



## Alcohol and Entertainment Licensing Sub-Committee

**Friday 28 March 2025 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:

Long (Chair)  
Rajan Seelan

#### Substitute Members:

Ahmed, Bajwa, Chohan, Ethapemi, Hack,  
Hylton, Lorber, Mahmood,

**For further information contact:** Devbai Bhanji, Governance Assistant  
Tel: 020 8937 6841; Email: [devbai.bhanji@brent.gov.uk](mailto:devbai.bhanji@brent.gov.uk)

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

## **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
<b>1 Apologies for absence and clarification of alternate members</b>	
<b>2 Declarations of Interests</b>	
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.	
<b>3 Application for a Bingo Premises Licence by Merkur Slots UK Ltd for the premises known as Merkur Slots, 265 Neasden Lane, NW10 1QG, pursuant to the provisions of the Licensing Act 2003</b>	1 - 70

**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.

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## 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, 265 Neasden Lane, NW10 1QG
Applicants Agent:	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 a Ward Councillor 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

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**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):

**265 Neasden Lane  
London  
NW10 1QG**

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**

9(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, NW10 0AD**

**MERKUR Slots** **Bingo Premises Licence: 10409**  
**51-55 High Road, Willesden, London, NW10 2SU**

**MERKUR Slots** **Bingo Premises Licence: 31723**  
**67 High Street, Harlesden, London, NW10 4NS**

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 the Police and Licensing Authority, MERKUR Slots UK Ltd have offered the following conditions, which are to be attached to the 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. In the event of any instances of pre-planned single staffing, details of this will be recorded centrally and retained on a log which will be provided to the police or licensing authority upon request.**

**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.
- 12. The requirement for door staff shall be risk assessed and cognisance taken of police advice.

**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: **17 December 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 8597751**

24. Postal address for correspondence associated with this application:

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

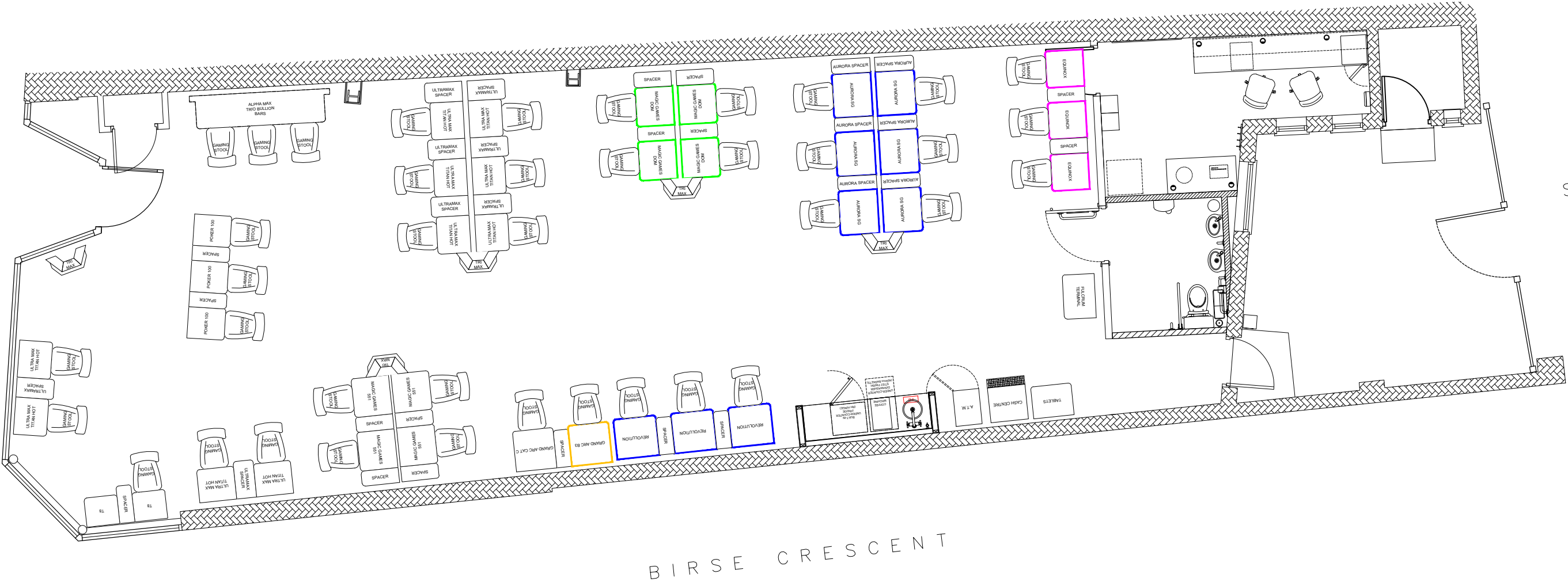
25. If you are happy for correspondence in relation to your application to be sent via e-mail, please give the e-mail address to which you would like correspondence to be sent:


**f.faulkner@popall.co.uk**

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**PROPOSED GAMING AREA: 121.9m<sup>2</sup>  
FOR ILLUSTRATION PURPOSES ONLY**

PLEASE NOTE: SPACERS ARE NOT GAMING MACHINES



<b>REVISIONS</b> <b>REV 00:</b>	<b>FIT OUT TYPE LICENCING</b>	<b>REFERENCE DRAWINGS</b>			
	<b>PROJECT</b> <b>MERKUR SLOTS</b> <b>265 NEASDEN LANE</b> <b>NEASDEN</b> <b>NW10 1QG</b>	SCALE 1:75			DRAWN BY MG
	<b>DESCRIPTION</b> <b>PROPOSED MACHINE PLAN</b>	DATE 13/11/24			
			DRAWING No. <b>905-PL-105</b>		REVISION <b>00</b>

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### 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 Limited 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 Limited complies with the Commission's advice on the Proceeds of Crime Act 2002.
- Merkur Slots UK Limited 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 Limited premises operate digital CCTV and customer areas are supervised.
- Merkur Slots UK 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 UK 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 Limited has an extensive security, audit and money laundering team monitoring employees and customer activity.
- All Merkur Slots UK 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 operate a robust late night working policy, which is fully supported by a full-time Night Manager.
- Merkur Slots UK 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, 265 Neasden Lane, Neasden, NW10 1QG

## Local Area Risk Assessment

Trading Name:	Merkur Slots
Premise	265 Neasden Lane, Neasden, NW10 1QG
Local Authority:	London Borough of Brent Council
Premise Licence No:	New application
Operator Licence No:	000-003266-N-103444-031 (Merkur Slots UK Limited)
Company Details:	Merkur Slots UK, Matrix House, North Fourth Street, Milton Keynes MK9 1NJ
Name and Title of Assessor:	Ewelina Lesner – Internal Compliance Auditor, Amanda Kiernan – Head of Compliance
Date of Assessment:	22/11/2024
Review Date:	Upon opening in conjunction with local staff

## Local Area Profile Risk Factors

Local Risk Profile:	Merkur Slots is located on Neasden Lane, a busy local parade. Nearby occupiers are predominately local independent Barber and Coffee Shops with a handful of national occupiers which include Tesco, Costa, Subway, KFC, and Paddy Power. Directly outside the premise there is a bus stop and phone boxes, the bus routes may well attract children and young person's travelling to places of education. Birse Crescent is to the right of the premise, this road leads into residential areas of houses and flats, there are residential flats above the premise with a private access road running behind the properties. There are garages/storage units in an access road behind the properties on the other side of Birse Crescent.
Establishments of note:	The nearest fast food restaurant is KFC at 286 Neasden Ln, NW10 1QG which may attract children and young persons to congregate in groups. Tiffy Tom's pub is located within 1 minutes' walk away, this pub reopened in 2023 under new management, previously operating as Sal's Bar the licence was revoked in 2021 due to multiple reports of crime and disorder. St Catherines Church Foodbank is located less than 3 minutes' walk from the Merkur Slots premise, the foodbank operates every Tuesday between 5:30pm to 6:30pm and provides lunches on the 1 <sup>st</sup> and 3 <sup>rd</sup> Saturday of every month between 12:30 to 1:30pm. The Brent Foodbank located at St Mary's Church End, Neasden Lane, NW10 2TS, distributes food on Tuesdays and Thursdays 12:30 to 15:00pm. Addiction Treatment rehab provide support for gambling and alcohol addiction in the Neasden NW10 area - <a href="https://www.addictiontreatmentrehab.co.uk/london/neasden">https://www.addictiontreatmentrehab.co.uk/london/neasden</a>
Adjoining premises:	The premises is a corner unit located next to a charity shop 'Peaceful Solutions' to the left and Birse Crescent to the right. Residential flats are above the premise.
Crime statistics:	Annual total crime rate in local area is 128 per thousand population. This can be rated as 5 out of 10 or medium crime level compared to other local areas in England and Wales. Annual total crime rate in Brent is 89 per thousand population, which can be rated as 4 out of 10 or low crime level compared to other local authority districts in England and Wales. Below are annual crime rates by crime type. Figures represent the number of crimes of a certain type per thousand population. Violence and sexual offences 47.8, Other theft 17.3, Anti-social behaviour 11.4, Burglary 10.8, Vehicle crime 10.2, Public order 8.37, Drugs 6.58, Criminal damage and arson 4.78, Robbery 2.99, Theft from the person 2.99, Shoplifting 2.39, Other crime 1.2, Bicycle theft 0.598, Possession of weapons 0.598. ( <i>crystalroof.co.uk</i> )
Population:	Residents of these neighbourhoods include sizable numbers identifying with ethnicities originating outside Europe, particularly in Africa or Bangladesh. The proportion of residents identifying as White, Indian or Pakistani is well below the London average. Neighbourhood age profiles are skewed towards younger adults, and above average numbers of families have children. Rates of use of English at home are below average. Marriage rates are low, and levels of separation or divorce are above average. ( <i>crystalroof.co.uk</i> )
Culture:	The main ethnic group is Black African, representing 25% of the population. On average, 8% of the population in London belong to the Black African ethnic group. The following ethnic groups have proportions higher than the average for the London: Other Asian: 8% (London average: 5%), Black African: 25% (London average: 8%), Arab: 20% (London average: 1.6%). Conversely, the following ethnic groups have a proportion lower than the average for London: White British: 7% (London average: 37%), Other, White: 10% (London average: 15%), Indian: 2.9% (London average: 7%), Bangladeshi: 0.6% (London average: 4%). The main religion is Muslim, representing 49% of the population. On average, 15% of the population in London belong to the Muslim religion. Conversely, the following religions have a proportion lower than the average for London: Hindu: 2.3% (London average: 5%), Jewish: 0% (London average: 1.7%), Sikh: 0% (London average: 1.6%), No Religion: 9% (London average: 27%), Religion Not Stated: 4% (London average: 7%). ( <i>crystalroof.co.uk</i> )
Unemployment:	Full-Time Employee 12.6%, Part-Time Employee (defined as 30 hours or less per week) 16%, Self Employed 13.6%, Unemployed 5.4%, Full-Time Student (with or without job) 11.7%, Retired 13%, Looking After Home or Family 16.7%, Long-Term Sick or Disabled 5.4%, Other 5.6%. Employment is in caring, leisure, other service occupations, sales and customer service, or process, plant, and machine operation. Part time working and full-time student study are common. Levels of unemployment are slightly above average. ( <i>streetcheck.co.uk</i> ) ( <i>crystalroof.co.uk</i> )
Deprivation:	Index of Multiple Deprivation - 8/10. This is used to characterise the deprivation levels of the neighbourhoods. It takes into account the following domains: Income Deprivation Domain - 8/10, Employment Deprivation Domain - 6/10, Education, Skills and Training Deprivation Domain - 6/10, Health Deprivation and Disability Domain - 2/10, Crime Domain - 10/10, Barriers to Housing and Services Domain - 10/10, Living Environment Deprivation Domain - 9/10, Income Deprivation Affecting Children Index (IDACI) - 8/10, Income Deprivation Affecting Older People Index (IDAOPI) - 8/10. ( <i>crystalroof.co.uk</i> )

Local Police:	Neasden Lane, NW10 1QG is within the Dollis Hill policing neighbourhood, under the Metropolitan Police force area. Wembley Police Station, 603 Harrow Road, HA0 2HH. Current policing priorities are to reduce drug dealing, street drinking and ASB in Neasden Town Centre; reduce crime and fear of violence around Neasden Tube Station and to reduce residential burglaries in the west section of the ward. ( <i>police.uk</i> )
Age Verification:	Age verification test purchasing, and mystery shopper visits are frequently carried out by third party companies - ServeLegal and Store Checker. Age verification tests for 2024 current pass rate of 89% is higher than the industry average, all venues receive 2 or 3 random test visits per year.
Independent Security Reviews	<p>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.</p> <p>Key comments from the reports include:</p> <p>'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.'</p> <p>'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'.</p> <p>'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'.</p>

**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 Premises and Brent Council Borough Profile.

**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	<p><b>Unemployment</b>                      Full-Time Employee 12.6%, Part-Time Employee (defined as 30 hours or less per week) 16%, Self Employed 13.6%, Unemployed 5.4%, Full-Time Student (with or without job) 11.7%, Retired 13%, Looking After Home or Family 16.7%, Long-Term Sick or Disabled 5.4%, Other 5.6%. Employment is in caring, leisure, other service occupations, sales and customer service, or process, plant, and machine operation. Part time working and full-time student study are common. Levels of unemployment are slightly above average. (<i>streetcheck.co.uk</i>) (<i>crystalroof.co.uk</i>)</p> <p><b>Deprivation</b>                      Index of Multiple Deprivation – 8/10. This is used to characterise the deprivation levels of the neighbourhoods. It takes into account the following domains: Income Deprivation Domain – 8/10, Employment Deprivation Domain – 6/10, Education, Skills and Training Deprivation Domain – 6/10, Health Deprivation and Disability Domain – 2/10, Crime Domain – 10/10, Barriers to Housing and Services Domain – 10/10, Living Environment Deprivation Domain – 9/10, Income Deprivation Affecting Children Index (IDACI) – 8/10, Income Deprivation Affecting Older People Index (IDAOP) – 8/10. (<i>crystalroof.co.uk</i>)</p> <p><b>Schools and Education</b>                      Wykeham Primary School, Aboyne Rd, , NW10 0EX                      Neasden Montessori School, 4 Tanfield Ave, NW2 7RX                      Braintcroft Primary School, Warren Rd, NW2 7LL                      The Crest Academy, Crest Rd, NW2 7SN</p>	<p><b>Age Verification</b>  <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 Neasden Premise frontage is 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>The Crest Boys Academy, 80 Crest Rd, NW2 7LX  Menorah Girls School, 105 Brook Rd, NW2 7BZ  Alnour Arabic School &amp; Tuition Centre, 3 Coombe Rd, NW10 0EB  Poplar Grove School, Poplar Grove, Wembley HA9 9DB  St Margaret Clitherow RC Primary School, Quainton St, NW10 0BG  Our Lady of Grace Junior School, Dollis Hill Ln, NW2 6HS  Northview Junior and Infant School, Northview Cres, NW10 1RD  North Brent School, 12 Neasden Ln, NW10 2TF  Mitchell Brook Primary School, Bridge Rd, NW10 9DG  Neasden Tutors, Neasden, NW10 0DY  Lead After School Club, 484 Neasden Ln N, Greater, NW10 0DG  AlflyCademy, 10B Lansdowne Grove, NW10 1PR  College of North West London, Denzil Rd, Dudden Hill Ln, NW10 2XD</p> <p><b>Community Centres and Youth Centres</b>  Kingfisher Community Centre, Crest Rd, NW2 7LG  Community Hire - Crest, Crest Rd, NW2 7SN  Prajapati Hall, 519 N Circular Rd., NW2 7QG  Neasden Advice Ltd, 306 Neasden Ln, NW10 0AD  Learie Constantine Centre, 43-47 Dudden Hill Ln, NW10 2ET  SWAGAT Hall, 19 Dudden Hill Ln, NW10 2ET  Brent District Scouts, Scout Approach, Village Way, NW10 0LH  27th Willesden Scouts, Village Way, NW10 0NE  37th Willesden Scouts, r, o, 121 Randall Ave, NW2 7SX</p> <p><b>Parks, playgrounds and sports/leisure facilities</b>  Neasden Recreation Ground, NW2 7TE  Welsh Harp Open Space, NW9 7NB  Gladstone Park Pond, Gladstone Park Gardens, NW2  Rose Garden, Brook Road Dudden Hill, NW2 6HU  Gladstone Park, 52 Mulgrave Rd, NW10 1JG  Gladstone Park, South, 91 Kendal Rd, NW10 1JE  Gladstone Park Children's Playground, NW2 6GR  playing area (Recreation Ground neasden), NW2 7QH  Childrens Play Area, NW10 9EE  Gibbons Recreation Ground, NW10 9BX</p> <p><b>Vulnerable and addiction support services</b>  Citizens Advice Brent, 270-272 High Rd, NW10 2EY  Neasden Advice Ltd, 306 Neasden Ln, NW10 0AD  Launch It Neasden, 60 Neasden Ln, NW10 2UW</p> <p>Addiction Treatment rehab provide support for gambling and alcohol addiction in the Neasden NW10 area - <a href="https://www.addictiontreatmentrehab.co.uk/london/neasden">https://www.addictiontreatmentrehab.co.uk/london/neasden</a></p>	<p>Age verification test purchasing, and mystery shopper visits are frequently carried out by 3rd party companies – Check Policy and Store Checker. Age verification tests for 2024 current results are a pass rate of 94% which is higher than the Industry average, all venues receive 2 or 3 random test visits per year.</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 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' <a href="https://www.gamblingcommission.gov.uk/PDF/Young-People-Gambling-Report-2019">https://www.gamblingcommission.gov.uk/PDF/Young-People-Gambling-Report-2019</a></p> <p><b>Vulnerability</b>  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>
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	<p><b>Homeless shelters and food banks</b>  Open Soulz, 7 Forty Ln, Wembley HA9 9EA  Brent Foodbank, Vestry Hall, 21 Neasden Ln, NW10 2TS  St Catherines Church, Neasden Lane, Neasden, NW10 1QB</p> <p>St Catherines Church Foodbank is located less than 3 minutes' walk from the Merkur Slots premise, the foodbank operates every Tuesday between 5:30pm to 6:30pm and provides lunches on the 1<sup>st</sup> and 3<sup>rd</sup> Saturday of every month between 12:30 to 1:30pm. The Brent Foodbank located at St Mary's Church End, Neasden Lane, NW10 2TS, distributes food on Tuesdays and Thursdays 12:30 to 15:00pm.</p> <p><b>Pawnbrokers and Loan Shops</b>  No pawnbrokers or loan shops within 1 mile of venue.</p> <p><b>Medical Centres, Care Homes and Mental Health facilities</b>  E&amp;J Bio UK Ltd, 305 Neasden Ln, NW10 1QR  Neasden Medical Centre, 21 Tanfield Ave, NW2 7SA  St. Georges Medical Centre, St Georges Medical Centre, Park Hill House, 9 Dollis Hill Ln, NW2 6JH  Gladstone Medical Centre, 5 Dollis Hill Ln, NW2 6JH  Simply Bright, Dental Surgery, 1 Dollis Hill Ln, NW2 6JH  Brent Ambulance Station, Unit 2, Falcon Park Industrial Estate, Neasden Ln, NW10 1RZ  Medical Diagnosis Ltd, 12 Great Central Way, NW10 OUR  Brentfield Medical Centre, 10 Kingfisher Way, NW10 8TF  Church End Medical Centre, 66 Mayo Rd, NW10 9HP  Tudor House Medical Centre, 1 Chalkhill Rd, HA9 9DS  Crest Medical Centre, 157 Crest Rd, , NW2 7NA  Voyage Care: 16 Balnacraig Avenue, 16 Balnacraig Ave, NW10 1TH  Randall Care Homes, 80 Randall Ave, NW2 7SS  Jude House, 92 Randall Ave, NW2 7SU  Arran Court, Press Rd, NW10 OEE  Ogilvy Court Care Home - DMP Healthcare, 13-23 The Dr, HA9 9EF  Tudor Gardens Care Home, 31 Tudor Gardens, NW9 8RL  Franklyn Lodge, 8 Forty Ln, HA9 9EB  Spring Lake Care Home Ltd, Forty Ln, HA9 9EU  MHA Riverview Lodge - Dementia Care Home, Birchen Grove, NW9 8SE  Roberts Court, 19 Neasden Ln, W10 2RS  Inspired Coaching &amp; Therapy, 1 Verney St, NW10 OAY  EXPERT THERAPY, 54 Randall Ave, NW2 7ST</p> <p><b>Gambling premises</b>  Merkur Slots, 304 Neasden Ln, Neasden, NW10 OAD  Admiral Casino, 251 Neasden Lane, Neasden, NW10 1QG  Coral, 310 Neasden Lane, NW10 OAD  Coral, 29 Blackbird Hill, NW9 8RS  Paddy Power, 328A Neasden Lane, NW10 OEP  Jennings Bet, Neasden, NW10 1QG</p>	<p>All staff complete on boarding and 6 monthly refresher training which includes Safeguarding Children and Vulnerable People and Customer Interaction.  Staff are trained how to deal with vulnerable customers and how to make effective interactions, any difficult cases are referred to our compliance team for review and resolution.</p> <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><b>Customer Interaction</b>  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>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>Whilst most customers can enjoy and manage their gambling, Merkur Slots recognises it has a duty of care to those who struggle to manage their gambling and may be experiencing harm from gambling. Accordingly, we provide a self-exclusion facility for those customers that wish to request an exclusion for a fixed period, which is for a minimum of not less than 6 months, nor more than 12 months, with the customer, on request, having the option to extend one or more periods for a further 6 months. During the exclusion process the person is guided towards gambling support services.</p> <p>Merkur Slots are members of both the Bingo Association and BACTA industry self-exclusion schemes which adhere to the below LCCP codes:  LCCP 3.5 – Self-exclusion  3.5.1 – Self-exclusion – non remote SR code  3.5.2 – Self-exclusion non-remote ordinary code  3.5.6 – multi-operator non-remote SR code  3.5.7 – multi-operator non-remote ordinary code</p>
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<p>Preventing gambling being a source of crime or disorder, being associated with crime and disorder or being used to support crime</p>	<p><b>Crime statistics</b>          Annual total crime rate in local area is 128 per thousand population. This can be rated as 5 out of 10 or medium crime level compared to other local areas in England and Wales. Annual total crime rate in Brent is 89 per thousand population, which can be rated as 4 out of 10 or low crime level compared to other local authority districts in England and Wales. Below are annual crime rates by crime type. Figures represent the number of crimes of a certain type per thousand population. Violence and sexual offences 47.8, Other theft 17.3, Anti-social behaviour 11.4, Burglary 10.8, Vehicle crime 10.2, Public order 8.37, Drugs 6.58, Criminal damage and arson 4.78, Robbery 2.99, Theft from the person 2.99, Shoplifting 2.39, Other crime 1.2, Bicycle theft 0.598, Possession of weapons 0.598. (<i>crystalroof.co.uk</i>)</p>	<p><b>Premise Security and violence in the workplace</b>  <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 Neasden 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 Neasden is fitted with a HD CCTV system with coverage of all public areas including all entry and exits points, CCTV is 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><b>Local Police</b> Neasden Lane, NW10 1QG is within the Dollis Hill policing neighborhood, under the Metropolitan Police force area. Wembley Police Station, 603 Harrow Road, HA0 2HH. Current policing priorities are to reduce drug dealing, street drinking and ASB in Neasden Town Centre; reduce crime and fear of violence around Neasden Tube Station and to reduce residential burglaries in the west section of the ward. (<i>Police.uk</i>)</p> <p><b>Public Houses and Alcohol Licensed Premise</b> Greens, 362-364 Neasden Ln N, NW10 0BT Katie's Bar (Neasden), 350 Neasden Ln, NW10 0AD Venue 295, 295 Neasden Ln, NW10 1QR Sal's Bar, 249 Neasden Ln, NW10 1QG TIFFTY TOMS, 249A Neasden Ln, NW10 1QG Ox &amp; Gate, 341 Oxgate Ln, NW2 7HS Moloney's London, 429 High Rd, NW10 2JN Tony's Bar London, 356-360 High Rd, NW10 2EG Family Restaurant, 236 Neasden Ln, NW10 0AA Sham Rose Restaurant and Cafe, 281 Neasden Ln, NW10 1QJ</p> <p><b>Pawnbrokers and Loan Shops</b> No pawnbrokers or loan shops within 1 mile of venue.</p> <p><b>Gambling premises</b> Merkur Slots, 304 Neasden Ln, Neasden, NW10 0AD Admiral Casino, 251 Neasden Lane, Neasden, NW10 1QG Coral, 310 Neasden Lane, NW10 0AD Coral, 29 Blackbird Hill, NW9 8RS Paddy Power, 328A Neasden Lane, NW10 0EP Jennings Bet, Neasden, NW10 1QG</p>	<p>Floor layout is 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 regularly patrol the gaming floor to supervise and interact with customers to identify underage or vulnerable persons.</p> <p><b>General Crime and Disorder</b> <i>To identify aggressive customers to prevent crime and disorder 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 SMART Tablet Incident App inc. crime reference number where applicable. 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 Neasden participates with any local/town centre scheme and actively seek to support and be involved with any local initiatives targeted at reducing crime and/or disorder and will engage in the sharing of information with other businesses to support the local community.</p> <p><b>Anti-social behaviour outside the premise</b> 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.</p> <p>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.</p>
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Incidents of anti-social behaviour are recorded on the 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 is implemented where concerns of criminal activity or association of are suspected. Any suspicious activities are reported to the nominated officer who report to NCA where appropriate.

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 always be maintained and subject to regular review and risk assessment.

Merkur Slots, in line with many businesses on the high street at times operate with a single staff member.

In considering when it is appropriate for a venue to operate with one member of staff Merkur Slots 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 Neasden operates 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 are protected by Staffguard security system and intruder alarms are 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 are be logged on the SMART Tablet Incident App and depending on severity is 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 is 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**

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

Area Manager's operate 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 Staffguard security system and intruder alarms are installed. Staffguard provides instant access to live security support and there are panic alarms giving direct contact with the Police.

Ensuring that gambling is conducted in a fair and open way

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#### **Gaming Machine and Supervision**

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

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

#### **Customer Complaints**

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

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

The Company Code of Practice and Complaints and Disputes Policy are 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 have digital marketing screens which 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>Other</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 28</p>	<p><b>Places of worship and Religious Buildings</b>          Alpha &amp; Omega Christian Fellowship Outreach Ministries, Wykeham Family Centre, Annesley Cl, NW10 0ES          Neasden Methodist Church, 331 Neasden Ln N, NW10 OAF          Islamic Cultural Centre (Neasden), 259 Neasden Ln, NW10 1QG          St Catherine’s Church, Neasden Ln, NW10 1QB          Christ Temple, 2 Clifford Way, NW10 1AN          WISPM Women Welfare London, 23 Baskerville Gardens, Dog lane, NW10 1PF          Kamara Youths, Neasden Ln, NW10 1QB          LoveWorld North West London (Christ Embassy), Crest Academy, Crest Rd, NW2 7LY          The Oasis Church Neasden, Crest Road, NW2 7LG          St Mary's, Willesden, Neasden Ln, NW10 2TS          BAPS Shri Swaminarayan Mandir, London, Pramukh Swami Rd, NW10 8HW          English Martyrs Roman Catholic Church, Chalkhill Rd, Wembley HA9 9EW          St. Francis of Assisi Church, Cullingworth Rd, NW10 1NR</p>	<p><b>Ethnicity and Local Area Demographic</b>          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 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><b>Training &amp; Social Responsibility</b>          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>Merkur Casino has a dedicated Learning and Development Team and a Safer Gambling team that deliver face to face social responsibility training.</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>
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Merkur Slots Neasden Premise Layout

<b>Premise level:</b>	The venue is a ground floor premise.
<b>Premise frontage:</b>	Merkur Slots Neasden is 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).
<b>Counter Position:</b>	<p>Merkur Slots Neasden floor layout is 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"> <li>- 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.</li> <li>- Beverage and snacks are provided from the service area</li> <li>- 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</li> <li>- The CCTV monitor on the central desk allows staff to view the exterior at all times.</li> </ul>
<b>Floor layout:</b>	Merkur Slots Neasden floor layout is 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 regularly patrol the gaming floor and interact with customers allowing identification of underage and vulnerable persons. 'Stay in Control' Posters and Leaflets are located in prominent locations within the premise.
<b>Machine Positions:</b>	<p>Merkur Slots Neasden 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).</p> <p>Bingo is available by means of G-Tab tablets offering a range of Bingo products and Live calling. G Tabs 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>
<b>Hidden Areas:</b>	Merkur Slots Neasden is fitted with a HD CCTV system with coverage of all public areas including all entry and exits points, CCTV is clearly advertised to customers with screens visible by employees when working in the service area.


## 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.

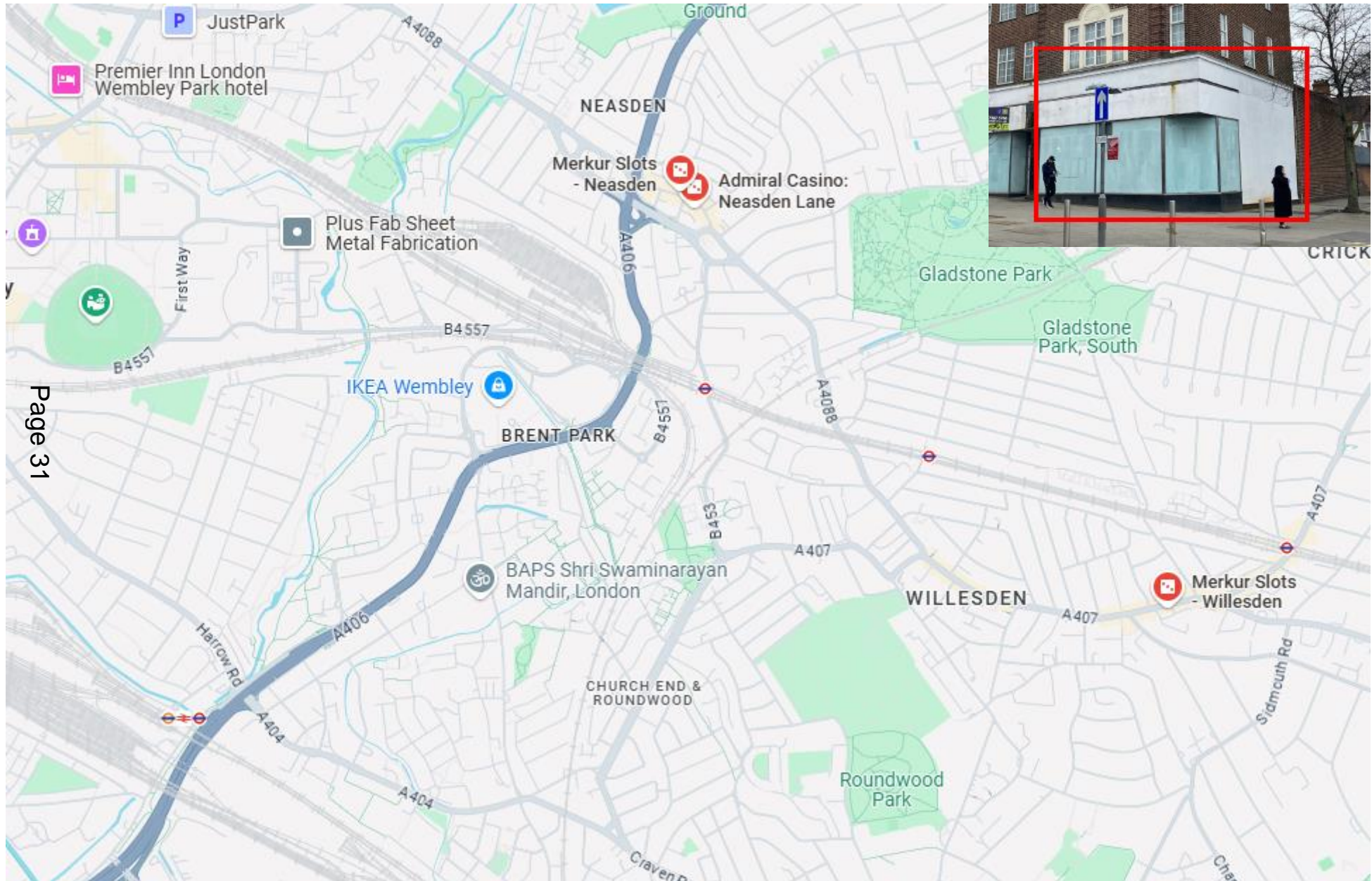
MERKUR Slots UK have operated other premises within the local authority area at 304 Neasden Lane, NW10 0AD since 2007, 478 High Road, Wembley, HA9 7BH since 2007 and 51-55 High Road, Willesden, NW10 2SU since 2021. None of our operational venues have been subject to review proceedings.

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.

<b>Assessors Name:</b>	Amanda Kiernan
<b>Signature:</b>	
<b>Date:</b>	22/11/2024

# Merkur Slots, 265 Neadens Lane, Neasden, NW10 1QG:



# Merkur Slots, 265 Neadens Lane, Neasden, NW10 1QG:



# Merkur Slots – example premise frontage



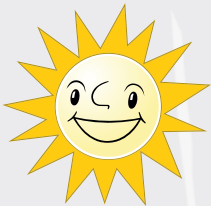
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# WORKING TOGETHER



Accredited by the Global  
Gambling Guidance Group

Page 35 **THE MERKUR FAMILY**



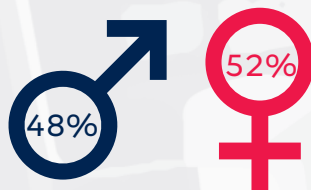
# PART OF THE MERKUR GROUP

## A Strong Partner For More Than 60 Years



MERKUR Casino UK is a subsidiary of the family run MERKUR 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 2,000 people over 3 Bingo Clubs, over 230 High Street gaming centres and 3 Family Entertainment Centres under two main brands.



**52% of employees are female**

**48% of employees are male**



MERKUR Slots is the main UK brand. 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 clubs 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.



# MYTHBUSTERS

## We Are Not Betting Shops

MERKUR Casino UK is one of the UK's largest operators of High Street Adult Gaming Centres (AGCs) and High Street bingo venues. AGCs are often, unfortunately, put into the same category as betting shops. This is because there is a widespread misunderstanding of how AGCs operate and who our customers are. We want to address these misconceptions and demonstrate that a new AGC on your local high street is a good thing. Public concerns surrounding betting shops were largely due to the presence of Fixed Odds Betting Terminals (FOBTs). Our venues do not offer these types of machines. Our machines offer low stakes ranging from 10p to a maximum of £2, plus a variety of bingo products are also available. These machines have been around for many, many years.

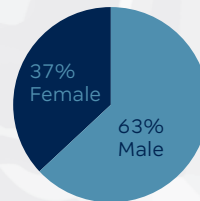


Our AGCs and High Street bingo venues are where people come to spend their spare change, have a game of bingo and enjoy their favourite pastime in convenient locations.

The market on the high street has evolved with venues now providing electronic bingo tablets.



Our machines operate at low stakes.



Our venues appeal to all ages with our membership gender database split of 63% male / 37% female.



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

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





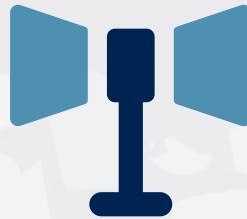
# OUR OPERATION

## We Are Not Noisy Neighbours

Whilst we sit within the leisure sector, noise levels are very low and limited from our venues. We currently operate 24 hours in over 150 venues.



Our machines generate low levels of noise.



We do not have tannoy systems that you find in seaside amusement centres.



We only play background music like at any other high street shop.



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.



Customers tend to visit on their own or in couples. We rarely see large groups.



We do not offer or serve alcohol in our AGC premises.

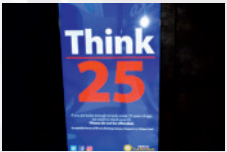
Our customer base after midnight is predominantly the local entertainment workforce and shift workers who like to relax after their busy shifts.





# RESPONSIBILITY IS THE FOUNDATION OF OUR BUSINESS

## Think 25 Messaging



## We Are Not A Problem

Being a responsible operator is high priority across the MERKUR 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

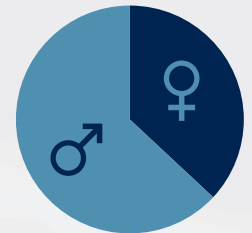


We provide complimentary refreshments, teas and coffees, to customers and do not sell alcohol. Our staff will not allow anyone into the premises who appears to be intoxicated.



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 63% Male / 37% Female



We are subject to regular independent test purchases and are consistently above the average leisure industry pass rate.

# 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

SMARThub 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.



Our Category B3 machines support safer gambling by having time and limit settings available to customers. **Page 40**

## 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; 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. We have appointed a Safer Gambling Manager role to support safer gambling initiatives.

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



- Senior Manager representation from MERKUR Group.
- Member of the National Council.
- Head of Compliance is Vice Chair of the Safer Gambling Committee.

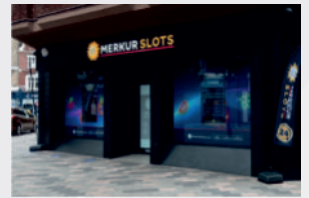


- Operations Director and Head of Compliance are Directors.



- Head of Compliance is a member of the Safer Gambling 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  
£1.4 million for good causes since 2005

### Please contact us

For press enquiries:

email [martha@sourcemc.co.uk](mailto:martha@sourcemc.co.uk)

phone +44 (0) 7796 614137

MERKUR Casino UK

Matrix House

North Fourth Street

Milton Keynes

Mk9 1NJ

Page 43

phone 01908 351200

email [info@merkur-casino.com](mailto:info@merkur-casino.com)



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Monday 23<sup>rd</sup> December, 2024

Application Number: 33757

To whom it may concern,

**Re: Subject: Objection to Merkur Slots Application at 263–265 Neasden Lane**

I am writing on behalf of concerned residents, and as an elected representative of the Neasden community, to formally object to the proposed Merkur Slots development at 263–265 Neasden Lane. This objection seeks to highlight the detrimental impacts of the application in terms of its size, location, impact on vitality and viability, and its contribution to social harm within the community.

**General Overview**

Brent already faces significant challenges related to gambling, as highlighted in a recent needs assessment (2024). **The borough has the second-highest concentration of gambling premises in London, with 81 licensed establishments—making gambling facilities more accessible than supermarkets, banks, or schools.** Brent was also ranked 5<sup>th</sup> among local authorities with the highest number of betting shops per capita. Another exploitative gambling establishment is therefore grossly unwelcome and inappropriate for our community.

Key findings of Brent Council's Joint Strategic Needs Assessment (JSNA) have revealed that:

**Gambling Prevalence:**

- 6.2% of Brent residents are categorised as problem gamblers, over double the national average (2.9%).

**Economic Impact:**

- Gambling-related harm costs Brent an estimated £14.3 million annually.

**Targeting of Deprived Areas by:**

- Operators such as Merkur Slots consistently target deprived areas, including Harlesden, Neasden, and Willesden.

**Addictive Products:**

- Fixed Odds Betting Terminals (FOBTs) and online slots cause over half of all problem gambling cases in the UK, despite being played by only 3% of the population.
- FOBTs have an addiction rate of over 50%. For comparison, heroin has an addiction rate of 20-30%, and tobacco has an addiction rate of 30%.

These findings underscore the need for a reduction in the number of gambling establishments, particularly in areas like Neasden Lane, to mitigate harm and protect vulnerable populations.

## 1. Impact on Vitality and Viability

The proposed Merkur Slots development also poses a significant threat to the vitality and viability of Neasden Lane as a local commercial centre. **There are already 3 betting shops in just 100 metres of Neasden Lane which consistently attract anti-social behaviour.** The introduction of yet another gambling establishment in this prominent location undermines the council's efforts to cultivate a diverse and vibrant local economy.

The National Planning Policy Framework (NPPF) and the London Plan emphasise the importance of maintaining healthy, inclusive, and economically sustainable town centres. Gambling establishments, such as the proposed adult gaming centre, disproportionately affect the balance of commercial activities in retail hubs. Neasden Lane already accommodates several similar establishments, creating an over-concentration that deters other types of businesses from thriving and reduces the area's attractiveness to a wider demographic.

Additionally, the proposed design lacks a vibrant, active frontage that contributes to the pedestrian experience. Instead of fostering engagement and interaction, the development detracts from the sense of community and activity essential for a thriving town centre.

## 2. Concerns Regarding Size and Location

The scale and location of the proposed Merkur Slots venue are inappropriate for the area and conflict with the surrounding land uses. The development raises serious concerns about its impact on nearby residential properties. The continuous nature of the operation is likely to lead to increased noise and anti-social behaviour, particularly during late-night hours when most other businesses are closed. A study by our neighbouring borough, Ealing Council, outlined a profound link between gambling premises and anti-social behaviour.

The Brent Local Plan highlights the importance of protecting residents from excessive noise, antisocial behaviour, and disturbance resulting from commercial activities. This proposal fails to meet those criteria and risks undermining the residential amenity of those living in close proximity. Furthermore, its prominent location on Neasden Lane, a vital artery for the local community, exacerbates its negative impact by prioritising a gambling establishment over more inclusive and beneficial land uses.

## 3. Social Impact and Health Concerns

The Merkur Slots application raises profound concerns regarding its potential to exacerbate social harm within the community. Neasden is already an area facing significant socio-economic challenges, including high levels of deprivation and vulnerability to gambling-related harm. The addition of another gambling establishment will only compound these issues, since these shops fuel a vicious circle of harm, addiction and despair.

The key findings from the Brent gambling needs assessment emphasise that:

- **Financially Vulnerable Populations:** Many individuals gamble out of financial desperation, particularly during the ongoing cost-of-living crisis.
- **Young People and Ethnic Minorities:** Young people (16-24 years) are three times more likely to exhibit problem gambling habits. While ethnic minorities gamble less frequently, they experience disproportionately higher rates of harm.

The NPPF and the London Plan emphasise the importance of creating healthy, inclusive communities that contribute to the well-being of their residents. This proposal directly undermines those principles by targeting a population already disproportionately affected by gambling-related harm. Instead of promoting inclusivity and resilience, the development risks deepening existing inequalities and social challenges.

In summary, the proposed Merkur Slots development at 263–265 Neasden Lane is fundamentally at odds with our aspirations for the local area and the needs of the local community.

We are deeply concerned by its size, location, and the operational nature threaten the quality of life of residents, and the social fabric of the area. The proposal contravenes the objectives of the London Plan, the Brent Local Plan, and the NPPF.


We strongly urge the Licensing Authority to reject this application and prioritise developments that contribute positively to the economic, social, and cultural well-being of Neasden and its residents.

Yours sincerely,

**CLLR LIZ DIXON**


Dollis Hill Ward

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I oppose this application on the grounds of public safety and safety of young children. This area is one of the most deprived in Brent and is suffering from lack of services. The area has problems already with street drinkers and drug users it will only encourage more poverty from people who are already suffering. This shopping precinct is deteriorating but this does not mean that we recoup business rates by just filling spaces best left empty or a meanwhile charity shop as the residents might appreciate some help of a genuine type.


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As a local resident I believe that a gambling licence for the premises at 265 Neasden Lane is a clear danger to children: there is a bus stop opposite the premises where large numbers of schoolchildren gather daily to get buses to/from their schools. 265 Neasden Lane is an entirely inappropriate location for any kind of gambling establishment.


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I would like to object to the licence application for a Bingo Club on Neasden Lane by Merkur for two reasons. First, in relation to crime and disorder - Neasden Lane already has several gambling shops/premises. There are lots of people who drink on the street near these premises and on the corner of Cairnfield Avenue, creating an unsafe atmosphere, litter, and engaging in other anti-social behaviours such as urinating on the street. The people that are attracted to the parade of shops by the gambling premises will increase with an additional Bingo Club, creating more anti-social behaviour and making the environment feel less safe and clean for others. Secondly, the site is adjacent to a bus stop where large numbers of school children (primary and secondary) gather daily to get buses to/from their schools. I would be concerned about this site harming and exploiting children.

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The proliferation of gambling shops on our high street and shopping centres is an environmental and social curse because of its negative impact on the mental health on residents/ communities who can least afford to gamble. I therefore object to more gambling licenses.

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[REDACTED]

Dear License Committee, I am writing to formally respond to the Merkur Slots Application at 263–265 Neasden Lane application number 33757 for a Bingo Club Premises Licence/Gambling Premises Licence New Application. My constituency of Brent East has been disproportionately impacted by problem gambling with betting shops and adult gaming centres planted amidst our most vulnerable and deprived communities, impacting those who can least afford it. According to Brent Council's Joint Strategic Needs Assessment (JSNA), the borough's problem gambling rate is 6.2%, which is over double the national average. Additionally, gambling-related harm costs the borough an estimated £14.3 million annually. Anti-social behaviour linked to loitering outside gambling shops is extremely problematic and I see this in casework I receive year-round. The liberalisation of gambling legislation as introduced in the Gambling Act 2005 has been a serious failure for communities and this application just highlights the serious problems and I implore the Planning Inspectorate to take serious action and refuse the application. There is already a proliferation of gambling shops and adult gaming centres in my constituency, with three betting shops already within 100 metres of the proposed site. We know already that they have a propensity to cluster in poorer communities, which are more susceptible to gambling harm due to the hope that a big win will help them out of their situation. It is deeply concerning that further details regarding the building have not been supplied. This is a strong community, and it is being blighted by these shops, whose owners hold the area in complete contempt and disregard. The fact that the application contains few details does not surprise me. I wrote to 7,000 households in Brent, to ask them for their own experiences of gambling and the betting shops in Brent. This was going to form a response to the Government's Gambling Review, the response to my call for evidence has been stark: • 97.5% were opposed to betting shops • 80% questioned why more shops were being given permission • 75% called for the number of stores to be limited • 62.5% detailed experiences of anti-social behaviour in the locale of these shops I have heard from families who've faced financial ruin because of gambling and from so many people for whom their daily lives are blighted by the associated anti-social behaviour, in particular street drinking and drugs, which circulate in close proximity to these gambling establishments. To conclude, I strongly urge the Licensing Authority to reject this application. The people of Neasden deserve a vibrant, diverse high street that supports the well-being of all residents, not another exploitative gambling venue that deepens existing harms. Thank you for taking the time to consider my response. Warm regards, [REDACTED]

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**From:** [REDACTED]  
**Sent:** Sunday, January 12, 2025 2:20 PM  
**To:** Business Licence <business.licence@brent.gov.uk>  
**Subject:** RE: Objection to Merkur Slots Application at 263-265 Neasden Lane application number 33757 for a Bingo Club Premises Licence/Gambling Premises Licence New Application.

Dear Sir / Madam,

This constitutes a formal objection to the proposed Merkur Slots application at 263-265 Neasden Lane. As an elected representative and a voice for deeply concerned residents, I vehemently oppose this application due to its detrimental impact on the community and the area. City Hall has provided significant funding to Neasden and allowing this application to proceed would work completely against the efforts that all partners are making to improve the Town Centre and the area.

### **A Plague of Gambling Establishments:**

Brent already suffers from an oversaturation of gambling venues. With 81 licensed gambling establishments, our borough boasts a higher concentration than supermarkets, banks, or even schools – a truly alarming statistic. This over-proliferation, particularly in areas like Neasden, directly contradicts the principles of responsible community planning.

### **Fueling Addiction and Social Harm:**

The Brent Council Joint Strategic Needs Assessment (JSNA) paints a grim picture:

- . **Epidemic of Problem Gambling:** 6.2% of Brent residents grapple with problem gambling, a staggering figure twice the national average.
- . **Economic Devastation:** Gambling-related harm costs Brent a staggering £14.3 million annually.
- . **Predatory Targeting:** Operators like Merkur Slots exploit vulnerable communities, with Neasden, Harlesden, and Willesden bearing the brunt of this exploitation.
- . **The Deadliness of FOBTs:** Fixed Odds Betting Terminals (FOBTs) and online slots, despite being utilized by a mere 3% of the population, are the primary drivers of problem gambling. The addiction rate of FOBTs surpasses even heroin and tobacco, highlighting their devastating impact.

These stark realities underscore the urgent need to curb the proliferation of gambling establishments, especially in areas like Neasden Lane, to safeguard our community from the devastating consequences of gambling addiction.

### **Eroding the Vitality of Neasden Lane:**

The proposed Merkur Slots development poses a grave threat to the vitality and viability of Neasden Lane as a thriving commercial centre.

- . **Anti-Social Behavior Hotspots:** The existing concentration of betting shops within a mere 100 meters of Neasden Lane already contributes to significant anti-social behavior. Adding another gambling establishment will only exacerbate this problem.
- . **Undermining Community Development:** This application directly undermines the substantial investments made by City Hall to revitalize Neasden Town Centre.
- . **Deterring Diverse Businesses:** The oversaturation of gambling establishments discourages other businesses from establishing themselves, hindering the development of a diverse and vibrant commercial landscape.
- . **Unsightly Development:** The proposed design lacks the vibrancy and aesthetic appeal necessary for a thriving town center. Instead of fostering a welcoming and engaging atmosphere, it will detract from the pedestrian experience.

### **Size, Location, and Nuisance:**

The scale and location of this proposed development are entirely inappropriate:

- . **Residential Intrusion:** The continuous operation of this gambling establishment will inevitably lead to increased noise, disturbance, and anti-social behavior, severely impacting the quality of life for nearby residents.
- . **Ignoring Community Concerns:** This proposal blatantly disregards the Brent Local Plan's emphasis on protecting residents from the negative impacts of commercial activities.

### **Exacerbating Social Inequalities:**

This application raises profound concerns about its impact on the most vulnerable members of our community:

- . **Preying on Financial Desperation:** Many individuals, particularly during times of economic hardship, turn to gambling as a desperate coping mechanism.
- . **Targeting Young People and Ethnic Minorities:** Young people and ethnic minorities are disproportionately impacted by gambling-related harm.

This development directly contradicts the principles of creating healthy and inclusive communities. Instead of fostering well-being, it will deepen existing inequalities and exacerbate social challenges.

### **Conclusion:**

The proposed Merkur Slots development at 263-265 Neasden Lane is an affront to our community. It represents a threat to the health, safety, and well-being of our residents.

I urge the Licensing Authority to categorically reject this application and prioritize developments that contribute positively to the economic, social, and cultural fabric of Neasden.



Best wishes,



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**From:** Esther, Chan  
**Sent:** 22 January 2025 11:27  
**To:** Felix Faulkner  
**Cc:** Business Licence; Legister, Linda; Phil.S.Graves  
**Subject:** RE: RE: CONSULT: New Bingo Club Premises Licence - Merkur Slots, 265 Neasden Lane, NW10 1QG - 33757 PCX:000085000004210

Dear Felix,

Thank you for your email.

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

Kind Regards

Esther Chan  
Licensing Inspector  
Regulatory Services

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**From:** Felix Faulkner  
**Sent:** Wednesday, January 22, 2025 11:11 AM  
**To:** Esther, Chan  
**Cc:** Business Licence ; Legister, Linda ; Phil.S.Graves; Felix Faulkner  
**Subject:** RE: RE: CONSULT: New Bingo Club Premises Licence - Merkur Slots, 265 Neasden Lane, NW10 1QG - 33757 PCX:000085000004210

Dear Esther, Linda and Phil,

I hope you are well.

I have taken instruction from my client and confirm that the conditions outlined in my email on 16 January are agreed on the basis that the representations from the licensing and police are withdrawn.

On this basis I would be grateful if you could confirm that your representations are withdrawn.

Many thanks for your assistance in this matter.

Kind regards

Felix

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From: Phil.S.Graves@met.police.uk  
Sent: 22 January 2025 11:23  
To: f.faulkner@popall.co.uk  
Cc: Esther, Chan; Business Licence; Legister, Linda  
Subject: RE: RE: CONSULT: New Bingo Club Premises Licence - Merkur Slots, 265 Neasden Lane, NW10 1QG - 33757 PCX:000085000004210

Felix / Brent,

With the attached conditions all agreed in place, police withdraw representations.

Felix, thanks again for your assistance with the application.

Thanks,

Phil

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From: Felix Faulkner  
Sent: 22 January 2025 11:11  
To: Esther.Chan@brent.gov.uk  
Cc: business.licence; Linda.Legister; Graves Phil S - NW-CU ; Felix Faulkner  
Subject: RE: RE: CONSULT: New Bingo Club Premises Licence - Merkur Slots, 265 Neasden Lane, NW10 1QG - 33757 PCX:000085000004210

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

16. The licensee shall install and maintain an intruder alarm on the premises.
17. The premises shall install and maintain a panic button behind the service counter.
18. The licensee will ensure that customer toilets are checked every hour for evidence of drug taking. Toilet checks are to be documents stating the time and member of staff who made the checks.
19. Toilet doors remain locked and access is permitted by staff members.
20. Signs to be displayed alerting customers to the following;
  - a) No alcohol
  - b) No smoking
  - c) No persons under 18 Years
  - d) Persons will be prosecuted for causing criminal damage
  - e) Prominent GamCare documentation will be displayed at the premises
21. The licensee shall:
  - a) provide training on the specific local risks to the licensing objectives that have been identified for these premises as part of the staff induction training programme.
  - b) periodically provide refresher training to all of its staff working at these premises on the specific local risks to the licensing objectives.
  - c) Participation in this training shall be formally recorded on each member of staffs training records which, if requested will be presented to the Licensing Authority as soon as practicable.
22. New and seasonal staff must attend induction training and receive refresher training every six months.
23. The requirement for door staff shall be risk assessed and cognisance taken of police advice.
24. 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.
25. 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.
26. 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.
27. A member of staff trained in the use of the CCTV system shall be available at the premise at all times that the premises are open for trading.
28. The CCTV system shall display on any recordings the correct date and time of the recording.



Basemap Map



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1:1250

0 0.02 0.04 kilometres



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