over my drink.
47. The staff then left me to enjoy playing the machines. I was not pressurised or encouraged to spend money.
48. During my visit I saw customers enter the venue and other customers leave. The numbers of customers never got above eight at any time. The hot and soft drinks were prepared at a reception desk area which was clean and tidy.
49. Whilst I was in the venue, I saw the staff cleaning, wiping down surfaces and completing a low-profile patrol checking on customers' needs and making sure they weren't underage or vulnerable. I felt safe, the staff were friendly, polite, informative and I found the premises clean and tidy.
50. Before leaving I used the toilets and found them to be clean and tidy. The toilets were regularly checked as shown by the toilet check sheet and there were Gamcare leaflets available for customers to take away – Image A36.
51. At no time during my observations did I see anyone hanging around the premises. Customers arriving went straight into the premises and customers leaving left the area straight away. I left the premises at 03:18 hours – Image A37.
52. Between 03:20 hours and 05:00 hours vehicular traffic and pedestrian traffic was varied.
53. Customers visited the 24-hour premises throughout the night in small numbers without any incidents of crime and disorder or anti-social behaviour. This position remained unchanged during the course of my observations until 06:00 hours when I departed.
54. Prior to my departure I obtained further images that show there was no problems, issues or anti-social behaviour in the area – Image A38, A39, A40, A41, A42.
55. On several occasions during my time in the area I saw the Merkur Slots door supervisor patrolling around the front of the premises in between the entrances to checking the front of the premises was clear and no one was loitering around.

Summary

56. I found Merkur Slots 456 Holloway Road to have a smart, well-lit, and professional looking frontage. The premises were carpeted, with music playing in the background and the atmosphere was relaxed and welcoming.
57. At the time of my visit to the location, I saw no evidence of crime and disorder, anti-social behaviour, littering, street drinking, drug dealing or groups of youths hanging around. However, on two occasions I did see a female engaged in begging approaching customers as they left McDonalds in Seven Sisters Road. There was no begging around Merkur Slots premises and I saw proactive patrols being conducted by the door supervisor to deter and prevent this activity or any other criminal behaviour from taking place.
58. People entering these premises were vetted before being allowed stay to ensure drunken or other vulnerable people didn't gain access to the premises.
59. It is clear the presence of Merkur Slots in the Holloway Road does not lead to or result in people who have been on a night out, staying in the area any longer than they had planned to and that customers do not hang around outside the premises causing problems.
60. Merkur Slots UK takes safer gambling seriously. This can be evidenced with the use of safeguarding programs such as:
- i. Merkur 360 Program - To achieve higher standards of player protection Merkur have worked with G4 Global Gambling Guidance Group, which focuses on the provision of responsible gambling and has also implemented its own 360 responsible gambling program.
 - ii. Think 25 Policy – Strict Over 18 Policy. All venues operate a Think 25 Policy whereby photographic ID is required to gain entry.
 - iii. In View Tools – Staying in control is a key part of messaging in the Merkur venues. Leafleting and posters such as BeGambleAware and GamCam, can be found in the venues main area and in private places such as toilets.
 - iv. Staff Training – Merkur Slots has developed a detailed training programme for all staff members including its own City and Guilds accredited training developed in partnership with YGAM and Betknowmore.
61. Leveche Associates Ltd have carried out covert visits on numerous Adult Gaming Centres that operate throughout the UK 24-hrs a day, 7-days a week. Visits to these premises established that they are well run and that there are clearly defined systems in place to ensure the premises operate in support of the gambling objectives and don't attract or take advantage of juveniles or other vulnerable persons. The visits also established that Merkur Slots customers do not cause crime or anti-social behaviour.

62. At Merkur Slots premises the demographic is much older and doesn't attract young people or children. The environment is very different to a loud busy arcade, it is a low-key carpeted style lounge with no more than a handful of mature customers in at any one time.
63. Merkur Slots UK and their premises operate in support of the principles of Secured by Design, the company recommended by the Chief Officers of UK Police Forces for Crime Prevention standards.
64. In conclusion, from my visits it is my opinion Merkur Slots UK Limited are well run, and their operation significantly reduces the risk of crime and disorder and vulnerable people being taken advantage of and it is clear that the Merkur Slots premises do not impact on the environment, infrastructure, or local community.
65. I believe the facts in my report are honest and true. The opinions I have expressed are made in good faith and in my best judgement. The fee for this report is not conditional on the outcome of any future case, application or finding.

Stuart Jenkins
Licensing Consultant
Leveche Associates Limited
28/09/2022



Appendix A

Observation Images

3rd - 4th September 2022

Merkur Slots

456 Holloway Road

N7 6QA

Leveche Associates Ltd

Nightingale House

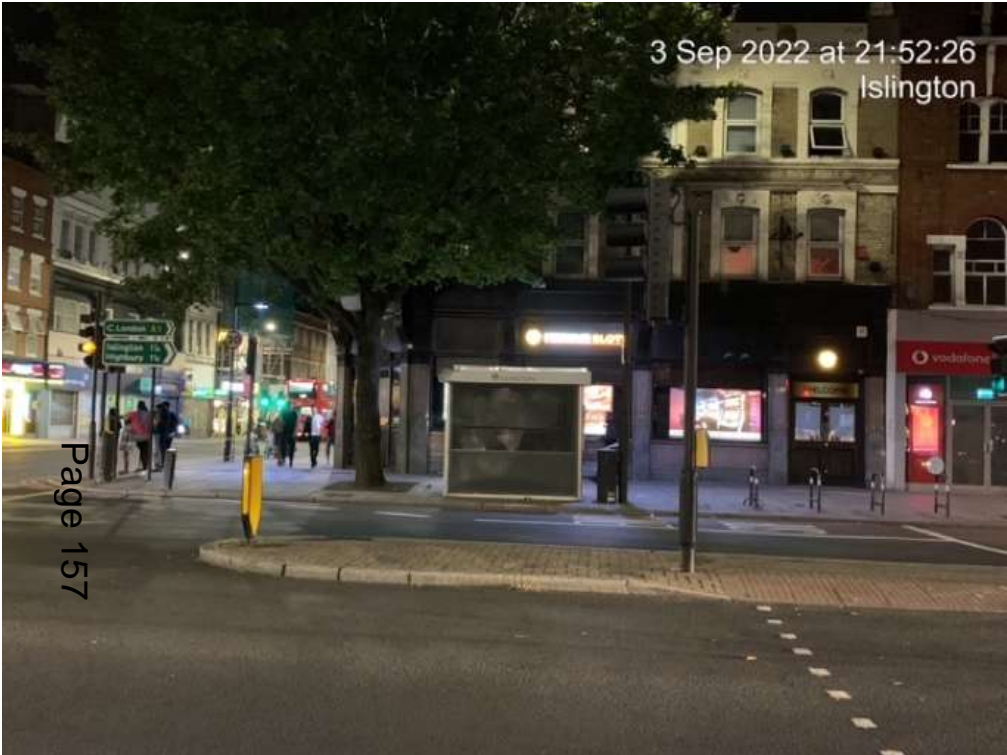
46-48 East Street

Epsom

Surrey KT17 1 HQ

Merkur Slots
Merkur Slots 456 Holloway Road N7 6QA

3rd - 4th September 2022



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Image A1

21:52hrs

Merkur Slots 456 Holloway Road N7 6QA



Image A2

21:54hrs

Merkur Slots 456 Holloway Road N7 6QA

Merkur Slots
Merkur Slots 456 Holloway Road N7 6QA
3rd - 4th September 2022



Page 158

Image A3

22:12hrs

Admiral Casino 3 Seven Sisters Road N7 6AJ



Image A4

22:12hrs

H & T Pawnbrokers 9 Seven Sisters Road N7 6AJ

Merkur Slots
Merkur Slots 456 Holloway Road N7 6QA
3rd - 4th September 2022



Page 159

Image A5

22:12hrs

McDonalds 13-15 Seven Sisters Road N7 6AJ



Image A6

22:13hrs

Betfred 10-12 Seven Sisters Road N7 6AH

Merkur Slots
Merkur Slots 456 Holloway Road N7 6QA

3rd - 4th September 2022



Image A7

22:14hrs

The Enkel Arms 34 Seven Sisters Road N7 6AA



Image A8

22:15hrs

Paddy Power 42-44 Seven Sisters Road N7 6AA

Merkur Slots
Merkur Slots 456 Holloway Road N7 6QA
3rd - 4th September 2022



Image A9

22:16hrs

William Hill 37 Seven Sisters Road N7 6AX



Image A10

22:17hrs

Seven Sisters Road looking west

Merkur Slots
Merkur Slots 456 Holloway Road N7 6QA

3rd - 4th September 2022



Image A11

22:21hrs

Merkur Slots 456 Holloway Road



Image A12

22:21hrs

Holloway Road looking south

Merkur Slots
Merkur Slots 456 Holloway Road N7 6QA
3rd - 4th September 2022



Image A13

22:21hrs

Holloway Road looking north



Image A14

22:25hrs

Waitrose 366 Holloway Road j/w Tollington Road

Merkur Slots
Merkur Slots 456 Holloway Road N7 6QA
3rd - 4th September 2022



Image A15

22:27hrs

Shopping Arcade off Holloway Road leading to
Morrisons Supermarket



Image A16

22:28hrs

Lidl 422-434 Holloway Road looking north

Merkur Slots
Merkur Slots 456 Holloway Road N7 6QA
3rd - 4th September 2022



Image A17
22:29hrs
Holloway Road looking north



Image A18
22:29hrs
Big Red 385 Holloway Road N7 0RY

Merkur Slots
Merkur Slots 456 Holloway Road N7 6QA

3rd - 4th September 2022



Image A19

22:31hrs

Odeon Lux Cinema 419 - 727 Holloway Road N7 6LJ



Image A20

22:32hrs

Holloway Road looking south

Mercur Slots
Mercur Slots 456 Holloway Road N7 6QA
3rd - 4th September 2022



Image A21

22:33hrs

Ladbrokes Bookmakers 502 Holloway Road N7 6JA



Image A22

22:34hrs

The Hercules Public House 504 Holloway Road N7 6JA

Merkur Slots
Merkur Slots 456 Holloway Road N7 6QA
3rd - 4th September 2022



Image A23

22:42hrs

Parkhurst Road looking east towards
Holloway Road j/w Seven Sisters Road



Image A24

00:16hrs

Merkur Slots 456 Holloway Road

Merkur Slots
Merkur Slots 456 Holloway Road N7 6QA

3rd - 4th September 2022



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Image A25

00:16hrs

Holloway Road looking north



Image A26

00:16hrs

Holloway Road looking south

Merkur Slots
Merkur Slots 456 Holloway Road N7 6QA
3rd - 4th September 2022



Image A27

00:19hrs

Looking towards Merkur Slots 456 Holloway Road



Image A28

00:21hrs

Seven Sisters Road looking east

Merkur Slots
Merkur Slots 456 Holloway Road N7 6QA

3rd - 4th September 2022



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Image A29

00:22hrs

Seven Sisters Road looking east



Image A30

02:41hrs

Parkhurst Road looking towards j/w Holloway Road and Seven Sisters Road.

Merkur Slots
Merkur Slots 456 Holloway Road N7 6QA

3rd - 4th September 2022



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Image A31

02:42hrs

Merkur Slots 456 Holloway Road



Image A32

02:42hrs

Holloway Road looking south

Merkur Slots
Merkur Slots 456 Holloway Road N7 6QA
3rd - 4th September 2022



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Image A33

02:42hrs

Holloway Road looking north



Image A34

02:44hrs

Seven Sisters Road looking west

Merkur Slots
Merkur Slots 456 Holloway Road N7 6QA

3rd - 4th September 2022



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Image A35

02:46hrs

Merkur Slots Holloway Road looking south



Image A36

03:15hrs

Toilet Check Sheet Merkur Slots Holloway Road

Merkur Slots
Merkur Slots 456 Holloway Road N7 6QA
3rd - 4th September 2022



Image A37

03:18hrs

Merkur Slots Holloway Road



Image A38

05:10hrs

Holloway Road looking north

Merkur Slots
Merkur Slots 456 Holloway Road N7 6QA

3rd - 4th September 2022



Image A39

05:10hrs

Holloway Road looking south towards Merkur Slots

Image A40

05:37hrs

Looking towards Merkur Slots 456 Holloway Road j/w Seven Sisters Road

Merkur Slots
Merkur Slots 456 Holloway Road N7 6QA
3rd - 4th September 2022

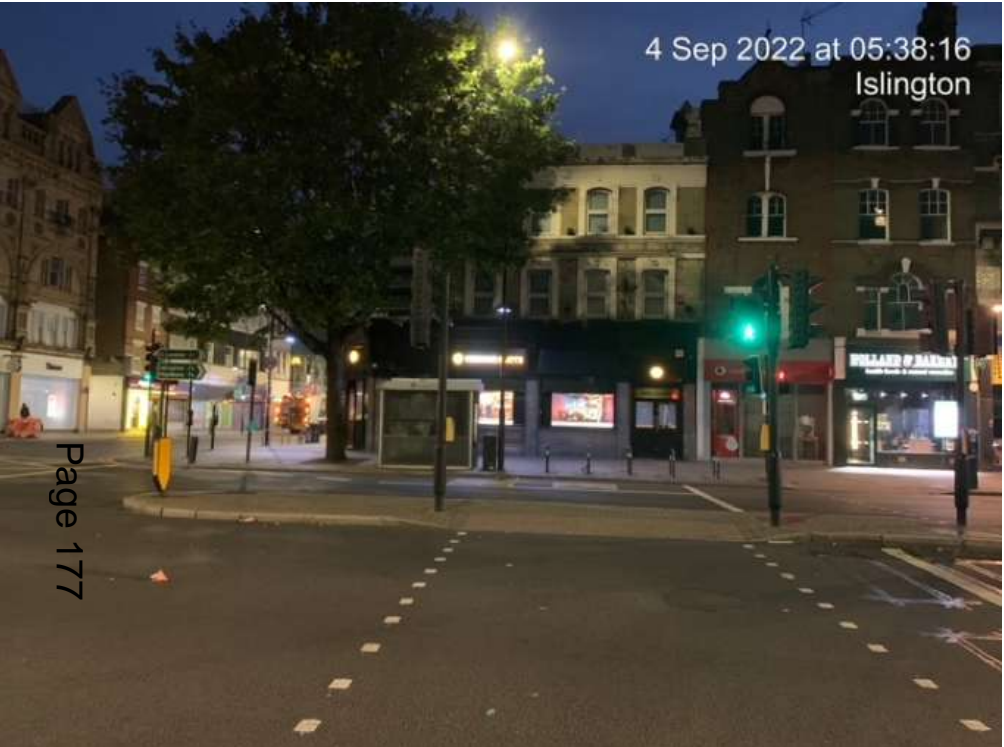


Image A41

05:38hrs

Merkur Slots 456 Holloway Road



Image A42

05:38hrs

Holloway Road looking north



Full Observation Report

**Stuart Jenkins – Licensing Consultant
Leveche Associates Limited**

Merkur Slots

146 High Street Hounslow Middlesex TW3 1LR

Executive Summary

1. Observations were conducted on Merkur Slots premises at 146 High Street Hounslow Middlesex TW3 1LR and the surrounding area. The premises are situated in a parade of shops on the High Street in Hounslow Town Centre. The premises operates 24-hours a day 7-days a week.
2. One covert visit was made to the site and the surrounding area. The covert visit showed the premises to be well run with no issues. There were two other gaming premises with a similar business model to Merkur Slots in the area, Admiral Casino 192 High Street TW3 1HL and Royal Casino Slots 1-2 Cressys Corner, Lampton Road TW3 1HA.
3. From the observations, it is clear that Merkur Slots, operating 24-hours a day does not create anti-social behaviour or any other crime and disorder that would have a negative impact on nearby residents, the environment, local infrastructure, or wider local community.
4. Photographic images support these observations and the conclusions reached.

Introduction

5. We are instructed to conduct independent observations at Merkur Slots premises 146 High Street Hounslow Middlesex TW3 1HR and the surrounding area.

6. Merkur Slots UK operate the venue which has a 24-hour licence under the Gambling Act 2005.
7. The premises come under the jurisdiction of Hounslow Borough Council.

Personal – Stuart Jenkins

8. I am a Director of Leveche Associates Limited, an independent company dealing with Licensing and Security in the Private Sector. I am a former Police Officer having retired from the Metropolitan Police after completion of over 30 years exemplary service.
9. Throughout my police career the majority of my service was spent on specialist units engaged on proactive operations :- 1993–1997 Central Territorial Support Group (TSG) - Level 1 Public Order, firearms officer and dedicated surveillance officer; 1997–1998 CO14 Clubs & Vice Unit – test purchase officer and street offences investigations; 1998-2000 Charing Cross Division on promotion – overt and covert licensing operations; 2000-2008 CO14 Clubs & Vice Unit – lead officer for the investigation of serious criminal offences within licensed premises across London, test purchase officer, Pan-London licensing tactical advisor, Licensing Policy Development and Implementation for the Metropolitan Police Service (MPS) and intelligence unit supervisor; 2008-2018 Marine Policing Unit (MPU) – licensing lead for the MPU; licensing tactical advisor Notting Hill Carnival, covert licensing operations and intelligence unit supervisor. Marine intelligence and accreditation lead for the Queens Diamond Jubilee River Pageant and intelligence lead for the London Olympics 2012.
10. I have worked as an Independent Consultant in the Licensing and Security Industry for the last 5 years.
11. I was a Home Office qualified Crime Prevention Design Advisor.
12. I am the holder of the BTEC Level 3 Certificate (Security Industry Authority) – Close Protection Operative in the Private Security Industry.
13. I am the holder of a Personal Licence under the Licensing Act 2003.

Observations

14. Observations were carried out at Merkur Slots premises 146 High Street Hounslow Middlesex and the surrounding area between 21:00 hours on Thursday 25th August 2022 and 06:00 hours on Friday 26th August 2022.
15. The area felt safe with members of the public going about their business, working, shopping, and socialising.

16. The area is well lit and illuminated from street lighting and shop front lights. I had clear and unobstructed views throughout the observations.
17. During observations I concentrated on signs of criminality, begging, anti-social behaviour, vulnerable persons, other persons at risk and the general environment.
18. Merkur Slots is in a large parade of shops on the High Street in Hounslow Town Centre. There are shops and commercial businesses on either side of High Street. Many of these shops have residential properties above them – Image A1.
19. High Street generally runs east to west. Immediately outside the venue is a wide footpath and beyond that the restricted one-way road with a separate cycle lane. At the time of my visit the road was closed to vehicular traffic due to ongoing road works. During the observations there was no vehicular traffic and pedestrian traffic was varied – Image A2, A3.
20. East of and next to the premises is Table 11 142-144 High Street Hounslow TW3 1LR. To the west of and next to the premises is the Dental Surgery 148-150 High Street Hounslow TW3 1LR then empty shop premises at 152 High Street Hounslow TW3 1LR. Opposite the premises were Primark 165-169 High Street Hounslow TW3 1QL and Iceland Supermarket 147-161 High Street Hounslow TW3 1QL. Other shops line the High Street on both sides of the road.
21. The area of observations was from Laurence Road in the east and Bell Road in the west. This area is densely populated with many retail premises, that include supermarkets, mini supermarkets, small food shops, a pub, cafes, hairdressers, barbers, estate agents, slots casinos, bookmakers, restaurants, fast-food shops and pawn brokers which service the transient and residential population alike.
22. The area has a diverse community living together in a mixture of privately owned and rental accommodation.
23. High Street and the immediate area are well served by public transport with a variety of bus routes, taxis, underground and mainline trains. There was ample car parking available in a nearby pay and display car park and restricted parking in the side roads. These transport mediums allow the public to arrive and leave the area safely and quickly.
24. Hounslow East and Hounslow Central Underground Stations are nearby and Hounslow Mainline Station 12 minutes' walk (0.6 miles).
25. There are eight other gambling premises in the High Street Hounslow area, all of which close by 22:00 hours except Admiral Casino, Merkur Slots and Royal Casino Slots:
 - i. Admiral Casino Slots 192 High Street Hounslow TW3 1HL – Image A6.

- ii. Betfred 2-7 Montague Road Hounslow TW3 1LD – Image A12
- iii. Coral 208 High Street Hounslow TW3 1HE – Image A8
- iv. Paddy Power 162 High Street Hounslow TW3 1BQ – Image A5
- v. Paddy Power 295 High Street Hounslow TW3 1EF - Image A15
- vi. Ladbrokes 113 A & B High Street Hounslow TW3 1QT – Image A23
- vii. Merkur Slots 237-239 High Street Hounslow TW3 1EA – Image A19
- viii. Royal Casino Slots 1-2 Cressys Corner Lampton Rd TW3 1HA – Image A17

26. These premises can be divided into two main types:

- i. Betting premises not licensed to serve alcohol.
- ii. Gaming premises – Adult Gaming Centres (AGC) and Bingo Premises not licensed to serve alcohol.

27. Admiral Casino and Royal Casino Slots have similar business models to Merkur Slots UK which operates 24-hours, 7-days a week.

28. There was one public house in the vicinity of the gaming premises – The Bell Public House 2 Staines Road Hounslow TW3 3JS. At the time of my visit it appeared to be well run and there were no issues – Image A16.

29. Throughout my observations in and around High Street I saw no begging taking place in the street, no street drinkers, vagrants, or drug dealing around the premises or the area.

30. Photographic images of what was seen during the observations were taken to support my findings and are documented in Appendix A.

Covert Observations

Deployment

31. I conducted covert observations from between 21:00 hours on Thursday 25th August 2022 and 06:00 hours on Friday 26th August 2022.

32. At 21:00 hours I arrived in the area of the Merkur Slots premises 146 High Street Hounslow and started observations by monitoring the venue and the immediate area around it.

33. At 21:26 hours McDonalds 200-202 High Street Hounslow was very busy. Delivery riders were parked on the road and footpaths outside McDonalds and other restaurants waiting to service fast food deliveries – Image A7.

34. There was a good volume of pedestrian traffic in and around the parade of shops and in High Street. At this time most of the shops and the Treaty Centre had closed. The bookmakers were still open but soon closed without any issues. After 22:00 hours the only premises open close to Merkur Slots were fast-food take aways, The Bell Public House, Admiral Casino, Royal Casino Slots and some restaurants. They were well run and had no issues – Image A9.

35. Between 22:00 hours and 01:00 hours a continuous flow of pedestrians walked past the venue transiting the area or visiting the 24-hour mini supermarkets and fast-food shops. McDonalds in High Street closed at 00:00 hours – Images A23, A24, A27, A28, A29, A30, A31, A32.
36. Between 01:00 hours and 02:47 hours pedestrian and traffic numbers reduced – Images A33, A34, A35.
37. Between 02:48 hours and 03.10 hours I conducted a covert visit to the Merkur Slots 146 High Street – Image A36.
38. At 02:48 hours I went to the entrance door which was closed. I saw that entry could be controlled by using a bell security entry system. On the glass of the door I saw signage stating no under 18's, CCTV in operation, no alcohol and that a time delay lock was in operation.
39. I pushed the door but it was locked. After a few seconds the door was opened by a male member of staff wearing smart clothing with an SIA door supervisor badge clearly displayed. He looked at me and I asked if I could come in to play the machines. He nodded and welcomed me into the premises.
40. Once inside I found myself in a large carpeted room on one level and there were gaming machines of various types throughout the premises.
41. On the left-hand side wall midway in the room there was a reception desk area. This area was used for the preparation of refreshments with a facility to make hot drinks.
42. As I approached the reception I saw there were two further members of staff, one female and one male who were dressed in smart corporate clothing. The female member of staff welcomed me to the venue and asked if I needed any assistance with choosing a machine to play. I stated I was fine.
43. I walked through the premises and saw there were two other customers in the venue. All were male aged between 35 years and 45 years. I found a machine and started to play it.
44. After a short period of time the female staff member approached me and asked if I would like a soft drink, water, coffee, tea or a snack. I asked if I could get an alcoholic drink and she stated they didn't sell alcohol but the non-alcoholic drinks they provided were free for customers. I accepted her offer of a coffee and after a couple of minutes, she brought the drink to me.
45. The staff member then left me to enjoy playing the machines. I was not pressurised or encouraged to spend money.
46. During my visit no other customers came into the venue. The hot and soft drinks were prepared at a reception desk area which was clean and tidy.

47. Whilst I was in the venue, I saw the staff cleaning, wiping down surfaces and completing a low-profile patrol checking on customers' needs and making sure they weren't underage or vulnerable. I felt safe, the staff were friendly, polite, informative and I found the premises clean and tidy.
48. Before leaving I used the toilets which were located on the left-hand side towards the back of the premises. I found them to be clean and tidy. The toilets were regularly checked as shown by the toilet check sheet and there were Gamcare leaflets available for customers to take away – Image A37, A38.
49. At no time during my observations did I see anyone hanging around the premises. Customers arriving went straight into the premises and customers leaving left the area straight away. I left the premises at 03:10 hours – Image A39.
50. Between 03:10 hours and 05:05 hours there was no vehicular traffic and low levels of pedestrian traffic – Images A40, A41, A42.
51. Customers visited the 24-hour premises throughout the night in small numbers without any incidents of crime and disorder or anti-social behaviour. This position remained unchanged during the course of my observations.
52. I remained in the area until 06:00 hours. Prior to my departure I obtained further images that show there was no problems, issues or anti-social behaviour in the area – Image A43, A44, A45, A46.

Summary

53. I found Merkur Slots 146 High Street Hounslow to have a smart, well-lit, and professional looking frontage. The premises were carpeted, with music playing in the background and the atmosphere was relaxed and welcoming. At the time of my visit to the location, I saw no evidence of crime and disorder, anti-social behaviour, littering, street drinking, drug dealing, begging or groups of youths hanging around.
54. People entering these premises were vetted before being allowed stay to ensure drunken or other vulnerable people didn't gain access to the premises.
55. It is clear the presence of Merkur Slots in the High Street Hounslow does not lead to or result in people who have been on a night out, staying in the area any longer than they had planned to and that customers do not hang around outside the premises causing problems.
56. Merkur Slots UK takes safer gambling seriously. This can be evidenced with the use of safeguarding programs such as:
 - i. Merkur 360 Program - To achieve higher standards of player protection Merkur have worked with G4 Global Gambling Guidance Group, which

focuses on the provision of responsible gambling and has also implemented its own 360 responsible gambling program.

- ii. Think 25 Policy – Strict Over 18 Policy. All venues operate a Think 25 Policy whereby photographic ID is required to gain entry.
 - iii. In View Tools – Staying in control is a key part of messaging in the Merkur venues. Leafleting and posters such as BeGambleAware and GamCam, can be found in the venues main area and in private places such as toilets.
 - iv. Staff Training – Merkur Slots has developed a detailed training programme for all staff members including its own City and Guilds accredited training developed in partnership with YGAM and Betknowmore.
57. Leveche Associates Ltd have carried out covert visits on numerous Adult Gaming Centres that operate throughout the UK 24-hrs a day, 7-days a week. Visits to these premises established that they are well run and that there are clearly defined systems in place to ensure the premises operate in support of the gambling objectives and don't attract or take advantage of juveniles or other vulnerable persons. The visits also established that Merkur Slots customers do not cause crime or anti-social behaviour.
58. At Merkur Slots premises the demographic is much older and doesn't attract young people or children. The environment is very different to a loud busy arcade, it is a low-key carpeted style lounge with no more than a handful of mature customers in at any one time.
59. Merkur Slots UK and their premises operate in support of the principles of Secured by Design, the company recommended by the Chief Officers of UK Police Forces for Crime Prevention standards.
60. In conclusion, from my visits it is my opinion Merkur Slots UK Limited are well run, and their operation significantly reduces the risk of crime and disorder and vulnerable people being taken advantage of and it is clear that the Merkur Slots premises do not impact on the environment, infrastructure, or local community.
61. I believe the facts in my report are honest and true. The opinions I have expressed are made in good faith and in my best judgement. The fee for this report is not conditional on the outcome of any future case, application or finding.

Stuart Jenkins
Licensing Consultant
Leveche Associates Limited
27/09/2022



LEVECHE
ASSOCIATES LIMITED

Appendix A

Observation Images
25th -26th August 2022

Merkur Slots

146 High Street
Hounslow
Middlesex
TW3 1LR

Leveche Associates Ltd

Nightingale House
46-48 East Street
Epsom
Surrey KT17 1HQ

Merkur Slots

146 High Street Hounslow Middlesex TW3 1LR
25th - 26th August 2022



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Image A1

21:19hrs

Merkur Slots 146 High Street Hounslow TW3 1LR



Image A2

21:19hrs

High Street Hounslow looking west

Merkur Slots

146 High Street Hounslow Middlesex TW3 1LR
25th - 26th August 2022

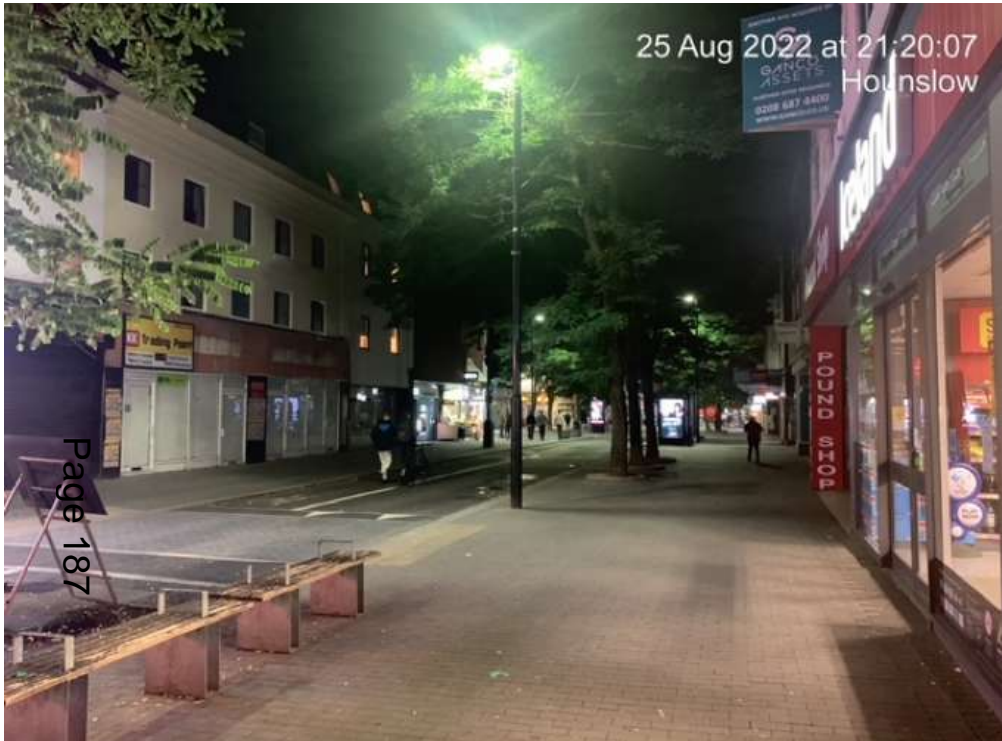


Image A3

21:20hrs

High Street Hounslow looking east



Image A4

21:20hrs

Table 11 Restaurant 142 -144 High Street
Hounslow TW3 1LR

Mercur Slots

146 High Street Hounslow Middlesex TW3 1LR
25th - 26th August 2022



Page 188

Image A5

21:22hrs

Paddy Power 162 High Street Hounslow TW3 1BQ



Image A6

21.25hrs

Admiral Casino Slots 192 High Street
Hounslow TW3 1HL

Mercur Slots

146 High Street Hounslow Middlesex TW3 1LR
25th - 26th August 2022



Page 189

Image A7

21:26hrs

McDonalds 200-202 High Street Hounslow TW3 1HE



Image A8

21:28hrs

Coral Bookmakers 208 High Street Hounslow TW3 1HE

Mercur Slots

146 High Street Hounslow Middlesex TW3 1LR
25th - 26th August 2022



Image A9

21:29hrs

Entrance to Treaty Centre High Street Hounslow



Image A10

21:31hrs

Holy Trinity Church High Street Hounslow

Merkur Slots

146 High Street Hounslow Middlesex TW3 1LR
25th - 26th August 2022



Image A11

21:32hrs

H&T Pawnbrokers 253 High Street Hounslow TW3 1EA



Image A12

21:32hrs

2 - 7 Montague Road Hounslow TW3 1LD

Mercur Slots

146 High Street Hounslow Middlesex TW3 1LR
25th - 26th August 2022



Image A13

21:34hrs

Market Place 281-287 High Street Hounslow TW3 1EF



Image A14

21:34hrs

High Street Hounslow looking east

Merkur Slots

146 High Street Hounslow Middlesex TW3 1LR
25th - 26th August 2022



Image A15

21:35hrs

Paddy Power 295 High Street Hounslow TW3 1EF



Image A16

21:36hrs

The Bell Public House
2 Staines Road Hounslow TW3 3JS

Mercur Slots

146 High Street Hounslow Middlesex TW3 1LR
25th - 26th August 2022



Image A17

21:38hrs

Royal Casino Slots 1-2 Cressys Corner
Lampton Road Hounslow TW3 1HA



Image A18

21:38hrs

Bath Road Hounslow looking west

Merkur Slots

146 High Street Hounslow Middlesex TW3 1LR
25th - 26th August 2022



Image A19

21:44 hrs

Merkur Slots 237 -239 High Street Hounslow TW3 1EA



Image A20

21:44hrs

Merkur Slots 237 -239 High Street Hounslow TW3 1EA

Mercur Slots

146 High Street Hounslow Middlesex TW3 1LR
25th - 26th August 2022



Image A21

21:54hrs

Cineworld Cinema Hounslow



Image A22

22:33hrs

High Street Hounslow looking west

Merkur Slots

146 High Street Hounslow Middlesex TW3 1LR
25th - 26th August 2022



25 Aug 2022 at 22:34:36
Hounslow

Page 197

Image A23

22:34hrs

Ladbrokes 113 A & B High Street Hounslow TW3 1QT



25 Aug 2022 at 22:37:26
Hounslow

Image A24

22:37hrs

High Street Hounslow looking west
towards Merkur Slots

Mercur Slots

146 High Street Hounslow Middlesex TW3 1LR
25th - 26th August 2022



Page 198

Image A25

22:41hrs

Douglas Street j/w High Street Hounslow looking south



Image A26

00:30hrs

High Street Hounslow looking west

Merkur Slots

146 High Street Hounslow Middlesex TW3 1LR
25th - 26th August 2022



Image A27

00:33hrs

High Street Hounslow looking west



Image A28

00:34hrs

Merkur Slots 148 High Street Hounslow

Mercur Slots

146 High Street Hounslow Middlesex TW3 1LR
25th - 26th August 2022



Image A29

00:36hrs

High Street Hounslow looking west



Image A30

00:38hrs

High Street Hounslow looking west

Merkur Slots

146 High Street Hounslow Middlesex TW3 1LR
25th - 26th August 2022



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Image A31

00:38hrs

McDonalds High Street Hounslow looking east



Image A32

00:41hrs

Merkur Slots 146 High Street Hounslow looking east

Merkur Slots

146 High Street Hounslow Middlesex TW3 1LR
25th - 26th August 2022



Image A33

02:43hrs

High Street Hounslow Looking west



Image A34

02:45hrs

Gio's Bar 113B High Street Hounslow 1QT

Merkur Slots

146 High Street Hounslow Middlesex TW3 1LR
25th - 26th August 2022



Image A35

02:46hrs

High Street Hounslow looking west



Image A36

02:47hrs

Merkur Slots 146 High Street Hounslow

Merkur Slots

146 High Street Hounslow Middlesex TW3 1LR
25th - 26th August 2022

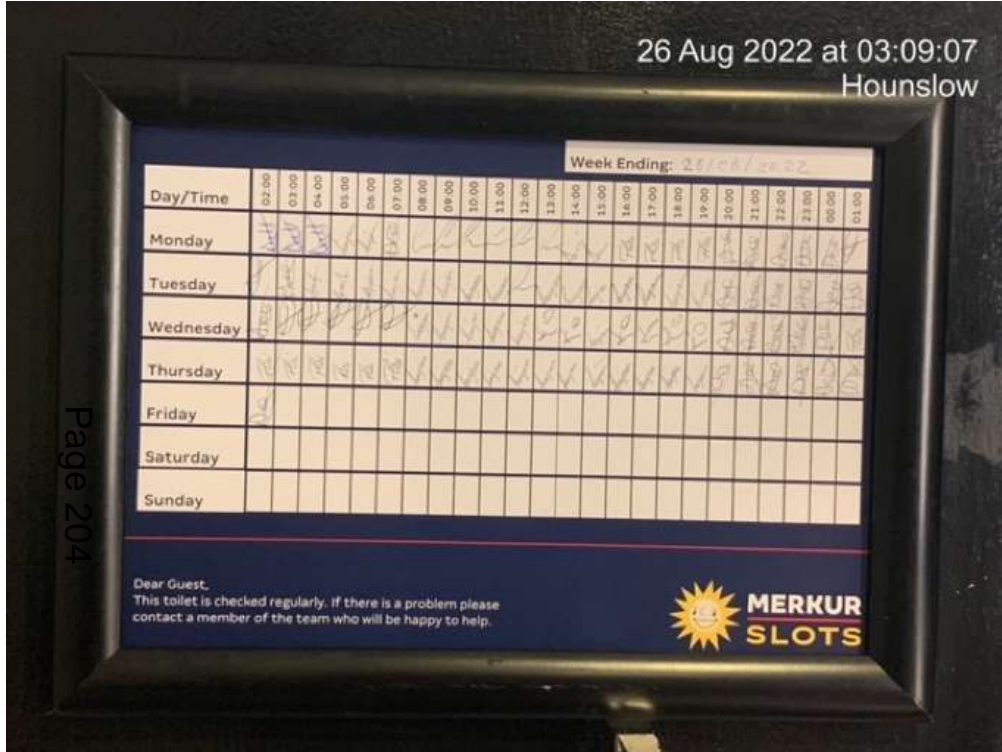


Image A37

03:09hrs

Toilet Check Sheet Merkur Slots 146 High Street Hounslow.

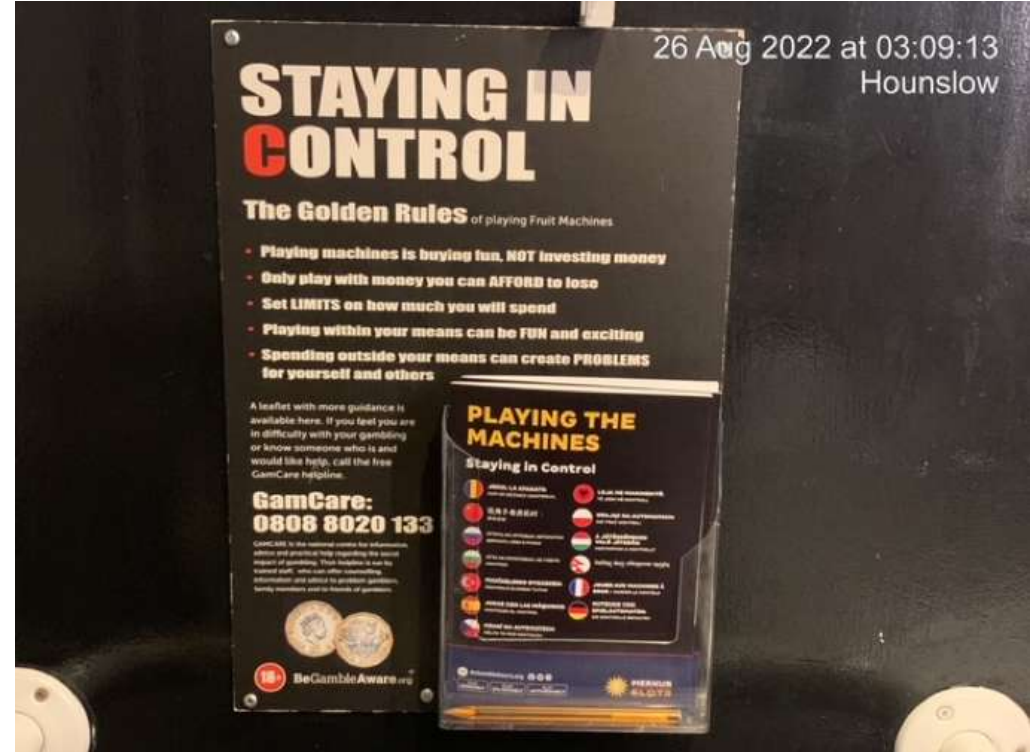


Image A38

03:09hrs

Staying in Control Poster and Gam Care Leaflets in Toilet

Merkur Slots

146 High Street Hounslow Middlesex TW3 1LR
25th - 26th August 2022



Image A39

03:10hrs

Merkur Slots 146 High Street Hounslow



Image A40

03:10hrs

High Street Hounslow looking west

Mercur Slots

146 High Street Hounslow Middlesex TW3 1LR
25th - 26th August 2022



Image A41

05:04hrs

High Street Hounslow looking west



Image A42

05:04hrs

High Street Hounslow looking east

Merkur Slots

146 High Street Hounslow Middlesex TW3 1LR
25th - 26th August 2022



Image A43

05:09hrs

Merkur Slots 146 High Street Hounslow



Image A44

05:12hrs

High Street Hounslow looking east

Merkur Slots

146 High Street Hounslow Middlesex TW3 1LR
25th - 26th August 2022



Image A45

05:12hrs

High Street Hounslow looking west



Image A46

05:14hrs

Merkur Slots 146 High Street Hounslow



Full Observation Report

Stuart Jenkins – Licensing Consultant

Leveche Associates Limited

**Merkur Slots
3 Central Parade Streatham High Road
London SW16 1HT**

**Merkur Slots
110 Streatham Hill
London SW2 4RD**

Executive Summary

1. Observations were conducted on Merkur Slots premises at 3 Central Parade Streatham High Road London SW16 1HT and 110 Streatham Hill London SW2 4RD and the surrounding area between 21:00 hours on Saturday 27th August 2022 and 06:15 hours Sunday 28th August 2022 and again at Merkur Slots 3 Central Parade Streatham High Road London SW16 1HT between 21:20 hours and 22:10 hours on Thursday 15th September 2022.
2. Covert visits were made to these sites and the surrounding areas. The observations showed the premises are situated on Streatham High Road and Streatham Hill respectively. Both premises are on the busy A23. The visits showed the premises to be well run with no issues on each occasion.
3. There is one other operator in the area with a similar business model to Merkur Slots which is Admiral Casino 119 Streatham High Road SW16 1HJ located opposite the Merkur Slots premises in Streatham High Road. Both Admiral Casino in Streatham High Road and Merkur Slots in Streatham Hill operate 24-hours a day. From the observations, it is clear that Merkur Slots operating 24-hours a day does not create anti-social behaviour, noise or any other crime and disorder and does not have a negative impact on nearby residents, the environment, local infrastructure, or wider local community.

Introduction

4. I have been instructed to conduct independent observations on the Merkur Slots premises at 3 Central Parade Streatham High Road London SW16 1HT and 110 Streatham Hill London SW2 4RD and the surrounding areas. These premises are licenced under the Gaming Act 2005.
5. Merkur Slots in Streatham High Road is open 08:00 hours to 00:00 hours 7-days a week and the premises in Streatham Hill is open 24-hours a day 7-days a week.
6. The premises come under the jurisdiction of Lambeth Council.

Personal – Stuart Jenkins

7. I am a former Police Officer having retired from the Metropolitan Police after completion of over 30 years exemplary service.
8. Throughout my police career the majority of my service was spent on specialist units engaged on proactive operations :- 1993–1997 Central Territorial Support Group (TSG) - Level 1 Public Order, firearms officer and dedicated surveillance officer; 1997–1998 CO14 Clubs & Vice Unit – test purchase officer and street offences investigations; 1998-2000 Charing Cross Division on promotion – overt and covert licensing operations; 2000-2008 CO14 Clubs & Vice Unit – lead officer for the investigation of serious criminal offences within licensed premises across London, test purchase officer, Pan-London licensing tactical advisor, Licensing Policy Development and Implementation for the Metropolitan Police Service (MPS) and intelligence unit supervisor; 2008-2018 Marine Policing Unit (MPU) – licensing lead for the MPU; licensing tactical advisor Notting Hill Carnival, covert licensing operations and intelligence unit supervisor. Marine intelligence and accreditation lead for the Queens Diamond Jubilee River Pageant and intelligence lead for the London Olympics 2012.
9. I have worked as an Independent Consultant in the Licensing and Security Industry for the last 5 years.
10. I was a Home Office qualified Crime Prevention Design Advisor.
11. I am the holder of the BTEC Level 3 Certificate (Security Industry Authority) – Close Protection Operative in the Private Security Industry.
12. I am the holder of a Personal Licence under the Licensing Act 2003.

Observations

13. I carried out my observations of Merkur Slots premises at 3 Central Parade Streatham High Road London SW16 1HT and 110 Streatham Hill London SW2 4RD and the surrounding area between 21:00 hours on Saturday 27th August 2022 and 06:15 hours Sunday 28th August 2022, and again at Merkur Slots 3 Central

Parade Streatham High Road London SW16 1HT between 21:20 hours and 22:05 hours on Thursday 15th September 2022 - Images A1, A2, B1, C3.

14. The area felt safe with members of the public going about their business, working, shopping, and socialising.
15. The area is well lit and illuminated from street lighting and shop front lights. I had clear and unobstructed views throughout the observations.
16. During observations I concentrated on the pedestrian footfall, signs of criminality, begging, anti-social behaviour including any additional noise, vulnerable persons, other persons at risk and the general environment.
17. Both premises are located on busy high streets on the main A23 leading into Central London. Many of these shops have residential properties above them.
18. Streatham High Road and Streatham Hill generally run north to south.
19. My initial observations centred around the Merkur Slots on Streatham High Road. The premises are situated within a parade of shops on a busy high street. Immediately outside the venue is a footpath and then the A23 road itself. Two-way vehicular and pedestrian traffic can pass the venue in either direction. During the observations vehicular and pedestrian traffic was constant but varied.
20. North of and next to the premises is the Creamery & Coffee, 2 Central Parade Streatham High Road SW16 1HT. To the south of and next to the premises is Galaxy Cut Price Brands 4 Central Parade Streatham High Road. Other retail premises, shops and restaurants line the rest of Streatham High Road – Image A3.
21. The area of observations was from Pendennis Road in the north and Gleneldon Street in the south. This area is densely populated with many retail premises, that include supermarkets, mini supermarkets, small food shops, pubs, cafes, bookmakers, restaurants, clothing shops and fast-food shops which service the transient and residential population alike.
22. The area has a diverse community living together in a mixture of privately owned and rental accommodation.
23. Streatham High Road is well served by public transport with a variety of day bus routes, taxis, and the nearby train station of Streatham Hill. There was restricted parking in the side roads. These transport mediums allow the public to arrive and leave the area safely and quickly.
24. There are three other gambling premises in the Streatham High Road area of observations:
 - i. Paddy Power Bookmakers 115 Streatham High Road SW16 1HJ – Image A5.
 - ii. William Hill Bookmakers 250 Streatham High Road SW16 1HS – Image A8.

iii. Admiral Casino 119 Streatham High Road SW16 1HJ – Image A4.

25. These premises can be divided into two main types:

- i. Betting premises not licensed to serve alcohol.
- ii. Gaming premises – Adult Gaming Centres (AGC) and Bingo Premises not licensed to serve alcohol.

26. Admiral Casino 119 Streatham High Road SW16 1HJ has a similar business model to Merkur Slots and operates 24-hours a day 7-days a week. The bookmakers all closed by 22:00 hours.

27. There are three public houses in the observation area:

- i. Pratts & Payne Beer Hall 103 Streatham High Road SW16 which is advertised as operating Monday to Thursday 12:00 hours to 23:00 hours, Friday and Saturday 12:00 hours to 00:00 hours and Sunday 11:00 hours to 22:00 hours – Image A7.
- ii. The Holland Tringham (Wetherspoons) Public House 107-109 Streatham High Road SW16 1HJ which is advertised as operating Sunday to Thursday 08:00 hours to 00:00 hours and Friday and Saturday 08:00 hours to 01:00 hours – Image A6.
- iii. The White Lion 232 Streatham High Road SW16 1BB which is advertised as closed Monday, Tuesday and Wednesday and operating Thursday 17:00 hours to 23:00 hours, Friday and Saturday 17:00 hours to 00:30 hours and Sunday 13:00 hours to 00:00 hours – Image A9.

28. After 02:00 hours my observations centred around the Merkur Slots on Streatham Hill. The premises are within the old Streatham Hill Theatre and are situated on the busy A23 which at that point has a three-lane carriageway either side of a central island. Immediately outside the venue is a footpath and then the A23 road itself. Two-way vehicular and pedestrian traffic can pass the venue in either direction. During the observations vehicular and pedestrian traffic was constant but varied.

29. North of and next to the premises is the Raymondo Studios 108 Streatham Hill SW2 4RD. To the south of and next to the premises is the junction with Barrhill Road and then Domino's Pizza 114 -116 Streatham Hill SW2 4RS. Other retail premises, shops and restaurants line the rest of Streatham Hill.

30. The area of observations was from Wyatt Park Road in the north and Ardwell Road in the south. This area is densely populated with many retail premises, that include supermarkets, mini supermarkets, small food shops, pubs, cafes, bookmakers, restaurants, clothing shops, and fast-food shops which service the transient and residential population alike.

31. The area has a diverse community living together in a mixture of privately owned and rental accommodation.

32. Streatham Hill is well served by public transport with a variety of bus routes, taxis, and the nearby train station of Streatham Hill. There was restricted parking in the side roads. These transport mediums allow the public to arrive and leave the area safely and quickly.
33. There are two other gambling premises in the Streatham High Road area of observations, all of which close by 22:00 hours:
 - i. Betfred Bookmakers 132-134 Streatham Hill SW2 4RS – Image B3
 - ii. Ladbrokes Bookmakers 79-81 Streatham Hill SW2 4UB – Image B4
34. There were no other premises with a similar business model to Merkur Slots in the area of observations.
35. During the observations I saw no illegal activity or anti-social behaviour taking place.
36. Throughout my observations in and around Streatham High Road and Streatham Hill I saw no begging taking place in the street, no street drinkers or drug dealing around the premises or the area.
37. Photographic images of what was seen during the observations were taken to support my findings and are documented in Appendices A, B and C.

Covert Observations

Deployment One

38. I conducted my covert observations from 21:00 hours on Saturday 27th August 2022 and 06:15 hours on Sunday 28th August 2022.
39. At 21:00 hours I arrived in the area of the Merkur Slots premises 3 Central Parade Streatham High Road London SW16 1HT and started my observations by monitoring the venue, the immediate area around it and the pedestrian footfall.
40. Pedestrian and vehicular traffic passing the premises was constant throughout my observations but varied dependent on the time of night. Most of the shops had closed when I arrived.
41. Between 22:00 hours and 02:00 hours a continuous flow of pedestrians walked past the venue transiting the area or visiting restaurants and late-night takeaway shops. During this time there were no groups of youths hanging around the premises or in the nearby streets. Pedestrians and vehicles made their way along Streatham High Road with purpose. At 00:00 hours Merkur Slots Streatham High Road closed without any issues – Images A10, A11, A12, A13, A14.

42. Throughout my continuing observations I recorded further photographic images that demonstrate there was no anti-social behaviour in the vicinity of the Merkur Slots premises – Images A18, A19, A20.
43. At 02:00 hours I moved my location to concentrate my observations on Merkur Slots 110 Streatham Hill SW2 4RD.
44. At 02:15 hours I arrived in the area of the Merkur Slots Streatham Hill and started my observations by monitoring the venue, the immediate area around it and the pedestrian footfall – Image B1, B2.
45. Between 02:32 hours and 03:03 hours I conducted a covert visit to the Merkur Slots 110 Streatham Hill SW2 4RD.
46. The front display of the premises was clean, well maintained and looked professional. The signage was clear and bright.
47. At 02:32 hours I went to the entrance door which was closed. I saw that entry was controlled by a bell security entry system. On the glass of the door, I saw signage stating no under 18's, CCTV in operation, no alcohol and that a time delay lock was in operation – Image B5.
48. I pushed the door, but it was locked. I pressed the entry button and after a few seconds the door was opened by a male member of staff and I entered.
49. I found myself in a long corridor and followed the male member of staff into the main gaming area. On entering this area, I saw a reception area where refreshments were also prepared. At the reception desk was another male member of staff. Both members of staff were wearing smart corporate clothing.
50. At that point I saw the first member of staff, who let me into the premises was a security guard and had an SIA registration badge displayed.
51. The room was deep and opened out into a large area left and right. I saw there was a wide variety of gaming machines throughout this single room.
52. On seeing me the second member of staff approached and welcomed me to the premises. He asked if I had been to this Merkur Slots premises previously and I said I had. He then asked me if I needed any help with the gaming machines or choosing one to play. I stated I was fine and chose a machine towards the middle of the premises on the back wall.
53. Whilst I was playing the machine the second member of staff asked if I would like a soft drink, water, coffee, tea or a snack. I asked if I could get an alcoholic drink and he explained the premises weren't licensed for alcohol but the non-alcoholic drinks they provided were free for customers. I accepted his offer of a coffee.
54. After a couple of minutes, the staff member brought over my coffee and stated if I needed any help to ask him or his colleague.

55. There were eight other customers in the venue at the time of my visit. There four females and four males aged between 27 and 60 years. During my visit no other customer came into the venue.
56. The hot and soft drinks were prepared at a reception desk area which was clean and tidy.
57. Whilst I was in the venue, I saw the staff cleaning, wiping down surfaces and completing a low-profile patrol checking on customers' needs and making sure they weren't underage or vulnerable. I felt safe, I was not pressurised to use the machines or to spend money. The staff were friendly, polite, informative and I found the premises clean and tidy.
58. Before leaving I used the toilets which were clean and tidy and located away from the main room along another corridor. The toilets were regularly checked as shown by the toilet check sheet and there were Gamcare leaflets available for customers to take away – Image B6, B7.
59. At no time during my observations did I see anyone hanging around the premises. Customers arriving went straight into the premises and customers leaving left the area straight away. I left the premises at 03:02 hours – Image B8.
60. Local Authority Street Cleaning vehicles and buses operated throughout the night.
61. Throughout my continuing observations I recorded further photographic images that demonstrate there was no anti-social behaviour in the vicinity of the Merkur Slots premises – Images B9, B10, B11, B12, B13, B14.
62. I remained in the area until 06:15 hours when I concluded my observations.

Deployment Two

63. I conducted my covert observations from between 21:20 hours to 22:10 hours on Thursday 15th September 2022.
64. At 21:20 hours I arrived in the area of Merkur Slots 3 Central Parade Streatham High Road London SW16 1HT and started my observations by monitoring the venue and the immediate area around it – Image C1, C2.
65. Pedestrian and vehicular traffic passing the premises was varied as is typical with Streatham High Road seven days a week.
66. Between 21:35 hours and 22:00 hours I conducted a covert visit to the Merkur Slots 3 Central Parade Streatham High Road SW16 1HT.
67. At 21:35 hours I went to the entrance door which was closed. I saw that entry was controlled by a bell security entry system. On the glass of the door, I saw signage

stating no under 18's, CCTV in operation, no alcohol and that a time delay lock was in operation – Image C3.

68. I pushed the door and entered the premises. In front of me I saw a board with the premises policies, rules and licences on display. I passed the policies board and entered the main area. I saw it was on one level which was carpeted and there were gaming machines of various types throughout.
69. Halfway down on the lefthand wall was a reception where refreshments were prepared. As I approached the reception, I saw a female member of staff wearing smart corporate clothing. She appeared to be engaged in preparing drinks.
70. At the time of my visit there were four other customers in the venue. Three male and one female aged between 30 years and 50 years.
71. I found a gaming machine just beyond the reception desk on the left-hand wall. The staff left me to enjoy playing the machine.
72. Whilst I was playing the machine I engaged the female member of staff in conversation and she asked if I would like a soft drink, water, coffee, tea or a snack. I asked if I could get an alcoholic drink and she explained the premises weren't licensed for alcohol but the non-alcoholic drinks they provided were free for customers. I accepted her offer of a coffee.
73. After a couple of minutes, the staff member brought over my coffee and stated if I needed any help to ask her.
74. I then saw a male member of staff come out of a staff door at the back of the premises and come to the reception. The female member of staff then went through the staff door and out of sight leaving the male managing the shop floor.
75. Whilst I was in the venue, I saw the staff cleaning, wiping down surfaces and completing a low-profile patrol checking on customers' needs and making sure they weren't underage or vulnerable. I felt safe, I was not pressurised to use the machines or to spend money. The staff were friendly, polite, informative and I found the premises clean and tidy.
76. Before leaving I used the toilets which were clean and tidy. The toilets were regularly checked as shown by the toilet check sheet and there were Gamcare leaflets available for customers to take away – Image C4, C5.
77. At no time during my observations did I see anyone hanging around the premises. Customers arriving went straight into the premises and customers leaving left the area straight away. I left the premises at 22:00 hours.
78. Throughout my continuing observations I recorded further photographic images that demonstrate there was no anti-social behaviour in the vicinity of the Merkur Slots premises – Images C7, C8.
79. I remained in the area until 22:10 hours when I concluded my observations.

Summary

80. I found Merkur Slots in Streatham High Road and Streatham Hill to have smart, well-lit, and professional looking frontage. The premises were carpeted, with music playing in the background and the atmosphere was relaxed and welcoming.
81. At the time of my visits to the location, I saw no evidence of crime and disorder, anti-social behaviour, excessive noise, littering, street drinking, drug dealing, begging or groups of youths hanging around.
82. People entering these premises were vetted before being allowed admission or immediately upon entry to ensure drunken or other vulnerable people didn't gain access to the premises.
83. It is clear the presence of Merkur Slots in Streatham High Road and Streatham Hill does not lead to or result in people, who have been on a night out, staying in the area any longer than they had planned to.
84. Merkur Slots UK takes safer gambling seriously. This can be evidenced with the use of safeguarding programs such as:
- i. Merkur 360 Program - To achieve higher standards of player protection Merkur have worked with G4 Global Gambling Guidance Group, which focuses on the provision of responsible gambling and has also implemented its own 360 responsible gambling program.
 - ii. Think 25 Policy – Strict Over 18 Policy. All venues operate a Think 25 Policy whereby photographic ID is required to gain entry.
 - iii. In View Tools – Staying in control is a key part of messaging in the Merkur venues. Leafleting and posters such as BeGambleAware and GamCam, can be found in the venues main area and in private places such as toilets.
 - iv. Staff Training – Merkur Slots has developed a detailed training programme for all staff members including its own City and Guilds accredited training developed in partnership with YGAM and Betknowmore.
85. From my visits to many Merkur Slots Premises, I have found professional and attentive staff managing them. The premises are well run and there are clearly defined systems in place to ensure the premises operate in support of the gambling objectives and don't attract or take advantage of juveniles or other vulnerable persons.
86. The demographic is much older and doesn't attract young people or children. The environment is very different to a loud busy arcade, it is a low-key carpeted style lounge with no more than a handful of mature customers in at any one time.

87. Merkur Slots UK and their premises operate in support of the principles of Secured by Design, the company recommended by the Chief Officers of UK Police Forces for Crime Prevention standards.

88. In conclusion, from my visits it is my opinion Merkur Slots UK Limited are well run, and their operation significantly reduces the risk of crime and disorder and vulnerable people being taken advantage of. It is clear that the Merkur Slots premises do not impact on the environment, infrastructure, or local community.

89. I believe the facts in my report are honest and true. The opinions I have expressed are made in good faith and in my best judgement. The fee for this report is not conditional on the outcome of any future case, application or finding.

Stuart Jenkins
Licensing Consultant
Leveche Associates Limited
18/09/2022



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Appendix A

Observation Images
27th - 28th August 2022

Merkur Slots

3 Central Parade
Streatham High Road
SW16 1HT

Leveche Associates Ltd

Nightingale House
46-48 East Street
Epsom
Surrey KT17 1HQ

Merkur Slots

3 Central Parade Streatham High Road SW16 1HT
27th - 28th August 2022



Image A1

21:13hrs

Merkur Slots 3 Central Parade Streatham SW16 1HT



Image A2

21:13hrs

Merkur Slots 3 Central Parade Streatham High Road
looking south

Merkur Slots

3 Central Parade Streatham High Road SW16 1HT
27th - 28th August 2022



Image A3

21:14hrs

H&T Pawnbrokers 254 Streatham High Road SW16 1HT



Image A4

21:15hrs

Admiral Casino 119 Streatham High Road SW16 1HJ

Mercur Slots

3 Central Parade Streatham High Road SW16 1HT
27th - 28th August 2022



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Image A5

21:16hrs

Paddy Power 115 Streatham High Road SW16 1HJ



Image A6

21:16hrs

The Holland Tringham (Wetherspoon) PH
107-109 Streatham High Road SW16 1HJ

Merkur Slots

3 Central Parade Streatham High Road SW16 1HT
27th - 28th August 2022



Image A7

21:17hrs

Pratts & Payne Bar 103 Streatham High Road SW16 1HJ

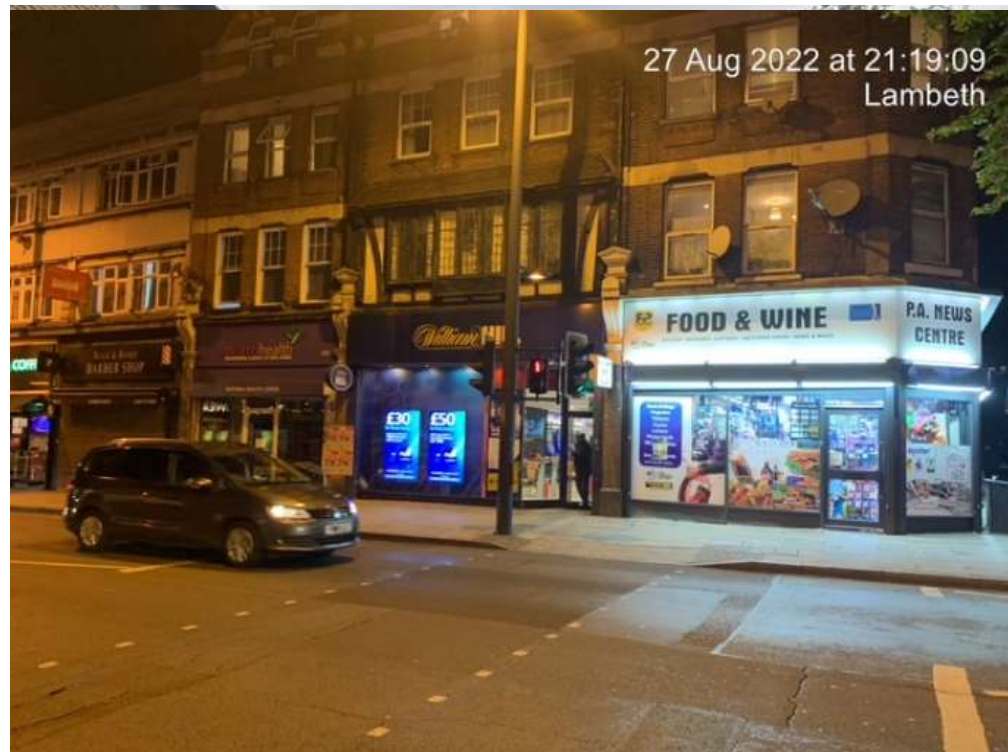


Image A8

21:19hrs

William Hill Bookmakers
250 Streatham High Road SW16 1HS

Merkur Slots

3 Central Parade Streatham High Road SW16 1HT
27th - 28th August 2022



Image A9

21:22hrs

The White Lion 232 Streatham High Road SW16 1BB



Image A10

23:26hrs

Merkur Slots 3 Central Parade
High Road Streatham

Mercur Slots

3 Central Parade Streatham High Road SW16 1HT
27th - 28th August 2022



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Image A11

23:26hrs

Mercur Slots 3 Central Parade Streatham High Road



Image A12

23:27hrs

Streatham High Road looking south

Merkur Slots

3 Central Parade Streatham High Road SW16 1HT
27th - 28th August 2022



Image A13

23:27hrs

Streatham High Road looking north



Image A14

23:28hrs

Streatham High Road looking north

Merkur Slots

3 Central Parade Streatham High Road SW16 1HT
27th - 28th August 2022



Image A15

01:52hrs

Streatham High Road looking south



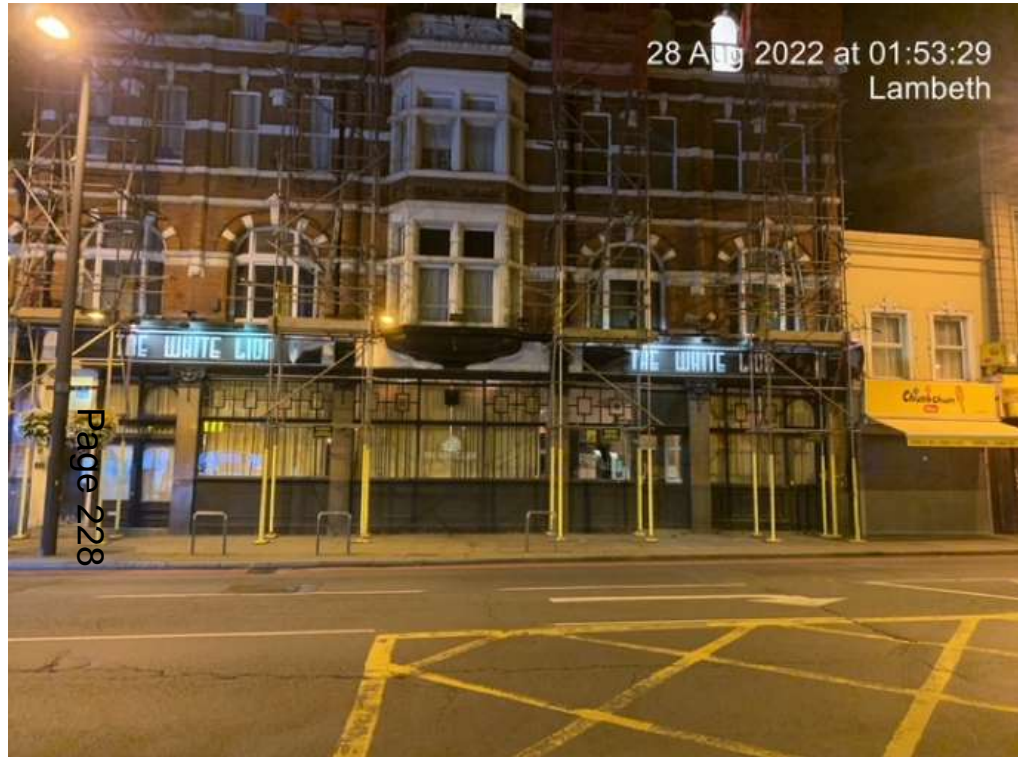
Image A16

01:53hrs

Streatham High Road looking north

Merkur Slots

3 Central Parade Streatham High Road SW16 1HT
27th - 28th August 2022



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Image A17

01:53hrs

The White Lion Streatham High Road



Image A18

01:59hrs

Merkur Slots 3 Central Parade Streatham High Road

Merkur Slots

3 Central Parade Streatham High Road SW16 1HT
27th - 28th August 2022



Image A19

01:59hrs

Streatham High Road looking south



Image A20

01:59hrs

Streatham High Road looking north



Appendix B

Observation Images

28th August 2022

Merkur Slots

110 Streatham Hill

London

SW2 4TD

Leveche Associates Ltd

Nightingale House

46-48 East Street

Epsom

Surrey KT17 1HQ

Merkur Slots

110 Streatham Hill London SW2 4TD
28th August 2022



Image B1

02:21hrs

Merkur Slots 110 Streatham Hill London SW2 4TD



Image B2

02:22hrs

Streatham Hill looking north

Mercur Slots

110 Streatham Hill London SW2 4TD
28th August 2022



Image B3

02:23hrs

Betfred 132 - 134 Streatham Hill SW2 4RS



Image B4

02:28hrs

Ladbrokes 79 - 81 Streatham Hill SW2 4UB

Merkur Slots

110 Streatham Hill London SW2 4TD
28th August 2022



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Image B5

02:30hrs

Merkur Slots 110 Streatham Hill SW2 4TD



Image B6

03:00hrs

Toilet Check Sheet
Merkur Slots 110 Streatham Hill SW2 4TD

Merkur Slots

110 Streatham Hill London SW2 4TD
28th August 2022



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Image B7

03:01hrs

Staying in Control Literature in Toilets
Merkur Slots Streatham Hill



Image B8

03:03hrs

Merkur Slots 110 Streatham Hill SW2 4TD

Merkur Slots

110 Streatham Hill London SW2 4TD
28th August 2022



Image B9

04:59hrs

Merkur Slots 110 Streatham Hill SW2 4TD



Image B10

04:59hrs

Streatham Hill looking north

Merkur Slots

110 Streatham Hill London SW2 4TD
28th August 2022



Image B11

05:00hrs

Streatham Hill looking south



Image B12

06:03hrs

Streatham Hill looking north

Merkur Slots

110 Streatham Hill London SW2 4TD
28th August 2022



Image B13

06:03hrs

Streatham Hill looking south



Image B14

06:08hrs

Merkur Slots 110 Streatham Hill SW2 4TD



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ASSOCIATES LIMITED

Appendix C

Observation Images
15th September 2022

Merkur Slots

3 Central Parade
Streatham High Road
SW16 1HT

Leveche Associates Ltd

Nightingale House
46-48 East Street
Epsom
Surrey KT17 1HQ

Merkur Slots
3 Central Parade Streatham High Road SW16 1HT
15th September 2022



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Image C1

21:33hrs

Streatham High Road looking south

Image C2

21:34hrs

Streatham High Road looking north

15th September 2022



Image C3

21:34hrs

Merkur Slots 3 Central Parade Streatham SW16 1HT



Image C4

21:58hrs

Staying in Control Literature - Gamcare Leaflets



Image C7

22:01hrs

Streatham High Road looking south

Image C8

22:01hrs

Streatham High Road looking north



Full Observation Report

Stuart Jenkins – Licensing Consultant

Leveche Associates Limited

Merkur Slots Cashino

69 Tottenham Court Road London W1T 2HA

Executive Summary

1. Observations were conducted on Merkur Slots Cashino 69 Tottenham Court Road London W1T 2HA and the surrounding area between 20:30 hours on Wednesday 17th August 2022 and 06:00 hours on Thursday 18th August 2022 and between 00:05 hours and 00:20 hours on Friday 16th September 2022.
2. Two covert visits were made to the site and the surrounding area. The observations showed the premises are situated on Tottenham Court Road near Godge Street Underground Station and are open 24-hours a day 7-days a week. The visits showed the premises to be well run with no issues on both occasions.
3. There are no other gaming premises with a similar operation to Merkur Slots in the immediate area. From the observations, it is clear that Merkur Slots operating 24-hours a day does not create anti-social behaviour, noise or any other crime and disorder and does not have a negative impact on nearby residents, the environment, local infrastructure, or wider local community.

Introduction

4. I have been instructed to conduct independent observations on the Merkur Slots premises at Merkur Slots Cashino 69 Tottenham Court Road London W1 2HA and the surrounding area.

5. The premises has a 24-hour licence under the Gaming Act 2005 and is open 24-hours a day 7-days a week.
6. The premises come under the jurisdiction of Camden Council in the London Borough of Camden.

Personal – Stuart Jenkins

7. I am a former Police Officer having retired from the Metropolitan Police after completion of over 30 years exemplary service.
8. Throughout my police career the majority of my service was spent on specialist units engaged on proactive operations :- 1993–1997 Central Territorial Support Group (TSG) - Level 1 Public Order, firearms officer and dedicated surveillance officer; 1997–1998 CO14 Clubs & Vice Unit – test purchase officer and street offences investigations; 1998-2000 Charing Cross Division on promotion – overt and covert licensing operations; 2000-2008 CO14 Clubs & Vice Unit – lead officer for the investigation of serious criminal offences within licensed premises across London, test purchase officer, Pan-London licensing tactical advisor, Licensing Policy Development and Implementation for the Metropolitan Police Service (MPS) and intelligence unit supervisor; 2008-2018 Marine Policing Unit (MPU) – licensing lead for the MPU; licensing tactical advisor Notting Hill Carnival, covert licensing operations and intelligence unit supervisor. Marine intelligence and accreditation lead for the Queens Diamond Jubilee River Pageant and intelligence lead for the London Olympics 2012.
9. I have worked as an Independent Consultant in the Licensing and Security Industry for the last 5 years.
10. I was a Home Office qualified Crime Prevention Design Advisor.
11. I am the holder of the BTEC Level 3 Certificate (Security Industry Authority) – Close Protection Operative in the Private Security Industry.
12. I am the holder of a Personal Licence under the Licensing Act 2003.

Observations

13. I carried out my observations of Merkur Slots Cashino 69 Tottenham Court Road W1 2HA and the surrounding area between 20:30 hours on Wednesday 17th August 2022 and 06:00 hours on Thursday 18th August 2022 and between 00:05 hours and 00:20 hours on Friday 16th September 2022.
14. The area felt safe with members of the public going about their business, working, shopping, and socialising.
15. The area is well lit and illuminated from street lighting and shop front lights. I had clear and unobstructed views throughout the observations.

16. During observations I concentrated on the pedestrian footfall, signs of criminality, begging, anti-social behaviour including any additional noise, vulnerable persons, other persons at risk and the general environment.
17. The premises are located on a busy high street within a parade of shops in the heart of London. Mainstream shops line both sides of Tottenham Court Road. Many of these shops have residential properties above them – Image A1.
18. Tottenham Court Road generally runs north to south. Immediately outside the venue is a wide footpath and then the road itself. Two-way vehicular and pedestrian traffic can pass the venue in either direction. During the observations vehicular and pedestrian traffic was varied.
19. North of and next to the premises is the entrance to Xen-Do Martial Arts Centre which shares the same postal address of 69 Tottenham Court Road and building as Merkur Slots Cashino. Next to the Martial Arts Centre entrance is CEX Entertainment Exchange 70 Tottenham Court Road and then Kentucky Fried Chicken 71 Tottenham Court Road. To the south of and next to the premises is Dianetics & Scientology Life Improvement Centre 68 Tottenham Court Road. Other retail premises, shops and restaurants line the rest of Tottenham Court Road.
20. The area of observations was from Warren Street in the north and Store Street in the south. This area is densely populated with many retail premises, that include small food shops, pubs, cafes, bookmakers, restaurants, fast-food shops, and furniture stores which service the transient and residential population alike.
21. The area has a diverse community living together in a mixture of privately owned and rental accommodation.
22. Tottenham Court Road is well served by public transport with a variety of bus routes, taxis, hire bikes and the nearby underground train stations of Goodge Street and Warren Street. There was ample car parking available in a nearby pay and display car park and restricted parking in the side roads. These transport mediums allow the public to arrive and leave the area safely and quickly.
23. Bus Stops are nearby and opposite Merkur Slots Cashino with the Marylebone Mainline and Underground Station in Melcombe Place NW1 6JJ, a 12-minute walk (1.8 miles).
24. There are two other gambling premises in the Tottenham Court Road area of observations, all of which close by 22:00 hours:
 - i. Betfred Bookmakers 116 Tottenham Court Road W1T 5AJ
 - ii. Coral Bookmakers 75 Warren Street NW1 3AD
25. These premises can be divided into two main types:
 - i. Betting premises not licensed to serve alcohol.
 - ii. Gaming premises – Adult Gaming Centres (AGC) and Bingo Premises not licensed to serve alcohol.

26. There are no other operators with a similar business model to Merkur Slots Cashino that operates 24-hours a day 7-days a week in the area of observations – Images A2, A3, A4, A5, A6, A7, A8, A9, A10, A11, A12 and A13.

27. There are four public houses in the observation area:

- i. Rising Sun Public House 46 Tottenham Court Road W1T 2EL which is advertised as operating Monday to Thursday 11:00 hours to 00:00 hours, Friday and Saturday 11:00 hours to 01:00 hours, and Sunday 11:00 hours to 22:30 hours – Image A14.
- ii. The Court Public House 108A Tottenham Court Road W1T 5AA which is advertised as operating Sunday to Wednesday 12:00 hours to 00:00 hours, and Thursday, Friday and Saturday 12:00 hours to 01:00 hours – Image A25.
- iii. Fitzrovia Belle Bar & Hotel 174 Tottenham Court Road W1T 7NT which is advertised as operating Monday to Sunday 07:00 hours to 00:00 hours – Image A26.
- iv. TCR 183 Tottenham Court Road W1T 7PE which is advertised as operating Monday to Wednesday 12:00 hours to 00:00 hours, and Thursday, Friday and Saturday 12:00 hours to 01:00 hours and Sunday 12:00 hours to 22:30 hours – Image A27.

28. North of the premises is Whitfield Gardens at the junction with Tottenham Street, an open space with gardens and seating for public use. During the observations I saw no illegal activity or anti-social behaviour taking place – Image A30.

29. Throughout my observations in and around Tottenham Court Road I saw no begging taking place in the street, no street drinkers or drug dealing around the premises or the area. However, I did see people who are living on the street encamped, some in tents, underneath the canopy of Heals Furniture Store 196 Tottenham Court Road W1T 7LQ. This is a daily occurrence with members of the local homeless community sheltering overnight at Heals – Image A10, A39, A40, A41, A42, A43 and A44..

30. Photographic images of what was seen during the observations were taken to support my findings and are documented in Appendices A and B.

Covert Observations

Deployment One

31. I conducted my covert observations from between 20:30 hours on Wednesday 17th August 2022 and 06:00 hours on Thursday 18th August 2022.

32. At 20:30 hours I arrived in the area of the Merkur Slots Cashino premises 69 Tottenham Court Road and started my observations by monitoring the venue, the immediate area around it and the pedestrian footfall.
33. Pedestrian and vehicular traffic passing the premises was constant throughout my observations but varied dependent on the time of the day. Most of the shops had closed when I arrived. The bookmakers were still open but soon closed without any issues.
34. Between 22:00 hours and 03:00 hours a continuous flow of pedestrians walked past the venue transiting the area or visiting restaurants and late-night takeaway shops. During this time there were no groups of youths hanging around the premises or in the nearby streets. Pedestrians and vehicles made their way along Tottenham Court Road with purpose. Delivery riders were parked on the road and footpaths outside fast food shops whilst servicing fast food deliveries.
35. Between 03:14 hours and 03:32 hours I conducted a covert visit to the Merkur Slots Cashino 69 Tottenham Court Road – Image A32.
36. The front display of the premises above the liveried shop glass front had been removed and was clearly being refurbished. Even though the signage was removed the shop front was clean, well maintained and looked professional.
37. At 03:14 hours I went to the entrance door which was closed. I saw that entry could be controlled by using a bell security entry system. On the glass of the door, I saw signage stating no under 18's, CCTV in operation, no alcohol and that a time delay lock was in operation.
38. I pushed the door and entered the premises. I saw to my left a board with the premises policies, rules and licences on display. I passed the policies board and entered the main area. I saw it was on two levels which were carpeted and there were gaming machines of various types throughout the premises.
39. Halfway down the right-hand wall was a reception area where refreshments were also prepared. At the reception desk were two male members of staff who were both wearing smart corporate clothing. After the reception desk there was an upper level with further gaming machines.
40. On seeing me one of the members of staff approached and welcomed me to the premises. He asked if I had been to this Merkur Slots premises previously and I said I had. He then asked me if I needed any help with the gaming machines or choosing one to play. I stated I was fine and chose a machine towards the middle of the premises.
41. Whilst I was playing the machine he asked if I would like a soft drink, water, coffee, tea or a snack. I asked if I could get an alcoholic drink and he explained the premises weren't licensed for alcohol but the non-alcoholic drinks they provided were free for customers. I accepted his offer of a coffee.

42. After a couple of minutes, the staff member brought over my coffee and stated if I needed any help to ask him or his colleague.
43. The staff member then left me to enjoy playing the machines. I was not pressurised or encouraged to spend money.
44. There were six other customers in the venue at the time of my visit. All six were male and aged between 27 and 45 years. During my visit one other customer came into the venue.
45. The hot and soft drinks were prepared at a reception desk area which was clean and tidy.
46. Whilst I was in the venue, I saw the staff cleaning, wiping down surfaces and completing a low-profile patrol checking on customers' needs and making sure they weren't underage or vulnerable. I felt safe, I was not pressurised to use the machines or to spend vast sums of money. The staff were friendly, polite, informative and I found the premises clean and tidy.
47. Before leaving I used the toilets which were clean and tidy and located in the basement area. The toilets were regularly checked as shown by the toilet check sheet and there were Gamcare leaflets available for customers to take away – Image A33, A34.
48. At no time during my observations did I see anyone hanging around the premises. Customers arriving went straight into the premises and customers leaving left the area straight away. I left the premises at 03:32 hours – Image A35.
49. Local Authority Street Cleaning vehicles and buses operated throughout the night.
50. Throughout my continuing observations I recorded further photographic images that demonstrate there was no anti-social behaviour in the vicinity of the Merkur Slots premises – Image A36, A37, A38, A39, A40, A41, A42, A43, A44.
51. I remained in the area until 06:00 hours when I concluded my observations.

Deployment Two

52. I conducted my covert observations from between 00:05 hours and 00:20 hours on Friday 16th September 2022.
53. At 00:05 hours I arrived in the area of the Merkur Slots Cashino premises 69 Tottenham Court Road and started my observations by monitoring the venue and the immediate area around it – Image B1.
54. I saw that since my visit new signage had been installed above the glass shop front saying 'Merkur Cashino'. Pedestrian and vehicular traffic passing the

premises was constant but varied as is typical with Tottenham Court Road seven days a week.

55. Between 00:06 hours and 00:17 hours I conducted a covert visit to the Merkur Slots Cashino 69 Tottenham Court Road – Image B2, B17.
56. At 00:06 hours I went to the entrance door which was closed. The time delay lock was in operation. I pressed the entry button and after a few seconds the door was opened by a male member of staff and I entered. I saw to my left the board with the premises policies, rules and licences on display. I passed the policies board and entered the main area. The layout of the premises was as I have previously described.
57. As I followed the staff member through the premises he asked if I would like a soft drink, water, coffee, tea or a snack. I politely declined his offer.
58. I saw on the upper level another male member of staff monitoring customers. Both members of staff were dressed in smart corporate clothing.
59. At the time of my visit there were three other customers in the venue. They were all male, aged between 30 years and 40 years.
60. I found a gaming machine towards the back of the premises on the upper level. The staff left me to enjoy playing the machines. I was not pressurised or encouraged to spend money.
61. Whilst I was in the venue, I saw the staff cleaning, wiping down surfaces and completing a low-profile patrol checking on customers' needs and making sure they weren't underage or vulnerable. I felt safe, I was not pressurised to use the machines or to spend money. The staff were friendly, polite, informative and I found the premises clean and tidy.
62. At no time during my observations did I see anyone hanging around the premises. Customers arriving went straight into the premises and customers leaving left the area straight away. I left the premises at 00:17 hours.

Summary

63. I found Merkur Slots Cashino in Tottenham Court Road to have a smart, well-lit, and professional looking frontage. The premises were carpeted, with music playing in the background and the atmosphere was relaxed and welcoming.
64. At the time of my visits to the location, I saw no evidence of crime and disorder, anti-social behaviour, excessive noise, littering, street drinking, drug dealing, begging or groups of youths hanging around. There were, however, homeless people sleeping rough, but this wasn't anywhere near the Merkur Slots Cashino premises.

65. People entering these premises were vetted before entering or immediately upon entry to ensure drunken or other vulnerable people didn't gain access to the premises.
66. It is clear the presence of Merkur Slots in Tottenham Court Road does not lead to or result in people, who have been on a night out, staying in the area any longer than they had planned to.
67. Merkur Slots UK takes safer gambling seriously. This can be evidenced with the use of safeguarding programs such as:
- i. Merkur 360 Program - To achieve higher standards of player protection Merkur have worked with G4 Global Gambling Guidance Group, which focuses on the provision of responsible gambling and has also implemented its own 360 responsible gambling program.
 - ii. Think 25 Policy – Strict Over 18 Policy. All venues operate a Think 25 Policy whereby photographic ID is required to gain entry.
 - iii. In View Tools – Staying in control is a key part of messaging in the Merkur venues. Leafleting and posters such as BeGambleAware and GamCam, can be found in the venues main area and in private places such as toilets.
 - iv. Staff Training – Merkur Slots has developed a detailed training programme for all staff members including its own City and Guilds accredited training developed in partnership with YGAM and Betknowmore.
68. From my visits to many Merkur Slots Premises, I have found professional and attentive staff managing them. The premises are well run and there are clearly defined systems in place to ensure the premises operate in support of the gambling objectives and don't attract or take advantage of juveniles or other vulnerable persons.
69. The demographic is much older and doesn't attract young people or children. The environment is very different to a loud busy arcade, it is a low-key carpeted style lounge with no more than a handful of mature customers in at any one time.
70. Merkur Slots UK and their premises operate in support of the principles of Secured by Design, the company recommended by the Chief Officers of UK Police Forces for Crime Prevention standards.
71. In conclusion, from my visits it is my opinion Merkur Slots UK Limited are well run, and their operation significantly reduces the risk of crime and disorder and vulnerable people being taken advantage of.
72. From my observations it is clear that the Merkur Slots premises do not impact on the environment, infrastructure, or local community.

73. I believe the facts in my report are honest and true. The opinions I have expressed are made in good faith and in my best judgement. The fee for this report is not conditional on the outcome of any future case, application or finding.

Stuart Jenkins
Licensing Consultant
Leveche Associates Limited
17/09/2022



Appendix A

Observation Images
17th - 18th August 2022

Merkur Slots Cashino

69 Tottenham Court Road
London
W1T 2HA

Leveche Associates Ltd

Nightingale House
46-48 East Street
Epsom
Surrey KT17 1 HQ

17th - 18th August 2022



Image A1

20:48hrs

Merkur Slots Cashino
69 Tottenham Court Road W1T 2HA



Image A2

20:48hrs

Tottenham Court Road looking south

17th - 18th August 2022



Image A3

20:48hrs

Tottenham Court Road looking north

Image A4

20:51hrs

Tottenham Court Road j/w Chenies Street looking north

Merkur Slots Casino
69 Tottenham Court Road London W1T 2HA

17th - 18th August 2022



Image A5

20:51hrs

Tottenham Court Road looking north

Image A6

20:52hrs

Tottenham Court Road j/w Goodge Street looking west

Merkur Slots Cashino
69 Tottenham Court Road London W1T 2HA

17th - 18th August 2022



Image A7

20:53hrs

Merkur Slots Cashino
69 Tottenham Court Road W1T 2HA



Image A8

20:54hrs

Goodge Street Underground Station
Tottenham Court Road

Merkur Slots Cashino
69 Tottenham Court Road London W1T 2HA

17th - 18th August 2022



Image A9

20:54hrs

Whitfield Gardens Tottenham Court Road
j/w Tottenham Street

Image A10

20:55hrs

Heals Furniture Store
196 Tottenham Court Road

17th - 18th August 2022



Image A11

21:00hrs

Betfred 116 Tottenham Court Road W1T 5AJ



Image A12

21:02hrs

Warren Street Underground Station
Tottenham Court Road

17th - 18th August 2022



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Image A13

21:23hrs

Tottenham Court Road j/w Store Street looking north



Image A14

21:23hrs

Rising Sun Public House
46 Tottenham Court Road W1T 2EL

Merkur Slots Cashino
69 Tottenham Court Road London W1T 2HA

17th - 18th August 2022



Image A15

22:32hrs

Merkur Slots Cashino Tottenham Court Road



Image A16

22:33hrs

Tottenham Court Road looking south

17th - 18th August 2022



Image A17

22:33hrs

Tottenham Court Road looking north



Image A18

22:34hrs

Whitfield Gardens Tottenham Court Road
j/w Tottenham Street

17th - 18th August 2022



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Image A19

23:54hrs

Tottenham Court Road looking south



Image A20

23:54hrs

Whitfield Gardens Tottenham Court Road
j/w Tottenham Street

17th - 18th August 2022



Image A21

23:54hrs

Goodge Street Unground Station
Tottenham Court Road



Image A22

23:55hrs

Merkur Slots Cashino Tottenham Court Road

17th - 18th August 2022



Image A23

23:55hrs

Tottenham Court Road looking south



Image A24

00:12hrs

Coral Bookmakers 75 Warren Street NW1 3AD

17th - 18th August 2022



Image A25

00:16hrs

The Court Public House
108A Tottenham Court Road W1T 5AA



Image A26

00:17hrs

Fitzrovia Belle Bar & Hotel
174 Tottenham Court Road W1T 7NT

17th - 18th August 2022



Image A27

00:18hrs

TCR Bar 183 Tottenham Court Road W1T 7PE



Image A28

00:22hrs

Pa Station 76 Tottenham Court Road W1T 2HG

17th - 18th August 2022



Image A29

03:10hrs

Tottenham Court Road looking north



Image A30

03:12hrs

Whitfield Gardens Tottenham Court Road
j/w Tottenham Street

17th - 18th August 2022



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Image A31

03:12hrs

Tottenham Court Road looking south



Image A32

03:13hrs

Merkur Slots Cashino Tottenham Court Road

17th - 18th August 2022



Image A33

03:24hrs

Staying in Control Poster Gam Care
Merkur Slots Cashino Tottenham Court Road



Image A34

03:25hrs

Toilet Check Sheet Merkur Slots Cashino
Tottenham Court Road

17th - 18th August 2022



18 Aug 2022 at 03:32:42
London, England W1T

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Image A35

03:32hrs

Merkur Slots Cashino Tottenham Court Road



18 Aug 2022 at 03:36:59
London, England W1T

Image A36

03:36hrs

Godge Street Underground Station
Tottenham Court Road

17th - 18th August 2022



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Image A37

03:37hrs

Tottenham Court Road looking north



Image A38

03:37hrs

Tottenham Court Road looking south

17th - 18th August 2022



Image A39

03:39hrs

Tottenham Court Road looking south



Image A40

05:51hrs

Tottenham Court Road looking north

17th - 18th August 2022



Image A41

05:52hrs

Tottenham Court Road looking south



Image A42

05:54hrs

Merkur Slots Cashino Tottenham Court Road

17th - 18th August 2022



Image A43

05:57hrs

Goodge Street Underground Station
Tottenham Court Road



Image A44

05:58hrs

Whitfield Gardens Tottenham Court Road
j/w Tottenham Street



Appendix B

Observation Images
16th September 2022

Merkur Slots Cashino

69 Tottenham Court Road
London
W1T 2HA

Leveche Associates Ltd

Nightingale House
46-48 East Street
Epsom
Surrey KT17 1HQ

16th September 2022



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Image B1

00:06hrs

Merkur Slots Cashino
69 Tottenham Court Road W1T 2HA



Image B2

00:06hrs

New Signage - Merkur Slots Cashino
69 Tottenham Court Road W1T 2HA

16th September 2022

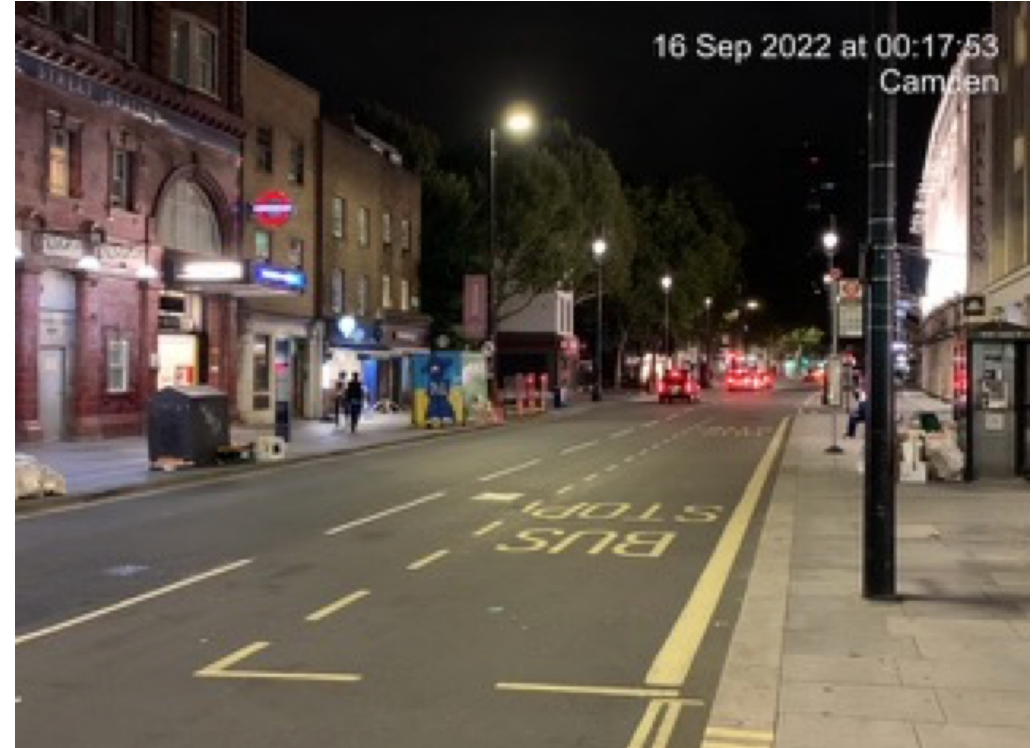


Image B3

00:17hrs

Merkur Slots Cashino
69 Tottenham Court Road W1T 2HA

Image B4

00:17hrs

Tottenham Court Road looking north



Full Observation Report

**Stuart Jenkins – Licensing Consultant
Leveche Associates Limited**

Merkur Slots

403 – 405 Green Street Upton Park Plaistow E13 9AU

Executive Summary

1. Observations were conducted on Merkur Slots premises at 403-405 Green Street Upton Park Plaistow E13 9AU and the surrounding area. The premises are situated in a parade of shops and located on the B167. The premises operates 24-hours a day 7-days a week.
2. One covert visit was made to the site and the surrounding area. The covert visit showed the premises to be well run with no issues. There was one other gaming premises with a similar business model to Merkur Slots in the area, Game Nation 353 Green Street E13 9AR which is open 24-hours a day 7-days a week.
3. From the observations, it is clear that Merkur Slots, operating 24-hours a day does not create anti-social behaviour or any other crime and disorder that would have a negative impact on nearby residents, the environment, local infrastructure, or wider local community.
4. Photographic images support these observations and the conclusions reached.

Introduction

5. We are instructed to conduct independent observations at Merkur Slots premises 403-405 Green Street Upton Park Plaistow E13 9AU and the surrounding area.
6. Merkur Slots UK operate the venue which has a 24-hour licence under the Gambling Act 2005.

7. The premises come under the jurisdiction of Newham Borough Council.

Personal – Stuart Jenkins

8. I am a Director of Leveche Associates Limited, an independent company dealing with Licensing and Security in the Private Sector. I am a former Police Officer having retired from the Metropolitan Police after completion of over 30 years exemplary service.
9. Throughout my police career the majority of my service was spent on specialist units engaged on proactive operations :- 1993–1997 Central Territorial Support Group (TSG) - Level 1 Public Order, firearms officer and dedicated surveillance officer; 1997–1998 CO14 Clubs & Vice Unit – test purchase officer and street offences investigations; 1998-2000 Charing Cross Division on promotion – overt and covert licensing operations; 2000-2008 CO14 Clubs & Vice Unit – lead officer for the investigation of serious criminal offences within licensed premises across London, test purchase officer, Pan-London licensing tactical advisor, Licensing Policy Development and Implementation for the Metropolitan Police Service (MPS) and intelligence unit supervisor; 2008-2018 Marine Policing Unit (MPU) – licensing lead for the MPU; licensing tactical advisor Notting Hill Carnival, covert licensing operations and intelligence unit supervisor. Marine intelligence and accreditation lead for the Queens Diamond Jubilee River Pageant and intelligence lead for the London Olympics 2012.
10. I have worked as an Independent Consultant in the Licensing and Security Industry for the last 5 years.
11. I was a Home Office qualified Crime Prevention Design Advisor.
12. I am the holder of the BTEC Level 3 Certificate (Security Industry Authority) – Close Protection Operative in the Private Security Industry.
13. I am the holder of a Personal Licence under the Licensing Act 2003.

Observations

14. Observations were carried out at Merkur Slots premises 403-405 Green Street Upton Park Plaistow E13 9AU and the surrounding area between 21:00 hours on Thursday 8th September 2022 and 06:10 hours on Friday 9th September 2022.
15. The area felt safe with members of the public going about their business, working, shopping, and socialising.
16. The area is well lit and illuminated from street lighting and shop front lights. I had clear and unobstructed views throughout the observations.

17. During observations I concentrated on signs of criminality, begging, anti-social behaviour, vulnerable persons, other persons at risk and the general environment.
18. Merkur Slots is in a large parade of shops on the busy B167 junction with Redclyffe Road. There are shops and commercial businesses on either side of Green Street including the Queen Street Market which is on the opposite side of the road and to the north of the premises. Many of these shops have residential properties above them – Image A1, A5.
19. Green Street generally runs north to south. Immediately outside the venue is a wide footpath and beyond that the road. Two-way vehicular and pedestrian traffic can pass the venue in either direction. During the observations vehicular and pedestrian traffic was varied – Image A2, A3.
20. North of and next to the premises is W & W Handmade Shoes 401 Green Street E13 9AU. To the south of and next to the premises is the junction with Redclyffe Road and then Blossom & Brownes Sycamore 407 Green Street E13 9AU. Other shops line Green Street on both sides of the road.
21. The area of observations was from Plashet Grove in the north and Tudor Road in the south. This area is densely populated with many retail premises, that include supermarkets, mini supermarkets, small food shops, a pub, cafes, hairdressers, estate agents, slots casinos, bookmakers, restaurants and fast-food which service the transient and residential population alike.
22. The area has a diverse community living together in a mixture of privately owned and rental accommodation.
23. Green Street is well served by public transport with a variety of bus routes, underground trains and taxis. There was ample car parking available in a nearby pay and display car park and restricted parking in the side roads. These transport mediums allow the public to arrive and leave the area safely and quickly.
24. Bus Stops are located a short distance away at near the junction with Redclyffe Road and opposite Merkur Slots with the Upton Park Underground Station 100 metres to the north – Image A6.
25. There are four other gambling premises in the Upton Park area, all of which close by 22:00 hours except Game Nation Casino:
 - i. Ladbrokes Bookmakers 365 Green Street E13 9AR – Image A8
 - ii. Paddy Power Bookmakers 351 Green Street E13 9AR – Image A7
 - iii. Paddy Power Bookmakers 297 Green Street E13 9AR – Image A9
 - iv. Game Nation 353 Green Street E13 9AR - Image A7
26. These premises can be divided into two main types:
 - i. Betting premises not licensed to serve alcohol

- ii. Gaming premises – Adult Gaming Centres (AGC) and Bingo Premises not licensed to serve alcohol
27. Game Nation has a similar business model to Merkur Slots UK which operates 24-hours 7-days a week – Image A7.
 28. There is one public house in the vicinity of the gaming premises called The Queens Public House 410 Green Street E13 9JJ which is advertised as operating Monday to Thursday 11:00 hours to 23:00 hours, Friday to Saturday 11:00 hours to 01:00 hours and Sunday 12:00 hours to 23:30 hours. At the time of my visit, it appeared to be well run and there were no issues.
 29. Throughout my observations in and around Green Street I saw no begging taking place in the street, no street drinkers, vagrants, or drug dealing around the premises or the area.
 30. Photographic images of what was seen during the observations were taken to support my findings and are documented in Appendix A.

Covert Observations

Deployment

31. I conducted covert observations from between 21:00 hours on Thursday 8th September 2022 and 06:10 hours on Friday 9th September 2022.
32. At 21:00 hours I arrived in the area of the Merkur Slots premises 403 - 405 Green Street and started observations by monitoring the venue and the immediate area around it.
33. There was a good volume of pedestrian traffic in and around the Merkur Slots premises, most of the shops had closed when I arrived. The bookmakers were still open but soon closed without any issues. After 22:00 hours the only premises open close to Merkur Slots were fast-food takeaway restaurants like Papa's Chicken / Pizza 337 Green Street E13 9AU which was advertised as being open from 09:00 hours to 05:30 hours on a Thursday. They were well run and had no issues.
34. Between 22:00 hours and 23:00 hours a continuous flow of pedestrians walked past the venue transiting the area or visiting the 24-hour mini supermarkets. Delivery riders were parked on the road and footpaths waiting to service fast food deliveries – Images A10 and A11.
35. Between 23:30 hours and 02:20 hours pedestrian and traffic numbers reduced – Images A15, A16, A17, A18, A19, A20, A21, A22, A23, A24, A25, A26, A27, A28, A29, A30, A31, A32, A33.
36. Between 02:31 hours and 03:00 hours I conducted a covert visit to the Merkur Slots 403-405 Green Street E13 9AU – Image A34.

37. At 02:31 hours I went to the entrance door which was closed. I saw that entry could be controlled by using a bell security entry system. On the glass of the door I saw signage stating no under 18's, CCTV in operation, no alcohol and that a time delay lock was in operation.
38. I pushed the door and entered the premises. Immediately in front of me I saw a board with the premises policies, rules and licences on display. I passed the policies board and entered the main area. I saw it was on one level which was carpeted and there were gaming machines of various types throughout the premises.
39. Further into the premises on the right-hand wall was a reception area where refreshments were prepared. At the reception desk were two male members of staff who were both wearing smart corporate clothing.
40. One of the male members of staff approached me and welcomed me to the premises. He asked if I had been to this Merkur Slots premises before and I said I had.
41. The male staff member then asked me if I needed any help with the gaming machines or choosing one to play. I stated I was fine and chose a machine.
42. Once at the machines the same staff member approached me and asked if I would like a soft drink, water, coffee, tea or a snack. I asked if I could get an alcoholic drink and he explained the premises weren't licensed for alcohol but the non-alcoholic drinks they provided were free for customers. I accepted his offer of a coffee.
43. After a couple of minutes, the male staff member brought over my coffee and stated if I needed any help to ask him or his colleague.
44. The staff member then left me to enjoy playing the machines. I was not pressurised or encouraged to spend money.
45. There were four other customers in the venue at the time of my visit. All four were male and aged between 28 and 50 years. During my visit one other customer came into the venue.
46. The hot and soft drinks were prepared at a reception desk area which was clean and tidy.
47. Whilst I was in the venue, I saw the staff cleaning, wiping down surfaces and completing a low-profile patrol checking on customers' needs and making sure they weren't underage or vulnerable. I felt safe, the staff were friendly, polite, informative and I found the premises clean and tidy.
48. Before leaving I used the toilets which were clean and tidy. The toilets were regularly checked as shown by the toilet check sheet and there were Gamcare leaflets available for customers to take away – Image A35, A36.

49. At no time during my observations did I see anyone hanging around the premises. Customers arriving went straight into the premises and customers leaving left the area straight away. I left the premises at 03:00 hours – Image A37.
50. Between 03:00 hours and 05:00 hours pedestrian traffic was varied with customers visiting the Takeaway Restaurant until it closed without incident. Traffic using Green Street was constant, but the numbers of vehicles did vary.
51. The remaining premises open operated 24-hours a day and customers frequented them throughout the night in small numbers without any incidents of crime and disorder or anti-social behaviour. This position remained unchanged until 05:00 hours.
52. At around 05:00 hours shop traders started to arrive to prepare and open their premises ready for the day ahead – Images A38, A39, A40.
53. I remained in the area until 06:10 hours. Prior to my departure I obtained further images that show there was no problems, issues or anti-social behaviour in the area – Image A41, A42, A43, A44.

Summary

54. I found Merkur Slots Green Street Upton Park to have a smart, well-lit, and professional looking frontage. External CCTV cameras were mounted on the front, righthand side wall and rear of the building. There was good security lighting at the front and rear of the premises with bright street lightening illuminating the right-hand side of the premises.
55. The premises were carpeted, with music playing in the background and the atmosphere was relaxed and welcoming. At the time of my visits to the location, I saw no evidence of crime and disorder, anti-social behaviour, littering, street drinking, drug dealing, begging or groups of youths hanging around.
56. People entering these premises were vetted before being allowed stay to ensure drunken or other vulnerable people didn't gain access to the premises.
57. It is clear the presence of Merkur Slots in Green Street does not lead to or result in people who have been on a night out, staying in the area any longer than they had planned to and that customers do not hang around outside the premises causing problems.
58. Merkur Slots UK takes safer gambling seriously. This can be evidenced with the use of safeguarding programs such as:
 - i. Merkur 360 Program - To achieve higher standards of player protection Merkur have worked with G4 Global Gambling Guidance Group, which focuses on the provision of responsible gambling and has also implemented its own 360 responsible gambling program.

- ii. Think 25 Policy – Strict Over 18 Policy. All venues operate a Think 25 Policy whereby photographic ID is required to gain entry.
 - iii. In View Tools – Staying in control is a key part of messaging in the Merkur venues. Leafleting and posters such as BeGambleAware and GamCam, can be found in the venues main area and in private places such as toilets.
 - iv. Staff Training – Merkur Slots has developed a detailed training programme for all staff members including its own City and Guilds accredited training developed in partnership with YGAM and Betknowmore.
59. Leveche Associates Ltd have carried out covert visits on numerous Adult Gaming Centres that operate throughout the UK 24-hours a day, 7-days a week. Visits to these premises established that they are well run and that there are clearly defined systems in place to ensure the premises operate in support of the gambling objectives and don't attract or take advantage of juveniles or other vulnerable persons. The visits also established that Merkur Slots customers do not cause crime or anti-social behaviour.
60. At Merkur Slots premises the demographic is much older and doesn't attract young people or children. The environment is very different to a loud busy arcade, it is a low-key carpeted style lounge with no more than a handful of mature customers in at any one time.
61. Merkur Slots UK and their premises operate in support of the principles of Secured by Design, the company recommended by the Chief Officers of UK Police Forces for Crime Prevention standards.
62. In conclusion, from my visits it is my opinion Merkur Slots UK Limited are well run, and their operation significantly reduces the risk of crime and disorder and vulnerable people being taken advantage of. It is clear that the Merkur Slots premises do not impact on the environment, infrastructure, or local community.
63. I believe the facts in my report are honest and true. The opinions I have expressed are made in good faith and in my best judgement. The fee for this report is not conditional on the outcome of any future case, application or finding.

Stuart Jenkins
Licensing Consultant
Leveche Associates Limited
16/09/2022



Appendix A

Observation Images
8th-9th September 2022

Merkur Slots

403 - 405 Green Street
Upton Park
Plaistow
E13 9AU

Leveche Associates Ltd

Nightingale House
46-48 East Street
Epsom
Surrey KT17 1 HQ

Merkur Slots
403 - 405 Green Street Upton Park Plaistow E13 9AU
8th - 9th September 2022



Image A1

21:03hrs

Merkur Slots
403-405 Green Street Upton Park E13 9AU



Image A2

21:03hrs

Green Street Upton Park looking south

Merkur Slots
403 - 405 Green Street Upton Park Plaistow E13 9AU
8th - 9th September 2022



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Image A3

21:04hrs

Green Street Upton Park looking north



Image A4

21:04hrs

The Queens Public House
410 Green Street E13 9JJ

Mercur Slots
403 - 405 Green Street Upton Park Plaistow, E13 9AU
8th - 9th September 2022



Image A5

21:05hrs

Queens Market Green Street E13 9BA



Image A6

21:06hrs

Upton Park Underground Station
Green Street E13 9AP

Merkur Slots
403 - 405 Green Street Upton Park Plaistow E13 9AU
8th - 9th September 2022



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Image A7

21:08hrs

Paddy Power Bookmakers



Image A8

21:09hrs

Ladbrokes 305 Green Street

Merkur Slots
403 - 405 Green Street Upton Park Plaistow E13 9AU
8th - 9th September 2022



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Image A9

21:10hrs

Paddy Power Bookmakers
297 Green Street j/w Plashet Grove



Image A10

21:29hrs

Green Street Upton Park looking south

Merkur Slots
403 - 405 Green Street Upton Park Plaistow E13 9AU
8th - 9th September 2022



Image A11

21:35hrs

Side / rear view Merkur Slots Redclyffe Road



Image A12

23:26hrs

Green Street Upton Park looking south

Merkur Slots
403 - 405 Green Street Upton Park Plaistow E13 9AU
8th - 9th September 2022



Image A13

23:27hrs

Merkur Slots Green Street Upton Park



Image A14

23:28hrs

Front Aspect Merkur Slots
Green Street Upton Park

Merkur Slots
403 - 405 Green Street Upton Park Plaistow E13 9AU
8th - 9th September 2022



Image A15

23:30hrs

Green Street Upton Park looking south



Image A16

23:30hrs

Green Street Upton Park looking north

Merkur Slots
403 - 405 Green Street Upton Park Plaistow E13 9AU
8th - 9th September 2022



Image A17

23:31hrs

Ladbrokes 365 Green Street Upton Park



Image A18

23:32hrs

Green Street Upton Park looking north

Merkur Slots
403 - 405 Green Street Upton Park Plaistow E13 9AU
8th - 9th September 2022



Image A19

23:36hrs

Merkur Slots Green Street Upton Park



Image A20

23:37hrs

Side Aspect Merkur Slots Green Street Upton Park

Merkur Slots
403 - 405 Green Street Upton Park Plaistow E13 9AU
8th - 9th September 2022



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Image A21

23:58hrs

Rear Aspect Merkur Slots Upton Park



Image A22

02:03hrs

Green Street Upton Park looking north

Merkur Slots
403 - 405 Green Street Upton Park Plaistow E13 9AU
8th - 9th September 2022



Image A23

02:05hrs

Green Street Upton Park looking south



Image A24

02:06hrs

Merkur Slots Green Street Upton Park

Merkur Slots
403 - 405 Green Street Upton Park Plaistow E13 9AU
8th - 9th September 2022



Image A25

02:07hrs

Green Street Upton Park looking north



Image A26

02:08hrs

Queens Market Green Street Upton Park

Merkur Slots
403 - 405 Green Street Upton Park Plaistow E13 9AU
8th - 9th September 2022



Image A27

02:08hrs

Papa's 337 Green Street E13 9AU



Image A28

02:09hrs

Upton Park Underground Station
Green Street looking north

Merkur Slots

403 - 405 Green Street Upton Park Plaistow E13 9AU

8th - 9th September 2022



Image A29

02:11hrs

Game Nation 353 Green Street E13 9AR



Image A30

02:13hrs

H&T Pawnbrokers 342 Green Street E13 9AP

Merkur Slots
403 - 405 Green Street Upton Park Plaistow E13 9AU
8th - 9th September 2022



Image A31

02:17hrs

Green Street Upton Park looking south



Image A32

02:17hrs

Green Street looking south towards
Upton Park Underground Station

Merkur Slots
403 - 405 Green Street Upton Park Plaistow E13 9AU
8th - 9th September 2022



Image A33

02:18hrs

Upton Park Underground Station Green Street



Image A34

02:30hrs

Merkur Slots Green Street Upton Park



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Image A35

02:58hrs

Toilet Check Sheet Merkur Slots Green Street



Image A36

02:58hrs

Staying in Control Gam Care Literature
Merkur Slots Green Street

Merkur Slots
403 - 405 Green Street Upton Park Plaistow E13 9AU
8th - 9th September 2022



Image A37

03:01hrs

Rear and Side Aspect of Merkur Slots Upton Park



Image A38

04:47hrs

Green Street Upton Park looking south

Merkur Slots
403 - 405 Green Street Upton Park Plaistow E13 9AU
8th - 9th September 2022



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Image A39

04:53hrs

Merkur Slots Green Street Upton Park



Image A40

04:54hrs

Shopping Area and Shops opposite
Merkur Slots Green Street

Merkur Slots
403 - 405 Green Street Upton Park Plaistow E13 9AU
8th - 9th September 2022



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Image A41

06:00hrs

Rear / side aspect Merkur Slots Upton Park



Image A42

06:01hrs

Green Street Upton Park looking north

Merkur Slots
403 - 405 Green Street Upton Park Plaistow E13 9AU
8th - 9th September 2022



Image A43

06:01hrs

Merkur Slots Green Street Upton Park



Image A44

06:01hrs

Green Street Upton Park looking south



Full Observation Report

**Stuart Jenkins – Licensing Consultant
Leveche Associates Limited**

Merkur Slots

91 High Road Wood Green N22 6BB

Executive Summary

1. Observations were conducted on Merkur Slots premises at 91 High Road Wood Green London N22 6BB and the surrounding area. The premises are situated in a parade of shops and located on the A105. The premises operates 24-hours a day 7-days a week.
2. One covert visit was made to the site and the surrounding area. The covert visit showed the premises to be well run with no issues. There were four other gaming premises with a similar business model to Merkur Slots in the area namely: Game Nation, Little Vegas and the two Admiral Casinos.
3. From the observations, it is clear that Merkur Slots, operating 24-hours a day does not create anti-social behaviour or any other crime and disorder that would have a negative impact on nearby residents, the environment, local infrastructure, or wider local community.
4. Photographic images support these observations and the conclusions reached.

Introduction

5. We are instructed to conduct independent observations at Merkur Slots premises 91 High Road Wood Green London N22 6BB and the surrounding area.

6. Merkur Slots UK operate the venue which has a 24-hour licence under the Gambling Act 2005.
7. The premises come under the jurisdiction of Haringey Borough Council.

Personal – Stuart Jenkins

8. I am a Director of Leveche Associates Limited, an independent company dealing with Licensing and Security in the Private Sector. I am a former Police Officer having retired from the Metropolitan Police after completion of over 30 years exemplary service.
9. Throughout my police career the majority of my service was spent on specialist units engaged on proactive operations :- 1993–1997 Central Territorial Support Group (TSG) - Level 1 Public Order, firearms officer and dedicated surveillance officer; 1997–1998 CO14 Clubs & Vice Unit – test purchase officer and street offences investigations; 1998-2000 Charing Cross Division on promotion – overt and covert licensing operations; 2000-2008 CO14 Clubs & Vice Unit – lead officer for the investigation of serious criminal offences within licensed premises across London, test purchase officer, Pan-London licensing tactical advisor, Licensing Policy Development and Implementation for the Metropolitan Police Service (MPS) and intelligence unit supervisor; 2008-2018 Marine Policing Unit (MPU) – licensing lead for the MPU; licensing tactical advisor Notting Hill Carnival, covert licensing operations and intelligence unit supervisor. Marine intelligence and accreditation lead for the Queens Diamond Jubilee River Pageant and intelligence lead for the London Olympics 2012.
10. I have worked as an Independent Consultant in the Licensing and Security Industry for the last 5 years.
11. I was a Home Office qualified Crime Prevention Design Advisor.
12. I am the holder of the BTEC Level 3 Certificate (Security Industry Authority) – Close Protection Operative in the Private Security Industry.
13. I am the holder of a Personal Licence under the Licensing Act 2003.

Observations

14. Observations were carried out at Merkur Slots premises 91 High Road Wood Green N22 6BB and the surrounding area between 21:00 hours on Friday 26th August 2022 and 06:00 hours on Saturday 27th August 2022.
15. The area felt safe with members of the public going about their business, working, shopping, and socialising.

16. The area is well lit and illuminated from street lighting and shop front lights. I had clear and unobstructed views throughout the observations.
17. During observations I concentrated on signs of criminality, begging, anti-social behaviour, vulnerable persons, other persons at risk and the general environment.
18. Merkur Slots is in a large parade of shops on the busy A105. There are shops and commercial businesses on either side of High Road. Many of these shops have residential properties above them – Image A1, A5.
19. High Road generally runs north to south. Immediately outside the venue is a wide footpath and beyond that the road. Two-way vehicular and pedestrian traffic can pass the venue in either direction. During the observations vehicular and pedestrian traffic was varied – Image A2, A3.
20. North of and next to the premises is Hide & Seek 93 High Road Wood Green then Herb China 95 High Road Wood Green and McDonalds Restaurant 97-101 High Road Wood Green. To the south of and next to the premises is Ozan Jewellery Shop 89 High Road Wood Green. Other shops line High Road on both sides of the road.
21. The area of observations was from Gladstone Avenue in the north and Turnpike Lane in the south. This area is densely populated with many retail premises, that include mini supermarkets, small food shops, a pub, cafes, hairdressers, estate agents, slots casinos, bookmakers, restaurants and fast-food shops which service the transient and residential population alike.
22. The area has a diverse community living together in a mixture of privately owned and rental accommodation.
23. High Road is well served by public transport with a variety of bus routes, taxis, underground and mainline trains. There was ample car parking available in a nearby pay and display car park and restricted parking in the side roads. These transport mediums allow the public to arrive and leave the area safely and quickly.
24. Bus Stops are located opposite Merkur Slots with the Turnpike Underground Station 5 minutes walk (0.3 miles) and Hornsey Mainline Station 13 minutes walk (0.7 miles) – Image A6.
25. There are nine other gambling premises in the Upton Park area, all of which close by 22:00 hours except Game Nation Casino, Little Vegas and the two Admiral Casinos:
 - i. Admiral Casino Slots 9 High Road Wood Green N22 6BH – Image A13.
 - ii. Admiral Casino Slots 117 High Road Wood Green N22 6BB – Image A16.
 - iii. Betfred 64 High Road Wood Green N22 6HK – Image A7.
 - iv. Paddy Power 33 High Road Wood Green N22 6BH – Image A15.

- v. Game Nation 49 High Road Wood Green N22 6BH - Image A8.
- vi. Ladbrokes 13 High Road Wood Green N22 6BH – Image A12.
- vii. Ladbrokes 12 The Broadway High Road N22 6DS – Image A19.
- viii. Little Vegas 17 High Road Wood Green N22 6BH – Image A11.
- ix. William Hill The Broadway High Road Wood Green N22 6DS – Image A18.

26. These premises can be divided into two main types:

- i. Betting premises not licensed to serve alcohol.
- ii. Gaming premises – Adult Gaming Centres (AGC) and Bingo Premises not licensed to serve alcohol.

27. Game Nation, Little Vegas and the two Admiral Casinos have similar business models to Merkur Slots UK which operates 24-hours 7-days a week – Images A8, A11, A13, A16.

28. There were no public houses in the vicinity of the gaming premises but there were late night restaurants and diners. At the time of my visit, it appeared to be well run and there were no issues.

29. Throughout my observations in and around High Road I saw no begging taking place in the street, no street drinkers, vagrants, or drug dealing around the premises or the area.

30. Photographic images of what was seen during the observations were taken to support my findings and are documented in Appendix A.

Covert Observations

Deployment

31. I conducted covert observations from between 21:00 hours on Friday 26th August 2022 and 06:00 hours on Saturday 27th August 2022.

32. At 21:00 hours I arrived in the area of the Merkur Slots premises 91 High Road Wood Green and started observations by monitoring the venue and the immediate area around it.

33. There was a good volume of pedestrian traffic in and around the parade of shops and the whole road. At this time most of the shops had closed. The bookmakers were still open but soon closed without any issues. After 22:00 hours the only premises open close to Merkur Slots were fast-food take away and restaurants. They were well run and had no issues.

34. Between 22:00 hours and 01:00 hours a continuous flow of pedestrians walked past the venue transiting the area or visiting the 24-hour mini supermarkets. Delivery riders were parked on the road and footpaths waiting to service fast food deliveries – Images A16, A17, A18, A19, A20, A21, A22, A23, A24, A25, A26, A27.

35. Between 01:00 hours and 04:03 hours pedestrian and vehicular numbers reduced – Images A28, A29.
36. Between 04:06 hours and 04:35 hours I conducted a covert visit to the Merkur Slots 91 High Road Wood Green – Image A30.
37. At 04:06 hours I went to the entrance door which was closed. I saw that entry could be controlled by using a bell security entry system. On the glass of the door I saw signage stating no under 18's, CCTV in operation, no alcohol and that a time delay lock was in operation.
38. I pushed the door and entered the premises. Immediately in front of me I saw a screen board. As I walked past it I saw on the back of it were the premises policies, rules and licences on display. I passed the policies board and entered the main area. I saw it was on one level and carpeted.
39. As I moved into the premises I saw that there a series of gaming machines of various types throughout. On the left-hand side and further into the premises was the staff reception desk area. This area was also used for the preparation of refreshments with a facility to make hot drinks.
40. As I approached the reception area I was greeted by a male member of staff who was dressed in smart corporate clothing. He asked if I needed any assistance with choosing a machine to play, I stated I was fine.
41. I walked through the premises and saw there were six other customers in the venue. All were male aged between 27 years and 45 years.
42. I found a machine and started to play it. Whilst seated I noticed there was a second male member of staff in the venue who was smartly dressed in corporate clothing.
43. After a short period of time the first staff member approached me and asked if I would like a soft drink, water, coffee, tea or a snack. I asked if I could get an alcoholic drink and he stated they didn't sell alcohol but the non-alcoholic drinks they provided were free for customers. I accepted his offer of a coffee which was brought to me a few minutes later.
44. The staff member then left me to enjoy playing the machines. I was not pressurised or encouraged to spend money.
- e 45. During my visit on other customer came into the venue. The hot and soft drinks were prepared at a reception desk area which was clean and tidy.
46. Whilst I was in the venue, I saw the staff cleaning, wiping down surfaces and completing a low-profile patrol checking on customers' needs and making sure they weren't underage or vulnerable. I felt safe, the staff were friendly, polite, informative and I found the premises clean and tidy.

47. Before leaving I used the toilets which were clean and tidy. The toilets were regularly checked as shown by the toilet check sheet and there were Gamcare leaflets available for customers to take away – Image A31, A32.
48. At no time during my observations did I see anyone hanging around the premises. Customers arriving went straight in and customers leaving left the area straight away. I left the premises at 04:35 hours – Image A33.
49. Between 04:40 hours and 05:00 hours pedestrian traffic was varied with customers visiting the takeaway restaurants that were open 24-hours a day. Traffic using High Road was constant, but the numbers of vehicles did vary. At this time market stall workers started to set up for the day ahead – Image A34.
50. Customers visited the 24-hour premises throughout the night in small numbers without any incidents of crime and disorder or anti-social behaviour. This position remained unchanged until 06:00 hours.
51. I remained in the area until 06:10 hours. Prior to my departure I obtained further images that show there was no problems, issues or anti-social behaviour in the area – Image A35, A36, A37, A38.

Summary

52. I found Merkur Slots 91 High Road Wood Green to have a smart, well-lit, and professional looking frontage. The premises were carpeted, with music playing in the background and the atmosphere was relaxed and welcoming. At the time of my visit to the location, I saw no evidence of crime and disorder, anti-social behaviour, littering, street drinking, drug dealing, begging or groups of youths hanging around.
53. People entering these premises were vetted before being allowed stay to ensure drunken or other vulnerable people didn't gain access to the premises.
54. It is clear the presence of Merkur Slots in High Road Wood Green does not lead to or result in people who have been on a night out, staying in the area any longer than they had planned to and that customers do not hang around outside the premises causing problems.
55. Merkur Slots UK takes safer gambling seriously. This can be evidenced with the use of safeguarding programs such as:
 - i. Merkur 360 Program - To achieve higher standards of player protection Merkur have worked with G4 Global Gambling Guidance Group, which focuses on the provision of responsible gambling and has also implemented its own 360 responsible gambling program.
 - ii. Think 25 Policy – Strict Over 18 Policy. All venues operate a Think 25 Policy whereby photographic ID is required to gain entry.

- iii. In View Tools – Staying in control is a key part of messaging in the Merkur venues. Leafleting and posters such as BeGambleAware and GamCam, can be found in the venues main area and in private places such as toilets.
 - iv. Staff Training – Merkur Slots has developed a detailed training programme for all staff members including its own City and Guilds accredited training developed in partnership with YGAM and Betknowmore.
56. Leveche Associates Ltd have carried out covert visits on numerous Adult Gaming Centres that operate throughout the UK 24-hrs a day, 7-days a week. Visits to these premises established that they are well run and that there are clearly defined systems in place to ensure the premises operate in support of the gambling objectives and don't attract or take advantage of juveniles or other vulnerable persons. The visits also established that Merkur Slots customers do not cause crime or anti-social behaviour.
57. At Merkur Slots premises the demographic is much older and doesn't attract young people or children. The environment is very different to a loud busy arcade, it is a low-key carpeted style lounge with no more than a handful of mature customers in at any one time.
58. Merkur Slots UK and their premises operate in support of the principles of Secured by Design, the company recommended by the Chief Officers of UK Police Forces for Crime Prevention standards.
59. In conclusion, from my visits it is my opinion Merkur Slots UK Limited are well run and their operation significantly reduces the risk of crime and disorder and vulnerable people being taken advantage of. It is clear that the Merkur Slots premises do not impact on the environment, infrastructure, or local community.
60. I believe the facts in my report are honest and true. The opinions I have expressed are made in good faith and in my best judgement. The fee for this report is not conditional on the outcome of any future case, application or finding.

Stuart Jenkins
Licensing Consultant
Leveche Associates Limited
26/09/2022



Appendix A

Observation Images

26th - 27th August 2022

Merkur Slots

91 High Road
Wood Green
London
N22 6BB

Leveche Associates Ltd

Nightingale House
46-48 East Street
Epsom
Surrey KT17 1HQ

Merkur Slots

91 High Road Wood Green London N22 6BB
26th - 27th August 2022



Image A1

21:06hrs

Merkur Slots
91 High Road Wood Green London N22 6BB



Image A2

21:07hrs

Merkur Slots
91 High Road Wood Green London N22 6BB

Mercur Slots

91 High Road Wood Green London N22 6BB
26th - 27th August 2022



Image A3

21:14hrs

High Road Wood Green looking north



Image A4

21:14hrs

High Road Wood Green looking south

Merkur Slots

91 High Road Wood Green London N22 6BB
26th - 27th August 2022



Image A5

21:15hrs

High Road Wood Green looking north



Image A6

21:15hrs

High Road opposite Merkur Slots looking north

Mercur Slots

91 High Road Wood Green London N22 6BB
26th - 27th August 2022



Image A7

21:17hrs

Betfred 64 High Road Wood Green N22 6HL



Image A8

21:20hrs

Game Nation 49 High Road Wood Green N22 6BH

Mercur Slots

91 High Road Wood Green London N22 6BB
26th - 27th August 2022



Image A9

21:21hrs

High Road Wood Green looking south

Image A10

21:21hrs

High Road Wood Green looking south

Merkur Slots

91 High Road Wood Green London N22 6BB
26th - 27th August 2022



Image A11

21:22hrs

Little Vegas 17 High Road Wood Green N22 6BH



Image A12

21:23hrs

Ladbrokes 13 High Road Wood Green N22 6BH

Mercur Slots

91 High Road Wood Green London N22 6BB
26th - 27th August 2022



Image A13

21:23hrs

Admiral Casino Slots
9 High Road Wood Green N22 6BH



Image A14

21:24hrs

High Road Wood Green j/w Turnpike Lane

Mercur Slots

91 High Road Wood Green London N22 6BB
26th - 27th August 2022



Image A15

21:26hrs

Paddy Power 33 High Road Wood Green N22 6BH



Image A16

22:29hrs

Admiral Casino Slots
117 High Road Wood Green N22 6BB

Mercur Slots

91 High Road Wood Green London N22 6BB
26th - 27th August 2022



Image A17

22:35hrs

High Road Wood Green looking north



Image A18

22:38hrs

William Hill The Broadway
High Road Wood Green N22 6DS

Mercur Slots

91 High Road Wood Green London N22 6BB
26th - 27th August 2022



Image A19

22.38hrs

Ladbrokes12 The Broadway
High Road Wood Green N22 6DS



Image A20

22:41hrs

Looking south towards The Mall
Shopping Centre High Road

Merkur Slots

91 High Road Wood Green London N22 6BB
26th - 27th August 2022



Image A21

22:42hrs

High Road Wood Green looking north



Image A22

23:47hrs

McDonalds
97 - 101 High Road Wood Green N22 6BB

Merkur Slots

91 High Road Wood Green London N22 6BB
26th - 27th August 2022



Image A23

22:48hrs

Merkur Slots 91 High Road Wood Green



Image A24

00:31hrs

High Road Wood Green looking north

Merkur Slots

91 High Road Wood Green London N22 6BB
26th - 27th August 2022



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Image A25

00:31hrs

High Road Wood Green looking south



Image A26

00:32hrs

Merkur Slots 91 High Road Wood Green

Mercur Slots

91 High Road Wood Green London N22 6BB
26th - 27th August 2022



Image A27

00:33hrs

High Road Wood Green looking south



Image A28

04:03hrs

High Street Wood Green

Merkur Slots

91 High Road Wood Green London N22 6BB
26th - 27th August 2022



Image A29

04:03hrs

High Road Wood Green looking north



Image A30

04:05hrs

Merkur Slots 91 High Road Wood Green

Merkur Slots

91 High Road Wood Green London N22 6BB
26th - 27th August 2022



Image A31

04:31hrs

Staying In Control Poster in Toilets



Image A32

04:32hrs

Toilet Check List Merkur Slots High Road Wood Green

Merkur Slots

91 High Road Wood Green London N22 6BB
26th - 27th August 2022



Image A33

04:37hrs

Merkur Slots High Road Wood Green



Image A34

04:38hrs

High Road Wood Green looking north

Mercur Slots

91 High Road Wood Green London N22 6BB
26th - 27th August 2022



Image A35

05:53hrs

High Road Wood Green looking south



Image A36

05:53hrs

High Road Wood Green looking north

Merkur Slots

91 High Road Wood Green London N22 6BB
26th - 27th August 2022



Image A37

05:54hrs

Merkur Slots 91 High Road Wood Green



Image A38

05:54hrs

McDonalds High Road Wood Green