



Alcohol and Entertainment Licensing Sub-Committee

Tuesday 27 August 2024 at 10.00 am

Boardrooms 1&2 - 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

Substitute Members

Councillors:

Bajwa, Chohan, Ethapemi, Mahmood, Hack, Lorber,
Hylton, Rajan-Seelan

For further information contact: Devbai Bhanji, Governance Assistant
Tel: 020 8937 6841; Email: devbai.bhanji@brent.gov.uk

For electronic copies of minutes and agendas please visit:
[Council meetings and decision making | Brent Council](#)

The press and public are welcome to attend this meeting

Notes for Members - Declarations of Interest:

If a Member is aware they have a Disclosable Pecuniary Interest* in an item of business, they must declare its existence and nature at the start of the meeting or when it becomes apparent and must leave the room without participating in discussion of the item.

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

Introductions, if appropriate.

| Item | Page |
|--|--------|
| 1 Apologies for absence and clarification of alternate members | |
| 2 Declarations of Interests | |
| Members are invited to declare at this stage of the meeting, the nature and existence of any relevant disclosable pecuniary or personal interests in the items on this agenda and to specify the item(s) to which they relate. | |
| 3 Application for a Bingo Premises Licence by Merkur Slots UK Ltd Ltd for the premises known as Merkur Slots, 67 High Street, NW10 4NS, pursuant to the provisions of the Licensing Act 2003 | 1 - 60 |

Date of the next meeting: Date Not Specified



- Please remember to **SWITCH OFF** your mobile phone during the meeting.
- The meeting room is accessible by lift and seats will be provided for members of the public

This page is intentionally left blank

Gambling Act 2005

Application for a Bingo Premises Licence

1. The Application

| | |
|-----------------------------|--|
| Name of Applicant: | Merkur Slots UK Ltd |
| Name & Address of Premises: | Merkur Slots, 67 High Street, NW10 4NS |
| Applicants Agent: | Felix Faulkner – Poppleston Allen |

The application is for a Bingo Premises Licence

2. Background

None

3. Relevant Representations

Representations were received and withdrawn from the Police and Licensing Officers. Representations remain outstanding from Ward Councillors and local residents.

4. Interested Parties

None

5. Policy Considerations

None specific

6. Associated Papers

- A. Copy of Application Form
- B. Copies of Representations
- C. Location Map

This page is intentionally left blank

**Application for a premises licence
under the Gambling Act 2005 (standard form)**

PLEASE READ THE FOLLOWING INSTRUCTIONS FIRST

If you are completing this form by hand, please write legibly in block capitals using ink. Use additional sheets if necessary (marked with the number of the relevant question). You may wish to keep a copy of the completed form for your records.

Where the application is—

- In respect of a vessel, or
- To convert an authorisation granted under the Betting, Gaming and Lotteries Act 1963 or the Gaming Act 1968,

the application should be made on the relevant form for that type of premises or application.

Part 1 – Type of premises licence applied for

Regional Casino

Large Casino

Small Casino

Bingo

Adult Gaming Centre

Family Entertainment Centre

Betting (Track)

Betting (Other)

Do you hold a provisional statement in respect of the premises? Yes No

If the answer is “yes”, please give the unique reference number for the provisional statement (as set out at the top of the first page of the statement):

Part 2 – Applicant Details

If you are an individual, please fill in Section A. If the application is being made on behalf of an organisation (such as a company or partnership), please fill in Section B.

Section A

Individual applicant

1. Title: Mr Mrs Miss Ms Dr Other (please specify)

2. Surname: _____ Other name(s): _____

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

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

Postcode:

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

4(b) If the applicant does not hold an operating licence but is in the process of applying for one, give the date on which the application was made:

5. Tick the box if the application is being made by more than one person.

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

Section B

Application on behalf of an organisation

6. Name of applicant business or organisation:

Merkur Slots UK Ltd

7. The applicant's registered or principal address:

**Second Floor
Matrix House
North Fourth Street
Milton Keynes
MK9 1NJ**

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

003266-N-103444

8(b) If the applicant does not hold an operating licence but is in the process of applying for one, give the date on which the application was made:

N/A

9. Tick the box if the application is being made by more than one organisation.

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

Part 3 – Premises Details

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

Merkur Slots

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

**67 High Street
Harlesden
London
NW10 4NS**

12. Telephone number at premises (if known): **N/A**

13. If the premises are in only a part of a building, please describe the nature of the building (for example, a shopping centre or office block). The description should include the number of floors within the building and the floor(s) on which the premises are located.

N/A

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

No

14(b). If the answer to question 14(a) is yes, please give the names of all the licensing authorities within whose area the premises are partly located, **other than the licensing authority to which this application is made:**

N/A

Part 4 – Times of operation

15(a). Do you want the licensing authority to exclude a default condition so that the premises may be used for longer periods than would otherwise be the case?

No

15(b). If the answer to question 15(a) is yes, please complete the table below to indicate the times when you want the premises to be available for use under the premises licence.

| | <i>Start</i> | <i>Finish</i> | <i>Details of any seasonal variation</i> |
|-------|--------------|---------------|--|
| Mon | | | |
| Tue | | | |
| Wed | | | |
| Thurs | | | |
| Fri | | | |
| Sat | | | |
| Sun | | | |

16. If you wish to apply for a premises licence with a condition restricting gambling to specific periods in a year, please state the periods below using calendar dates:

N/A

Part 5 – Miscellaneous

17. Proposed commencement date for licence (leave blank if you want the licence to commence as soon as it is issued):

ASAP

18(a). Does the application relate to premises which are part of a track or other sporting venue which already has a premises licence?

No

18(b). If the answer to question 18(a) is yes, please confirm by ticking the box that an application to vary the main track premises licence has been submitted with this application.

19(a). Do you hold any other premises licences that have been issued by this licensing authority?

Yes

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

Merkur Slots **Adult Gaming Centre Premises Licence: 10409**
478 High Road, Wembley, HA9 7BH

Merkur Slots **Adult Gaming Centre Premises Licence: GA0291**
304 Neasden Lane, London, N2W10 0AD

Merkur Slots **Bing Premises Licence: 20692**
51-55 High Road, Willesden, NW10 2SU

20. Please set out any other matters which you consider to be relevant to your application:

Merkur Slots UK Ltd have full authority to provide licensed gaming by the provision of an Operating Licence granted by the Gambling Commission. The UK's Gambling Regulator has therefore approved the measures implemented to ensure that effective anti-money laundering procedures are applied and policies have been developed to ensure responsible trading in accordance with the gambling legislation, the licensing objectives and the licence conditions and code of practice.

The applicant has comprehensive measures to ensure that all gambling remains socially responsible, which includes detailed staff training on matters such as the protection of the vulnerable, including homeless individuals and young persons. The applicant is an experienced licenced operator providing a large estate of gambling premises across the United Kingdom.

A copy of Merkur Slots UK Limited's Operational Standards has been provided in support of the application and full copies of the Applicant's policies and procedures are available, if required.

A copy of Merkur Slots UK Limited's 'Working Together' document has also been supplied in support of the application, which provides an overview of the licensee's proposed operation. Merkur Slots UK Limited applies extensive policies and procedures to promote the Licensing Objectives.

Following initial due-diligence undertaken with Brent Council's Licensing Authority, which was undertaken via Team Meeting, Merkur Slots have proposed the following conditions to be attached to their licence upon successful grant of this application;

- 1. CCTV shall be installed to Home Office Guidance standards and maintained in a good working condition. Recordings shall be kept for 31 days and shall be made available to police and authorised officers from Brent council upon request.**
- 2. An incident log shall be kept for the premises and made available on request to an authorised officer Brent 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.**
- 3. 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**
- 4. 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.**
- 5. There shall be no pre-planned single staffing at the premises from 20:00 until closing.**
- 6. 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.**
- 7. The on duty manager shall implement a policy of banning any customers who engage in crime or disorder within or outside the premises.**
- 8. A notice, visible from the exterior of the premises shall state that customers drinking alcohol outside the premises will not be permitted and those who do so will be banned from the premises.**

9. The licensee will ensure that customer toilets are checked every hour for evidence of drug taking and alcohol consumption. Toilet checks are to be documents stating the time and member of staff who made the checks.

10. Toilet doors remain locked and access is permitted by staff members.

11. 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.

Part 6 – Declarations and Checklist (Please tick)

We confirm that, to the best of my/ our knowledge, the information contained in this application is true. We understand that it is an offence under section 342 of the Gambling Act 2005 to give information which is false or misleading in, or in relation to, this application.

We confirm that the applicant(s) have the right to occupy the premises.

Checklist:

- Payment of the appropriate fee has been made/is enclosed
- A plan of the premises is enclosed
- We understand that if the above requirements are not complied with the application may be rejected
- We understand that it is now necessary to advertise the application and give the appropriate notice to the responsible authorities

Part 7 – Signatures

21. Signature of applicant or applicant's solicitor or other duly authorised agent. If signing on behalf of the applicant, please state in what capacity:

Signature: 

Print Name: **Poppleston Allen**

Date: **13/05/2024**

Capacity: **Solicitors for & on behalf of the applicant**

22. For joint applications, signature of 2nd applicant, or 2nd applicant's solicitor or other authorised agent. If signing on behalf of the applicant, please state in what capacity:

Signature: _____

Print Name: _____

Date: _____

Capacity: _____

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

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

Part 8 – Contact Details

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

Felix Faulkner

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

0203 859 7751

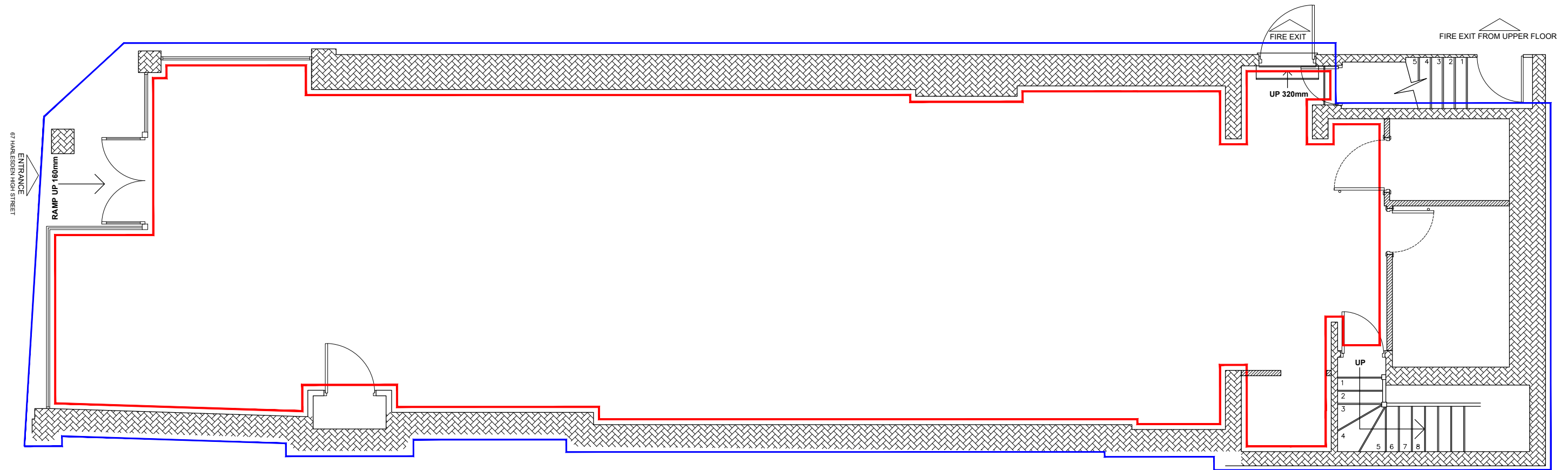
24. Postal address for correspondence associated with this application:

**Poppleston Allen
The Stanley Building
7 Pancras Square
Kings Cross
London
N1C 4AG**

25. If you are happy for correspondence in relation to your application to be sent via e-mail, please give the e-mail address to which you would like correspondence to be sent:

f.faulkner@popall.co.uk

This page is intentionally left blank



| LICENSE PLAN LEGEND | |
|---------------------|---|
| LINE TYPE | LINE TYPE DESCRIPTION |
| | AREA IN WHICH FACILITIES WILL BE PROVIDED FOR GAMING. |
| | EXTENT OF PREMISES |

GAMBLING ACT 2005 LICENSING PLAN
 Anything shown on this plan, which is not required by The Gambling Act 2005 (Premises Licences and Provisional Statements) Regulation 2007 is for illustrative purposes only, and does not form part of the premises licence.

| |
|-----------------------------|
| REVISIONS REV 00: |
|-----------------------------|

| |
|---|
| FIT OUT TYPE LICENSING |
| PROJECT MERKUR SLOTS 67 HARLESDEN HIGH STREET HARLESDEN NW10 4NS |
| DESCRIPTION PROPOSED LICENCE PLAN |

| | |
|----------------------------------|-----------------------|
| REFERENCE DRAWINGS | |
| SCALE 1:75 | |
| DRAWN BY LR | |
| DATE 29/02/24 | |
| DRAWING No. 893-PL-106 | REVISION 00 |

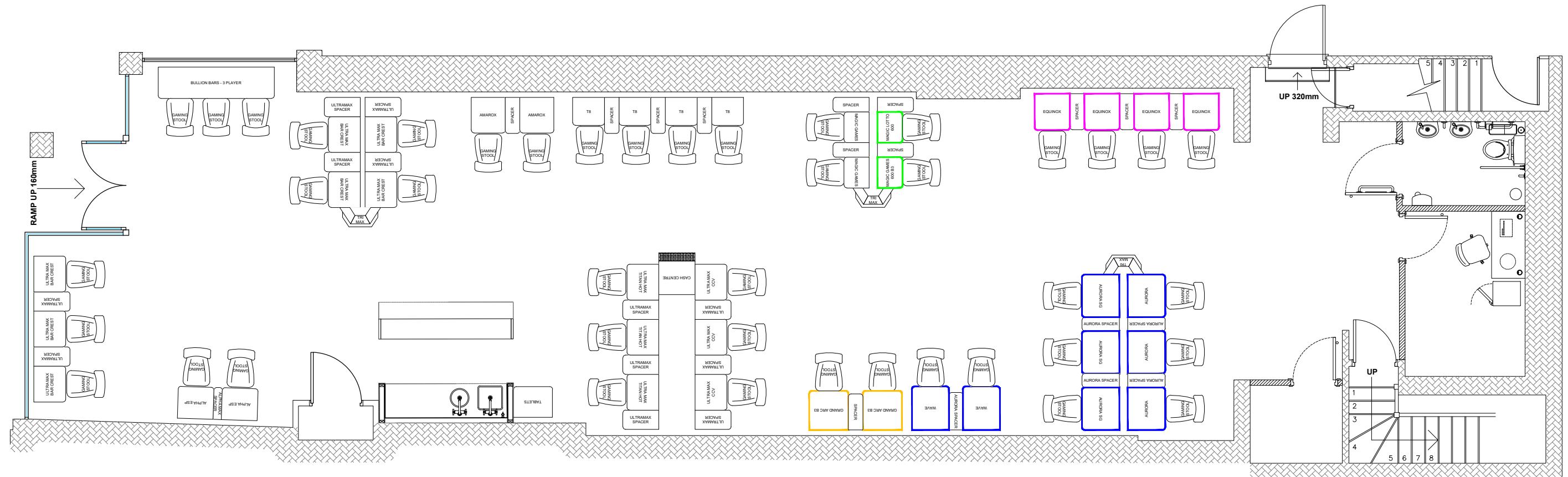


COPYRIGHT IS RESERVED BY MERKUR CASINO UK AND IS ISSUED ON THE CONDITION THAT IT IS NOT COPIED OR DISCLOSED BY OR TO ANY UNAUTHORISED PERSONS WITHOUT PRIOR CONSENT FROM MERKUR CASINO UK.

This page is intentionally left blank

PROPOSED GAMING AREA: 141.6m² FOR ILLUSTRATION PURPOSES ONLY

PLEASE NOTE: SPACERS ARE NOT GAMING MACHINES



| MACHINES LEGEND | |
|-------------------|----------|
| MACHINE CATERGORY | QUANTITY |
| CAT B3 | 0 |
| CAT C | 0 |
| CAT D | 0 |
| DUOPOTS | 0 |
| TRIMAX | 0 |
| TABLETS | 0 |
| RATIO | 0/0 |

REVISIONS
REV 00:

FIT OUT TYPE LICENCING
PROJECT
MERKUR SLOTS
67 HARLES DEN HIGH STREET
HARLES DEN
NW10 4NS
DESCRIPTION
PROPOSED MACHINE PLAN

REFERENCE DRAWINGS
SCALE
1:75
DRAWN BY
RT
DATE
07/05/24

DRAWING No.
893-PL-105
REVISION
00



COPYRIGHT IS RESERVED BY MERKUR CASINO UK AND IS ISSUED ON THE CONDITION THAT IT IS NOT COPIED OR DISCLOSED BY OR TO ANY UNAUTHORISED PERSONS WITHOUT PRIOR CONSENT FROM MERKUR CASINO UK.

This page is intentionally left blank



THE LICENSING OBJECTIVES UNDER THE GAMBLING ACT 2005

- 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 persons from being harmed or exploited by gambling

Objective 1 - Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.

- Merkur Slots UK Ltd is aware that it must notify the Gambling Commission should we suspect that offences under the Gambling Act 2005 are being committed.
- Merkur Slots UK Ltd complies with the Commission's advice on the Proceeds of Crime Act 2002.
- Merkur Slots UK Ltd has completed its own Business Anti-money laundering risk assessment, local area risk assessments and implements anti-money laundering policies and procedures.
- If we suspect anyone of using our premises for the furtherance of criminal activity (for instance drug dealing, using counterfeit money, selling suspected stolen property and criminal damage) we will contact the police immediately, report to our Head of Compliance and record the instance in the AML and Incidents modules of the electronic Smart Tablet system.
- All Merkur Slots UK Ltd premises operate digital CCTV and customer areas are supervised.
- Merkur Slots UK Ltd operates a group-wide Security Alert system where incidents are shared instantly with all licenced premises. We have an internal Fraud Measures Team that respond to and investigate incidents. As a BACTA member, we receive nationwide Security Alerts, which are circulated via the Security Alert system to all licenced premises.
- All Merkur Slots premises provide a static alarm system which is also supported by Staff Guard, a nationwide security company that offers 24hr support via a monitoring centre with fully trained operatives who advise on difficult situations and escalate appropriately.
- Merkur Slots UK Ltd has an extensive security, audit and money laundering team monitoring employees and customer activity.
- All Merkur Slots employees complete six-monthly refresher training which covers this licencing objective; anti-money laundering policies and procedures; and guidance on the Proceeds of Crime Act 2002.
- Merkur Slots UK Ltd operate a robust late night working policy, which is fully supported by a full-time Night Manager.
- Merkur Slots UK Ltd does not operate a single-manning policy between 8pm and close, however, should an emergency occur a 'locked door' and 'keep in touch' policy is implemented.

Objective 2 - Ensuring that gambling is conducted in a fair and open way.

- Our gaming rules are prominently displayed in each of our licensed premises.
- Our employees have a full understanding of machine gaming rules.

Merkur Slots UK Limited

Operational Standards



- We encourage customer-facing employees to use positive discretion to resolve customer issues at a local level, where possible.
- Our Customer Complaints procedure is displayed prominently in every venue. Where customer disputes cannot be resolved satisfactorily, we refer all potential disputes to our appointed Alternate Dispute Resolution provider (IBAS).
- All venue managers attend our National Training Centre for a thorough induction programme prior to taking on responsibility of their own venue and team.
- All licensed premises employees receive induction and six-monthly refresher training during the course of their employment to ensure that potential issues can be addressed at the earliest opportunity.

Objective 3 - Protecting children and other vulnerable persons from being harmed or exploited by gambling

- All our licensed premises are strictly adult only and we provide appropriate notification on entry, on all marketing material and throughout our premises.
- We operate a Think 25 policy as standard and all employees are trained to request a photographic form of identity if they suspect that a customer is under age. All challenges are recorded on our Smart Tablet system under Age Verification Checks and Check Policy are our third-party independent partner for compliance testing.
- All licensed premise employees receive induction and six-monthly refresher training during the course of their employment on social responsibility and safeguarding children and vulnerable people, with a particular focus on the prevention of harm.
- We prominently display information throughout our licensed premises on responsible gambling and provide details of organisations that can provide support and guidance such as BeGambleAware.
- Socially Responsible messaging is implemented on B3 and Category C digital machines.
- All licensed premise employees are trained to identify potential at risk customers and conduct effective interactions. Customer interactions are recorded on the Interactions module on the electronic Smart Tablet and reviewed centrally by the Compliance team.
- We implement a self-exclusion policy throughout our licensed premises and operate a Smart Tablet system for recording self-exclusions, reinstatements and breaches. We are also members of the Bingo Association Multi-Operator Self-exclusion Scheme.
- The layout of our premises is designed to facilitate customer supervision by employees.
- We provide an annual donation in support of research, education and treatment of problem gambling.

All three licensing objectives are embedded at all levels within the organisation via training both on-line and face to face, during Operational meetings, Business Bulletin communications, Compliance/Audit visits and annual conferences.

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-103444-030 (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: | On 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%) (<i>police.uk</i>). In February 2024, 268 crimes were recorded within a half mile of the venue. The most commonly recorded crimes were 78 Violence & Sexual Offences, 70 Anti-social behaviour, 25 Criminal damage and arson, 21 Public Order, 17 Other Theft, 14 Theft from a person, 9 Burglary and 8 Robbery. (<i>streetcheck.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 reduce violence and drug dealing in the area of Harlesden High Street – Harrow Road NW10 and in the area of Park Parade, Leghorn Road, Harlesden Gardens NW10; To work closely with Brent Council, Businesses and resident of Station Road in order to reduce drugs and Street Drinking problem in Station Road and Surrounding area and Robbery – High Visibility Patrols To reduce and prevent Street Robberies in the Town Centre Area. (<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'. |

Page 18

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 19 | <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> |

| | | |
|--|--|---|
| | <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</p> <p>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</p> <p>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</p> <p>Vulnerable and addiction support services EACH Brent, Design works, Park Parade, London NW10 4HT</p> <p>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</p> <p>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 9AR</p> | <p>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.</p> <p>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.</p> <p>Results of age verification checks and third-party results are shared with the Gambling Commission.</p> <p>Proof of Age scheme in place with application forms available in the venue.</p> <p>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.</p> <p>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</p> <p>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.</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>All staff complete on boarding and 6 monthly refresher training which includes Safeguarding Children and Vulnerable People and Customer Interaction.</p> <p>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> |
|--|--|---|

| | | |
|--|--|---|
| | <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> |
|--|--|---|

| | | |
|--|---|---|
| | <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>Regular Festivals, Town Events and Mass Gatherings Wickham annual Festival, PO17 5HD</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> |
|--|---|---|

| | | |
|---|---|--|
| <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%) (police.uk). In February 2024, 268 crimes were recorded within a half mile of the venue. The most commonly recorded crimes were 78 Violence & Sexual Offences, 70 Anti-social behaviour, 25 Criminal damage and arson, 21 Public Order, 17 Other Theft, 14 Theft from a person, 9 Burglary and 8 Robbery. (streetcheck.uk) 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 reduce violence and drug dealing in the area of Harlesden High Street – Harrow Road NW10 and in the area of Park Parade, Leghorn Road, Harlesden Gardens NW10; To work closely with Brent Council, Businesses and resident of Station Road in order to reduce drugs and Street Drinking problem in Station Road and Surrounding area and Robbery - High Visibility Patrols To reduce and prevent Street Robberies in the Town Centre (Police.uk)</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> |
|---|---|--|

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

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.

| | | |
|---|---|--|
| <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 28</p> <p>Other</p> | <p>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</p> | <p>Ethnicity and Local Area Demographic Merkur Slots does not discriminate on the ground of ethnic or social demographic.</p> <p>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.</p> <p>Merkur Slots takes a holistic approach to customers and is aware that the Equality Act precludes the exclusion of any group for generalised reasons.</p> <p>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.</p> <p>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.</p> <p>Merkur Slots have attained Responsible Gambling Accreditation from the G4 Global Gambling Guidance Group.</p> <p>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.</p> <p>There are two National Training Centres and a dedicated Learning and Development Team.</p> <p>Gamcare Accredited training completed by members of management.</p> <p>All staff complete on boarding and 6 monthly refresher training: The Essentials of Compliance, Safeguarding Children and Vulnerable People Age Verification and Customer Interaction.</p> <p>Staff are aware of the importance of social responsibility, trained to advise customers of gambling responsibly and identifying potential problem gamblers.</p> <p>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.</p> |
|---|---|--|

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. |

Page 26

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.

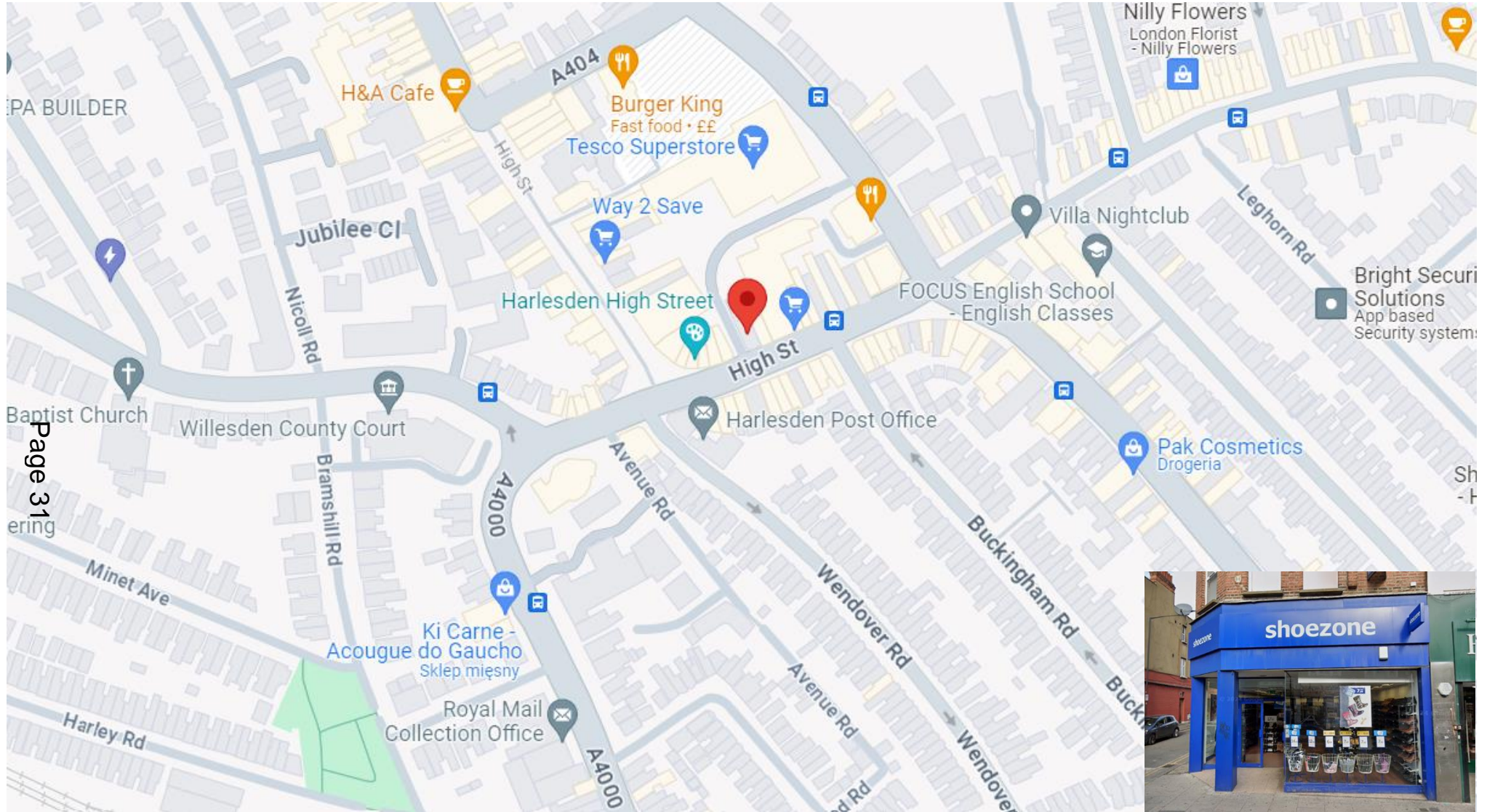
None of our operational venues have been subject to review proceedings.

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.

| | | |
|---------|-----------------|--|
| Page 30 | Assessors Name: | Ewelina Lesner and Amanda Kernan |
| | Signature: |  |
| | Date: | 07/04/2024 |

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



Merkur Slots – Shop frontage example



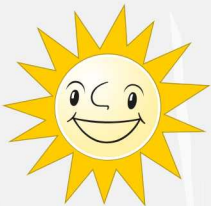
Page 32

WORKING TOGETHER



Accredited by the Global Gambling Guidance Group

Page 33 **THE MERKUR FAMILY**



PART OF THE GAUSELMANN GROUP

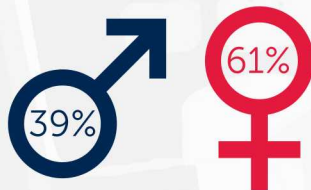
A Strong Partner For More Than 60 Years



**MERKUR
CASINO**

Merkur Casino UK, formerly Praesepe, is a subsidiary of the family run Gauselmann Group who are based in Espelkamp (Germany). Over the last 60 years the group has grown to operate more than 700 venues across Europe under the Merkur Brand. Millions of enthusiastic guests at home and abroad know our logo. The laughing MERKUR Sun is a guarantor for the best entertainment.

Merkur Casino UK employs over 1,600 people (61% Female) over 3 Bingo Clubs, over 180 High Street gaming centres and 3 Family Entertainment Centres under two main brands.



61% of employees are female
39% of employees are male



**MERKUR
SLOTS**

Merkur Slots is the main UK brand. All Merkur Cashino and Cashino Gaming venues will be rebranded into this new name over time. Our venues represent the very best in terms of exciting 'slot gaming' entertainment through delivering to our customers the latest in venue product and atmosphere. These venues are known for their highly trained teams and first class face to face service.



**MERKUR
BINGO**

Merkur Bingo clubs, formerly Beacon Bingo, are very important to our customers in their local communities. Our teams strive to deliver not just great service but a Bingo experience which focusses on ambience, safety and fun in a modern environment. The flagship venue at Cricklewood, in North London, is the largest in Europe.

HIGH STREET BINGO

What is it?

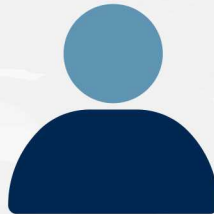
Bingo is one of the UK's favourite pastimes and Praesepe is one of the UK's largest operators of licensed bingo and arcade premises. Our High Street Bingo Venues:



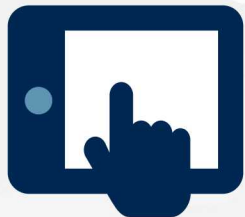
Offer more local, convenient locations to play Bingo rather than travelling to larger clubs.



Our teams remain with the customers on the venue floor rather than behind a counter.



Our customers can attend and play bingo at any time with the numbers auto-called.



The market on the high street has evolved with venues now providing Electronic Bingo Tablets.



Our Bingo terminals offer B3, Cat C and Cat D products with an average stake of between 30-40p stake.



Bingo is available for play from 9am until midnight.



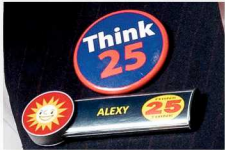
Bingo Terminals





RESPONSIBILITY IS THE FOUNDATION OF OUR BUSINESS

Think 25 Messaging



Players in Venue



We Are Not A Problem

Being a responsible operator is high priority across the Gauselmann group and in the UK, Merkur Casino is always looking at ways to adhere to the three licensing objectives as technology and customer behaviour changes.

GAMBLING COMMISSION

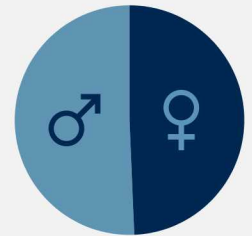
Merkur Casino is regulated by the Gambling Commission and Licensing Authorities



We do not sell or serve alcohol in our venues. We provide complimentary refreshments, teas and coffees, to customers. Our staff will not allow anyone into the premises who appears to be intoxicated.



We are immensely proud of the fact that we have never had a licence revoked or even reviewed. Incidents are extremely rare. We simply do not generate noise and anti-social behaviour.



Our venues operate a Think 25 policy whereby any persons who look under 25 have to produce a form of photo ID.



Our venues appeal to all ages with our membership gender database split of 52 % Male / 48% Female



Our venues have 3 external age tests per year with a compliance rate of over 94% for the last 3 years, compared to other leisure and gambling sectors that sit around 80%.

SOCIAL RESPONSIBILITY MEASURES IN PLACE



In Venue

Operationally we have a number of measures in place to protect our customers. Throughout the business Merkur Casino also has a number of socially responsible gambling tools, and management and training initiatives that include:



All staff complete on-boarding and six-monthly refresher training on "The Essentials of Compliance and Social Responsibility" and "Safeguarding Children and Vulnerable People".



Dedicated Learning & Development Team and National training centres.

IHL SMART tablet in every venue for the recording of customer interactions, self-exclusions, incidents and alerts.



All data is centrally reviewed and evaluated by an independent Audit/Compliance team.



Six monthly compliance audits to help identify training needs in venue.

Local Area Risk Assessments are updated annually to identify any changes in the local area.



Compliance



Training Centre



Online Training





SOCIAL RESPONSIBILITY MEASURES IN PLACE

Machine Messaging



Customer Interaction Training



All Levels

We provide an annual assurance statement to the Gambling Commission. This officially details the Board's commitment to the company values, purpose and culture and the accountability placed on delivery of the licensing objectives.



The statement contains information on how we operate effective governance, regulatory risk management, compliance controls, social responsibility and safer gambling initiatives.



It is also an opportunity to set out any initiatives relating to significant changes being introduced to improve control systems, risk-management, governance and safer gambling. Our recent commitments include: Socially Responsible Machine Messaging; Customer Set Your Limits; SMART Alert application to report criminal activity; opening our Second National Training Centre; Think 25 messaging and Customer Interaction Training.



Merkur Casino UK received the international certificate of accreditation from the Global Gambling Guidance Group (G4). Our Merkur 360 programme showcases how we are continually improving our social responsibility commitments throughout all levels of the business.

Merkur Casino UK also engages with the Bingo Association, Bacta and Gambling Business Group bodies.



- Senior Manager representation Divisional meetings.
- Operations Director is the Chair for division 3 representing Adult Gaming Centres.
- Member of the National Council.
- Head of Compliance is Vice Chair of the Social Responsibility Committee.

- Operations Director and Head of Compliance are
- Head of Compliance is a member of the Social Responsibility Committee.

BENEFITS TO THE HIGH STREET



Benefits for your High Street include:



Over 90% of new Merkur Slots venues occupy former vacant units.



Investment from £100,000 to £250,000 in long-standing vacant venues.



Linked trips with other shops helping to support other businesses.



Local jobs for between 6 and 12 people depending on the hours of operation.



Increased footfall to the High Street.



We provide an important natural surveillance on the high street, particularly late into the evenings.

COMMUNITY & CHARITY

Merkur Initiative

Supporting Local Charities and Good Causes

Amongst other charities, some of your donations have helped:



Merkur Casino UK has raised in excess of
£1.2 million for good causes since 2005

Please contact us

For press enquiries:

email martha@sourcemc.co.uk

phone +44 (0) 7796 614137

Merkur Casino UK

Seebeck House

1A Seebeck Place

Knowlhill

Milton Keynes

phone 01908 351200

email info@merkur-casino.com



From: Patel, Councillor Mili

Sent: Monday, June 10, 2024 9:42 PM

To: Business Licence

Cc: Kelcher, Councillor Matt; Chan, Councillor Jumbo; Chappell, Councillor Elliot; Rubin, Councillor Jake; Donnelly-Jackson, Councillor Fleur

Subject: Application Number: 31723

On behalf of the Harlesden and Kensal Green ward councillors, and also the Roundwood ward councillors, I am writing to lodge a joint objection to the application by Merkur Slots for a Bingo Club Premises Licence.

We object to this application because we believe it contravenes the Council's four licencing objections:

1) Preventing crime and disorder

Harlesden is a location that is already saturated with betting shops, bingo halls and adult gaming centres. On a six-hundred-meter stretch from Craven Park Road to Harlesden High Street there is currently a total of six gambling premises, with potential for more to come. An additional adult gaming centre is not needed and would further cluster the high street.

Evidence has demonstrated that the public health and community safety impacts of gambling are often exacerbated in areas in which clusters of betting shops are located. This means that vulnerable residents are often targeted, anti-social behaviour is increased, and the high street is further impacted.

Increasing the density of Harlesden's gambling cluster will only divert further resources from stretched policing budgets. This is why our dedicated Harlesden Police Force have objected to further gambling premises being opened whenever applications have come up.

2) Public Health

A stones-throw away from 67 High Street is a homeless shelter. The homeless charity, Crisis, have submitted objections against these types of applications. The negative social, economic, and public health impacts of gambling are well documented.

In the Council's Statement of Principles for Gambling, section 4.5 outlines the importance of protecting vulnerable adults. Within the guidance a persons 'situation' is highlighted as needing to be considered, this includes if the individual 'is experiencing financial difficulties, is homeless, is suffering from domestic or financial abuse, has caring responsibilities, experiences a life change or sudden change in circumstances.'

An additional adult gaming centre would, in our view as local representatives, put already vulnerable people at further risk. Moreover, in addition to the homeless shelter, Harlesden is an area with high levels of poverty and deprivation as identified by the Brent Poverty Commission. Granting this application would therefore undermine the Council's efforts to safeguard vulnerable adults.

3) Public Safety

The saturation of betting shops and gambling premises also increases the likelihood of crime within the area. Harlesden High Street already has high levels of anti-social behaviour, and an additional adult gaming centre could increase this level and attract further illicit and anti-social activities.

A study from nearby Ealing Council explored crime and disorder in relation to gambling premises and found that: 'as well as reported crime in betting premises being much higher than the controls, there was a clear and statistically significant increase in crime in the vicinity of betting shops, with the greatest correlations at the closest distances from the premises.'

We are clear that public safety in our two wards would be undermined if this application were to go through.

4) Protecting Children from Harm

Harlesden High Steet is a known area for young people to congregate, particularly after school.

Whilst Merkur Slots outline that they operate a strict over-18 policy, the proliferation of gambling premises and the consistent visible exposure to them on the high street is likely to increase interest in them and potentially encourage young people to explore gambling opportunities either illegally or when they are of age.

We have a duty to ensure that young people are aware of the impacts of gambling. We should follow the principles of Brent's groundbreaking policy which prevents new fast food outlets opening in close proximity to schools and also prevent gambling sites clustering in these areas.

We believe that, for all these reasons the application is in contravention of Brent's licencing objectives and should be rejected by the committee.

Cllr Mili Patel

Deputy Leader of Brent Council

Labour Councillor for Harlesden and Kensal Green Ward

Merkur Slots – Resident Reps

Rep 1

We don't need yet another gambling hotspot in our town centre, there are already plenty causing havoc. Children as young as 11 are seen gambling. There is a school less than 500ft away No more gambling on our streets we are safer with empty shops.

Rep 2

This area is constantly used by many young children including toddlers to teenagers. There's already one gambling place at the corner of high street which attracts people with questionable behaviours e.g. drinking in public from early morning, some physical and verbal fighting. As a family with young kids living in the area, we strongly opposed to this development.

Rep 3

I object on three counts, 1 there is already multiple gambling shops, in fact a ridiculous amount for such a small town centre, Silver time, 2 ladbrokes (one right in front of Shoe Zone), 2 there is a school nearby and 3 this is not what you want if you want to curb gambling addiction within the community. This town needs an upgrade no further downgrades.

Rep 4

I object as there is a gambling establishment round the corner opposite jubilee clock, there is a school nearby and children would go past this gambling establishment during their lunch break and going home and the council should be doing more to help the community from avoiding gambling addiction not encourage it.

Rep 5

I am writing as a local resident, to object to the application of a gambling licence for 67 High Street Harlesden.

Harlesden town centre already has far too many gambling establishments and anti social behaviour is often in evidence around them with local drunks seen drinking, smoking, swearing and sometimes even fighting outside at all times of day.

I am also concerned of the effect on young people in the area as this part of the high street is frequented by school children waiting for buses before and after school who should not be exposed to either the gambling advertising or the antisocial behaviours.

It's clearly not what the area needs or the local residents want. As evidenced by previous successful campaigns to block other gambling establishments opening.

Please block this and all further applications for gambling establishments in Harlesden.

Many thanks

Rep 6

I object to Merkur Slots UK Ltd's application for a Bingo Licence for 67 High Street, Harlesden NW10 4NS.

I live nearby atMy children and wife and I will be affected by this development:
The reasons for my objections are:

1. To prevent crime and disorder. Harlesden is a poor area, featuring deprivation, substance abuse, criminal activity. Nearby Park Parade for example is a cannabis open market. Statistics show gambling establishments raise crime: people vulnerable to addiction find themselves unable to resist the temptation of gambling - this is why gambling companies like Merkur choose deprived areas like Harlesden - they lose money they don't have and or want more of the same, and often have to resort to crime to finance their addictions.

2. For public safety reasons. The above crimes usually involve street crime - begging, drug dealing, loitering - is of danger to the public.

3. Preventing public nuisance. On street crime, loitering, begging, drug dealing are all by products of gambling on slot machines (the most insidious, 4. Protecting children from harm. My children go to the library and the park through Harlesden. I want to protect them.

Yours faithfully

Rep 7

We already have a lot of gambling establishments in Harlesden. They tend to prey on the most vulnerable and poorest members of our society, as well as encouraging anti-social behaviour. Adding another gambling establishment will exacerbate the existing problems in the area, both social and personal, just to make money for a company that has no roots here. If Brent Council is serious about supporting communities and safeguarding their future, they will reject this application,

Rep 8

The high street already lost its purpose and gambling shops do not bring not any value, nor create healthy communities. Gambling is an addiction and should be banned in general. This area is already dealing with high rates of ASB and environmental issues, why to make it worse?

Rep 9

Strongly object - there are enough gambling places in the area, too many some would say (including myself). Harlesden will never improve its crime rate nor its diversity within the area; something we do desperately need. This application will only have a negative impact.

Rep 10

There is a similar business nearby, it is near a school and this is irresponsible to include further gambling establishments when there should be support to stop gambling addiction nationally, least of all in our local area

Rep 11

This area really does not need another betting shop, with two just round the corner, schools near by. Antosocial behaviour is a standard in front of such establishments here.

Rep 12

I overwhelmingly object. There are enough gambling establishments in Harlesden, which bring with them anti-social behaviour, loitering outside and drug dealing. I have a young family, I have seen the progress made so far in cleaning up Harlesden but there is much more to do, another establishment of this kind undermines these efforts.

Rep 13

One is more than enough in this small area which we have already. Gambling is an addiction and these encourage youngsters to get into these voices. Please put something worthy and useful for the community there. No more chicken shops, Pound shops or betting shops.

Please bring Harlesden up and not down all the time. A hardware shop like Robert Dyas would be useful.

Rep 14

How can we curb anti social behaviour and make the area safer and more thriving if we keep allowing gambling shops to open up within close distance from one another.

Rep 15

I strongly object to this application. There are already gambling sites in Harlesden, there are schools nearby and I really don't think this will help those in the community trying to curb/avoid gambling. No!

Rep 16

They are already a few betting shops around Harlesden High Street. Gambling addiction is already destroying families and the community at large. 18 to 23 year old young adults are getting addicted to slot machines There are few High schools near by and the presence of betting premises can only bad new for this future generations

Rep 17

Honestly! Give up already... we have too many of this around in an area where we have lots of schools and a high level of poverty. You need to stop preying on those that can help themselves. I object on three counts, 1 there is already various on the area, 2 there are many schools nearby and 3 we need to help those with gambling addiction within the community and this would only make the situation worse and bring more daytime drinking in the streets.

Rep 18

Please could we have no more adult gaming centres in Harlesden. They do nothing to enhance the area, or keep us save from the increased levels of crime experienced on a daily basis. They simply promote poverty, particularly in an area vulnerable to the effects of addiction. I have written already numerous times to object to other 'late night ice cream shops', and other undercover money laundering establishments. Please could these be removed from the area.

Rep 19

We do not need or want any more gambling establishments in our community. It encourages antisocial behaviour and is not good or healthy for the community on any level.

Rep 20

there are already lots of gambling places. There is already a lot of antisocial and criminal behaviour associated with existing places. Please do not add more gambling places to an area that already has an issue.

Rep 21

To whom it may concern,

I am writing to formally object to the application for a gambling licence for the premises located at 67 High Street, Harlesden on the grounds of public safety, health, and wellbeing concerns.

As a local resident, I have observed that our area already hosts several gambling establishments. The saturation of such venues can contribute to several significant issues within our community. An increase in gambling establishments is often correlated with higher

incidences of crime and anti-social behavior. The concentration of such venues can attract criminal activities, including theft, fraud, and other related offenses. This increase in crime not only affects the immediate vicinity of the gambling establishments but can also extend to surrounding residential areas.

The presence of multiple gambling venues can compromise public safety. Frequenting these establishments, individuals might become targets of crime, or engage in behavior that threatens the safety of others. Ensuring the well-being and security of residents should be a priority, and additional gambling venues would undermine these efforts. Moreover, gambling establishments can contribute to noise pollution, littering, and other forms of public nuisance, disrupting the peace and order of the community.

Gambling addiction is a serious public health issue that can have devastating effects on individuals and families. The proliferation of gambling venues exacerbates this problem, contributing to mental health issues, financial distress, and family breakdowns. Our community needs more support services and healthier recreational options, not additional gambling facilities.

There are several schools in our district, and the presence of a new gambling establishment poses a significant risk to young people. Exposure to gambling at a young age can lead to harmful behaviors and addiction. Ensuring that children and young persons are protected from such influences is paramount for their healthy development. With multiple schools in the vicinity, the establishment of another gambling venue is inappropriate and harmful. Children should not be exposed to gambling-related activities or environments on their way to and from school, as this normalises gambling behaviour and poses a risk to their well-being.

In light of these points, I urge Brent Council to reject the application for a gambling licence. The potential negative impact on crime rates, public safety, health, and the welfare of young people far outweighs any benefits that such an establishment might bring.

Thank you for considering my objections. I trust that the council will act in the best interest of the community and its residents.

Best regards,

From: Esther, Chan
Sent: Friday, June 14, 2024 5:46 PM
To: Felix Faulkner
Cc: Aaron Newbold; Business Licence; Legister, Linda
Subject: RE: CONSULT: New Bingo Club Premises Licence - Merkur Slots, 67 High Street, NW10 4NS - 31723 PCX:000085000002887

Dear Felix,

Thank you for your email.

I have no further comments and now wish to withdraw my representation.

I have updated our agreement in respect of the conditions on the attached revised representation for the purpose of clarity.

Kind Regards

Esther Chan
Licensing Inspector
Regulatory Services

From: Felix Faulkner
Sent: Friday, June 14, 2024 5:23 PM
To: Esther, Chan
Cc: Aaron Newbold; Business Licence; Legister, Linda
Subject: Re: CONSULT: New Bingo Club Premises Licence - Merkur Slots, 67 High Street, NW10 4NS - 31723 PCX:000085000002887

Hi Esther,

Thanks for your time earlier this week – it was lovely to speak with you.

See attached the amalgamated conditions as agreed with the client. All is there as we discussed, and the only change the client requested is to replace the word ‘Cashier’ with ‘Service’ in no.17.

I trust this is satisfactory, and if so, I would be grateful if you could confirm your representation is withdrawn.

Many thanks
Felix

From: Esther, Chan
Date: Monday, 10 June 2024 at 09:15
To: Felix Faulkner
Cc: Aaron Newbold; Business Licence; Legister, Linda
Subject: RE: CONSULT: New Bingo Club Premises Licence - Merkur Slots, 67 High Street, NW10 4NS - 31723 PCX:000085000002887

Dear Felix,

We can schedule a MS Teams meeting if that helps on Wednesday.

Kind Regards

Esther Chan
Licensing Inspector
Regulatory Services

From: Felix Faulkner
Sent: Monday, June 10, 2024 8:54 AM
To: Esther, Chan
Cc: Aaron Newbold; Business Licence; Legister, Linda
Subject: RE: CONSULT: New Bingo Club Premises Licence - Merkur Slots, 67 High Street, NW10 4NS - 31723 PCX:000085000002887

Hi Esther,

Thank you for this – all received.

Can you let me know when you are free for a chat to discuss this?

I just want to review with the proposed conditions and see exactly which are new requests.

Thanks
Felix

From: Esther, Chan
Sent: Friday, June 7, 2024 9:11 PM
To: Felix Faulkner
Cc: Business Licence; Legister, Linda
Subject: RE: CONSULT: New Bingo Club Premises Licence - Merkur Slots, 67 High Street, NW10 4NS - 31723

GAMBLING ACT 2005
Licence: New Bingo Club Premises Licence
Reference: 31723

Dear Sir/Madam,

Applicant: **Merkur Slots UK Limited**
Premises: **Merkur Slots, 67 High Street, NW10 4NS**

Please find attached representation from the Licensing Authority.

Kind Regards

Esther Chan
Licensing Inspector

Felix Faulkner
Poppleston Allen
The Stanley Building
7 Pancras Square
Kings Cross
London
N1C 4AG

14 June 2024

Our Ref: 31723

Dear Felix Faulkner,

Re: Licensing Representation to the Application for a New Bingo Club Premises Licence under the Gambling Act 2005 at Merkur Slots, 67 High Street, NW10 4NS

I certify that I have considered the above application and I wish to make representations that the likely effect of the grant of the application is detrimental to the Licensing Objectives for the reasons indicated below.

Officer: Esther Chan – Licensing Inspector

An officer of the Licensing Authority, in whose area the premises are situated, who is authorised for the purposes of exercising its statutory function as a 'Responsible Authority' under the Gambling Act 2005

The Licensing Authority representations are primarily concerned with the three licensing objectives;

- **Preventing gambling from being a source of crime and 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 persons from being harmed or exploited by gambling.**

As a result of the premises licence application being received by Brent Council for a new Bingo Club Premises Licence, the licensing authority have examined the area of where the Bingo Club will be sited. Harlesden is a busy town centre consisting a mixture of different shops and surrounded by residential

dwellings. The area attracts a high level of crime and disorder including street drinking, falling under the cumulative impact zone.

With the above taken into consideration, Licensing Authority wish to propose the following conditions:

CCTV

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.

Children and Young People

6. The Licensee shall maintain a bound and paginated '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.

Entrances and Doors

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.

Staffing levels

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.

Identification of Offenders or Problem Persons

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.

Seating

15. The licensee shall ensure that all seating within the premises are either secured to the floor or are weighted to prevent lifting.

Alarms

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.

Toilets

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.

Signage, Promotional Material and Notices

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.

Staff Training

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.

Homeless and Street Drinking

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.

Recording of Incidents and Visits

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.

In order for the Licensing Authority to withdraw this representation, it will be necessary for you to confirm in writing that your client accept the above conditions.

Yours sincerely,



Esther Chan
Licensing Inspector
Regulatory Services

From: Brendon.McInness@met.police.uk
Sent: Monday, June 10, 2024 1:34 PM
To: f.faulkner
Cc: Business Licence; Legister, Linda
Subject: RE: Merkur Slots, 67 High Street NW10 4NS PCX:000085000002895

Hi Felix.

Thank you for that.

Please see amended representations attached to add that condition regarding the Maglock. As we are in agreement police are happy to withdraw representations and support your application.

CC Business Licence and Linda.
As we are in agreement with the attached. Police have withdrawn representations.

Kind regards

Brendon MCINNES PC 1187NW

From: Felix Faulkner
Sent: 10 June 2024 13:22
To: McInnes Brendon - NW-CU
Cc: [business.licence](#); [Linda.Legister](#)
Subject: RE: Merkur Slots, 67 High Street NW10 4NS PCX:000085000002895

Hi Brendon,

Thanks for this.

I note your representation includes all of the conditions proposed within the application which my client is happy to agree to.

The application does also include the following condition, which my client is happy to offer:

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.

Thank you for cooperation.

Many thanks
Felix

From: [Brendon.McInness](#).
Sent: Monday, June 10, 2024 1:00 PM
To: Felix Faulkner
Cc: [business.licence](#); [Linda.Legister](#)
Subject: Merkur Slots, 67 High Street NW10 4NS

Good afternoon.

Please find attached police representations for the above Premises licence.
If we are in agreement with the attached conditions then police will be in a position to withdraw representations and will be happy to support your application.

Hope to hear from you soon.

Kind regards





TERRITORIAL POLICING

Brent Police Licensing Unit

*Brent Civic Centre
Engineers Way
Wembley
Middlesex
HA9 0FJ*

Your ref: 31723

Our ref: 01QK/421/24/1187NW

**Brent Borough Licensing
NW BCU**

*South Harrow Police Station
74 Northolt Road
South Harrow
HA2 0DN*

Email: Brendon.McInness@met.police.uk

Web: www.met.police.uk

Date: 10th June 2024

Police Representation to the application for a Premises Licence for 'Merkur Slots', 67 High Street, NW10 4NS.'

I certify that I have considered the application shown above and I wish to make representations that the likely effect of the grant of the application is detrimental to the Gambling Act 2005 licensing objectives for the reasons indicated below.

**Officer: Brendon MCINNES
Licensing Constable 1187NW**

An officer of the Metropolitan Police, in whose area the premises are situated, who is authorised for the purposes of exercising its statutory function as a 'Responsible Authority' under the Gambling Act 2005.

The application has been made for a premises licence.

The Metropolitan Police (Brent) are making representations to this application for a premises licence in accordance with Section 1 of the Gambling Act 2005 licensing objectives;

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

Gambling establishments have historically been venues of repeated calls to police due to a variety of issues - criminal damage by frustrated customers, ASB, violence/public order, drug use, congregating street drinkers, local gang activity, underage children etc. The area of Harlesden within the borough of Brent already suffers from crime, disorder, ASB and street drinking issues. Therefore any new premises that could add to these issues would need to conduct their business stringently in line with the gambling licensing objectives.

Police are very familiar with the area and the transient community at nearby accommodation for vulnerable and mentally ill persons. In addition there are street drinkers consistently heavily under the influence of alcohol.

Police understand that the problems in the area are not enough to object to this application. However, further conditions would assist in upholding the licensing objectives under the Gambling Act 2005.

The application received is very thorough with regards a local area risk assessment and a number of licensing concerns are broadly covered by the application. However, some further conditions would be beneficial.

Police require the following points should be included in the operating schedule, or added as conditions on the premises licence.

1. CCTV shall be installed to Home Office Guidance standards and maintained in a good working condition. Recordings shall be kept for 31 days and shall be made available to police and authorised officers from Brent council upon request.

2. An incident log shall be kept for the premises and made available on request to an authorised officer Brent 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.

3. 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

4. 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.

6. There shall be no pre-planned single staffing at the premises from 20:00 until closing.

7. 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.

8. The on duty manager shall implement a policy of banning any customers who engage in crime or disorder within or outside the premises.

9. A notice, visible from the exterior of the premises shall state that customers drinking alcohol outside the premises will not be permitted and those who do so will be banned from the premises.

10. The licensee will ensure that customer toilets are checked every hour for evidence of drug taking and alcohol consumption. Toilet checks are to be documents stating the time and member of staff who made the checks.

11. Toilet doors remain locked and access is permitted by staff members.

12. 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.

Yours sincerely

PC Brendon MCINNES 1187NW
Brent Licensing
NorthWest Partnership & Prevention

This page is intentionally left blank

Basemap Map



1:1250

0 0.02 0.04 kilometres



Brent

This page is intentionally left blank