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Alcohol and Entertainment Licensing Sub-Committee

Tuesday 22 April 2025 at 10.00 am

Boardrooms 3 and 4, 3rd Floor, Brent Civic Centre, Engineers Way, Wembley HA9 0FJ

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

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

Membership:

Members	**Substitute Members:**
Councillors:	Councillors:
Long (Chair) Clinton L Smith	Ahmed, Akram, Bajwa, Chohan, Hylton, Mahmood, Rajan Seelan

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

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Council meetings and decision making | Brent Council

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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 of trade union).

(b) The interests a of a person from whom you have received gifts or hospitality of at least £50 as a member in the municipal year;

or

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

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

Agenda

Introductions, if appropriate.

Item Page

1 Apologies for absence and clarification of alternate members

2 Declarations of Interests

Members are invited to declare at this stage of the meeting, the nature and existence of any relevant disclosable pecuniary or personal interests in the items on this agenda and to specify the item(s) to which they relate.

3 Application for a Bingo Premises Licence by Merkur Slots UK Ltd for the premises known as Merkur Slots UK Ltd, pursuant to the provisions of the Licensing Act 2003 1 - 70



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.

	Start	*Finish*	*Details of any seasonal variation*
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

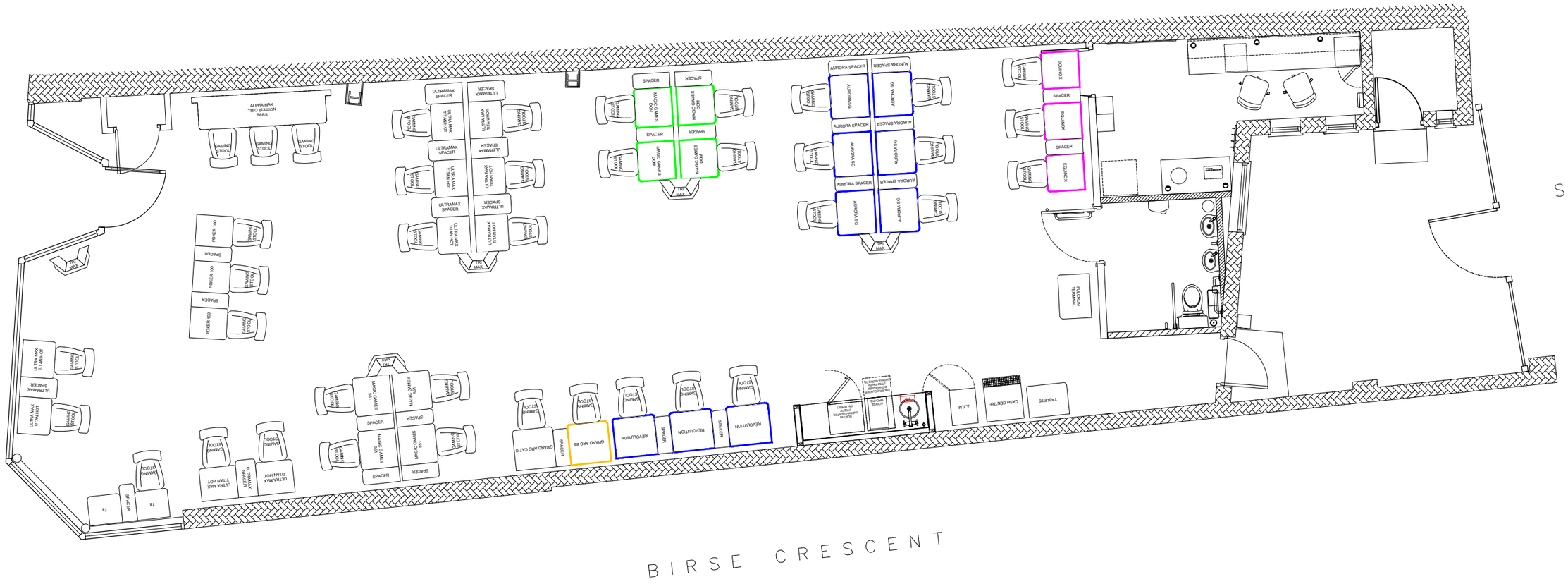
25. If you are happy for correspondence in relation to your application to be sent via e-mail, please give the e-mail address to which you would like correspondence to be sent:

f.faulkner@popall.co.uk

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PROPOSED GAMING AREA: 121.9m²
FOR ILLUSTRATION PURPOSES ONLY

PLEASE NOTE: SPACERS ARE NOT GAMING MACHINES



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

MERKUR SLOTS

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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.

- We encourage customer-facing employees to use positive discretion to resolve customer issues at a local level, where possible.
- Our Customer Complaints procedure is display 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

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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 Cresent 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 Cresent.
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 1st and 3rd 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 - https://www.addictiontreatmentrehab.co.uk/london/neasden
Adjoining premises:	The premises is a corner unit located next to a charity shop 'Peaceful Solutions' to the left and Birse Cresent 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. *(crystalroof.co.uk)*
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. *(crystalroof.co.uk)*
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%). *(crystalroof.co.uk)*
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. *(streetcheck.co.uk) (crystalroof.co.uk)*
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. *(crystalroof.co.uk)*

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. *(police.uk)*
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	MERKUR Slots UK appointed Leveche Associates Ltd to conduct independent covert visits on numerous AGC/Bingo venues that operate throughout the UK 24-hrs, 7 days a week including six venues in and around the London area. Key comments from the reports include: 'Visits to these premises established that they are well run and that there are clearly defined systems in place to ensure the premises operate in support of the gambling objectives and do not attract or take advantage of juveniles or other vulnerable persons. The visits also established that MERKUR Slots customer do not cause crime or anti-social behaviour.' 'MERKUR Slots UK and their premises operate in support of the principles of Secured by Design, the company recommended by the Chief Officers of UK Police Forces for Crime Prevention standards'. 'The presence of MERKUR Slots does not lead to or result in people, who have been on a night out, staying in the area any longer than they had planned to'.

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

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

Localised Risks to the Licensing Objectives

This Local Area Risk assessment takes into consideration Brent Council local authority Statement of Gambling Principles 2022-2025, reference section 8.5 for Bingo 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	**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. *(streetcheck.co.uk) (crystalroof.co.uk)* **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. *(crystalroof.co.uk)* **Schools and Education** 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	**Age Verification** *Ensuring Under 18's do not have access to licensed premises* All Merkur Slots venues are strictly adult only (over 18's only). Gambling is an age restricted product and Merkur Slots operates a 'Think 25' policy. Age verification is embedded in training platforms and responsible gambling policies. Over 18's notices are displayed on the entrance. Think 25 advertising is prominently displayed throughout the premise. Merkur Slots Neasden Premise frontage is of a style which obscures the interior with no advertising depicting images that may appeal to children. 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). 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.

Page 19	The Crest Boys Academy, 80 Crest Rd, NW2 7LX Menorah Girls School, 105 Brook Rd, NW2 7BZ Alnour Arabic School & 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 **Community Centres and Youth Centres** 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 **Parks, playgrounds and sports/leisure facilities** 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 **Vulnerable and addiction support services** 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 Addiction Treatment rehab provide support for gambling and alcohol addiction in the Neasden NW10 area - https://www.addictiontreatmentrehab.co.uk/london/neasden	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. Test purchase fails are reviewed within 48 hours by the Area Manager, this involves reviewing CCTV footage of the incident and implementing appropriate training or where necessary disciplinary action. All age verification checks are recorded on the SMART Tablet AV App, this data is collated centrally and regularly reviewed by an independent team of compliance auditors. Results of age verification checks and third-party results are shared with the Gambling Commission. Proof of Age scheme in place with application forms available in the venue. The children and young persons gambling participation survey shows that the number of 11-16 years olds that say they have gambled on fruit machines of whatever kind in an arcade, pub or club is around 2%. Of those around a half to two-thirds do so legally on Category D fruit machines which are located in FECs or holiday parks, where any play will be of short duration (as families will be on a day trip or holiday), in venues which they can only access with their parents, and in premises licensed to offer Category Ds which are as a result tightly-regulated. We also know from a study by Professor David Forrest and Dr Ian McHale that whilst adolescents at the coast are more likely to participate in gambling activities than those that do not, they are no more likely to be problem gamblers than those that do not live at the coast. This is an important finding. Many people cite early exposure to gambling as a cause of later gambling problems. There is no evidence of a causal link. As David Forrest stated at conference in Toronto in 2012 'marginal gamblers induced to participation by ease of access do not appear prone to problem gambling and more children gambling does not carry through to more children being problem gamblers. Panic about arcades does not appear justified' https://www.gamblingcommission.gov.uk/PDF/Young-People-Gambling-Report-2019 **Vulnerability** Training and guidance are given to Merkur Slots staff on vulnerability (the inability or limited ability of people to control their actions). This includes addictive gambling, mental health, alcohol or drugs issues. Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).

Page 20	**Homeless shelters and food banks** 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 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 1st and 3rd 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. **Pawnbrokers and Loan Shops** No pawnbrokers or loan shops within 1 mile of venue. **Medical Centres, Care Homes and Mental Health facilities** E&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 0UR 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 0EE 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 & Therapy, 1 Verney St, NW10 0AY EXPERT THERAPY, 54 Randall Ave, NW2 7ST **Gambling premises** 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	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. 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. **Customer Interaction** Merkur Slots provide comprehensive customer interaction training, instruction and supporting policies to all staff in this area (via training platforms, training centres and Compliance Manual). Staff are provided with the training to enable them to provide guidance on safer and responsible gambling. 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. 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. 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. 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. 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. 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

Page 21	**Public Houses and Alcohol Licensed Premise** Greenes, 362-364 Neasden Ln N, NW10 0BT Katie's Bar (Neasden), 350 Neasden Ln, NW10 0AD Venue 295, 295 Neasden Ln, NW10 1QR TIFFTY TOMS, 249A Neasden Ln, NW10 1QG Ox & 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 **Residential Areas** Neasden is a neighborhood located in the northwest of London and is known for being a primarily residential area with a mix of housing types including terraced houses, semi-detached houses and apartment buildings. **Bus stops and other Transport links** Neasden Shopping Centre / Birse Crescent (Stop FF), Neasden, London NW10 1QG Dudden Hill Lane (Stop GG), NW2 7SA Dudden Hill Lane (Stop HH), NW2 7RX St Catherine Neasden Church (Stop SS), NW2 6JE St Catherine Neasden Church (Stop TT), NW2 6JH Neasden Underpass (Stop EE), NW10 1TJ Neasden Shopping Centre (Stop JJ), NW2 7PY Ardley Close Neasden, NW10 0ES Winslow Close (Stop UU), NW10 0AH Village Way/North Circular Rd (Stop NN), NW10 0HY **Regular Festivals and Town Events/Mass Gatherings** BAPS Shri Swaminarayan Mandire in Neasden host the largest Diwali and Hindu New Year Celebrations in October – Pramukh Swami Rd, Neasden, NW10 8HW Neasden Festival – Kingsbury Park NW9 Neasden Temple Summary Fair – Pramukh Swami Rd, Neasden, NW10 8HW	Once a person has entered the self-exclusion scheme their image will appear on the Smart Tablet exclusion carousel. Staff are required to view the carousel at the start of every shift to ensure they are aware of any new exclusions so they may recognise the person should they attempt to enter the premises during their exclusion period. Any such attempts to enter the premise are recorded as a breach on the Smart Tablet. Once the self-excluded period has ended and the person wishes to return to the premise, they are required to engage in a reinstatement interview to discuss their return to gambling, following this they enter a 24-hour cooling-off period before their self-exclusion is lifted and they can return to the premise. Any previously self-excluded person returning to the premise to gamble will be noted as an at risk customer requiring close monitoring of their gambling behaviour with regular interactions. All customer interactions are recorded on the SMART Tablet Interaction App, this data is collated centrally and regularly reviewed by an independent team of compliance auditors. **Player Protection** *To identify signs associated with problem gambling and people who may be at risk of gambling related harm* *Failure to provide information to customers on responsible gambling* *Failure to maintain and administer the self-exclusion process, including breaches and reinstatement reviews* Staff are aware of the importance of social responsibility and are trained to advise customers on gambling responsibly and the identification of potential gambling harm. 'Stay in Control' Posters and Leaflets containing the Gamcare helpline number are in prominent locations within the premise and in private areas, such as customer toilets. Merkur Slots actively seek to support and be involved in any local initiatives targeted at reducing harm caused by gambling. Socially Responsible messaging is implemented on all digital B3 and Cat C machines. All machines display Gamble Responsibly stickers with helpline contact details. Senior Management are members of the BACTA Divisional and Socially Responsible Committees and Bingo Association Executive and Socially Responsible Committees. They take the opportunity to actively participate with these trade bodies, collaborating with other operators to promote responsible gambling initiatives including the development of an Accredited Gamcare training programme and the Machine Messaging trial and evaluation.

Page 22		The Gamcare Helpline Annual Statistics 2020 reported that calls received from people experiencing problems with their gambling were low in High Street Arcade Gaming Machines at 3% compared to Betting Shop Gaming Machines at 15%. The vast majority of calls were received from people within the on-line sector. **Deprivation** Whilst the premise may be near or in an area of relative deprivation, Merkur Slots takes the view that individual customers must be treated holistically, and the information provided in this document are designed to identify individuals that could potentially be at risk of gambling related harm Merkur Slots operates on the basis that its controls and best practice is always adopted therefore, it is not a question of degrees of vigilance being implemented in different areas. **Homelessness** Some premises are used by the homeless for warmth and company. Merkur Slots treats all customers with dignity and has a clear policy on begging. Staff are trained to deal with vulnerable people in a sympathetic manner, any difficult cases are referred to our compliance team for review and resolution. Staff are trained how to manage situations with homeless people seeking refuge. A line of contact is created with local high-risk premises, homeless shelters, foodbanks to provide social responsibility information. MERKUR staff are aware of where rough sleepers sleep and beggars loiter in the local area and actively prevent them from entering the premise, including close monitoring of individuals spending coins/low level amounts on a frequent basis. Should loitering increase due to extended hours additional notices will be added about loitering without play not being tolerated.
Preventing gambling being a source of crime or disorder, being associated with crime and disorder or being used to support crime	**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. *(crystalroof.co.uk)*	**Premise Security and violence in the workplace** *Poor security control measures which may increase vulnerability to crime* *Failure to protect employee and customers from harm during the hours of late-night opening* Merkur Slots Neasden is subject to a separate security risk assessment, local factors are considered, and proportionate control measures/physical security measures are installed. 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.

Page 23	**Local Police** 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. *(Police.uk)* **Public Houses and Alcohol Licensed Premise** Greenes, 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 & 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 **Pawnbrokers and Loan Shops** No pawnbrokers or loan shops within 1 mile of venue. **Gambling premises** 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	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. **General Crime and Disorder** *To identify aggressive customers to prevent crime and disorder* *Awareness of local crime issues in the local area* 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. 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. 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. The company operate an internal security alert system and are registered with trade associations for crime bulletins (BACTA and Association). 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. 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. **Anti-social behaviour outside the premise** Whilst Public Nuisance is not a Licensing Objective and the Gambling Commission has made clear that 'disorder' means serious disorder, Merkur Slots recognise that public nuisance can escalate in certain circumstances and as a corporate citizen, it has a responsibility to work in partnership with local residents and authorities to reduce environmental impacts. Staff are aware to monitor the outside of the premise and surrounding area for anti-social behaviour and take appropriate steps within reason to minimise the risks. The CCTV monitor on the central desk allows staff to view the exterior at all times.

Page 24		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.

Page 25		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

Page 26		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. Suspicions 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		**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.

Other	**Places of worship and Religious Buildings** Alpha & Omega Christian Fellowship Outreach Ministries, Wykeham Family Centre, Annesley Cl, NW10 0ES Neasden Methodist Church, 331 Neasden Ln N, NW10 0AF 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	**Ethnicity and Local Area Demographic** Merkur Slots does not discriminate on the ground of ethnic or social demographic. Local area profiles which detail deprivation, social, ethnic or population may be used as part of the risk assessment in relation to gambling related harm in conjunction with the company standard controls. Merkur Slots takes a holistic approach to customers and is aware that the Equality Act precludes the exclusion of any group for generalised reasons. Merkur Slots participate with any local/town centre scheme and actively seek to support and be involved with any local initiatives targeted at reducing deprivation (crime/employment/health) and engage in the sharing of information. **Training & Social Responsibility** Merkur Slots take responsible gambling and social responsibility seriously, ensuring all staff are fully trained to carry out their roles in a responsible manner. Merkur Slots have attained Responsible Gambling Accreditation from the G4 Global Gambling Guidance Group. Merkur Slots work with YGAM (Young Gamers and Gamblers Education Trust) to deliver City and Guilds accredited training on vulnerable and gambling harm to all levels of management. Merkur Casino has a dedicated Learning and Development Team and a Safer Gambling team that deliver face to face social responsibility training. Gamcare Accredited training completed by members of management. All staff complete on boarding and 6 monthly refresher training: The Essentials of Compliance, Safeguarding Children and Vulnerable People Age Verification and Customer Interaction. Staff are aware of the importance of social responsibility, trained to advise customers of gambling responsibly and identifying potential problem gamblers. Compliance and Social Responsibility Folder and Player Protection Framework containing policies and procedures is available to all staff. Venue Mangers review compliance logs monthly, Area Managers Bi monthly and Compliance Auditors annually.

Merkur Slots Neasden Premise Layout

Premise level:	The venue is a ground floor premise.
Premise frontage:	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).
Counter Position:	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. The central service area serves as the main support area for staff to manage the venue without having to leave the floor: - TiTo machines with a central redemption change machine GeWeTe, the GeWeTe is fitted with a duress code facility and built in time delay. Staff do not carry cash floats and only management can open the gaming machines and change machines. - Beverage and snacks are provided from the service area - SMART Tablet located on the service desk provides the facility to record age verification checks, customer interactions, incidents, self-exclusions, reinstatements, track and trace and general venue management checklists - The CCTV monitor on the central desk allows staff to view the exterior at all times.
Floor layout:	Merkur Slots 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.
Machine Positions:	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). 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.
Hidden Areas:	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

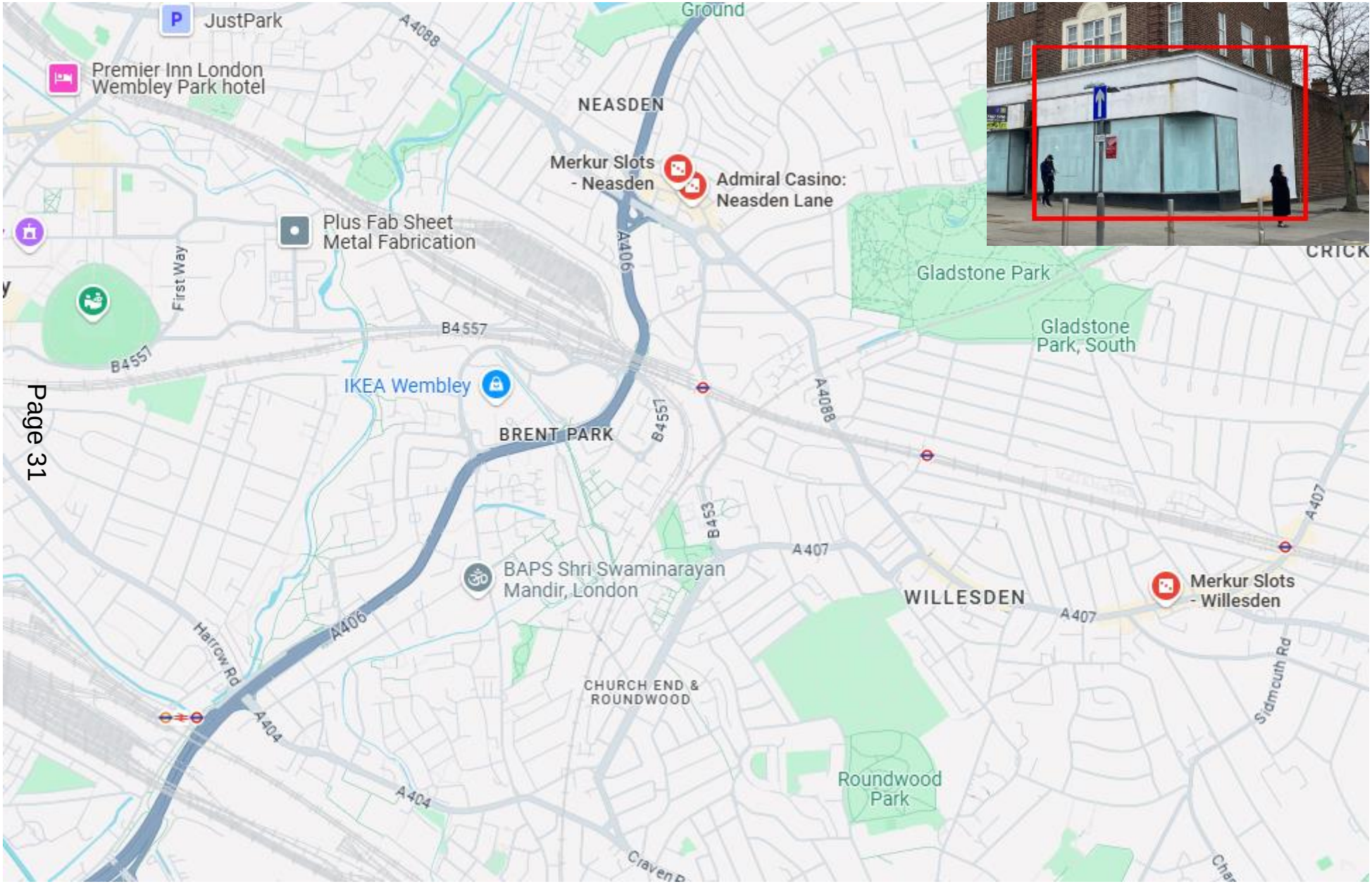
Merkur Slots has attained the prestigious Global Gaming Guidance Group (G4) accreditation for Responsible Gambling. This is only awarded after a rigorous audit of the company's safer gambling measures. Furthermore, ongoing accreditation requires reassessment every 18 months. MERKUR Slots UK have operated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

Assessors Name:	Amanda Kiernan
Signature:	
Date:	22/11/2024

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



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

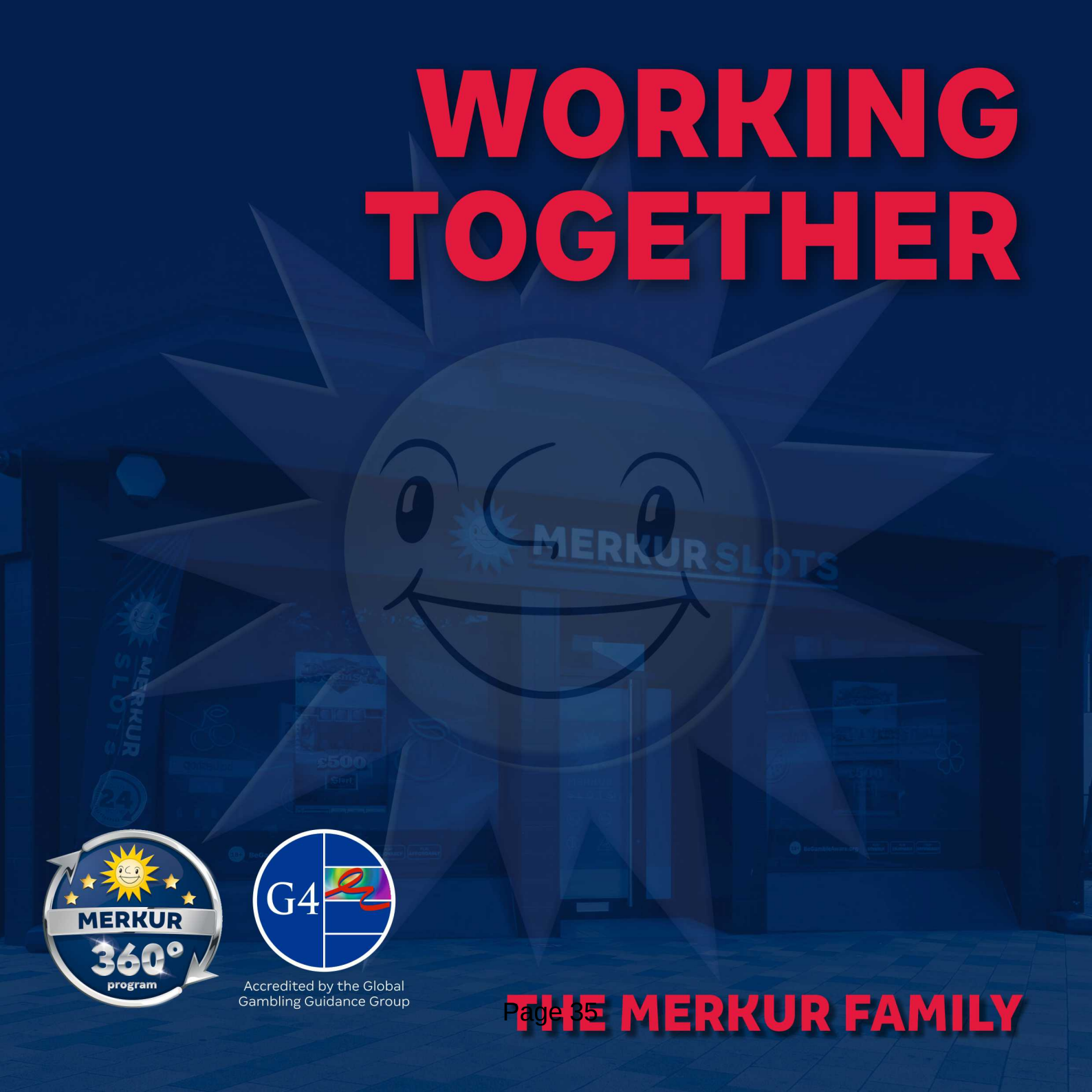


Merkur Slots – example premise frontage



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WORKING TOGETHER



MERKUR 360° program

Accredited by the Global Gambling Guidance Group

THE MERKUR FAMILY

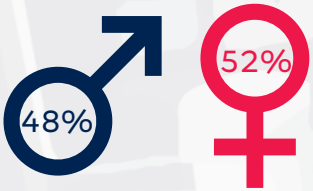
PART OF THE MERKUR GROUP

A Strong Partner For More Than 60 Years

MERKUR CASINO

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

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

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.

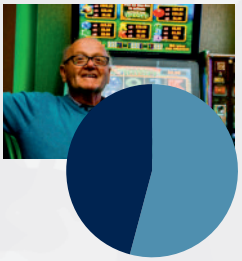
MYTHBUSTERS
We Are Not Betting Shops



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.



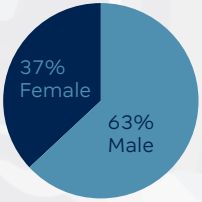




Our AGCs and High Street bingo venues are where people come to spend their spare change, have a game of bingo and enjoy their favourite pastime in convenient locations.

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





Safer Gambling

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

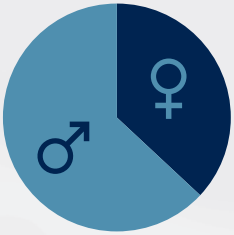
MERKUR Casino is regulated by the Gambling Commission and Licensing Authorities

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.

25

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



Think 25

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.

Compliance



Training Centre



Online Training





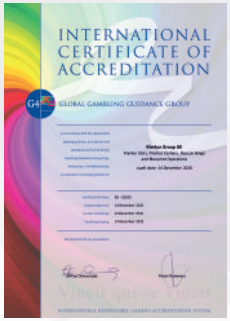
SOCIAL RESPONSIBILITY MEASURES IN PLACE

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.

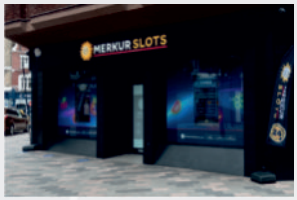
MERKUR Casino UK received the international certificate of accreditation from the Global Gambling Guidance Group (G4). Our MERKUR 360 programme showcases how we are continually improving our social responsibility commitments throughout all levels of the business. We have appointed a Safer Gambling Manager 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
phone +44 (0) 7796 614137

MERKUR Casino UK
Matrix House
North Fourth Street
Milton Keynes
Mk9 1NJ

phone 01908 351200
email info@merkur-casino.com

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OFFICE OF THE LABOUR GROUP
COUNCILLOR LIZ DIXON
DOLLIS HILL WARD

Room 4-049
Brent Civic Centre,
Wembley, HA9 0FJ
Cllr.Liz.Dixon@brent.gov.uk
www.brent.gov.uk

Monday 23rd 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 5th 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 he 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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[redacted]

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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[redacted]

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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[redacted]

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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[redacted]

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,

[redacted]

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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

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

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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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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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



1:1250

0 0.02 0.04 kilometres

Brent

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MERKUR SLOTS, 265 NEASDEN LANE, LONDON

LICENSING SUB-COMMITTEE HEARING – 22 APRIL 2025

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Merkur Slots, Neasden – Agreed Conditions with Police and Licensing

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. *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.*
7. *The CCTV system shall display on any recordings the correct date and time of the recording.*
8. *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.*
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. *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.*

11. *Prominent signage and notices advertising the Challenge 25 will be displayed showing the operation of such policy.*

12. *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.*

13. *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.*

14. *The licensee shall install and maintain an intruder alarm on the premises.*

15. *The premises shall install and maintain a panic button behind the service counter.*

16. *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.*

17. *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.*

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

19. *The Licensee shall implement a policy of banning any customers who engage in crime or disorder within or outside the premises.*

20. *The licensee will refuse entry to customers who appear to be under the influence of alcohol or drugs.*

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

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

23. *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*.

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. *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*

27. *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.*

28. *New and seasonal staff must attend induction training and receive refresher training every six months*.

BRENT COUNCIL LICENSING SUB-COMMITTEE
APPLICATION FOR BINGO PREMISES LICENCE
265 NEASDEN LANE, LONDON, NW10 1QG

SKELETON ARGUMENT ON BEHALF OF APPLICANT

Introduction

1. This is an application by Merkur Slots UK Limited ("the applicant") for a bingo premises licence.

2. Merkur Slots is the largest operator of such premises in the UK, with some 290 premises, principally in town and city centres.

3. It has been granted licences in every single premises it has applied for.

4. There are representations from 3 Councilors, and 4 other local people. In response to their concerns, the applicant has:

    a. filed a substantial bundle setting out in detail how the applicant promotes the licensing objectives, and responding to the matters raised;

    b. proposed a list of 28 conditions to promote the licensing objectives.

5. The representations are taken seriously. In order to do justice to them and respond adequately, it has been necessary to file extensive evidential and other material to show how the applicant promotes the licensing objectives, and the high standards to which it holds itself. The purpose of this skeleton argument is to help the Sub-Committee navigate the material by setting out some of the background to the application, explaining the legal context under the Gambling Act 2005, and making brief submissions dealing with the written representations.

6. In considering the application, the Committee may be particularly assisted by looking at the following documents:

    - Witness statements:

        - Amanda Kiernan, Head of Compliance (page 19-26)
        - Steve Ambrose, Operations Director (page 27-29)

- Nigel Davis, Head of Product (page 30-31)
- Observation reports re Merkur Premises by Leveche Associates (page 107-176)

- Legal obligations to promote licensing objectives:
  - Gambling Commission's Licence Conditions and Codes of Practice applicable to non-remote bingo licenses (page … 177-223)
  - Mandatory and default conditions attaching to bingo premises licences (page 236-237)
  - The individual conditions proposed (page 3-5)
- Operational standards (page 53-54)

Background

8. The applicant is part of the Merkur group, which is one of the most experienced providers of gaming premises on the high street across the UK, including adult gaming centres and bingo premises. Players in high street bingo premises access bingo games through the use of tablets, which are increasingly replacing paper bingo cards as provided in large, flat-floor bingo clubs.

9. As one would expect, the applicant and its sister companies have detailed systems for compliance with the law and promotion of the licensing objectives, which they *implement* through staff training and management programmes, and *supervise* through area and national management oversight and independent audit.

10. Bingo premises are subject to a high degree of regulation in order to support the licensing objectives, including the following:
    - Premises and their management and operation are subject to the Gambling Commission's extensive Licence Conditions and Codes of Practice applicable to non-remote bingo operating licences.
    - Premises licences are subject to mandatory and default conditions set by the Secretary of State with the approval of Parliament.
    - The number of machines, the way they operate and their stake and prize limits, are strictly regulated through the Gambling Act 2005 (by Parliament), regulations (by the Secretary of State) and technical standards (by the Gambling Commission). For example, at least 80% of the machines in bingo premises have the same stake and prize limits as pub fruit machines, with 20% governed by the same limits as other high street gambling establishment (AGCs and betting offices).
    - Individual premises are sometimes subject to additional premises licence conditions. In this case, the applicant has offered 28 further conditions.

The nature of high street bingo premises

11. Gambling on the high street in Great Britain is dominated by betting offices, both numerically and in terms of environmental impact. As to numbers, betting offices outnumber bingo premises 9:1 (5.995 v 650[1]). As to impact, betting offices can bring with them certain social issues. Hence, when an application is made for a bingo premises licence, it is sometimes feared that it will bring with it the same kind of issues as can arise at high street betting offices.

12. In fact, in terms of local impact, high street bingo premises in general and the applicant's in particular are materially different from betting offices:

On arrival

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

- The customer demographic is different from betting offices. It is older and up to 50% female with customers coming in alone or with partners rather than in groups.
- There are no "events" in bingo premises such as football matches or horse races and therefore no reason to hang around, and nowhere to cluster or socialise.
- Alcohol is not only 'not sold' but is strictly prohibited.
- Those under the influence of drugs or alcohol are not admitted.
- Good quality CCTV systems are fitted to the exterior of the premises and are monitored. Those outside know they are under surveillance. On the rare occasion that loitering occurs, it is quickly dealt with.
- Unlike in betting offices, staff are not behind the counter taking or paying out bets. They are on the shop floor, greeting customers as they enter, which also means controlling who is permitted to enter and effectively supervising the premises.
- The numbers of customers inside high street bingo premises are very low. This makes the premises easy to supervise. Staff numbers are adjusted to ensure adequate service and supervision.

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

[1] Gambling Commission industry statistics.

Exterior appearance

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

Upon entry

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

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

Interior Appearance

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

Participation

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

Protection of vulnerable people from being harmed or exploited by gambling

- Alcohol is not permitted in the applicant's bingo premises.
- Those who are intoxicated through alcohol or drugs are not permitted on the premises.

- As required by the Gambling Commission's Licence Conditions and Codes of Practice, the applicant's systems include processes for customer interaction and self-exclusion, operated by trained staff. Interventions are recorded electronically so that they can be overseen by independent compliance auditors.
- Customers may set deposit and time limits on machines to assist them with managing their gambling behaviour.
- "Stay in Control" posters and leaflets with the GamCare helpline number are located prominently in the premises, including the WC.
- All machines display responsible gambling messages with helpline contact details.
- Merkur's premises are subject to compliance assessment by the Gambling Commission. The Commission's high standards are maintained by the issue (where necessary) of improvement notices, with which Merkur complies immediately.

Protection of children from being harmed or exploited by gambling

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

13. The applicant's experience, and it is confirmed by independent evidence, is that the outward appearance, interior ambience (a rather sedate lounge), supervision, layout and product in its bingo premises are not attractive to children; and the applicant's systems have proved more than effective to ensure that underage gambling is simply not an issue in its premises.

14. It is also right to mention that, when trading on busy high streets nationally, Merkur's premises are almost always in close proximity to retail and service outlets attractive to children, but this has not proved problematic.

Security

15. The applicant does not suffer significant issues with crime and disorder. That is a function, cumulatively, of the customer demographic, the ban on alcohol, and the nature of the product; but it is also because of the specific measures taken by the applicant to prevent it crime and disorder:

    - Staffing levels are set following a security risk assessment. There is no pre-planned single staffing after 8 p.m.
    - Customer numbers are low, with usually only a handful of customers in the premises. Double digit numbers occur very rarely. This means that miscreant behaviour is easily (and immediately) identified, recorded, and dealt with.
    - The layout of the premises facilitates effective supervision. There is no space for groups to gather.
    - Staff members are on the trading floor, not behind a counter.
    - Good quality CCTV is used throughout (inside and out) and customers are aware they are monitored.
    - 'Staff Guard', which enables staff to use a portable alarm to liaise with a central security hub with audio and visual feeds to the premises, is used throughout the high-street retail industry. Staff can then speak directly with customers who therefore know they are being overseen. 'Staff Guard' personnel can liaise directly with local Police if necessary.
    - Staff members do not carry floats.
    - Safes are time-delayed.
    - Anti-money laundering systems are used on the machines.
    - The locational and social context of licensed premises is part of induction training for all staff.
    - Staff are also trained in how to deal with difficult customers (there is a 6-week training course at the outset followed by regular refresher training).
    - Any incidents are logged electronically and reviewed at national level.
    - Premises are fitted with maglocks, enabling entry to be controlled when necessary.
    - In the unlikely event that direct contact with the Police is desirable, panic alarms are fitted.
    - Venues are subject to ongoing security risk assessments, so that any further measures needed are periodically assessed and undertaken.
    - The applicant maintains good liaison with local Police.

The Law

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

> *In exercising their functions under this Part, a licensing authority shall aim to permit the use of premises for gambling in so far as the authority thinks it:*
>
> *(a) in accordance with any relevant code of practice [issued by the Gambling Commission]*
>
> *(b) in accordance with any relevant guidance issued by the Commission*
>
> *(c) reasonably consistent with the licensing objectives (subject to (a) and (b))*
>
> *(d) in accordance with the [authority's statement of licensing policy] (subject to (a) to (c).*

17. The gambling licensing objectives are:

> *(a)preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime,*
>
> *(b)ensuring that gambling is conducted in a fair and open way, and*
>
> *(c)protecting children and other vulnerable persons from being harmed or exploited by gambling.*

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

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

19. A refusal to licence premises needs to be justified by *evidenced* reasons which demonstrate that the licensing objectives would not be met if the licence were granted.

20. The following points should be noted:

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

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

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

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

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

As the Gambling Commission's Guidance says:

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

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

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

e. Conditions should only be added where it is <u>necessary</u> to do so, and even then, such conditions need to be proportionate to the circumstances requiring a response, relevant, directly related, fair and reasonable. (Conditions include any conditions limiting hours to less than the default hours set by Parliament.)

f. The following considerations are legally <u>irrelevant</u> to the determination of an application for a premises licence (see Gambling Commission Guidance):

i. Nuisance.

ii. A dislike of gambling.

iii. A general notion that it is undesirable to allow gambling premises in an area.

iv. Moral or ethical objections to gambling.

v. The demand for gambling premises (see s 153 Gambling Act 2005). As such, objections which state that there are enough gambling establishments in a locality may be relevant to planning, but they are irrelevant to licensing.

vi. Planning matters.

21. It is therefore necessary to consider:

- whether there is evidence which *demonstrat*es that the licensing objectives would not be met by granting the application;
- bearing in mind the controls on the applicant, including the further conditions offered as set out above, whether it is *necessary* to refuse or only partially grant the application;
- whether any further conditions could be added, to enable the Sub-Committee to grant the application, consistently with the Gambling Commission's guidance: see paragraph 20(c) above.

The Representations

22. In this application there are representations from three local Councillors, and four local people who have submitted representations in similar terms.

23. Putting to one side planning issues such as "*the economic, social, and cultural well-being of Neasden and its residents*" and "*efforts to cultivate a diverse and vibrant local economy*", the material representations under the Gambling Act 2005 may be summarised –

- Deprivation. The area is among the most deprived in Brent.
- Problem gambling. Brent has the second-highest concentration of gambling premises in London.
- Children and gambling. The premises are located opposite/adjacent to a bus stop used daily by large numbers of schoolchildren.
- Crime and disorder. Existing gambling premises already attract anti-social behaviour. There are issues with street drinking, littering, and public urination near existing gambling premises.

24. The applicant is very familiar with concerns such as raised by the representations. They are frequently expressed by local people when a new Merkur Slots licence is applied for. Its experience, however, is that when premises have been licensed and are up-and-running, it is the case that what was *feared* would happen has not in fact transpired. The applicant is respectful of the local concerns, however, and takes this opportunity to respond to them.

The Evidence

25. In order to assist licensing sub-committees and demonstrate *by evidence* that this is the case, Merkur commissioned independent observation reports of its premises (Leveche Associates Limited) in eight different locations, at different times of the day and night, during August and September 2022. The key findings from all 8 observation reports, organised by the relevant licensing objectives and operational considerations, were:

Prevention of crime and disorder:

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

Protection of children and vulnerable persons:

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

Sufficiency of staffing:

- All venues were sufficiently staffed with attentive, trained personnel carrying out key roles:
    - Door supervisors (where employed) controlling entry, vetting customers, and patrolling outside.
    - Staff welcoming guests, offering assistance, providing information on responsible gambling.

    - Roaming staff monitoring the premises, checking and assisting customers, as well as cleaning.
    - Merkur Slots has developed a detailed training programme for all staff members including its own City and Guilds accredited training developed in partnership with YGAM and Betknowmore.
- The premises were well run, with staff successfully upholding the licensing objectives.

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

- There was no evidence that the Merkur Slots premises negatively impacted the local environment, infrastructure, or community.
- No excessive noise, anti-social behaviour, or other public nuisance issues were observed in the vicinity of the premises.
- Venues had a relaxed, low-key atmosphere with only small numbers of customers at any time.
- Customers arrived and left in an orderly manner without congregating or causing disturbances outside.
- A 24-hour operation did not lead to noise complaints or anti-social behaviour in the surrounding area.

26. In summary, the observations provide consistent evidence that Merkur Slots operates responsibly in accordance with the gambling objectives and does not adversely affect the surrounding area in terms of crime, underage gambling, public nuisance, or anti-social behaviour.

27. The essential findings in respect of each of the eight locations are the same from premises to premises. For reference, two representative reports (with photographs) are at pages 107 – 176.

The applicant's submissions on the principal areas of concern

Problem gambling

28. A recurring concern is that some people who engage in gambling experience gambling-related harms. That is undoubtedly correct, which is why the licensing objectives include the protection of vulnerable people from being harmed or exploited by gambling; why the system of regulation imposes extensive obligations on operators to mitigate against such harm; and why, in the case of the applicant, it prioritises player protection, as extensively explained in the evidence served.

29. The question is not whether there is a potential for gambling-related harm locally but whether it has been demonstrated *by evidence* that a grant would harm or exploit vulnerable people in a way which cannot be protected by licence conditions.

30. The evidence before the Sub-Committee, in particular the independent reports from Leveche Associates, suggests that the applicant's control measures are more than 'reasonably consistent' with the licensing objective for the protection of vulnerable persons.

Children and gambling

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

32. Merkur's venues are subject to 3 external age tests per year with a compliance rate of over 94% for the last 3 years, compared with other leisure and gambling sectors that sit around 80%. However, no failure is acceptable. If there is a failure on test purchasing, action is taken immediately, including staff retraining, as necessary. The applicant operates 290 premises: it has never been suggested that underage gambling is a concern in any of them. This is despite many of its premises being near or next to premises attractive to children such as fast food outlets, or close to schools and bus stops.

Crime and disorder

33. As stated above, the applicant's premises do not suffer significant crime and disorder. This is a function of the premises' management, customer demographics, levels of customer usage and security measures. Furthermore, the applicant has extensive experience of operating in town and city centres with high levels of crime and anti-social behaviour. It also carries out security risk assessments before opening and periodically thereafter to ensure that its security measures (including staffing levels) are sufficient and responsive to local issues.

34. In order further to mitigate the risk of crime and disorder, the applicant has offered additional conditions, including:

    a) the installation and maintenance of CCTV (conditions 1- 6);

    b) staff training (conditions 27 and 28), including in issues related to the local area;

    c) no pre-planned single staffing after 8 p.m. until closing (condition 17);

    d) reasonable steps must be taken to prevent crime or disorder, nuisance and/or drinking outside the premises, supplemented by banning notices (conditions 24 and 25);

    e) a 'maglock' to be installed and maintained, which must be available for use at all times (condition 13);

    f) 'Staff Guard' to be installed/maintained, allowing direct contact with a central monitoring station by audio and CCTV communication (condition 16);

    g) third party age restricted testing (condition 12);

Conclusion

35. In conclusion:

- The applicant is a highly competent organisation, regulated by the Gambling Commission, and one whose corporate systems, staff training, management and audit are directed towards promotion of the licensing objectives.
- It is part of a group which operates some 290 licensed gambling premises in a wide variety of locations of higher and lower crime, deprivation and population density.
- The type of premises, their layout, their customer demographic, the low numbers of customers simultaneously using premises and the quality of management, mean that issues of crime and disorder are rare.
- The premises, if licensed, will be subject to strict regulatory requirements, deriving from: the Licence Conditions and Codes of Practice; machine stake, prize and numbers limits, and mandatory and default premises licence conditions.
- In addition, the applicant has offered licence conditions including those specifically drafted to meet local concerns.
- The applicant has a strong track record of co-operation with local statutory bodies. In the unlikely event of an untoward consequence, it will work to resolve the issue promptly and efficiently.
- The applicant will keep all security and other protective measures under review post-opening and will take any further measures as may be needed from time to time.

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

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

Gerald Gouriet KC

Francis Taylor Building
Inner Temple **7 April 2025**

LICENSING SUB - COMMITTEE HEARING – 24 MARCH 2025

WITNESS STATEMENT – AMANDA KIERNAN

1. I am Head of Compliance for MERKUR Slots UK Limited.

2. I am a Chartered Institute of Internal Auditors (IIA) Qualified Internal Risk and Corporate Governance Auditor with over 25 years' experience working in risk-based customer facing environments within various industries, including High Street Retail and Optical Health.

3. In 2011 I started working in the Gambling Industry occupying the role of Internal Audit Manager for Praesepe (the parent company of MERKUR Slots UK Limited), responsible for all internal and external audit policies and procedures. During 2018 a merger of the Audit and Compliance departments created the role of Head of Compliance, I now hold this position and am responsible for Internal Audit, Risk/Fraud Management and the Regulatory Compliance of the MERKUR organisation.

Overview

4. MERKUR is a leading national operator of bingo premises. The company operates a national estate of over 220 licensed bingo, adult gaming centre and family entertainment centre premises. Over 140 of MERKUR's premises operate with a 24-hour premises licence.

5. The business of MERKUR Slots premises is a mixture of bingo (played on electronic tablets) and gaming machines. Unlike betting offices, there is no ongoing entertainment such as a sporting event, and there are no communal places for groups of customers to gather. Our premises do not experience significant peaks and troughs of customers in the way betting offices do. Customer numbers are almost always in single figures. Customers do not gather outside our premises, as they do outside some betting offices. We do not cause problems to our residential or business neighbours, some of whom have commented that out control measures and external CCTV have helped *reduce* problems in the street.

6. All MERKUR's bingo premises are adult only and operate a strict Think 25 policy. Age verification procedures are embedded in Company training platforms and responsible gambling policies. Random age verification test purchasing and mystery shopper visits are carried out by third party companies (Serve Legal and Store Checker) and test results can be provided to the Licensing Authority upon request. MERKUR prides itself on its high standard of venue compliance and test purchase success rates nationally.

7. MERKUR Slots customer demographics show an average age over 30. Our products are not designed for children, and do not appeal to them due to their ambience, the nature of our gaming services and customer demographics. This is consistently seen across the whole of our licensed estate.

Responsible authorities

8. We always liaise with responsible authorities when making new applications and maintain a relationship with them during the currency of any licence granted.

9. A teams call was held with the Licensing Authority and Police officer on the 9th October 2024 to discuss the proposed application and operation, and a number of conditions were offered to the officers via email.

10. On 20th January, 28 safeguarding conditions were agreed with the Licensing Authority and Police and both their representations were withdrawn.

11. No response was received from any other responsible authority, nor did any other responsible authority submit an objection to the application.

12. No concerns were raised by the Child Protection Team and the Gambling Commission regarding MERKUR's bingo premises licence proposal, and neither submitted an objection to the application.

Gambling Commission

13. MERKUR has authority to provide bingo facilities through the grant of an Operating Licence issued by the Gambling Commission, which has approved the measures which MERKUR has put in place to ensure that it implements effective player protection, anti-money laundering procedures and security procedures; and trades responsibly in accordance with gambling legislation, the Licensing Objectives and the Gambling Commission's Licence Conditions and Codes of Practice ("LCCP").

14. MERKUR is subject to Gambling Commission inspection, ensuring that its training and compliance policies and procedures comply with the LCCP attached to the Company's Operating Licence.

15. MERKUR was selected by the Gambling Commission as one of the first top 40 licensees to prepare an annual assurance statement due to its size and scale of operation. Annual Assurance Statements enable a comprehensive review of the business, completed at Board level, involving consideration of the effectiveness of the Company's governance and risk management arrangements designed to facilitate positive consumer protection, address gambling-related harm and assess crime prevention measures. This process ensures that the highest standards are implemented across the Company's estate from Board through to premises level.

Staff training

16. All MERKUR staff receive initial six-week, classroom-based induction training upon recruitment, followed by 6-monthly refresher training programmes. Training modules include 'The Essentials of Compliance and Social Responsibility' which covers the Gambling Act 2005, LCCP, the Licensing Objectives and 'Safeguarding Children & Vulnerable People', which focus on assisting staff to recognise and respond to indicative behaviours of potential problem gambling and vulnerability and how to conduct effective customer interaction such as offering support regarding managing time spent playing (time outs); controlling stake limits; providing information on gambling support agencies such as GambleAware; offering participation in the Bingo Association's national self-exclusion scheme;

and refusing service, where deemed necessary. Excerpts from the Company's training platform are provided in the supporting documents.

17. As part of MERKUR's continuing commitment to high standards of staff training and compliance, the Company engaged the services of the charities YGAM (Young Gamers & Gamblers Education Trust) and Betknowmore to assist with the development and provision of additional Safer Gambling training and resources for venue and area managers. This training has been designed to complement our existing face-to-face training, is City and Guilds accredited and has been delivered to over 200 venue and area managers to date.

18. In addition, a series of focus groups has been held over the past 2 years, with both high street gaming and pub customers, with the participants being selected on the basis of being regular users of MERKUR Slots or pub machines. The aim of the project was to provide MERKUR with a snapshot of the business through the eyes of the customer. Focused on the key areas of customer engagement, product and service and understanding customer spending and gaming habits.

19. All staff training takes on board local area characteristics, as identified in the company's Local Area Risk Assessment, consultations with responsible authorities and any representations made. MERKUR understands that local risk assessment and staff training is a live matter, which is regularly re-assessed and adapted to any emerging or changing risks in the locations in which it operates. MERKUR is committed to partnership working and will always engage with local Betwatch, Pubwatch, or similar schemes to share best practice and local knowledge of venue operation or identified risks, whether or not they strictly relate to gambling premises.

Operation

20. The premises will be managed by an experienced venue manager, who will in turn be supported by a complement of staff who will all have received the comprehensive level of training appropriate to their specific role.

21. MERKUR Slots staff members are not restricted to counter positions that may be found in other licensed venues, such as betting premises. Our staff are actively encouraged to move throughout the premises and proactively engage with all customers, particularly on entry, not only to implement our Think 25 policy, but to build customer relationships and ensure effective identification of potentially vulnerable individuals.

22. The MERKUR Slots premises layout has been developed to facilitate customer observation and all staff members provide regular sweeps of the premises to ensure positive engagement with our customers and facilitate continuous observation and customer interaction.

23. Staff numbers and premises operation are regularly risk assessed, incorporating monitoring of premises operation, internal compliance audits completed by our field-based compliance team, evaluation of customer numbers and feedback from responsible authorities and interested parties. These measures ensure that premises are able to quickly adapt to any emerging risk or local concern.

24. Staff numbers and rotas are continuously reviewed to adapt to customer numbers, and cognisance is taken of police advice.

25. All MERKUR premises operate extensive CCTV throughout customer facing areas and also external areas to assist with monitoring customer behaviour and that of other individuals in the immediate vicinity of the premises. CCTV displays are appropriately situated to ensure that all customer areas are monitored.

26. Staff actively monitor and manage the area immediately outside their premises and record any incidents should they occur. Reporting lines are set up with local police teams to ensure that any potential local issues are identified and addressed.

Compliance

27. MERKUR has appointed a dedicated team of compliance auditors that work independently of its Operations Team to continually assess premises' compliance with the governing legislative standards and Company Policy and Procedure. Copies of our Policies and Procedures have been provided as part of our hearing bundle.

28. The Company conducts a compliance audit in each venue annually. These audits cover -

    a. Regulatory Compliance, Customer Interaction, Incidents, Self-exclusion breaches and Age Verification.

    b. Testing of staff on their level of knowledge and understanding of all relevant criteria. (Venues may be re-visited and any additional training needs addressed.)

    Records of incidents, interactions, self-exclusion breaches and age verification checks are collated on a central hub, which is regularly reviewed, and monthly reports are provided to Operations Teams.

29. In August 2020, Praesepe Limited, MERKUR's parent Company, and MERKUR's brand premises obtained G4 Global Gambling Guidance Group accreditation, which can be seen in the supporting documents. G4 is a group of international experts in the field of problem gambling and responsible gambling and accreditation is awarded to responsible operators. Audit reports identified that *'Customer care is of an exemplary standard in all MERKUR Venues, regulatory compliance policies and procedures are excellent…and provide a strong foundation for consistent approaches to Responsible Gambling across the (Company's) estate'.*

30. In February 2022 and again in 2023, MERKUR were subject to the G4 follow up audits, when it retained its accreditation status. The auditor commended the senior management training regarding gambling harm and social responsibility, noted that MERKUR's Safer Gambling ethics "*shine through as priority*" and "*customer care is a strong focus of the business*". The auditor further noted that staff loyalty, enthusiasm and knowledge were all of a high standard.

31. MERKUR has been praised by one of the country's leading safer gambling and gaming experts for 'championing innovation' in social responsibility. Lee Willows,

who founded ESG Gaming following his tenure launching and establishing YGAM, highlighted the work of MERKUR. He said: *"MERKUR is specifically supporting ESG Gaming with a two-year RET (research, education, treatment) funding commitment which has been transformational and enabled us to not only establish robust foundations but also contribute to crucial safer-gambling research."*

32. As an Operating Licence holder, MERKUR Slots UK Limited provides details of incident records and self-exclusion to the Gambling Commission as part of its Regulatory Returns and compliance process. All records are regularly evaluated to ensure that premises operate safely and responsibly.

Local issues

33. Representations to the application have been received from a number of local residents and councillors. They highlight a number of issues such as increase of crime and problem gambling in the area. The objections express concerns that a new bingo premises may exacerbate those problems currently already in existence in the area.

34. MERKUR is an experienced operator with a proven history of operating premises in challenging areas. Incidents of anti-social behaviour are rare, and if they occur, they are quickly and effectively dealt with. MERKUR'S track record is exemplary.

35. As I have mentioned in the "overview' section above, MERKUR premises do not experience the kind of difficulties sometimes experienced by betting offices in terms of crime, disorder and nuisance, due to our different clientele, customer numbers, product, layout and management. In summary –

    a. We do not find groups of people loitering outside our premises smoking or creating a disturbance, as is frequently the case with pubs or clubs. As confirmed by the extensive *Leveche* covert operations, our customers arrive, play the machines and leave.

    b. Similarly, by contrast with betting offices, there is no ongoing entertainment such as a sporting event and no communal places for crowds to gather. Our premises do not experience significant peaks and troughs of customers.

    c. Our customer numbers are almost always in single figures. I believe this to be a significant explanation of why we do not cause a nuisance to our neighbours.

    d. In general, it is rare for our venues to attract customers leaving alcohol licensed venues or fast-food venues, as the entertainment offering is significantly different. MERKUR's late night operation appeals to shift workers and employees of the late-night economy and our detailed policies, procedures and safeguards are designed to ensure that premises operation remains safe and secure for both staff and our customers.

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

36. MERKUR has considered local police crime statistics and the premises location along with the Council's Statement of Licensing Principles under the Gambling Act

2005, and all additional information provided during the due diligence stage of the application.

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

38. The Company is committed to working with all Responsible Authorities to ensure that any emerging risks are identified, incorporated into the premises risk assessment and effectively addressed.

Problem gambling

39. The company incorporates accredited Social Responsibility and Interaction training for is premises management teams.

40. MERKUR ensures that all staff continue to promote responsible gambling through customer behaviour observation and interaction. As part of this process, customer play, duration and spend is monitored and customer interactions are triggered to ensure play remains responsible.

41. Following a customer interaction, customers may be offered a variety of self-help measures to control and monitor spend and time spent gambling, time outs, information regarding gambling support services and self-exclusion. For customers deemed to be at risk who do not agree to self-exclusion we reserve the right to bar customers, should the need arise. Staff members are provided detailed training to ensure that interaction is completed in a sensitive manner whilst ensuring that the Company's policies and procedures are effectively implemented.

42. MERKUR has also undergone Gambling Commission inspection. It ensures that its training and compliance policies and procedures comply with the LCCP attached to the Company's Operating Licence.

43. Examples of some of MERKUR's responsible gambling information have been provided in the supporting documents.

Premises Operation

44. In addition to matters of staffing mentioned above and CCTV the following may be added -

<u>Alcohol policy</u>

45. MERKUR Slots venues do not sell alcoholic drinks, or allow them to be brought onto the premises.

46. All MERKUR Slots venues operate a strict zero tolerance drugs policy and refuse service to individuals who are deemed to be under the influence of alcohol. The company's extensive training, which incorporates Gamcare approved social responsibility and customer interaction tools, are designed to ensure minimal conflict and successful implementation of our strict polices.

47. In our experience, supported by *Leveche* covert observations, incidents of customers attempting to enter our venues whilst intoxicated or attempting to consume alcohol within our venues remains low across the Company's licensed estate, regardless of premises location.

Marketing and window displays

48. MERKUR operates a strict marketing and promotional guidelines policy, which has been developed in accordance with the LCCP and the Advertising Standards Authority's Committee of Advertising Practice (CAP) and Broadcast Committee of Advertising Practice (BCAP) Codes. A copy of the Company's Marketing Code of Practice and sample window displays can be seen in the supporting documents.

49. Venue window displays are designed having regard to premises' location, particularly in busy high street areas where children and young persons may pass by. Direct line of sight into premises is blocked by appropriate window displays and barriers adjacent to entrances, which minimise exposure of underage individuals to ambient gambling.

50. MERKUR does not operate VIP membership schemes.

51. All MERKUR's bingo premises are adult only and operate a strict Think 25 policy. Age verification procedures are embedded in Company training platforms and responsible gambling policies. Age verification test purchasing and mystery shopper visits are frequently carried out by third party companies (Serve Legal and Store Checker) and test results can be provided to the Licensing Authority upon request. MERKUR prides itself on its high standard of venue compliance and its test purchase success rates nationally.

52. All our venues operate a policy of no pre-planned single staffing after 8pm.

Conclusions

53. The business of MERKUR is the provision of safe and pleasant gaming environments. It remains crucial to the business that customers feel safe and welcome in MERKUR Slots premises. This principle is fundamental to Company management strategy from head office to premises level. It is a principle which as a company we have achieved in all of our venues, which provide safe, welcoming and congenial environments for our customers.

54. In the rare case that issues do arise, the resources and commitment are in place to ensure that they are speedily resolved. For obvious reasons, MERKUR does not wish to run licensed venues which cause regulatory issues, and the Company devotes a great deal of time and resources to ensuring that there are none.

55. In my experience a good manager and their team will know regular customers well and new customers will always attract raised awareness.

56. Although nuisance is not a licensing objective under the Gambling Act, it is right to emphasise that our premises do not cause nuisance to neighbours.

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

Date: 14 March 2025

LICENSING SUB - COMMITTEE HEARING – 24 MARCH 2025

SUPPLEMENTAL STATEMENT – STEVE AMBROSE

1. I am the Operations Director for Merkur having held this position since December 2016 responsible for all day-to-day operations across our estate of Adult Gaming Centres, High Street Bingo premises, Bingo Halls and Casino.

2. I am a Director of the Bingo Trade Association "The Bingo Association" and a member of the Gaming Council of the Amusement Trade Association "BACTA" covering High Street Gaming Centres across Great Britain.

3. I started in the Gaming Industry in 1992 and have held a multitude of positions ranging from Customer Service Assistant right up to my present position of Operations Director, this experience has enabled me to gain an understanding of the complexities of operating in gaming businesses both big and small, in rural and city centre locations.

4. Through my years of working in the gambling industry I can state categorically that it is rare for Merkur Slots UK Limited's venues, and specifically its high street bingo premises, to be associated with crime and disorder, anti-social behaviour or local nuisance.

5. Whilst I appreciate this may be different to perceived risks that may be associated with other licensed gambling venues, such as betting premises, I believe this reflects the type of gaming operated by Merkur and its customer demographic, which is approximately 50% female with an average age of over 30.

6. Due to the nature of the gaming services provided at our high street bingo venues, customers do not congregate outside our venues, unlike betting premises that may show sporting events over long periods of time. In our high street venues, there is no 'event' taking place.

7. Across the high street bingo estate, average customer numbers at any one time remain relatively low, in single figures, and customer numbers above 5 at any one time, would be considered a busy period.

8. Customer numbers do not vary significantly throughout the hours of premises operation and due to the relatively low numbers, later hours of operation are often sought, with the majority of Merkur premises operating into the early hours. Later hours of opening appeal to shift workers and employees of the late-night economy and Merkur Slots policies, procedures, safeguards, and security measures are designed to ensure that premises operate securely and safely at all hours of operation.

9. We operate premises throughout the UK in busy high street locations that have a high footfall of Children and Young persons. Due to the nature of our gambling premises, customer demographic and presentation of our venues on the high street, we do not see a significant number of underage individuals seeking to gain access to our premises regardless of location. In our experience, Merkur's product does not appeal to the younger generation.

10. Merkur's Think 25 policy and its implementation are effective tools ensuring that our venues operate responsibly. By strictly controlling our marketing and advertising and limiting line of site into venues, individuals that pass by our venues are not exposed to ambient gambling, which may be visible in other operator's venues, such as some betting premises and public houses that provide gaming machines.

11. All our venues operate CCTV throughout, which is designed to not only assist with monitoring all customer facing areas but to cover the area immediately in front of our venues, which provides additional security in the high street areas in which we operate.

10. Our venue teams seek to form genuine relationships with local police, town centre groups, support services and Betwatch or Pubwatch schemes should they be available. Our staff are proud of the areas in which they live and work and do not wish to see any level of anti-social behaviour.

11. We set out to provide a comfortable and convivial atmosphere. Our premises are carpeted, well-appointed and spotlessly clean. Our staff are smart and friendly. They are not positioned behind a counter, but are present on the trading floor, circulating and interacting with customers and offering tea and snacks.

12. Staff levels are continually risk assessed to ensure that sufficient numbers are maintained not only to enable effective premises management but also to ensure that customers can be continually monitored and assisted where necessary. As part of our commitment to working with local authorities, we will always liaise with local police licensing teams to ensure that where local police concerns are identified, sufficient staff members are on site during premises hours of operation.

13. Customer monitoring, interaction and any incidents including implementation of our Think 25 policy are recorded on electronic IHL tablets. This technology enables all recording to be logged whilst staff are present in customer facing areas and it is rare for staff to be called away to back office areas during their shifts. IHL tablets are linked through a central system so that Merkur Slots UK Limited's independent audit team can regularly monitor all records.

14. The Company's audit department collates and evaluates monthly reports on venue operations and management to allow continued assessment of operational compliance, including monitoring self-exclusions, under-age checks and any untoward behaviour. The monitoring process allows venues to adapt to any emerging risks and staff training requirements.

15. Our venues operate a ticket in ticket out system, which minimises the need for cash handling on site during opening hours.

16. Machine emptying is only carried out when customer numbers are low and security systems implemented, which include activating the premises maglock and ensuring sufficient staff remain on duty.

17. Merkur Slots UK Limited's venues also operate time delay safes where keys are stored. All cash is retained within the GeWeTe change machine on the venue floor.

18. Venues are equipped with our staff guard system. The system allows direct communication with a central monitoring station through audio and CCTV. The central monitoring station would then contact the relevant emergency services in case of incident.

19. The entrance to all venues are fitted with a magnetic door locking system. This allows staff members working to manage the entrants to the venue when in use.

20. The use of door supervision at any premises is decided on a risk assessment basis based on a multitude of factors per premises, with cognisance always taken of local Police and Licensing knowledge and advice.

21. Following the consultation period, 28 safeguarding conditions were agreed with the Police and Licensing Team, which alleviated their concerns and let to the withdrawal of their representations. These conditions include CCTV, Challenge 25, Maglock, no pre-planned single staffing post 20:00, StaffGuard, panic buttons, door supervision risk assessment, incident reporting and extensive staff training.

22. We have considered the local concerns raised by the Interested Parties and believe that should the Committee members be minded to grant the new premises licence as all perceived operational risks and fears should have been effectively addressed.

23. In our local area risk assessment we have identified local organisations that provide support services to local vulnerable individuals. Merkur is committed to working in partnership with local authorities and any organisations identified to discuss local concerns, ensuring that local risks are identified and incorporated into our risk assessment and management training.

24. All of these features mean that our premises provide safe and congenial environments and do not impact on their localities. In my experience, while concerns are sometimes expressed by local residents and authorities with regard to theoretical risks and the potential impact when applications are made, such concerns vanish once premises begin to operate as permitted.

Mr Steve Ambrose, Operations Director, Merkur Slots UK Limited

Date: 14 March 2025

LICENSING SUB-COMMITTEE HEARING – 28 MARCH 2025

SUPPLEMENTAL STATEMENT – NIGEL DAVIS

1. I am the Head of Gaming Machines for Merkur, and have held this position since 2010, and have continual service for the company since leaving school in 1980 some 44 Years' Service.

2. During this time, I have held various roles, including Venue Manager, Area Manager, Group Technical Service Manager this experience has given me great depth of knowledge of our Business, and the industry as a whole.

3. I am the Midlands Chairman of the Amusement Trade Association BACTA, and sit on various Committees. I take a very active role withing the Machines Committee of the Bingo Association. I have held a Gambling Commission PML since 2007, when they first came into force.

4. Merkur Slots UK Limited operates over 220 'High Street Bingo' premises, bingo clubs and Adult Gaming Centres throughout Great Britain.

5. The development of High Street Bingo has occurred because customers are becoming less interested in attending large, sub-regional bingo halls and increasingly wish to play bingo with a portable electronic terminal rather than marking numbers off a card. Accordingly, the High Street Bingo model has evolved, with a customer offer of live and automated bingo played on terminals, as well as on paper, with gaming machines in accordance with the permission provided by a bingo premises licence. The Gambling Commission is fully aware of the presentation of bingo in our high street premises.

6. In our premises, customers can move around with the bingo terminal, choosing to play while standing or in seating provided around the premises.

7. Customers have an opportunity to play non-remote bingo in the traditional way on paper bingo cards, and on tablets (including being linked to a national game) and to play machines, the limits for which are set by law.

8. As for gaming machines, the governing legislation provides strict limits on the types of machines that may be made available in bingo premises, which is the same as that permitted in licensed Adult Gaming Centres.

9. High Street Bingo premises operate a combination of category B3 and C gaming terminals with stakes ranging from 10p through to £2.

10. Only 20% of the gaming machines provided may be category B3s. The remainder, being the category C & D gaming machines, have the same stake and prize levels as those offered in pubs.

11. The bingo tablets are a multi-purpose device offering live linked Bingo Games, Bingo Variant Games and participation in the National Bingo Game, which is played twice daily.

12. The bingo tablets provide both remote and non-remote bingo, with remote bingo being the linked games operated by WiFi within the licensed premises.

13. Further details of the gaming content provided on the bingo tablets has been provided in the supporting documentation.

14. All Merkur Slots UK Limited premises are sufficiently staffed to ensure effective implementation of the Company's Think 25 policy and all staff are fully trained on the three Licensing Objectives under the Gambling Act 2005, with particular focus on the protection of vulnerable persons from being harmed or exploited by gambling. Full written details of the training and the Company's operating procedures have been provided in the hearing bundle.

15. As stated above, electronic bingo is a natural evolution of 'traditional bingo' and has been operated nationally for many years since the inception of the Gambling Act 2005 and is approved and understood by the Gambling Commission.

16. The LCCP also require that the internal and/or external presentation of the premises are such that a customer can reasonably be expected to recognise that the premises are licensed for the purposes of providing bingo facilities. We comply with this requirement by a notice on the façade of the premises, which states prominently "bingo played here", and by a similar notice inside the premises.

17. Our bingo offer is the same as it is in all of our high street bingo premises across the country. It is simply an extra offer to our customers, which is long established and has given rise to no regulatory concerns of the Gambling Commission. We have no evidence that the provision of electronic bingo is harmful to any of the licensing objectives.

Mr Nigel Davis, Head of Gaming Machines, Merkur Slots UK Limited

Date: 14 March 2025

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 Cresent 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 Cresent.
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 1st and 3rd 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 - https://www.addictiontreatmentrehab.co.uk/london/neasden
Adjoining premises:	The premises is a corner unit located next to a charity shop 'Peaceful Solutions' to the left and Birse Cresent 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. *(crystalroof.co.uk)*
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. *(crystalroof.co.uk)*
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%). *(crystalroof.co.uk)*
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. *(streetcheck.co.uk) (crystalroof.co.uk)*
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. *(crystalroof.co.uk)*

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. *(police.uk)*
Age Verification:	Age verification test purchasing, and mystery shopper visits are frequently carried out by third party companies - ServeLegal and Store Checker. All venues receive 2 or 3 random test visits per year.
Independent Security Reviews	MERKUR Slots UK appointed Leveche Associates Ltd to conduct independent covert visits on numerous AGC/Bingo venues that operate throughout the UK 24-hrs, 7 days a week including six venues in and around the London area. Key comments from the reports include: 'Visits to these premises established that they are well run and that there are clearly defined systems in place to ensure the premises operate in support of the gambling objectives and do not attract or take advantage of juveniles or other vulnerable persons. The visits also established that MERKUR Slots customer do not cause crime or anti-social behaviour.' 'MERKUR Slots UK and their premises operate in support of the principles of Secured by Design, the company recommended by the Chief Officers of UK Police Forces for Crime Prevention standards'. 'The presence of MERKUR Slots does not lead to or result in people, who have been on a night out, staying in the area any longer than they had planned to'.

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

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

Localised Risks to the Licensing Objectives

This Local Area Risk assessment takes into consideration Brent Council local authority Statement of Gambling Principles 2022-2025, reference section 8.5 for Bingo 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	**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. *(streetcheck.co.uk) (crystalroof.co.uk)* **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. *(crystalroof.co.uk)* **Schools and Education** 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	**Age Verification** *Ensuring Under 18's do not have access to licensed premises* All Merkur Slots venues are strictly adult only (over 18's only). Gambling is an age restricted product and Merkur Slots operates a 'Think 25' policy. Age verification is embedded in training platforms and responsible gambling policies. Over 18's notices are displayed on the entrance. Think 25 advertising is prominently displayed throughout the premise. Merkur Slots Neasden Premise frontage is of a style which obscures the interior with no advertising depicting images that may appeal to children. 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). 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.

Page 106	The Crest Boys Academy, 80 Crest Rd, NW2 7LX Menorah Girls School, 105 Brook Rd, NW2 7BZ Alnour Arabic School & 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 **Community Centres and Youth Centres** 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 **Parks, playgrounds and sports/leisure facilities** 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 **Vulnerable and addiction support services** 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 Addiction Treatment rehab provide support for gambling and alcohol addiction in the Neasden NW10 area - https://www.addictiontreatmentrehab.co.uk/london/neasden 36	Age verification test purchasing, and mystery shopper visits are frequently carried out by 3rd party companies - Check Policy and Store Checker. Test purchase fails are reviewed within 48 hours by the Area Manager, this involves reviewing CCTV footage of the incident and implementing appropriate training or where necessary disciplinary action. All age verification checks are recorded on the SMART Tablet AV App, this data is collated centrally and regularly reviewed by an independent team of compliance auditors. Results of age verification checks and third-party results are shared with the Gambling Commission. Proof of Age scheme in place with application forms available in the venue. The children and young persons gambling participation survey shows that the number of 11-16 years olds that say they have gambled on fruit machines of whatever kind in an arcade, pub or club is around 2%. Of those around a half to two-thirds do so legally on Category D fruit machines which are located in FECs or holiday parks, where any play will be of short duration (as families will be on a day trip or holiday), in venues which they can only access with their parents, and in premises licensed to offer Category Ds which are as a result tightly-regulated. We also know from a study by Professor David Forrest and Dr Ian McHale that whilst adolescents at the coast are more likely to participate in gambling activities than those that do not, they are no more likely to be problem gamblers than those that do not live at the coast. This is an important finding. Many people cite early exposure to gambling as a cause of later gambling problems. There is no evidence of a causal link. As David Forrest stated at conference in Toronto in 2012 'marginal gamblers induced to participation by ease of access do not appear prone to problem gambling and more children gambling does not carry through to more children being problem gamblers. Panic about arcades does not appear justified' https://www.gamblingcommission.gov.uk/PDF/Young-People-Gambling-Report-2019 **Vulnerability** Training and guidance are given to Merkur Slots staff on vulnerability (the inability or limited ability of people to control their actions). This includes addictive gambling, mental health, alcohol or drugs issues. Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP). All staff complete on boarding and 6 monthly refresher training which includes Safeguarding Children and Vulnerable People and Customer Interaction.

	Homeless shelters and food banks 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 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 1st and 3rd 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. **Pawnbrokers and Loan Shops** No pawnbrokers or loan shops within 1 mile of venue. **Medical Centres, Care Homes and Mental Health facilities** E&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 0UR 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 0EE 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 & Therapy, 1 Verney St, NW10 0AY EXPERT THERAPY, 54 Randall Ave, NW2 7ST **Gambling premises** 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	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. 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. **Customer Interaction** Merkur Slots provide comprehensive customer interaction training, instruction and supporting policies to all staff in this area (via training platforms, training centres and Compliance Manual). Staff are provided with the training to enable them to provide guidance on safer and responsible gambling. 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. 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. 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. 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. 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. 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 Once a person has entered the self-exclusion scheme their image will appear on the Smart Tablet exclusion carousel. Staff are required to view the carousel at the start of every shift to ensure they are aware of any new

Page 108	**Public Houses and Alcohol Licensed Premise** Greenes, 362-364 Neasden Ln N, NW10 0BT Katie's Bar (Neasden), 350 Neasden Ln, NW10 0AD Venue 295, 295 Neasden Ln, NW10 1QR TIFFTY TOMS, 249A Neasden Ln, NW10 1QG Ox & 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 **Residential Areas** Neasden is a neighborhood located in the northwest of London and is known for being a primarily residential area with a mix of housing types including terraced houses, semi-detached houses and apartment buildings. **Bus stops and other Transport links** Neasden Shopping Centre / Birse Crescent (Stop FF), Neasden, London NW10 1QG Dudden Hill Lane (Stop GG), NW2 7SA Dudden Hill Lane (Stop HH), NW2 7RX St Catherine Neasden Church (Stop SS), NW2 6JE St Catherine Neasden Church (Stop TT), NW2 6JH Neasden Underpass (Stop EE), NW10 1TJ Neasden Shopping Centre (Stop JJ), NW2 7PY Ardley Close Neasden, NW10 0ES Winslow Close (Stop UU), NW10 0AH Village Way/North Circular Rd (Stop NN), NW10 0HY **Regular Festivals and Town Events/Mass Gatherings** BAPS Shri Swaminarayan Mandire in Neasden host the largest Diwali and Hindu New Year Celebrations in October – Pramukh Swami Rd, Neasden, NW10 8HW Neasden Festival – Kingsbury Park NW9 Neasden Temple Summary Fair – Pramukh Swami Rd, Neasden, NW10 8HW	exclusions so they may recognise the person should they attempt to enter the premises during their exclusion period. Any such attempts to enter the premise are recorded as a breach on the Smart Tablet. Once the self-excluded period has ended and the person wishes to return to the premise, they are required to engage in a reinstatement interview to discuss their return to gambling, following this they enter a 24-hour cooling-off period before their self-exclusion is lifted and they can return to the premise. Any previously self-excluded person returning to the premise to gamble will be noted as an at risk customer requiring close monitoring of their gambling behaviour with regular interactions. All customer interactions are recorded on the SMART Tablet Interaction App, this data is collated centrally and regularly reviewed by an independent team of compliance auditors. **Player Protection** *To identify signs associated with problem gambling and people who may be at risk of gambling related harm* *Failure to provide information to customers on responsible gambling* *Failure to maintain and administer the self-exclusion process, including breaches and reinstatement reviews* Staff are aware of the importance of social responsibility and are trained to advise customers on gambling responsibly and the identification of potential gambling harm. 'Stay in Control' Posters and Leaflets containing the Gamcare helpline number are in prominent locations within the premise and in private areas, such as customer toilets. Merkur Slots actively seek to support and be involved in any local initiatives targeted at reducing harm caused by gambling. Socially Responsible messaging is implemented on all digital B3 and Cat C machines. All machines display Gamble Responsibly stickers with helpline contact details. Senior Management are members of the BACTA Divisional and Socially Responsible Committees and Bingo Association Executive and Socially Responsible Committees. They take the opportunity to actively participate with these trade bodies, collaborating with other operators to promote responsible gambling initiatives including the development of an Accredited Gamcare training programme and the Machine Messaging trial and evaluation. The Gamcare Helpline Annual Statistics 2020 reported that calls received from people experiencing problems with their gambling were low in High Street Arcade Gaming Machines at 3% compared to Betting Shop Gaming

Page 109		Machines at 15%. The vast majority of calls were received from people within the on-line sector. **Deprivation** Whilst the premise may be near or in an area of relative deprivation, Merkur Slots takes the view that individual customers must be treated holistically, and the information provided in this document are designed to identify individuals that could potentially be at risk of gambling related harm Merkur Slots operates on the basis that its controls and best practice is always adopted therefore, it is not a question of degrees of vigilance being implemented in different areas. **Homelessness** Some premises are used by the homeless for warmth and company. Merkur Slots treats all customers with dignity and has a clear policy on begging. Staff are trained to deal with vulnerable people in a sympathetic manner, any difficult cases are referred to our compliance team for review and resolution. Staff are trained how to manage situations with homeless people seeking refuge. A line of contact is created with local high-risk premises, homeless shelters, foodbanks to provide social responsibility information. MERKUR staff are aware of where rough sleepers sleep and beggars loiter in the local area and actively prevent them from entering the premise, including close monitoring of individuals spending coins/low level amounts on a frequent basis. Should loitering increase due to extended hours additional notices will be added about loitering without play not being tolerated.
Preventing gambling being a source of crime or disorder, being associated with crime and disorder or being used to support crime	**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. *(crystalroof.co.uk)* **Local Police** Neasden Lane, NW10 1QG is within the Dollis Hill policing neighborhood, under the Metropolitan Police force area. Wembley	**Premise Security and violence in the workplace** *Poor security control measures which may increase vulnerability to crime* *Failure to protect employee and customers from harm during the hours of late-night opening* Merkur Slots Neasden is subject to a separate security risk assessment, local factors are considered, and proportionate control measures/physical security measures are installed. 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. 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

Page 110	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. *(Police.uk)* **Public Houses and Alcohol Licensed Premise** Greenes, 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 & 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 **Pawnbrokers and Loan Shops** No pawnbrokers or loan shops within 1 mile of venue. **Gambling premises** 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	can be observed and staff regularly patrol the gaming floor to supervise and interact with customers to identify underage or vulnerable persons. **General Crime and Disorder** *To identify aggressive customers to prevent crime and disorder* *Awareness of local crime issues in the local area* 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. 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. 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. The company operate an internal security alert system and are registered with trade associations for crime bulletins (BACTA and Association). 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. 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. **Anti-social behaviour outside the premise** Whilst Public Nuisance is not a Licensing Objective and the Gambling Commission has made clear that 'disorder' means serious disorder, Merkur Slots recognise that public nuisance can escalate in certain circumstances and as a corporate citizen, it has a responsibility to work in partnership with local residents and authorities to reduce environmental impacts. Staff are aware to monitor the outside of the premise and surrounding area for anti-social behaviour and take appropriate steps within reason to minimise the risks. The CCTV monitor on the central desk allows staff to view the exterior at all times. Incidents of anti-social behaviour are recorded on the SMART Tablet Incident App.

Page 111		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.

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		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. Suspicions 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		**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.

Other	**Places of worship and Religious Buildings** Alpha & Omega Christian Fellowship Outreach Ministries, Wykeham Family Centre, Annesley Cl, NW10 0ES Neasden Methodist Church, 331 Neasden Ln N, NW10 0AF 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	**Ethnicity and Local Area Demographic** Merkur Slots does not discriminate on the ground of ethnic or social demographic. Local area profiles which detail deprivation, social, ethnic or population may be used as part of the risk assessment in relation to gambling related harm in conjunction with the company standard controls. Merkur Slots takes a holistic approach to customers and is aware that the Equality Act precludes the exclusion of any group for generalised reasons. Merkur Slots participate with any local/town centre scheme and actively seek to support and be involved with any local initiatives targeted at reducing deprivation (crime/employment/health) and engage in the sharing of information. **Training & Social Responsibility** Merkur Slots take responsible gambling and social responsibility seriously, ensuring all staff are fully trained to carry out their roles in a responsible manner. Merkur Slots have attained Responsible Gambling Accreditation from the G4 Global Gambling Guidance Group. Merkur Slots work with YGAM (Young Gamers and Gamblers Education Trust) to deliver City and Guilds accredited training on vulnerable and gambling harm to all levels of management. Merkur Casino has a dedicated Learning and Development Team and a Safer Gambling team that deliver face to face social responsibility training. Gamcare Accredited training completed by members of management. All staff complete on boarding and 6 monthly refresher training: The Essentials of Compliance, Safeguarding Children and Vulnerable People Age Verification and Customer Interaction. Staff are aware of the importance of social responsibility, trained to advise customers of gambling responsibly and identifying potential problem gamblers. Compliance and Social Responsibility Folder and Player Protection Framework containing policies and procedures is available to all staff. Venue Mangers review compliance logs monthly, Area Managers Bi monthly and Compliance Auditors annually.

Merkur Slots Neasden Premise Layout

Premise level:	The venue is a ground floor premise.
Premise frontage:	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).
Counter Position:	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. The central service area serves as the main support area for staff to manage the venue without having to leave the floor: - TiTo machines with a central redemption change machine GeWeTe, the GeWeTe is fitted with a duress code facility and built in time delay. Staff do not carry cash floats and only management can open the gaming machines and change machines. - Beverage and snacks are provided from the service area - SMART Tablet located on the service desk provides the facility to record age verification checks, customer interactions, incidents, self-exclusions, reinstatements, track and trace and general venue management checklists - The CCTV monitor on the central desk allows staff to view the exterior at all times.
Floor layout:	Merkur Slots 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.
Machine Positions:	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). 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.
Hidden Areas:	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

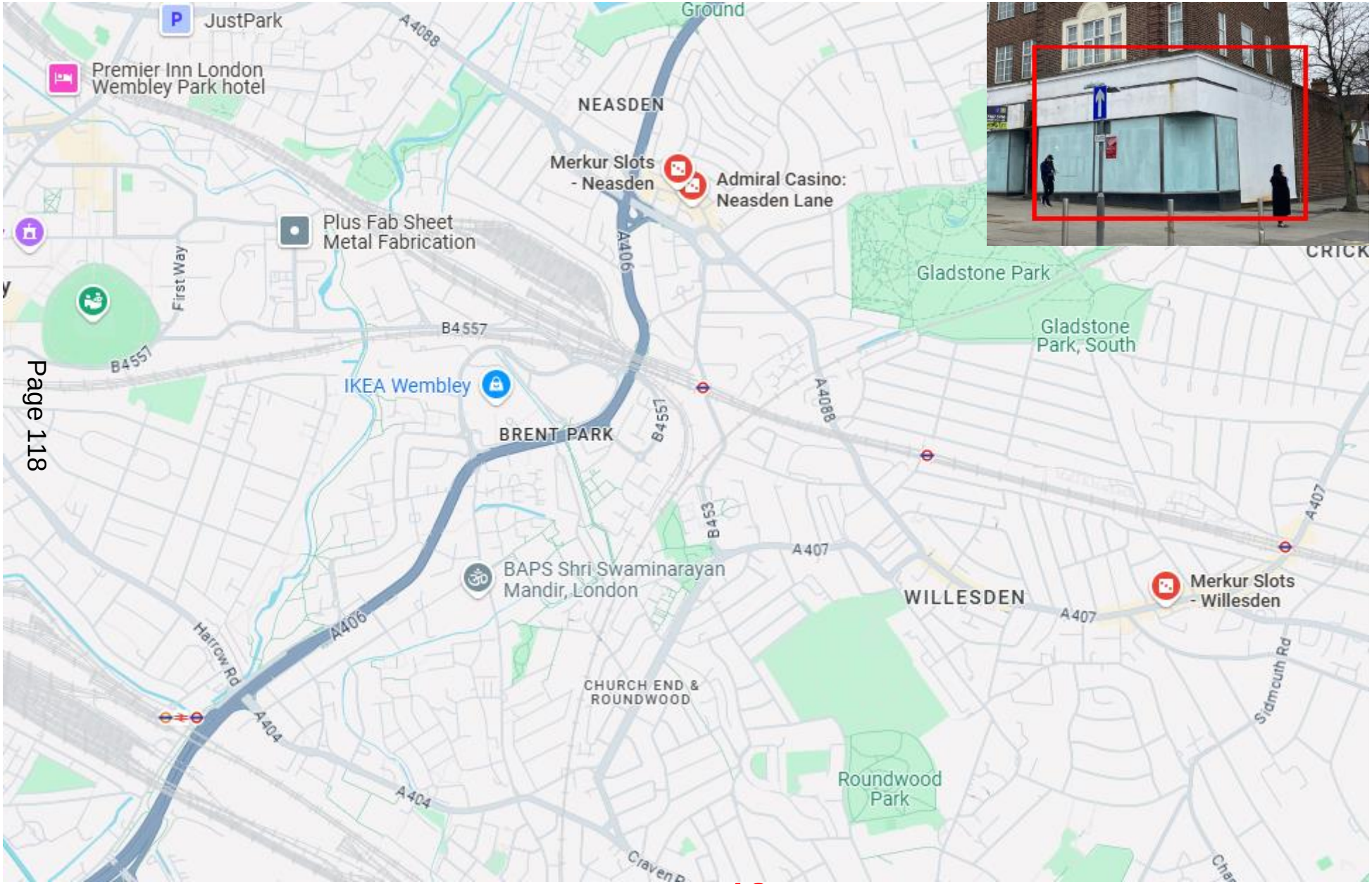
Merkur Slots has attained the prestigious Global Gaming Guidance Group (G4) accreditation for Responsible Gambling. This is only awarded after a rigorous audit of the company's safer gambling measures. Furthermore, ongoing accreditation requires reassessment every 18 months. MERKUR Slots UK have operated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

Assessors Name:	Amanda Kiernan
Signature:	
Date:	22/11/2024

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



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

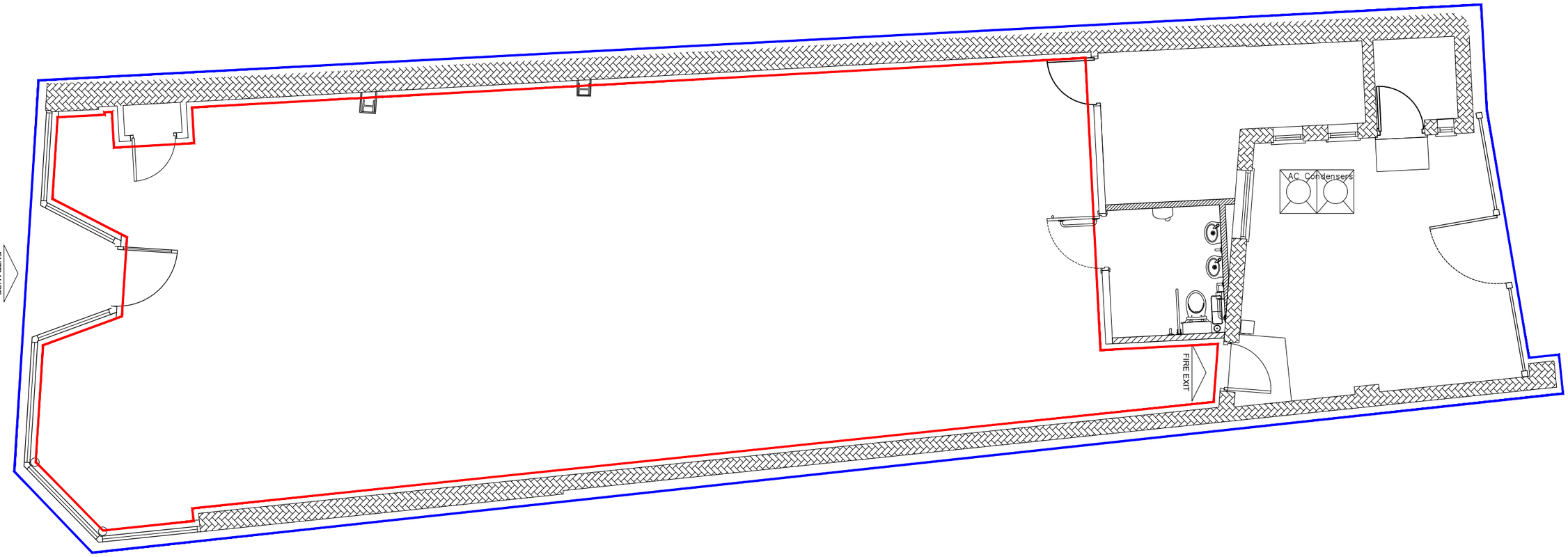


Merkur Slots – example premise frontage



50

PROPOSED GAMING AREA: 121.9m²



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

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

REVISIONS
REV 00:

FIT OUT TYPE
LICENCING

PROJECT
MERKUR SLOTS
265 NEASDEN LANE
NEASDEN
NW10 1QG

DESCRIPTION
PROPOSED LICENCE PLAN
51

REFERENCE DRAWINGS

SCALE
1:75

DRAWN BY
LR

DATE
11/10/24

DRAWING No.
905-PL-106

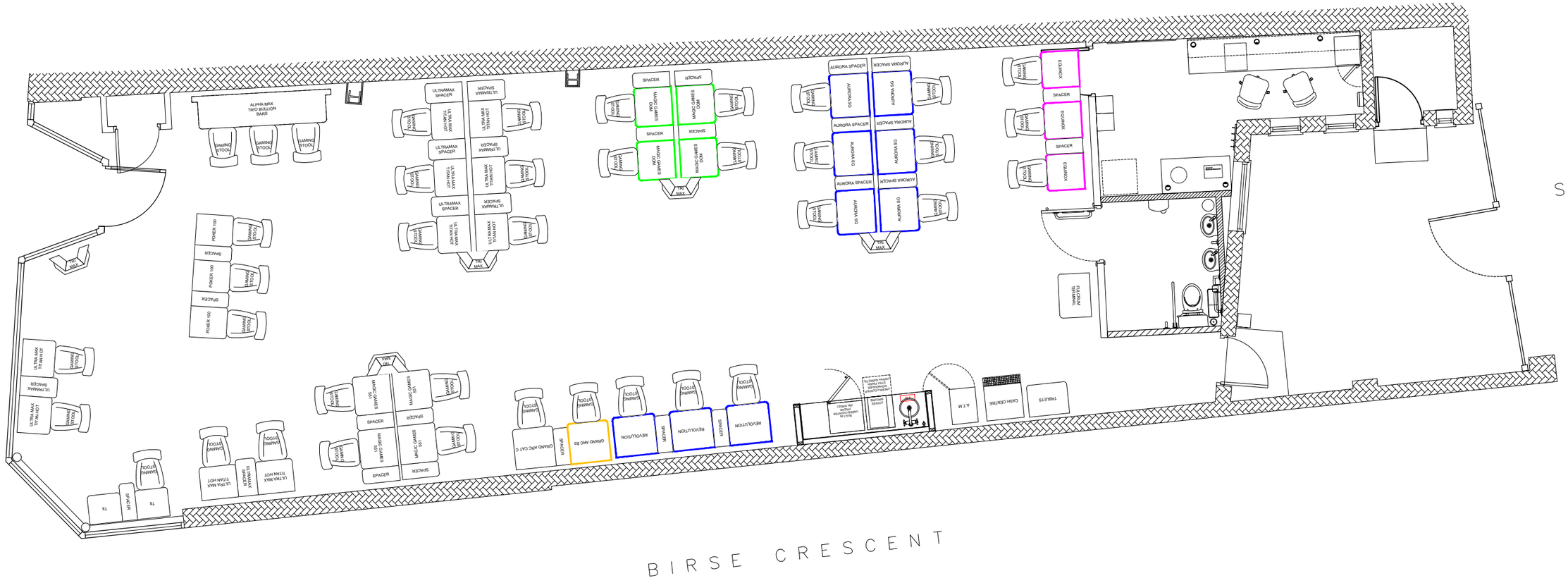
REVISION
00

MERKUR SLOTS

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PROPOSED GAMING AREA: 121.9m²
FOR ILLUSTRATION PURPOSES ONLY

PLEASE NOTE: SPACERS ARE NOT GAMING MACHINES



REVISIONS REV 00:	FIT OUT TYPE LICENCING	REFERENCE DRAWINGS	
	PROJECT MERKUR SLOTS 265 NEASDEN LANE NEASDEN NW10 1QG	SCALE 1:75	
		DRAWN BY MG	
	DESCRIPTION PROPOSED MACHINE PLAN 52	DATE 13/11/24	
		DRAWING No. 905-PL-105	REVISION 00

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Merkur Slots UK Limited
Operational Standards

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 fulltime Night Manager.
- Merkur Slots UK does not operate a single-manning policy between 10pm 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.

- We encourage customer-facing employees to use positive discretion to resolve customer issues at a local level, where possible.
- Our Customer Complaints procedure is display 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 complete a comprehensive 13 week 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 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 ServeLegal are our third-party independent partner for compliance testing. Test results are reported to the Gambling Commission.
- All licensed premise employees receive induction and six-monthly refresher training during 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.
- Merkur Slots UK have a Safer Gambling Team dedicated to supporting venues with meeting this licensing objective and their socially responsible requirements.
- 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, prevention, and treatment (RPT) of problem gambling.

All three licensing objectives are embedded at all levels within the organisation via training both online and face to face, during Operational meetings, Business Bulletin communications, Compliance/Audit visits, Safer Gambling Workshops and Annual Conferences.

WORKING TOGETHER



MERKUR 360° program

Accredited by the Global Gambling Guidance Group

THE MERKUR FAMILY

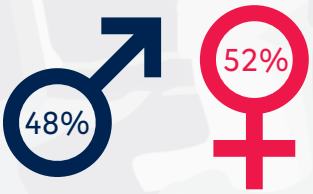
PART OF THE MERKUR GROUP

A Strong Partner For More Than 60 Years

MERKUR CASINO

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 in over 220 High Street gaming centres.



52% of employees are female

48% of employees are male

MERKUR SLOTS

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

MYTHBUSTERS
We Are Not Betting Shops







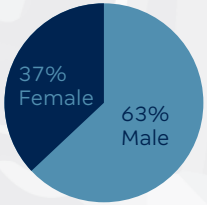


MERKUR Casino UK is one of the UK's largest operators of High Street Adult Gaming Centres (AGCs) and High Street bingo venues. AGCs are often, unfortunately, put into the same category as betting shops. This is because there is a widespread misunderstanding of how AGCs operate and who our customers are. 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 bing products are also available. These machines have been around for many, many years.

Our AGCs 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 do not offer or serve alcohol in our High Street Bingo premises.

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

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



RESPONSIBILITY IS THE FOUNDATION OF OUR BUSINESS

Think 25 Messaging





Players in Venue





We Are Not A Problem

Being a responsible operator is high priority across the 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

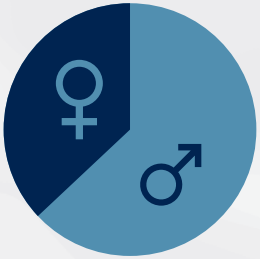
MERKUR Casino is regulated by the Gambling Commission and Licensing Authorities

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

25

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



Think 25

We are subject to regular independent test purchases and are consistently above the average leisure 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 centres.

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.

Compliance



Training Centre



Online Training





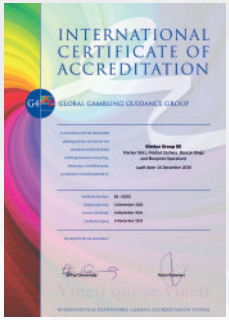
SOCIAL RESPONSIBILITY MEASURES IN PLACE

Machine Messaging



Customer Interaction Training





All Levels

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

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

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

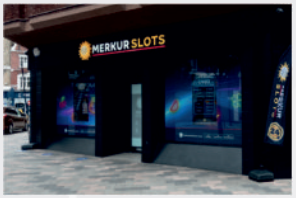
MERKUR Casino UK received the international certificate of accreditation from the Global Gambling Guidance Group (G4). Our MERKUR 360 programme showcases how we are continually improving our social responsibility commitments throughout all levels of the business.

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

- Senior Manager representation from MERKUR Group.
- Member of the National Council.
- Head of Compliance is Vice Chair of the Social Responsibility 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
phone +44 (0) 7796 614137

MERKUR Casino UK
Second Floor
Matrix House
North Fourth Street
Milton Keynes
MK9 1NJ

phone 01908 351200
email info@merkur-casino.com

MERKUR Slots recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice listed under the Social Responsibility code provision 3.4.1.

LCCP 3.4.1 – Premises-based customer interaction

The company has a detailed Safer Gambling Policy for Slots Venues which supports and expands on the procedure detailed in the MERKUR Slots Compliance Manual.

The Company makes use of all relevant sources of information to ensure effective customer interactions, in particular to identify at-risk customers who may not be displaying obvious signs of problem gambling.

If employees have concerns that a customer's behaviour may be related to having problems with gambling, the Duty Manager should be informed at the earliest available opportunity.

The Duty Manager is required to observe the individual and make a judgment as to whether it is appropriate to suggest to the customer that they might want to be provided with information regarding where they can seek professional advice about the nature of their gambling activity, or to discuss other options.

New Customer interaction – formal guidance was introduced by the Gambling Commission 31st October 2019. A copy is available to read in this section of your Compliance folder.

Customer interaction consists of the following 3 parts:

PROCEDURE

PART 1 – Identify and observe – behaviour or activity you have spotted or something the customer tells you.

PART 2 – Interact and take action - contact to prompt the customer to think about their gambling, for you to find out more, and an opportunity for you to offer information or support.

PART 3 – Evaluate and record the outcome – what you or the customer did next. In some cases, you may need to monitor the customer's gambling to spot any change which may prompt further action.

REMEMBER reporting an Interaction is NOT the same as reporting an Incident. An Interaction is a conversation with or an observation of a customer in regard to their gambling behaviour.

Conversations that have been had with a customer, are not just to be recorded at the point that signs of Gambling Harm have been observed,

they should be a record of the customer's journey with MERKUR as part of Customer Service rounds.

Recording what is considered 'usual' behaviour, will allow all employees to understand when a change is taking place, and interact with and record the conversation at a point before a customer starts to exhibit more severe behaviour.

The above 3 parts may include the following:

- Members of staff are trained as part of their 3-month induction process in the understanding of, and the strict adherence to this policy and accompanying logs.

- In addition to induction training, Safer Gambling Interaction and Evaluation, workshops are held with all senior management, managers, and supervisors within the Slots venues, to ensure they are fully aware of their responsibility in the monitoring and evaluation of Interaction/Conversations which take place in the venue.

- All Customer Interaction/Conversations must be logged on the Smart Tablet and are evaluated by a member of management with additional information or follow up conversation requested should it be felt insufficient information has been recorded.

- Recording a 'general' conversation that has taken place with a customer, in the course of an employee's normal customer Service role, will enable future monitoring and Interaction/Conversations to take place with any customer who starts to show a change in behaviour – whether this is visit frequency, pattern of play or length of time spent in the venue etc.

- For Machine players, machine hosts are trained to observe behaviour and have an Interaction/Conversation with customers where they observe changes in usual behaviour or signs of Gambling Harm.

- All employees are aware of those customers that are frequent visitors or deemed to be regular players. That monitoring and interaction needs to take place with these customers during their visits. An interaction may lead to the Duty Manager having to intervene or take appropriate action, possibly using the Machine Administration Reconciliation System (MARS), which provides the data to review the spend/play on most machines, for those customers deemed to be potentially at risk. Appropriate action would then be taken on a player-by-player basis.

- Behaviors that may be a result of a customer suffering from Gambling Harm may include intense mood swings, aggression, hysteria, remorse, excessive ATM use, excessive time and money spent, damage to property, violence, or the threat of violence to staff or other customers.

- Employees are aware of where customers can be directed for confidential advice should they be approached by them for help or when they identify signs of gambling harm. This Includes the Staying in Control information leaflet which includes GamCare Helpline.

- Employees are trained to guide customers through the process of self-exclusion if they consider a customer is at risk and/or where a customer requests self-exclusion information, this will be fully explained, and T&Cs provided to the customer.

- The Duty Manager may consider refusing service or barring the customer from the premises and, in extreme situations involving aggressive behaviour, contact police for assistance. Any interaction that results in an incident of this type, whether police attend or not must be recorded on the SMART Incident App on Smart tablet.

- If the customer refuses such information and continues to behave in a manner which could reasonably be considered to be disruptive or puts employees or other customers in potential danger, the Duty Manager will implement the Company's procedures for dealing with antisocial situations.

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 each.

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

Self-exclusion social responsibility code provision 3.5.1 is a condition of our Operating Licence under the Licence Conditions and Codes of Practice – (LCCP). New regulations were implemented by the Gambling Commission (LCCP Self-exclusion 3.5.1) and as from 6th April 2016, all gaming operators must be part of a multi operator self-exclusion scheme.

If a customer wishes to self-exclude this can be actioned immediately by a member of the MERKUR Slots venue team via the Smart Exclusion App on the Smart Tablet.

Please note you will need a Wi-Fi connection to access the Smart Tablet.

PROCEDURE – Using the Smart Exclusion Tablet

When a customer has requested that they wish to be refused entry to our premises, the customer and the member of staff will formally acknowledge and document their request on the Smart Exclusion tablet. For further information please refer to the "Smart Exclusion User Guide" available at the venue.

Self-exclusion is sector specific: -

- AGC Licensed Premises - 1km exclusion zone
- BINGO Licensed Premises 'Traditional Bingo Clubs' – National exclusion zone.
- BINGO Licensed Premises 'High Street' - 1km exclusion zone.

The premise licence is displayed on the Information Board at the venue entrance and details the premises as having a HIGH STREET BINGO or AGC License and lists any specific conditions attached to the license. The Smart tablet is set by default to the appropriate license. Employees will need to explain to all customers who wish to self-exclude, that it is sector specific and that they will need to visit other establishments in their local area if they frequent other premises operating Bingo, AGC, Licensed Betting Shops and Casinos licenses, for them to self-exclude from ALL gambling premises.

Please Note: the employee dealing with the self-exclusion process should make the customer aware that if they self–exclude from a High Street Bingo Premise Licence, they will be self-excluded from all Traditional Bingo clubs in the UK.

The above is detailed in the Self-exclusion Terms & Conditions - the customer will receive a copy upon activation of their self-exclusion - a copy of these are held in the Compliance and Social Responsibility Manual.

The customer will be asked to assist us in applying the exclusion by allowing you to take an up-to-date photograph. The Smart Exclusion tablet has a built-in web cam for this purpose. You will be prompted by the on-screen instructions when to take a photo of the customer during the self-exclusion process. **A photo is a mandatory requirement. The photo should be taken of head and shoulders and must be forward facing - please ensure the background is light so the image is clear. You must not use a photo of a photo or ID document.**

The employee will confirm the customer's exclusion for a minimum period of not less than six months, nor more than 12 months.

It must be made clear to the customer that they may not revoke the self-exclusion during this time and that they are entering a voluntary agreement.

Once the customer has entered their electronic signature on the tablet and the self-exclusion is confirmed, the information will be retained on the tablet at the venue and an electronic notification will be sent to other relevant licensed premises.

Any customer held on the membership system that chooses to self-exclude with be removed from all marketing activity during their self-exclusion period.

A photo gallery is available to view for ease of identifying customers who have self-excluded in the local area from any operator and includes your venue within the selected radius. Milton Keynes Head Office will automatically be notified of all self-exclusions.

Please note on the photo gallery,

- Exclusions which are live have no coloured border.
- Exclusions which are in the 6 months 'cooling off' period have a RED border. These photos will remain on the tablet for 6 months. If the customer does not return to gambling within the 6 months period, the photo will automatically disappear and be archived (with the exception of Traditional Bingo Clubs who retain the details for a longer period of time unless the customer reinstates).
- Exclusions in the 24 hours 'cooling off period have a BLUE border. This will be visible for customers who have reinstated and wish to resume gambling and will disappear after the 24-hour period.

If a customer tries to enter a relevant gaming premises during a self-exclusion period, this is classed as a breach and details should be recorded on the tablet by selecting the customer photo and selecting the Report Breach button.

When the self-exclusion period ends, a customer has the option to return to gambling. **The customer should return to the venue where they originally self-excluded from, to complete the re-instatement process on the tablet.** This button will be visible on the tablet only after the end date of the self-exclusion period.

If a customer wishes to extend their self-exclusion period for a further 6 months, they may do so by selecting the button on the tablet.

SELF EXCLUSION PROCEDURE FLOWCHART

Self-exclusion breach

Any incidents of self-excluded customers identified as entering the premise during their self-exclusion period must be recorded on the Smart Exclusion as a breach and the customer must be asked to leave the premise.

Self-exclusion extension

Customers wishing to extend their self-exclusion upon expiry can do so by requesting an extension for a further 6 months.

Customer wishing to re-instate after self-exclusion has expired

Customers wishing to resume gambling after a period of self-exclusion must be offered support and advice should they choose to re-instate. They must return to the venue in which they originally self-excluded to complete the re-instatement process with a member of staff who will conduct an interaction and guide them through the re-instatement process.

Once the re-instatement has been processed the customer enters a 24 hour cooling off period. Information will also be provided on how to extend the self-exclusion period should they wish to do so.

For full operating instructions for the Smart Exclusion tablet please refer to the Smart Exclusion User Guide available in the Compliance Manual at your venue.

TABLET – STAFF TRAINING

For staff training purposes follow the instructions on the tablet and enter the following details on New Exclusion – Contact Details page:

First Name: **dummy**
Last Name: **test**

You **do not** need to take a photo of a person, just point the camera to the floor and take the photo. All test entries will automatically get archived once a week from the database.

Smart Tablet malfunction

If for any reason your Smart Tablet is unavailable for use due to malfunction, please contact IT Support immediately who will investigate and resolve the issue. ITSupport@MERKUR-casino.com

Should a customer wish to self-exclude and your tablet is not available due to malfunction please complete the Manual Self-Exclusion request form with the customer and send immediately to Compliance_UK@merkur-casino.com a member of Compliance will contact the customer for an image and ID Verification to activate the self-exclusion.

Smart Tablet theft – please contact IT Support immediately who will ensure the tablet is deactivated and a replacement arranged.

POLICY

The Company recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice.

LCCP 5.1 Rewards and Bonuses
- 5.1.1 - Rewards and Bonuses – SR Code
- 5.1.6 - Compliance with advertising codes
- 5.1.9 - Compliance with industry advertising codes
- 5.1.11 - Direct electronic marketing consent

COMPLIANCE

All advertising and marketing by the Company comply with standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).

We adopt the general principles that our advertising is:

- Legal, decent, honest and truthful.
- Prepared with a sense of responsibility to consumers and to society.
- Respectful to the principles of fair competition generally accepted in business.
- Not intended to bring advertising into disrepute.

Specifically, we ensure that:

- Advertising contains nothing that is likely to lead people to adopt styles of gambling that are unwise.
- Advertisements and promotions are socially responsible and do not encourage excessive gambling.
- Care is taken not to exploit the young, the immature or those who are mentally or socially vulnerable.
- Advertisements are not directed at people under the age of 18 years through the selection of media, style of presentation, content or context in which they appear. No medium is used to advertise gambling if more than 20% of its audience is under 18 years old.
- Persons shown gambling are not, nor do they appear to be, under 25 years of age.
- There is honesty at all times with regard to the chances of winning, the likelihood of a big win, and the odds or payout ratio that applies to the gambling on offer.
- Advertising and promotional material carries a reference for the need to keep gambling under control.
- It is never suggested or implied that gambling is a means of getting out of financial difficulty.

MARKETING AND PROMOTION

Any incentive or reward scheme or other arrangement under which the customer may receive money, goods, services or other advantage (including the discharge in whole or in part of any liability (the benefit)) the scheme is designed to operate, and be operated, in such a way that neither the receipt nor the value or amount of the benefit is: -

A. Dependent on or calculated by reference to the length of time for or the frequency with which the customer gambles or has at any time gambled.
B. Dependent on the customer gambling for a pre-determined length of time or with a pre-determined frequency.

If the value of the benefit increases with the amount the customer spends, it does so at a rate no greater than that at which the amount spent, increases. Incentives and rewards are proportional to the type and level of the customer's gambling.

PROCEDURE

All Marketing and Promotions must be compliant.

All Marketing and Promotional activities must be approved by one of the following Managers relevant to the site.

- Operations Director
- Head of Compliance
- Marketing Director

MARKETING CODE OF PRACTICE

A GUIDE TO GETTING OUR ADVERTISING AND PROMOTIONS RIGHT – EVERY TIME !

The Marketing Department provides an annual programme of National activity.
All these communications and point-of-sale/display materials are legally compliant and present our customers with a fair and professionally managed image of a responsible gaming provider.
HOWEVER, occasionally 'local' activity may be requested from you. All 'local' activity should be cleared through the Marketing Department. This will ensure we are always:

LEGAL - DECENT - HONEST - TRUTHFUL

1. All our advertising and promotions must be legally compliant and MUST NOT be misleading or indecent.

2. All our advertising and promotions must be socially responsible and NOT promote gambling for financial gain.

3. All our advertising and promotions must be TRANSPARENT and clearly state the offer and any requirements or conditions applied to obtaining it.

4. Any terms or conditions related to the offer, including offer end dates MUST BE displayed clearly at the point-of-sale and/or on any related printed literature or publicity materials.

5. Any printed literature, display or point-of-sale material MUST contain the company's approved compliance baseline (see example below) which includes the over 18 symbol and Gamble Responsibly statement alongside your business name, brand/logo.

6. Advertising and promotions MUST NOT be targeted at, or exploit children, or those vulnerable to gambling. The law states :

   Advertisements and Promotions should not be specifically and intentionally targeted towards people under the age of 18 through the selection of media, style of presentation, content or context in which they appear. All advertisers and gambling operators should already be aware that it is an offence under Section 46 of the Gambling Act 2005 to invite a child or young person to gamble.

7. The use of models, photographic images or illustrations in advertising or promotions must look a minimum of 25 years of age.

8. DO NOT make purchase a condition of entry into a draw or raffle – buying a 'chance' of winning is a lottery, so always state NO PURCHASE NECESSARY (even if for charitable causes).

9. DO NOT present offers which reward extended play or incentivise disproportionate stake levels.

10. ALWAYS communicate offers clearly in grammatically correct English, avoiding slang, expletives or abusive text. Avoid anything customers could perceive as offensive or discriminatory and remember the 4 key code words:

LEGAL - DECENT - HONEST - TRUTHFUL

GUARANTEED JACKPOT WINS FOR EVERYONE!

PLAY THIS AND DOUBLE YOUR MONEY!

YOU WILL WIN A FORTUNE!
NO TERMS AND CONDITIONS

BEST BEFORE END

OVER 18 ONLY

THINK

FREE TO ENTER?

PLAY LONGER WIN MORE

IMPORTANT: All local promotions are required to be run through the Marketing Department.

Responsible Gambling Messaging

MERKUR have always adopted Think 25?

MERKUR implemented ‘multi-lingual’ Staying in Control leaflets and posters

All digital B3 and Cat C machines have RG messaging

Responsible Gambling Messaging

Machine Set Your Limits

Gamcare QR code integrated into machine and venue signage

Safer Gambling Week

INTRODUCTION

The MERKUR Money Laundering policy has been implemented in order to comply with the Money Laundering Regulations 2007 that requires processes to be adopted to avoid the possibility of money laundering.

LCCP 12.1.1 - Anti-money laundering - Prevention of money laundering and terrorist financing.

New obligations in respect of money laundering were imposed by the Proceeds of Crime Act 2002 (the "POCA") and the Money Laundering and Terrorist Financing Regulation 2017 ("the Regulations"). This legislation broadens the definition of money laundering and increases the range of activities caught by the statutory control framework. As of 10th January 2020, new money laundering regulations came into force. The regulations are applicable to the Licence Conditions & Codes of Practice (LCCP). Whilst our venues/sector is considered "Low Risk", this does not mean that there is "no risk" within our trading sectors.

As a result of this legislation Merkur Casino UK brands are required to establish procedures to prevent the use of its services and resources for money laundering. Anti-Money Laundering is effective within our business by taking a "risk based" approach.

MONEY LAUNDERING DEFINITION

Money laundering is a process by which the proceeds of crime are converted into assets which appear to have a legitimate origin, so that they can be retained permanently or recycled into further criminal enterprises. This definition of money laundering means that potentially any employee could contravene the Regulations if they were to become aware of, or suspect, the existence of criminal property and continue to be involved in a matter which relates to that property without reporting their concerns. In arcades, both Adult Gaming Centre (AGC) and High Street Bingo (HSB), this is typically stained or dyed notes and foreign coins. We should also be mindful of significant increases in customer spending habits which may be an indicator of criminal spend. In practice this is the most likely area of potential money laundering within our venues.

MONEY LAUNDERING POLICY

Brands operating under Merkur Casino UK are committed to ensuring that all necessary safeguards are in place with regard to the receipt of money in order to avoid it being used to launder money that may originate from the proceeds of crime.

Merkur Casino UK has detailed a Money Laundering Policy available to all employees on MyMERKUR and has appointed a designated Money Laundering Reporting Officer

(MLRO), Mrs. Amanda Kiernan. Email: AKiernan@merkur-casino.com

The deputy MLRO is - Mark Wells. Email: mwells@merkur-casino.com

All relevant staff are trained on the requirements of the Regulations and told of the need to report any suspicious cash transactions. All venues need to report any suspicious cash transactions of any note denomination value, including stained/dyed notes, and foreign coins to the value of £50 during one machine empty or cash collection. These incidents should be reported using the "(AML) ANTI MONEY LAUNDERING" app available on the Smart tablet. An automated alert will be sent to the Money Laundering Reporting Officer for the purpose of informing the relevant authorities.

DISCLOSURE PROCEDURE

Where it is suspected by a member of staff that money laundering activity is taking/has taken place, a disclosure must be made to the Money Laundering Reporting Officer as soon as possible. Because of the importance attached to the process, notification should normally take place immediately by telephone or, where that is not possible, by any other expedient means, including automated alerts of the "(AML) ANTI MONEY LAUNDERING" report available on your SMART tablet. Where there is suspicion of any type of potential money laundering incident CCTV images (if available and relevant) should be retained securely.

All incidents should be reported to your line Manager.

The Money Laundering Reporting Officer will maintain records of all notifications received detailing the method of verification used to identify the suspected person.

CASH HANDLING

Operating policies and procedures are in place regarding accounting practices and record keeping in respect of: -

- Monetary stakes introduced to machines (gross takings where available).
- Promo ticket transactions.
- GeWeTe payouts exceeding £1k approval.
- Customer refunds due to machine malfunctions.
- Money removed from machines (net takings where available). Where gross takings and net takings information is not available the operation will provide an explanation to the Commission
- Ticket In Ticket Out (TITO) vouchers from machines in arcades can be used for money laundering. Vouchers can be cashed in at a later date and criminals will use a range of outlets to disguise the origin of funds.

Members of staff, where appropriate, are trained as part of their induction process in the understanding of, and the strict adherence to this policy, and required to sign to the effect retaining a copy for their future reference. The original is retained on the employee's personnel file.

Both violence and aggression can be indicators of distress, to gain dominance and sometimes to maintain stability. As such they can be termed 'normal' if not always socially acceptable.

WHAT CAUSES AGGRESSION AND VIOLENCE?

There are many reasons why someone may behave in an aggressive or violent manner towards an individual or object. Below are some of the reasons in different situations.

Platonic	Human beings tend to judge things they are familiar with as good and things not familiar as suspect.
Instinctive	The best defence is attack!
Learned Behaviour	Aggression is sometimes part of the behaviour we have learned from society.
Energy Source	Natural release of pent-up instinctual energy - a pressure relief valve. Many of the activities socially acceptable are high forms of controlled aggression. The career drive in some people may be explained as an attempt to express instinctual aggression drive, but in a way, society accepts and rewards.
Frustration Response	When frustration in an individual reach's certain levels the only option open may be a display of aggression.

WHAT ARE SOME OF THE CAUSES OF VIOLENCE?

There are two aspects to consider:

Physical	Such as Brain Damage, Drug Abuse, Alcoholism, Sexual Abnormalities, Pain, Hunger, Sleep Deprivation, Environmental Changes (weather), Appearance, Illness, Defence of Territory of Possessions, Age.
Psychological	Such as Fear, Frustration, Humiliation, Inappropriate Assertiveness, Pain, Vulnerability, Threats (Defence of self), Age, Illness (affective disorders, schizophrenia), Oppression.

IDENTIFYING AN AGRESSIVE OR VIOLENT PERSON

There are tell-tale signs, so the key thing is to observe the customer discreetly whilst going about your duties. This way you will spot a change in demeanour or behaviour. These are some of the signs that can help in predicting the likelihood of imminent violence:

- Muscles tensed?
- Facial expression?
- Agitated?
- Pacing about?
- Withdrawn on approach?
- Voice - change of pitch/tone; insults; obscenities, threats?
- Sweating?
- Breathing - increase in respiration?
- Tearful?

PROCEDURE

Quite simply whenever there is an incident you should adopt the HEAT approach:

H Hear the customer – listen to their complaint or issues.
E Empathise – see to understand the problem.
A Acknowledge – 'I hear what you are saying', 'I'm sorry you feel that way'.
T Take Action – progress with whatever action is relevant to the situation.

Here are some further techniques which can help when responding to a customer behaving aggressively or violently: -

- Be alert and consider if you need further assistance.
- Control your behaviour in body language, feelings, and expression.
- Avoid eyeball to eyeball confrontation.
- Relieve the tension by adopting a calm approach.
- Speak and stand calmly but always remain balanced and ready to move.
- Consciously lower pitch and volume of voice.
- Speak clearly and slowly and do not stop talking because the other person does not answer.
- Try to get the person talking.
- Listen to what the person says and how it is said.
- Try to identify the source of concern and offer help if possible.
- Try to distract the person from the immediate cause of concern by changing the course of conversation - buy time to think, to plan, to obtain assistance.
- Understanding and kindness, simple human values which are often overlooked in today's society, can have a marked effect on the outcome of such cases.
- Do not argue!
- Do not give orders.
- Never make promises you cannot keep.
- Do not disagree unless necessary.
- Do not make threats that cannot be carried out or offer rewards for what started out as unlawful or improper conduct.

During conversation with the person being confronted use expressions such as:

- "I know you have a problem",
- "I know you are upset",
- "I believe you when you say something is wrong."
- Remember…. Keep your voice at a calm, even level.

These expressions will show that you have some affinity with the person and his/her position.

- Always consider if you need further assistance from a colleague if the person becomes abusive in their language or behaviour they should be asked to leave immediately.

  (Remember to refund their stake money). If they refuse to leave, then assistance from management or the police should be sought.

PREVENTING EMPLOYEES FROM BEING ABUSED

Under no circumstances should employees put themselves at risk with an abusive customer. If the following of the guidelines above has failed in calming a customer or the customer refuses to leave the premises when asked, a manager should be called. If the customer is still aggressive and still refuses to leave the premises, then the police should be called.

At no time should employees intervene physically in the removal of an individual from a site. All incidents should be fully recorded on the Smart Tablet Incident log and, where appropriate as an Interaction/conversation on Maxim.

DE-ESCALATION TRAINING

To support employees in dealing with an aggressive customer Merkur Slots has a programme of de-escalation training which is rolled out to all senior Slots employees.

Day 1 – Induction Level 7 Level 6 Level 5

REMINDER – Please ensure that the Day 1 – Induction is completed on the first day.

Training

How often have you started a new job, and all the training has been crammed into the first couple of days? It has been common practice in ensuring that the three main compliance courses are done on day one. Whilst this has been company policy, it is not a legal requirement.

With this in mind, we wish to spread out all aspects of training over a period of weeks, and not overwhelm the new starters. We recommend that you follow this guide, but you do have flexibility within each week; this will help meet the needs of the business. We understand that it may not be completed sequentially.

First impressions count

It is well documented that someone will form an impression of you within 7 seconds. A genuine warm welcome to a new colleague could make all the difference, and make them feel valued, right from the start.

As their line manager, make time to spend with them, and give them your full attention. Whatever you do will impact on their opinion of you and our company. A well thought out and implemented induction could help retain new staff, whilst creating a positive and professional impression.

Preparation

- Have you taken the time to read and understand all the guides in full, and prepared all necessary resources available to you?
- Is there a computer available, which the new employee can use?
- Do you have a member of staff on duty, that the new team member will be able to shadow?

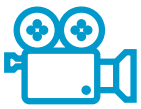
Housekeeping

- Welcome the new member of staff and offer them a refreshment.
- Introduce them to their colleagues, and any customers in the venue.
- Mention if there is a planned fire drill.
- Show them where they can keep their personal belongings.
- Point out where the toilets are.

Introduction to Workday/Litmos

New employees:

- Guide the new employee through Litmos and the functions they will be required to use.
- Highlight the mandatory courses that need to be completed on Litmos. The courses will be spread out over the 12-week induction. Too many courses at once can be overwhelming, and arguably, much of the Information may not be retained.



Watch the **MERKUR UK & MERKUR International Power Point presentation** on Litmos.



Welcome to Workday (Employees) (Litmos > Content Library > Collections)



Navigation & Need to Know (Litmos > Content Library > Collections)



Navigation of Litmos Dashboard (MyMERKUR > Documents > L&D Documents > Introduction to Litmos).

Venue Tour

Give a tour of the venue, covering the layout, where important items are kept, and safety procedures that are in place.

Use the following check list to assist you:

Fire safety

- Point out where every fire exit is.
- Walk through every route of escape.
- Highlight where the fire assembly point is.
- Point out all the fire extinguishers.
- Identify all the alarm call points.
- Show them where the customer's smoking area is, and where staff are permitted to smoke.

Compliance

- Talk through what is on the information board.
- Show the employee where the Compliance folder is kept and talk through it.
- Show the employee where the Ops Manual can be found online.
- Give a general overview of everything the tablet is used for.
- Explain our policy on Identifying visitors, internally and externally.
- Show the trainee where the first aid box is kept.
- Point out where the accident book is kept.
- Explain where risk assessments can be found, and what they are for.

REMEMBER - There may be procedures and requirements that are unique to your venue. Does your premises licence have any special conditions? The new member of staff needs to be made fully aware.



Complete the **Venue Tour Activity** on Litmos – Week 1 Learning Pathway.

Team Structure

Explain the team structure within the venue, and operations. Give the employee an understanding who is there for support in their new role.

- What are all the job roles within your venue.
- Who is the Cluster Manager, and what is their role.
- Who is the Area Manager, and what is their role.
- Who is the Operations Director.
- Where the Emergency Contacts list can be found.

Workday App

Ensure that your trainee has downloaded the Apps required for Workday and understands how to use and access them. They should have:

- Workday App
- Docusign
- Authenticator

Check In/Out – Part 1

Step 1	Point out where the SMART tablet is kept.
Step 2	Identify the Check-In/Out section.
Step 3	Explain how to use the Check-In/Out section.

REMEMBER – If you do not check In/Out, you will not get paid.

The employee is now aware that they must check in and out every time, but it is also necessary to approve the submitted time at the end of the week, every week.

At the end of week 1 your trainee will have checked in and out multiple times and will be able to see the full picture. This is the time from them to approve the submitted time.



Time & Scheduling Check In/Out (Litmos > Content Library > Collections)

HINT – This would be a good point to introduce the trainee to the MS28 – **Staff Signing In and out record.**

Scheduling

One of the most important things for an employee, is knowing when they are working, so this is suitable time to introduce them to their schedule:

- Show them how they can see their schedule on the App.
- Show them where they can see the hard copies.



Welcome to Time & Scheduling Hub (Employees) (Litmos > Content Library > Collections



Overview of how to view schedule & review shifts (Litmos > Content Library > Collections)

HINT – Does the trainee know the shifts they will be working for the rest of the week?

Standards & Expectations

Talk through our brand values, and the 5 pillars.



Complete the **Brand Activity** on Litmos – Week 1 Learning Pathway.

Explain what the company standards are and highlight what your expectations are. Areas to cover:

- Time keeping
- Sickness

Uniforms & Appearance



*You are a **'Brand Ambassador'** for our Company.*

The company philosophy of providing services at the highest level is reflected in the appearance of all colleagues within the company.

Customer Service Standards are not just how you look after our customers; it is how our customers also see you.

As a member of our MERKUR slots team, a uniform will be provided for you to wear when you are on duty.

When considering your appearance, the correct fit and condition of the uniform must be considered, along with it being presented well. You will be quickly and safely recognisable as a member of the MERKUR Slots team from a customer's point of view.

*Name badges should be worn at work as part of your uniform. "Think 25" badge **must be** worn at all times. Name badges should be displayed on the right-hand side of your uniform, "Think 25" badge is to be positioned above the name badge.*

Appearance of Employees

- *Well-groomed hair*
- *Pleasant body odour*
- *Perfectly cared hands (including fingernails)*
- *Minimal make-up*
- *Minimal jewellery "less is more"*
- *Good oral hygiene*
- *It is preferred that tattoos are covered up, especially if it is explicit or may cause offence.*
- *Dark footwear only. No open footwear*
- *Standards of dress will be monitored regularly and should be adhered to at all times.*

REMEMBER – You should be leading by example. A new member of staff will have no respect for you if you do not 'practise what you preach.'



Read **CS1/01 – Uniform & Appearance** (MyMERKUR > Documents > Venue Documents > MERKUR Slots Operations Manual > Customer Service).



Read **GP8/01 – Sickness/Injury Reporting** (MyMERKUR > Documents > Venue Documents > MERKUR Slots Operations Manual > General Procedures).

Compliance Essentials – Equality & Diversity



E-learning to be completed on Litmos – **Compliance Essentials – Equality & Diversity 1.0 (UK).**

Smoking & Vaping

Explain the company policies on smoking & Vaping. This is an ideal time to lay out your expectations regarding smoke breaks.



Read **CS12/01 Employee Smoking & Vaping** (MyMERKUR > Documents > Venue Documents > MERKUR Slots Operations Manual > Customer Service).

Introduction to the shop floor

Allocate time for the new member of staff to work on the shop floor. Ideally, it should be with yourself, but it could be any member of staff that works to standard.

This is an observational exercise, and the trainee should be shadowing whomever they are working with. During this time, ask the trainee to record what they see: e.g., staff acknowledging customers when entering. Give them a copy of the WOW factor and the customer journey.

Fire Safety – Part 1

Fire drills are particularly important, and new starters often get forgotten about.

TASK – Run a fire drill and complete the fire register log.



Read **HS2/01 – Fire Safety** (MyMERKUR > Documents > Venue Documents > MERKUR Slots Operations Manual > Health & Safety).

REMEMBER – If an auditor turns up, and a fire drill has not been competed with the trainee, your venue will lose marks.

End of day review

It is particularly important to set out time to have a chat with your new member of staff. This will further enhance their experience. Suggested questions:

- What have you learned today?
- How do you feel the day has gone?
- Do you have any questions?

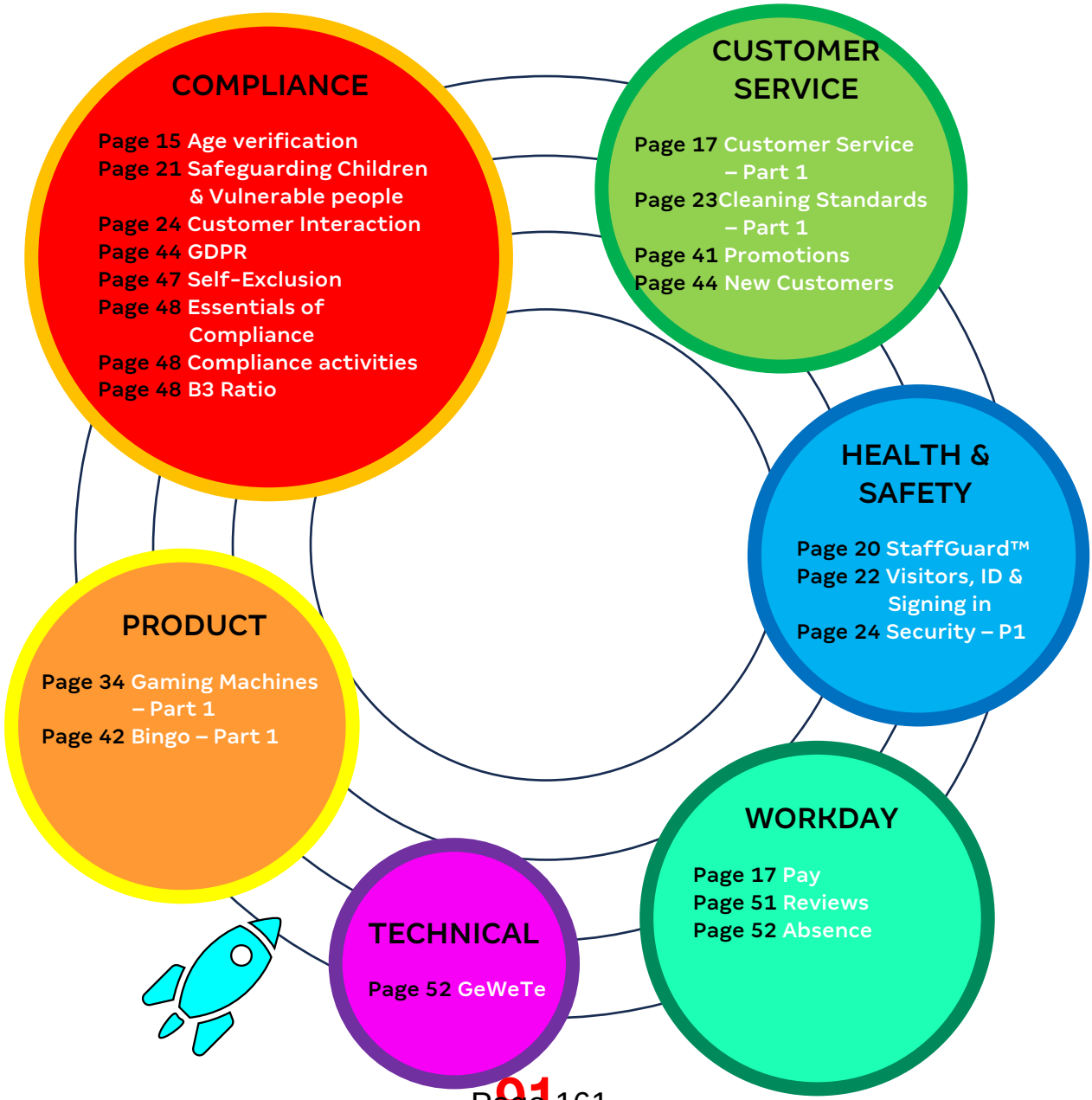
From '**Introduction to the shop floor,'** please review what your trainee observed, whilst shadowing.

Give a brief overview on what is going to be happening on day 2.

Learning Map – Week 1

You must explore all the planets orbiting the MERKUR sun. When you land on a planet you must train the subject to the best of your ability, using your experience and wealth of knowledge. You do not have to train everything on the planet in one go; you can re-visit it. You must land on every planet, but the order that you explore the planets is up to you.

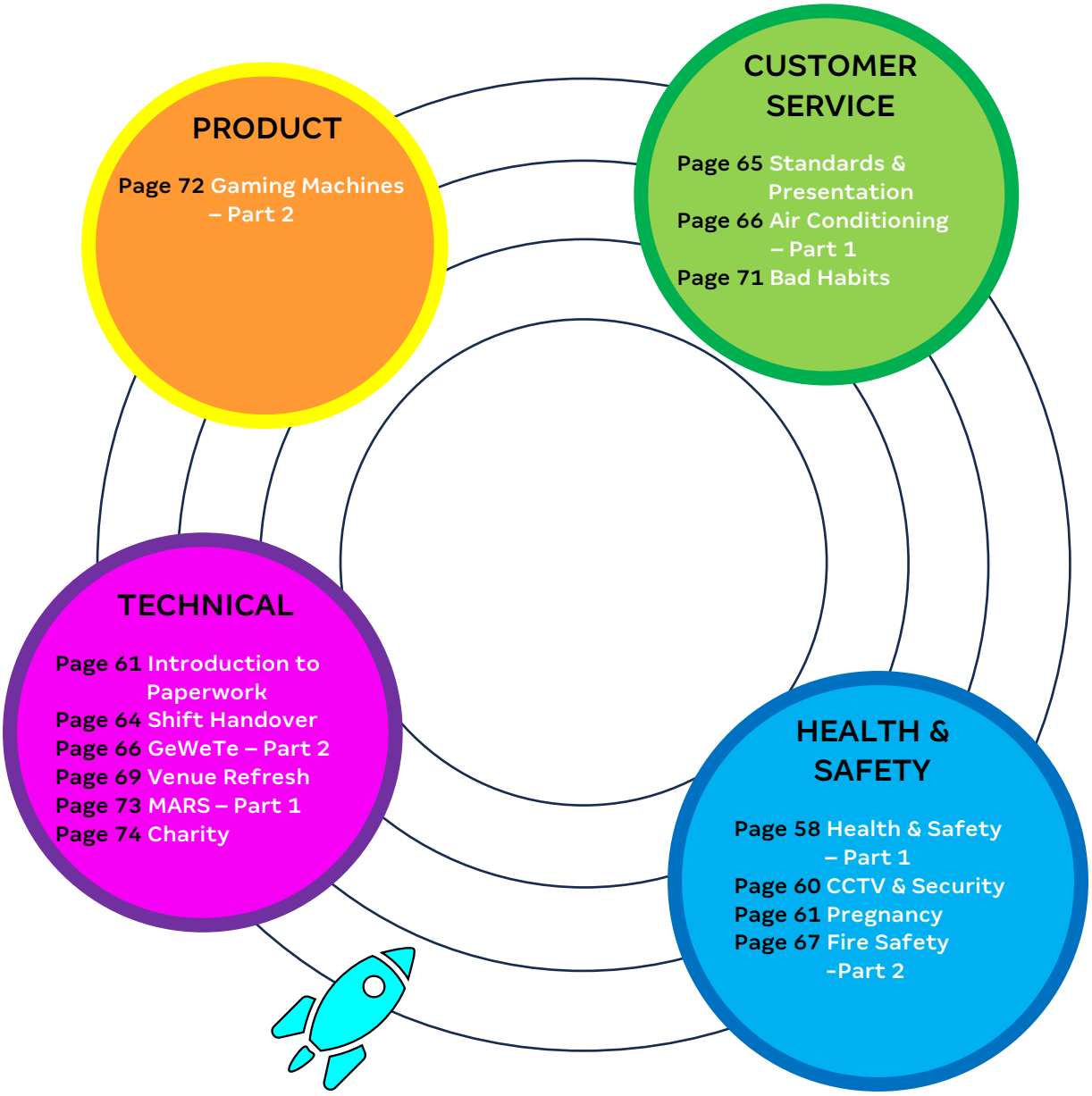
For more comprehensive information on the order to train each section, please refer to **Page 6 - How to train each week**, from the '**How to use the Management Guide to Training**'.



Learning Map – Week 2

You must explore all the planets orbiting the MERKUR sun. When you land on a planet you must train the subject to the best of your ability, using your experience and wealth of knowledge. You do not have to train everything on the planet in one go; you can re-visit it. You must land on every planet, but the order that you explore the planets is up to you.

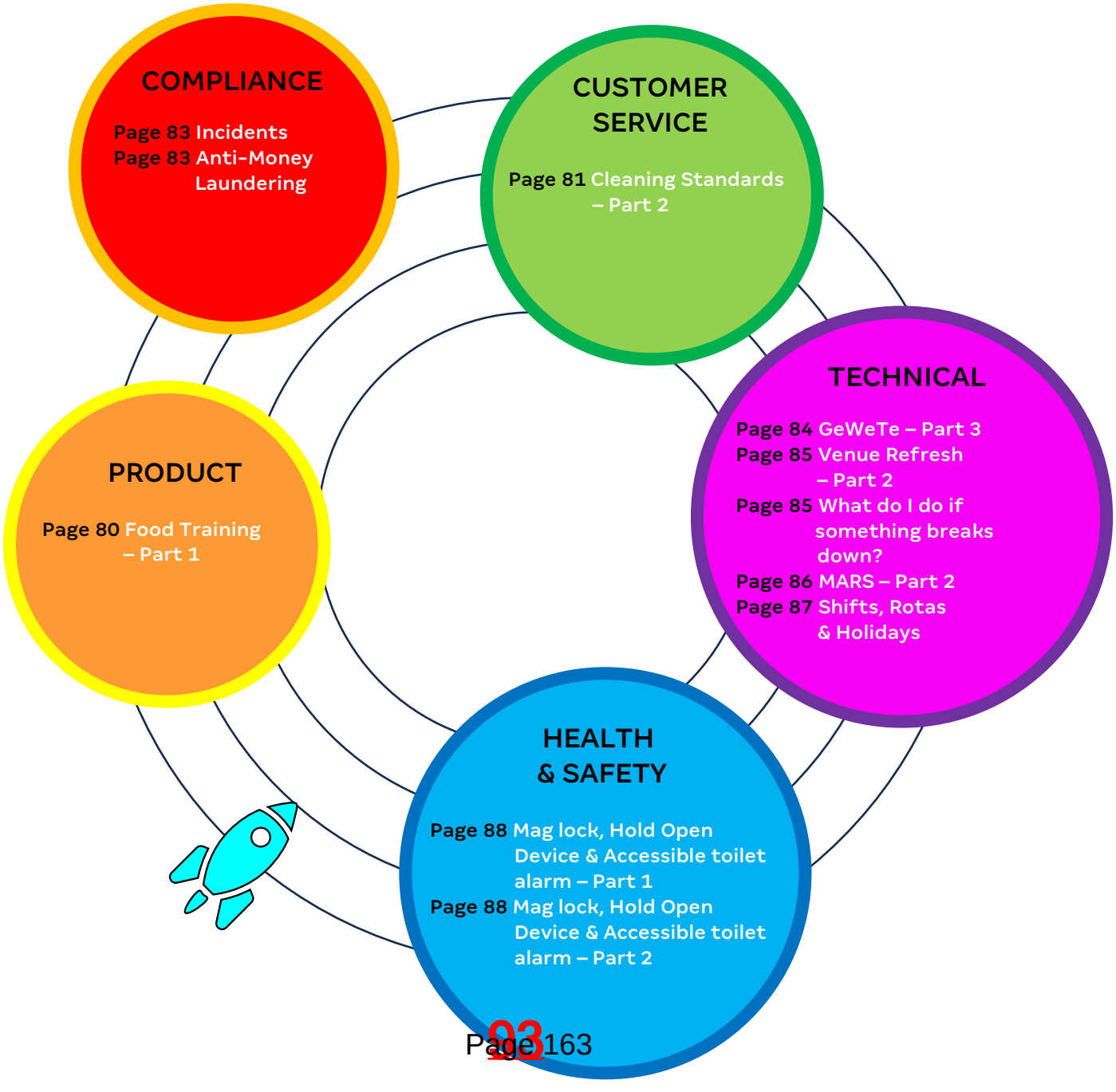
For more comprehensive information on the order to train each section, please refer to **Page 6 - How to train each week**, from the '**How to use the Management Guide to Training**'.



Learning Map – Week 3

You must explore all the planets orbiting the MERKUR sun. When you land on a planet you must train the subject to the best of your ability, using your experience and wealth of knowledge. You do not have to train everything on the planet in one go; you can re-visit it. You must land on every planet, but the order that you explore the planets is up to you.

For more comprehensive information on the order to train each section, please refer to **Page 6 - How to train each week**, from the '**How to use the Management Guide to Training**'.

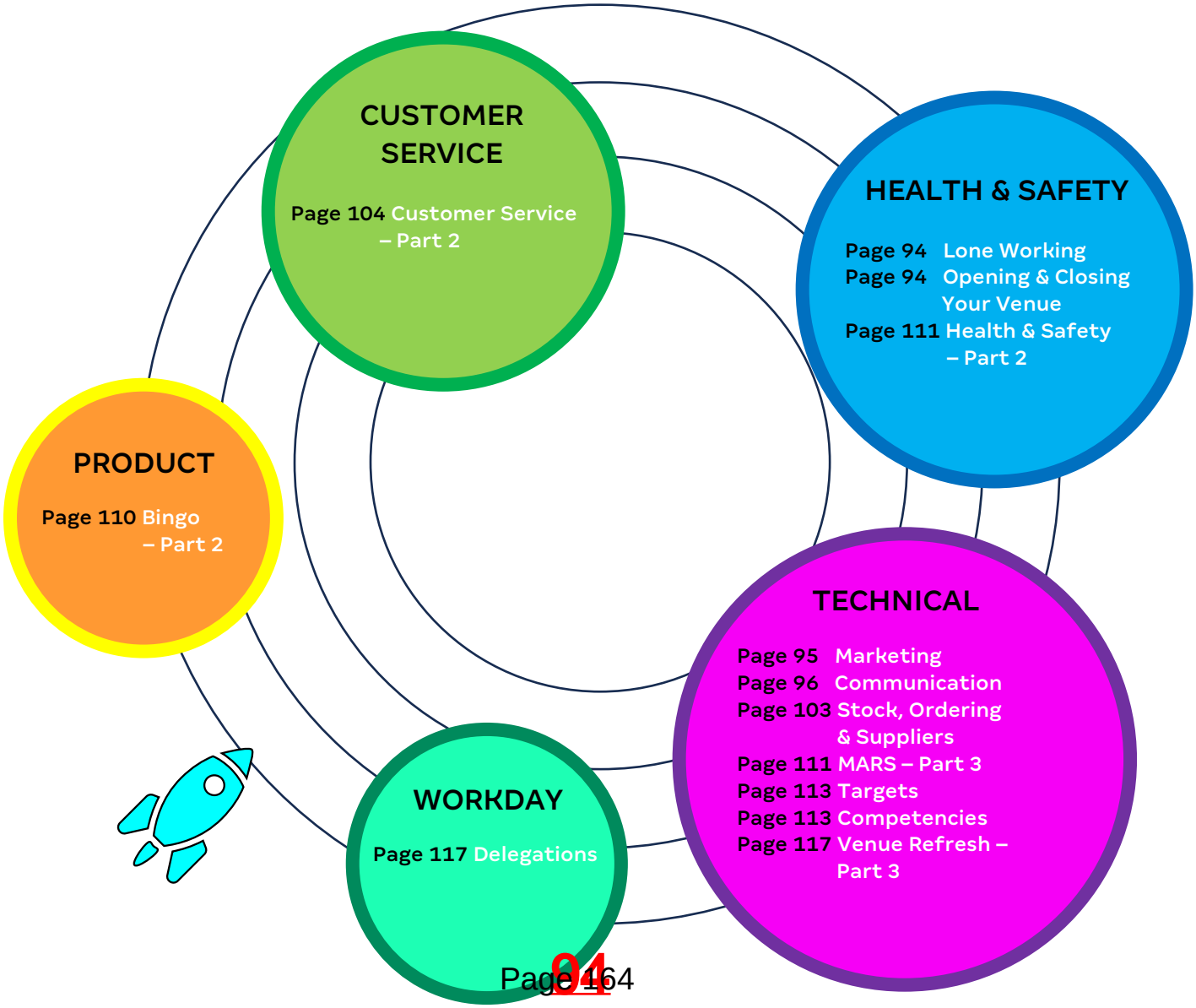


Week 4 Guide

Learning Map – Week 4

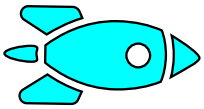
You must explore all the planets orbiting the MERKUR sun. When you land on a planet you must train the subject to the best of your ability, using your experience and wealth of knowledge. You do not have to train everything on the planet in one go; you can re-visit it. You must land on every planet, but the order that you explore the planets is up to you.

For more comprehensive information on the order to train each section, please refer to **Page 6 – How to train each week**, from the '**How to use the Management Guide to Training**'.



Week 5 Guide

Learning Map – Week 5

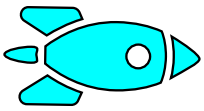


TECHNICAL

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Page 124 The Collection – Part 1
Page 128 Handpays, Cash Claims & Tito

Week 6 Guide

Learning Map – Week 6

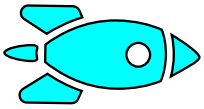


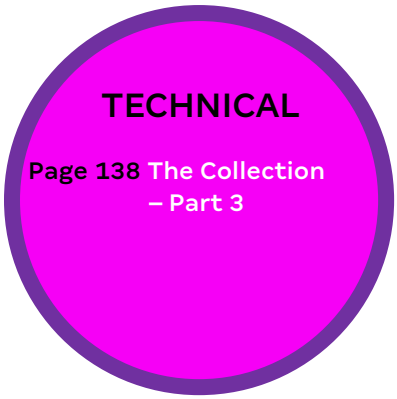
TECHNICAL

Page 133 The Collection – Part 2

Week 7 Guide

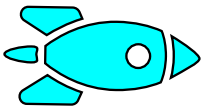
Learning Map – Week 7





Week 8 Guide

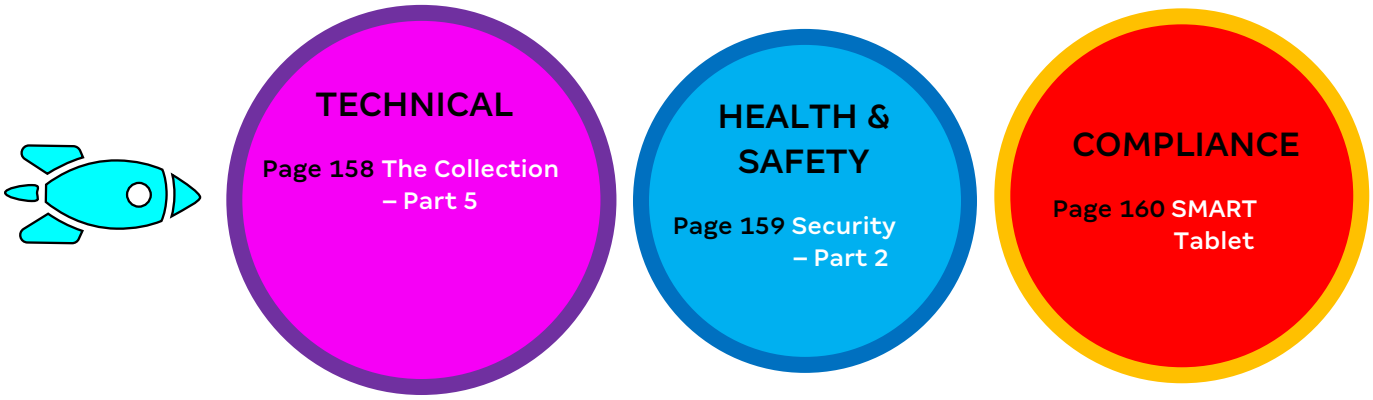
Learning Map – Week 8





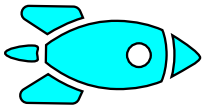
Week 9 Guide

Learning Map – Week 9



Week 10 Guide

Learning Map – Week 10



TECHNICAL

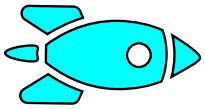
Page 167 The Collection – Part 6

COMPLIANCE

Page 167 Audits

Week 11 Guide

Learning Map – Week 11



TECHNICAL

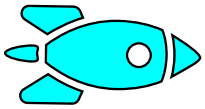
Page 171 The Collection – Part 7

CUSTOMER SERVICE

Page 171 Mystery Shoppers

Week 12 Guide

Learning Map – Week 12



TECHNICAL

Page 175The Collection – Part 8

CUSTOMER SERVICE

Page 175 WOW Factor

ROADMAP TO SUCCESS

The MERKUR Slots Roadmap to Success identifies and gives a clear journey of how to progress within your role.

You will be able to identify where you are in your journey and what is the expectation within your role. If you have an interest in progressing further the roadmap will highlight what the expectation at the next level is, and how you can achieve this.

You cannot progress further up the steps until you have achieved all requirements from the previous step and are displaying behaviours within the next levels competencies.

This Roadmap is designed to ensure that everyone has the same expectations within their role, and also allows you to develop to your own capabilities.

In the training timeline, there are seven different ways of accessing the training programme depending on where you start your journey. For anyone new joining the business you will have to complete your 12-week Induction following the relevant workbook and sign off.

This document will outline the hierarchal structure, using the job purpose and main tasks from the job description, focus on the training time lines and expectations within timelines; objective setting and reviews; and what courses/workshops will be available.

Team Member Level 7

12 Week Induction

Workbook

Keyholder/Team Member R2 Level 7

4 Week Step Up

Workbook

12 Week Induction

Supervisor Level 6

4 Week Step Up

Workbook

12 Week Induction

TIC/Assistant Manager Level 6

4 Week Step Up

Workbook

12 Week Induction

Venue Manager Level 5

Step into next available appropriate role

Workbook

12 Week Induction

Cluster Manager Level 4

12 Week Step Up (Cluster Manager Assessment / Review)

- Workbook

12 Week Induction

Area Manager Level 3

12 Week AM Induction

- AM Workbook

You must attain the competency of the previous step before progressing	Team Member	Keyholder	Supervisor	Assistant Manager/TIC	Venue Manager	Cluster Manager	Area Manager
INITIAL TRAINING PERIOD	Weeks 1– 12 Venue Manager - Responsible for Sign off Workbook	4 Weeks Venue Manager – Responsible for Sign off	4 Weeks Area Manager/Cluster Manager – Responsible for sign off	4 Weeks Area Manager/Cluster Manager – Responsible for sign off	Step into Next available role Area Manager/Cluster Manager – Responsible for sign off	12 Weeks Area Manager/Operations Director – Responsible for sign off	12 Weeks Operations Director – Responsible for sign off
BEHAVIOURS	**Team Member can demonstrate and apply the following:** • To promote the Company in a positive manner when dealing with internal and external customers. Assisting customers with queries, pay outs and any other issues that may arise. Own and resolve problems escalating where appropriate and in accordance with the complaints policy. • To manage the customer journey through the WOOOOOOOW Factor. • To follow all relevant company policies and procedures ensuring safety and security processes are adhered to. assist with pre- collection/midweek collection procedures as directed if required. • Complete company paperwork and accounting as per company policies. • To ensure the venue is compliant following all relevant policies and procedures outlined in the Compliance Manual. • To carry out any other reasonable duties as required, undertake additional or alternative duties related to you position as directed from time to time by your line manager. • Keep up to date with changes to the business using relevant systems (Meetings/MyMERKUR/Litmos/Workday etc).	**Keyholder can demonstrate and apply the following:** • To ensure that customer service is carried out in line with the company standards owning and resolving any problem. • Ensure that customer complaints are dealt with as quickly as possible. • Responsible for understanding and ensuring compliance with internal Responsible Gambling policies and UK Gambling Commission Licence Codes of Conduct and Practice (LCCP). • Organise team when working in the capacity of the keyholder to ensure all tasks are completed to the company standard. • To ensure that all machines in venue are playable, reporting any machines faults on MARS.	**Supervisor can demonstrate and apply the following:** • Establish and maintain customer service standards, positive experience on behalf of the company and maximise income wherever possible. • To ensure that all employees perform to required personal and company standards promoting teamwork to enhance business opportunities. • Ensure that all daily/weekly/periodical administration is completed at the correct time and to the required standard. Retain completed administration in line with company policy and legal requirements. • Standards are maintained at a high level and that all housekeeping standards are adhered to. • To monitor competitor activity, report as appropriate and recommend action where required.	**Assistant Managers can demonstrate and apply the following:** • Support the VM or Cluster/Area Manager in operating the venue. • Leads by example ensuring the team understands how to deliver excellent customer service. • Aware of the company audit requirements and ensure the team are implementing daily. • Support VM in managing the team. Play an active role in team briefings as and when required as well as attend Area meetings as required. • Create schedules and support the VM, in manning the venue. • To support the VM in achieving KPI's and audits. • Review employee training in line with company policy. • Effectively manage the machine arcade alongside the team to maximise revenue opportunities.	**Venue Managers demonstrate and apply the following:** • To undertake team briefings as and when required as well as attend Area meetings as required. • To conduct regular, random checks of floats, keys etc on all employees, taking appropriate action where necessary. • Complete schedules to support the needs of the business, in line with the company policy. • To achieve KPI's and audits. • Ensure employee training is completed in line with launches, refreshed and in line with company policy. • To implement appropriate marketing/promotional activities to maximise revenue opportunities. • To monitor and analyse machine income levels and recommend appropriate action to maximise revenue.	**Cluster Managers demonstrate and apply the following:** • Support the Area reporting in to the Area Manager. • Responsibility of a Cluster of venues with the VMs reporting into the Cluster Manager. • To monitor and analyse Area performance and recommend appropriate action to maximise revenue opportunities through regular KPI meetings.	**Area Managers demonstrate and apply the following:** • Review Area activity in relation to promotional activity and customer journey to improve performance. • Work collaboratively with other functions in the operation to deliver the best customer experience and results. • To monitor and analyse Area performance and recommend appropriate action to maximise revenue opportunities through regular KPI meetings. • Attend and present at Sales Meetings highlighting area performance and future plans. • Hold regular Area Meetings to discuss performance and share best practice through the team. • To conduct regular Audit checks and take appropriate action where necessary

	Team Member	Keyholder	Supervisor	Assistant Manager/TIC	Venue Manager	Cluster Manager	Area Manager
TECHNICAL SKILLS	• To ensure that the venue housekeeping is of the highest possible standards at all times. • To routinely clean all AGC equipment both before and during trading hours to ensure customers receive a high standard of presentation of equipment at all times. • To acquire and maintain a high level of machine knowledge both product and technical. • To report machine faults in line with company procedures using the relevant escalation process. • To report machine faults in line with company procedures using the relevant escalation process.	• Responsible for completing the venue refresh following all company security procedures. • Responsible for refilling and maintaining the float level of the venue GeWeTE and ATM following all company security procedures. • Responsible for completing MS9 Float Check ensuring all sections are completed accurately. Ensure all paperwork is completed accurately as well as declared on MARS. • To take full responsibility for the opening, trading, and closure of the venue in the absence of a Venue Manager/Supervisor. • Ensure the venue is set up to the required standard. • Understand the implication of the bingo equipment failing and how to manually run a game in venue. • Knows how to use the bingo equipment and follow the process to run a manual bingo game.	• To ensure venue cash collections are carried out in a timely and accurate manner, in accordance with Company procedures. • Investigate any exceptions, promptly taking remedial action, as necessary. • To assist in security investigations, as necessary. • To deal with the day-to-day problems arising from employees within the venue. • To respond to alarm activation's and take appropriate action. • To ensure at all times safety of all employees together with those members of the public visiting the venue.	• Effectively manage a team to ensure all company monies is secured and reconciled weekly following all relevant company security procedures. • Investigate any exceptions, promptly taking appropriate remedial action, as necessary. • To ensure a good working environment is established, in order to obtain the maximum commitment and productivity of employees. • To be actively involved in the recruitment of employees, ensuring that all applications are dealt with in a timely manner and in accordance with current legislation and company policy.	• To ensure that all newly recruited employees receive a full induction on commencement and are trained in all aspects of venue operation and are booked onto relevant courses to support customer service and product knowledge. • To undertake team briefings as and when required ensuring that records are made and maintained. • To deal with any instances of poor performance, misconduct or gross misconduct ensuring appropriate action is taken, this includes referral the Cluster/Area Manager. • Complete performance reviews in line with company policy. • To hold regular assessments of security procedures in liaison with the Cluster/Area Manager and where appropriate, identify potential weakness/threats.	• Support the Area Manager. Have responsibility of multiple sites reporting back into the Area Manager. • To conduct regular Audit checks and take appropriate action where necessary.	• Prioritisation of key tasks within the Area. • Respond to complex complaints and appropriately action responses. • Analyse Mars system and have a clear knowledge on how to track performance data and formulate plans alongside the Cluster/VM to maximise profits. • Manage disciplinary/appeals/ grievance procedures. • Apply the requirements of PML.

	Team Member	Keyholder	Supervisor	Assistant Manager/TIC	Venue Manager	Cluster Manager	Area Manager
ASSIGNED E-LEARNING	• Workday Training Course • Complaint Handling • Compliance Essentials – Equality & Diversity 1.0 (UK) • Age Verification • Safeguarding Children & Vulnerable People • GDPR Essentials • Essentials of Compliance • Leading Learning – Health & Safety at Work 1.0 • Manual Handling 3.0 • Fire Safety Awareness 3.0 (UK) • Food Safety and Hygiene – Allergen Awareness 3.0 (UK) • Food Safety and Hygiene – Catering Level 2 3.0 (UK) • Lone Working • Communicating Effectively 3.0 • Barriers to Communication Success – Part 1 2.0	• See Previous	• Relevant Workday Training Courses • Right to Work	• Relevant Workday Training Courses • Food Safety and Hygiene – Allergen Awareness 4.0 (UK) • Food Safety and Hygiene – Supervisors Level 3 3.0 (UK)	• Relevant Workday Training Courses	• Relevant Workday Training Courses	• Relevant Workday Training Courses
AVAILABLE TRAINING RESOURCES	• Back to Basics Resource Pack • Understanding Our Customers Resource Pack	• See Previous	• Management Essentials (3 Day Course)	• Investigatory Training (1 Day Course)	• Disciplinary Training (1 Day Course)	• Finance • Coaching • Situational Leadership • Marketing • Delegation/Time Management • Audit • Compliance/Complaint Handling/PML	• IML Level 5
POTENTIAL TRAINING RESOURCES	• Techniques to Handle Conflict and Escalation	• See Previous	• Mars • Train the Trainer • Feedback – Correcting Performance	• Commercial Awareness • Coaching	• Reviews • Store Checker		• Goal Setting/ SMART Objectives • Finance • Presentation Skills • Leadership and Vision • Influencing

	Team Member	Keyholder	Supervisor	Assistant Manager/TIC	Venue Manager	Cluster Manager	Area Manager
COMPETENCIES E LEARNING	• Customer Communications 1.0 • Be assertive the right way 3.0 • Leading Learning - Customer Service Excellence 1.0 • Communication and Social Skills - Receiving Feedback 2.0 • Customer Service Success 2.0 • Leading Learning - Self-Confidence 1.0 • Career Goals - Finding Purpose in Your Career 3.0 • How to Behave at Work Parties - Social Media 3.0 (Global) • How to Behave at Work Parties - Drugs and Alcohol 3.0 (Global) • Stress Management - Taking Care of Yourself 1.0 • How to Behave at Work Parties - Sexual Harassment 3.0 (Global)	• See Previous	• Clarify Team Expectations 1.0 • Innovation 1.0 • Be a Change Leader 1.0 • Culture Series – Be the Change (For Non-Managers) 1.0 • Communicating Effectively 3.0 • Feedback and Non-Verbal Communication 1.0 • Speaking and Listening 1.0 • Communication Styles in CX 1.0 • Leading Learning - Fraud Awareness 1.0 • Emotional Intelligence 3.0 • How to Influence 2.0 • Reducing Stress Through Time Management 1.0 • Preparing for Tasks Effectively 2.0 • Leading Learning - Time Management Tips 1.0 • Leading Learning - Productivity and Time Management 1.0 • Team Working Excellence 3.0	See Previous	• Performance - Goal Setting 1.0 • SMART Objectives 3.0 • Adapting to Change 1.0 • Introduction to Critical Thinking 1.0 • Critical Thinking - Evaluating Arguments and Evidence 1.0 • Communication Skills all Managers Must Master 2.0 • Communication Styles and Emotional Intelligence 2.0 • Scalable Customer Relationships 1.0 • Motivating Your People and Being a Positive Role Model 2.0 • Excellence in Customer Service 2.0 • Feedback and Service 1.0 • Coaching Skills 4.0 • Constructive Feedback 3.0 • Creating and Maintaining the Culture of Your Organization 1.0	• Setting Sound Goals 1.0 • Leadership Suite - Strategy and Pragmatism 1.0 • Leading Learning - The Customer Journey 1.0 • Leading Learning - Successful Networking 1.0 • Personal Development - Networking 2.0	• Organizational Strategy 1.0 • Utilizing Power and Influence Effectively 1.0 • Using Power and Influence Ethically 1.0 • Inspirational Leadership 3.0 • Handling Conflict and Negotiation Ethically • What Makes a Great Place to Work 1.0 • Leading Learning - Negotiating Cross Culturally 1.0 • Leading Learning - Virtual Negotiation and Influence 1.0 • Leading Learning - Negotiation and Influence 1.0 • Claim or Create Value in Negotiations 1.0 • Master the Art of Negotiating 2.0 • Managing the Negotiators' Dilemma 2.0 • Negotiation and Influencing People 3.0 Understanding Successful Negotiation 1.0

	Team Member	Keyholder	Supervisor	Assistant Manager/TIC	Venue Manager	Cluster Manager	Area Manager
COMPETENCIES E LEARNING (Continued)			• Leadership Suite - The Accidental Manager 1.0 • A Motivators Toolkit 2.0 • Employee Motivation - Job Dimensions 1.0		• Managing Teams • Be Likeable 2.0 • Time Management for Managers 1.0 • Essential Time Management Tools 1.0 • Time Management 2.0 • Tools and Knowledge for Successful Plans 1.0 • Productivity and Time Management 3.0 • Hire Team-Oriented Employees 1.0 • Being an Inclusive Leader 1.0 • Why Teamwork Works 1.0 • Leadership Suite - Managing Different Personalities 1.0 • Key Tools and Knowledge for Team Leading 1.0 • Become an Effective Leader - Part One 2.0 • Become an Effective Leader - Part Two 2.0 • The Team and its Members 1.0 • Diversity and Inclusion in Teamwork 2.0		

	Team Member	Keyholder	Supervisor	Assistant Manager/TIC	Venue Manager	Cluster Manager	Area Manager
STEP UP LEARNINGS	•	• Culture Series – Doing What's Right 1.0 • Culture Series – Setting An Example (For Non-managers) 1.0 • Decision Making Excellence 4.0	• Leadership and Management - Dealing with Difficult Staff 2.0 • Culture Series – Be the Change (For Non-Managers) • Five Tips for New Managers and Supervisors 1.0 • Demystifying Management 1.0 • Introduction to Managing Employee Performance 1.0 • Management Skills - What Does it Take? 1.0 • Leadership Suite - Impostor Syndrome in New Managers 1.0 • Leadership Suite - Peer to leader	• Transitioning to Management – The First Year • Leadership and Management – Coaching Others 2.0 • How to Delegate Effectively 2.0 (US) • Types of Management Styles in an Organization 1.0 • Put On Your Managers Hat • Culture Series – Start the Change (For Managers) • Model the Way 1.0 • Motivation and Job Performance 1.0	• Developing Management Skills 2.0 • Top 10 Mistakes of Managers 1.0 • Active Listening • Flexible Working • Leadership Suite - Trust Building and Empathy • Business Budgeting 1.0	• Leadership versus Management 2.0 • Evolution of Management 1.0	

INTERNATIONAL CERTIFICATE OF ACCREDITATION

GLOBAL GAMBLING GUIDANCE GROUP

In accordance with the responsible gaming policies, procedures and standards set by the Global Gambling Guidance Group (G4), Amsterdam, the Netherlands, accreditation is hereby granted to:

Merkur Casino UK

Audit date(s):
30 October - 3 November

Certificate Number:	EG - 00042024
Original Approval:	10 August 2020
Current Certificate:	3 November 2023
Certificate Expiry:	3 November 2026

On behalf of the G4 Foundation:

Jeffrey Derevensky

Pieter Remmers

Vincit qui se vincit

Full Observation Report

Stuart Jenkins – Licensing Consultant

Leveche Associates Limited

Merkur Slots

182-184 Edgware Road London W2 2DS

Executive Summary

1. Observations were conducted on Merkur Slots premises at 182-184 Edgware Road London W2 2DS and the surrounding area between 21:00 hours on Thursday 1st September 2022 and 06:15 hours on Friday 2nd September 2022, then again between 22:50 hours and 23:35 hours on Thursday 15th September 2022.

2. Two covert visit were made to the site and the surrounding area. The observations showed the premises are situated on a busy high street within a parade of shops on the A5 Edgware Road. The visits showed the premises to be well run with no issues on each occasion.

3. There are two other operators in the area with a similar business model to Merkur Slots which are Little Vic Casino 156 – 158 Edgware Road W2 2DS and Reel Time 212 Edgware Road W2 1DH which are advertised as being open 24-hours a day. From the observations and my visits to the area, it is clear that Merkur Slots operating 24-hours a day would not create anti-social behaviour, noise or any other crime and disorder and does not have a negative impact on nearby residents, the environment, local infrastructure, or wider local community.

Introduction

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

5. These premises are licenced under the Gaming Act 2005 and are open Sunday to Thursday 07:00 to 01:00 hours and Friday and Saturday 07:00 hours to 02:00 hours.

6. The premises come under the jurisdiction of Westminster City Council.

Personal – Stuart Jenkins

7. I am a former Police Officer having retired from the Metropolitan Police after completion of over 30 years exemplary service.

8. Throughout my police career the majority of my service was spent on specialist units engaged on proactive operations :- 1993–1997 Central Territorial Support Group (TSG) - Level 1 Public Order, firearms officer and dedicated surveillance officer; 1997–1998 CO14 Clubs & Vice Unit – test purchase officer and street offences investigations; 1998-2000 Charing Cross Division on promotion – overt and covert licensing operations; 2000-2008 CO14 Clubs & Vice Unit – lead officer for the investigation of serious criminal offences within licensed premises across London, test purchase officer, Pan-London licensing tactical advisor, Licensing Policy Development and Implementation for the Metropolitan Police Service (MPS) and intelligence unit supervisor; 2008-2018 Marine Policing Unit (MPU) – licensing lead for the MPU; licensing tactical advisor Notting Hill Carnival, covert licensing operations and intelligence unit supervisor. Marine intelligence and accreditation lead for the Queens Diamond Jubilee River Pageant and intelligence lead for the London Olympics 2012.

9. I have worked as an Independent Consultant in the Licensing and Security Industry for the last 5 years.

10. I was a Home Office qualified Crime Prevention Design Advisor.

11. I am the holder of the BTEC Level 3 Certificate (Security Industry Authority) – Close Protection Operative in the Private Security Industry.

12. I am the holder of a Personal Licence under the Licensing Act 2003.

Observations

13. I carried out my observations of Merkur Slots premises at 182-184 Edgware Road and the surrounding area between 21:00 hours on Thursday 1st September 2022 and 06:15 hours on Friday 2nd September 2022, and again between 22:50 hours and 23:35 hours on Thursday 15th September 2022.

14. The area felt safe with members of the public going about their business, working, shopping, and socialising.

15. The area is well lit and illuminated from street lighting and shop front lights. I had clear and unobstructed views throughout the observations.

16. During observations I concentrated on the pedestrian footfall, signs of criminality, begging, anti-social behaviour including any additional noise, vulnerable persons, other persons at risk and the general environment.

17. The area of observations is densely populated with many retail premises, licensed bars, and restaurants. Edgware Road is well served by public transport with regular bus routes, taxis, and trains. There was ample car parking available in a nearby pay and display car park and restricted parking in the side roads. There are London Underground Stations located at Edgware Road to the north of the premises and Marble Arch to the south. These transport mediums allow the public to arrive and leave the area safely and quickly.

18. The area has a diverse community living together in a mixture of privately owned and rental accommodation. The area also has several hotels and bed and breakfast establishments.

19. The premises is situated on the A5 a busy road running North to South. The southern end finishes at one of London's iconic tourist venues, Marble Arch and Hyde Park with the exclusive premises of Park Lane close by. To the north is the Marylebone Flyover which connects to the A40 a main arterial route into London. The road has two-way vehicular traffic passing the venue.

20. Running off Edgware Road, east to west are numerous residential hotel and commercial premises. On either side of Edgware Road there are many retail outlets including independent shop premises, licensed premises, gaming premises, betting shops, restaurants, estate agents, supermarkets, mini–supermarkets, hairdressers, barber shops, chemists and fast-food premises.

21. Immediately north of the premises is an empty shop then the junction with Crawford Place. Immediately south of the premises is a McDonalds Restaurant and then a large Waitrose Supermarket. Opposite there are a number of small independent shops including a mobile phone sales and service premises (Mr Tech and Linku), a Salon (Baghdad Salon) and a Pharmacy.

22. Pedestrian and vehicular traffic varied during the times of the observations. There was zoned parking in local side roads and additional underground parking for some of the residential apartment premises.

23. The area of observations was from Chapel Street in the north and George Street in the south.

24. There are seven other gambling premises in the Edgware Road W2 area of observations. The four bookmaker premises were all closed by 22:00 hours, the other gaming premises were open 24-hours:

    i. Coral Bookmakers 214 Edgware Road W2 1DH – Image A16
    ii. Ladbrokes Bookmakers 113-115 Edgware Road W2 2HX – Image A18
    iii. Paddy Power Bookmakers 242 Edgware Road W2 1DS – Image A15
    iv. William Hill Bookmakers 95 Edgware Road W2 2HX – Image A19
    v. Little Vic Casino 156 – 158 Edgware Road W2 2DS – Image A10

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

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

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

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

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

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

Covert Observations

Deployment One

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

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

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

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

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

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

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

35. Between 00:11 hours and – 00:21 hours I conducted a covert visit to the Merkur Slots Edgware Road – Images A25, A26.

36. The front display of the premises was clean, well maintained and looked professional. The signage was clear and bright.

37. At 00:11 hours I went to the entrance door which was closed. I saw that entry was controlled by using a bell security entry system. On the glass of the door, I saw signage stating no under 18's, CCTV in operation, no alcohol and that a time delay lock was in use.

38. I pushed the door and entered. On entry I saw to the right was a display board with the rules, policies and licences on show for customers and the authorities.

39. On entering this main area, the room opened into a large deep room. I saw it was on one level which was carpeted and there were gaming machines of various types throughout the premises.

40. About half way down on the left I saw a reception area where refreshments were also prepared. At the reception desk I saw two male members of staff dressed in smart corporate clothing.

41. One of the males approached and informed me that the premises was due to close in about 10 minutes. I stated I thought it closed at 1am and he stated it did, but they were closing early to allow staff to thoroughly clean the gaming machines and room. I saw that he had an SIA door supervisor badge clearly displayed. The other member of staff then spoke to me confirming I only had 10 minutes to use the machines until the premises closed, I replied that would be fine.

42. I saw there was one other customer in the premises. He was male about 27 years of age and casually dressed. No other customers came into the venue during my visit.

43. I found a gaming machine to play and sat down. I asked the second male if there were drinks available. He stated there were only soft drinks available as they were about to close. I declined the offer and carried on playing the machine.

44. There was a facility to prepare hot and soft drinks at the reception desk area which was clean and tidy.

45. Whilst I was in the venue, I saw the staff cleaning, wiping down surfaces and completing a low-profile patrol checking on customers' needs and making sure they weren't underage or vulnerable. I felt safe, I was not pressurised to use the machines or to spend money. The staff were friendly, polite, informative and I found the premises clean and tidy.

46. After 10 minutes in the premises, I was informed by staff that they were now closed, and I needed to leave. At no time during my observations did I see anyone hanging around the premises. Customers arriving went straight into the premises and customers leaving left the area straight away. I left the premises at 00:21 hours – Image A26.

47. At 01:00 hours Merkur Slots Edgware Road formally closed without any issues or incidents.

48. Throughout my continuing observations I recorded further photographic images that demonstrate there was no anti-social behaviour in the vicinity of the Merkur Slots premises – Images A27, A28, A29, A30, A31, A32, A33, A34, A35, A36, A37, A38, A39, A40, A41.

49. I remained in the area until 06:15 hours when I concluded my observations.

Deployment Two

50. I conducted my covert observations from between 22:50 hours to 23:35 hours on Thursday 15th September 2022.

51. At 22:50 hours I arrived in the area of the Merkur Slots 182-184 Edgware Road W2 2DS and started my observations by monitoring the venue and the immediate area around it – Image B1.

52. Pedestrian and vehicular traffic passing the premises was constant but varied as is typical with Edgware Road 24-hours 7-days a week.

53. Between 22:56 hours and 23:28 hours I conducted a covert visit to the Merkur Slots 182-184 Edgware Road W2 2DS – Image B2.

54. At 22:56 hours I went to the entrance door which was closed. The front of the premises was as I have described previously.

55. I pushed the door and entered the premises. In front of me was the board with the premises policies, rules and licences on display. I passed the policies board and entered the main area which was the same as when I visited previously.

56. I saw there were two male staff on duty who were dressed in smart corporate clothing. One of the males was also wearing an SIA door supervisor badge.

57. The member of staff without the SIA badge approached me, welcomed me to the venue and asked if I needed any help with choosing a gaming machine to play. I stated I was fine and looked around the premises.

58. I saw there were five other customers in the venue at the time of my visit. All five were male aged between 28 years and 55 years and casually dressed.

59. I found a gaming machine beyond the reception desk. The staff left me to enjoy playing the machines. I was not pressurised or encouraged to spend money.

60. Whilst I was playing the machine the male member of staff who spoke to me originally asked if I would like a soft drink, water, coffee, tea or a snack. I asked if I could get an alcoholic drink and he explained the premises weren't licensed for alcohol but the non-alcoholic drinks they provided were free for customers. I accepted his offer of a coffee.

61. After a couple of minutes, the staff member brought over my coffee and stated if I needed any help to ask him or his colleague.

62. The hot and soft drinks were prepared at the reception desk area which was clean and tidy.

63. As before whilst I was in the venue, I saw the staff cleaning, wiping down surfaces and completing a low-profile patrol checking on customers' needs and making sure they weren't underage or vulnerable. I felt safe, I was not pressurised to use the machines or to spend money. The staff were friendly, polite, informative and I found the premises clean and tidy.

64. Before leaving I used the toilets which were clean and tidy. The toilets were regularly checked as shown by the toilet check sheet and there were Gamcare leaflets available for customers to take away – Image B3, B4.

65. At no time during my observations did I see anyone hanging around the premises. Customers arriving went straight into the premises and customers leaving left the area straight away. Prior to me leaving two male customers left and did not return. I left the premises at 23:28 hours – Image B5.

66. Throughout my continuing observations I recorded a further photographic image that demonstrated there was no anti-social behaviour in the vicinity of the Merkur Slots premises – Image B6.

67. I remained in the area until 23:35 hours when I concluded my observations.

Summary

68. I found Merkur Slots in Edgware Road to have a smart, well-lit, and professional looking frontage. The premises were carpeted, with music playing in the background and the atmosphere was relaxed and welcoming.

69. At the time of my visits to the location, I saw mature females engaged in begging and homeless people sleeping in doorways on Edgware Road. However, this activity took place well away from Merkur Slots and was not linked to the premises in any way.

70. I saw no evidence of crime and disorder, anti-social behaviour, excessive noise, littering, street drinking, drug dealing or groups of youths hanging around.

71. People entering these premises were vetted before entering or immediately upon entry to ensure drunken or other vulnerable people didn't gain access to the premises.

72. It is clear the presence of Merkur Slots in Edgware Road does not lead to or result in people, who have been on a night out, staying in the area any longer than they had planned to.

73. Merkur Slots UK takes safer gambling seriously. This can be evidenced with the use of safeguarding programs such as:

    i. Merkur 360 Program - To achieve higher standards of player protection Merkur have worked with G4 Global Gambling Guidance Group, which focuses on the provision of responsible gambling and has also implemented its own 360 responsible gambling program.

    ii. Think 25 Policy – Strict Over 18 Policy. All venues operate a Think 25 Policy whereby photographic ID is required to gain entry.

    iii. In View Tools – Staying in control is a key part of messaging in the Merkur venues. Leafleting and posters such as BeGambleAware and GamCam, can be found in the venues main area and in private places such as toilets.

    iv. Staff Training – Merkur Slots has developed a detailed training programme for all staff members including its own City and Guilds accredited training developed in partnership with YGAM and Betknowmore.

74. From my visits to many Merkur Slots Premises, I have found professional and attentive staff managing them. The premises are well run and there are clearly defined systems in place to ensure the premises operate in support of the gambling objectives and don't attract or take advantage of juveniles or other vulnerable persons.

75. The demographic is much older and doesn't attract young people or children. The environment is very different to a loud busy arcade, it is a low-key carpeted style lounge with no more than a handful of mature customers in at any one time.

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

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

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

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

Appendix A

Observation Images

1st - 2nd September 2022

Merkur Slots

182-184 Edgware Road

London

W2 2DS

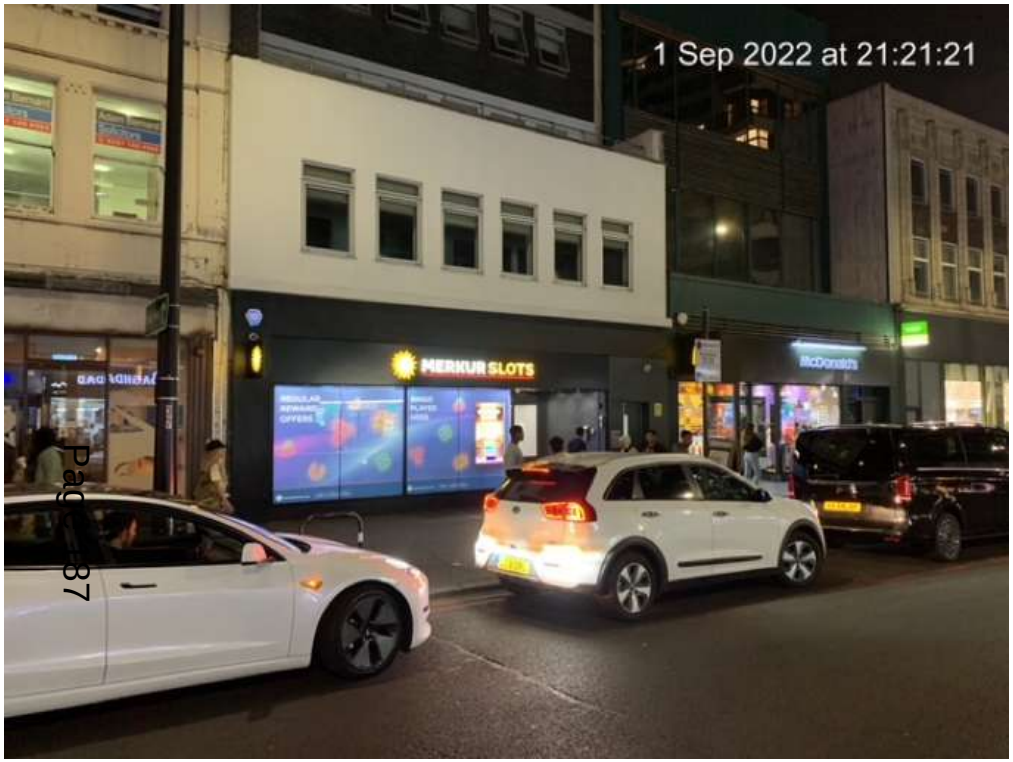
Leveche Associates Ltd

Nightingale House

46-48 East Street

Epsom

Surrey KT17 1 HQ



Page 87



Image A1

21:21hrs

Merkur Slots 182-184 Edgware Road London W2 2DS

Image A2

21:21hrs

Edgware Road looking south



Page 188

Image A3

21:21hrs

Edgware Road looking north



Image A4

21:26hrs

McDonalds 178 - 180 Edgware Road W2 2DS



Image A5

21:26hrs

Waitrose Supermarket
168 - 176 Edgware Road W2 2DX

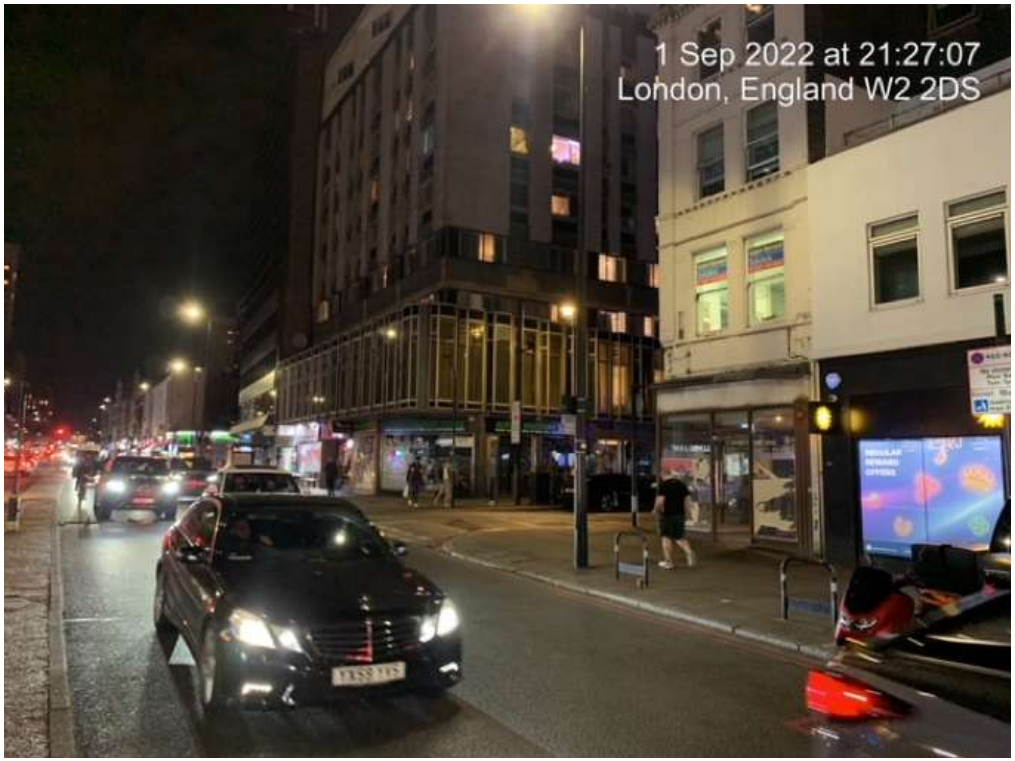


Image A6

21:27hrs

Edgware Road looking north

Image A7

21:27hrs

Pharmacentre 149 Edgware Road
(opposite Merkur Slots)

Image A8

21:28hrs

Female engaged in begging Edgware Road
looking north

Image A9

21:30hrs

Rough Sleeper Edgware Road looking north

Image A10

21:30hrs

The Little Vic Casino 156 Edgware Road W2 2DS

Image A11

21:31hrs

Victoria Casino 150 -162 Edgware Road W2 2DT

Image A12

21:32hrs

Female engaged in begging Edgware Road

122

Image A13

21:32hrs

Congestion Charge Restrictions Signage Edgware Road

Image A14

21:40hrs

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



Image A15

21:40hrs

Paddy Power 242 Edgware Road W2 1DS



Image A16

21:42hrs

Coral Bookmakers 214 Edgware Road W2 1DH

Image A17

21:43hrs

Reel Time 212 Edgware Road W2 1DH

Image A18

21:47hrs

Ladbrokes Bookmakers
113 - 115 Edgware Road W2 2HX

125

Image A19

21:49hrs

William Hill Bookmakers 95 Edgware Road W2 2HX

Image A20

21:50hrs

Edgware Road looking north

126

Image A21

23:53hrs

Merkur Slots 182 - 184 Edgware Road W2

Image A22

23:55hrs

Edgware Road j/w Sussex Gardens looking north

Image A23

23:55hrs

Edgware Road looking south

Image A24

23:58hrs

Edgware Road looking north

Image A25

00:10hrs

Merkur Slots 182 – 184 Edgware Road

Image A26

00:22hrs

Merkur Slots 182 – 184 Edgware Road

Image A27

02:40hrs

Merkur Slots 182 – 184 Edgware Road

Image A28

02:40hrs

Edgware Road looking south

130



Image A29

02:40hrs

Edgware Road looking north

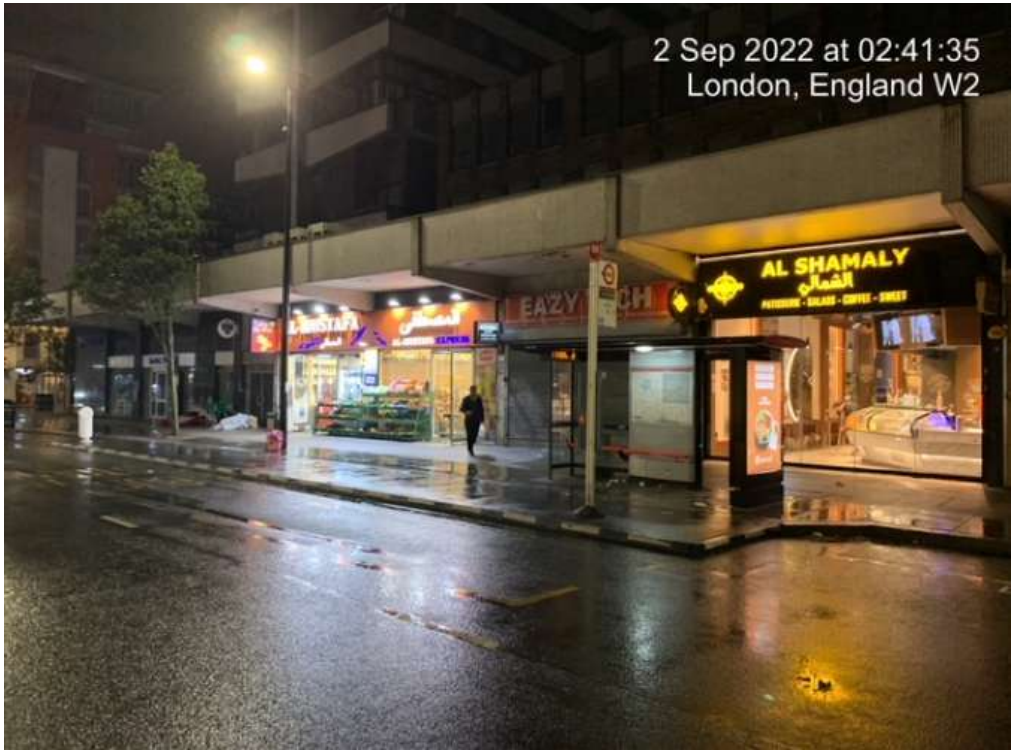


Image A30

02:41hrs

Al Mustafa Express 135 Edgware Road W2 2HR

131

LEVECHE
ASSOCIATES LIMITED

Image A31

02:42hrs

Little Vic Casino Edgware Road

Image A32

02:42hrs

Edgware Road looking south

Image A33

04:37hrs

Merkur Slots 182 – 184 Edgware Road

Image A34

04:37hrs

Edgware Road looking north

Image A35

04:37hrs

Edgware Road looking south

Image A36

04:38hrs

Rough Sleepers Edgware Road looking north

Image A37

04:39hrs

The Little Vic Casino Edgware Road

Image A38

06:04hrs

Merlur Slots 182 – 184 Edgware Road

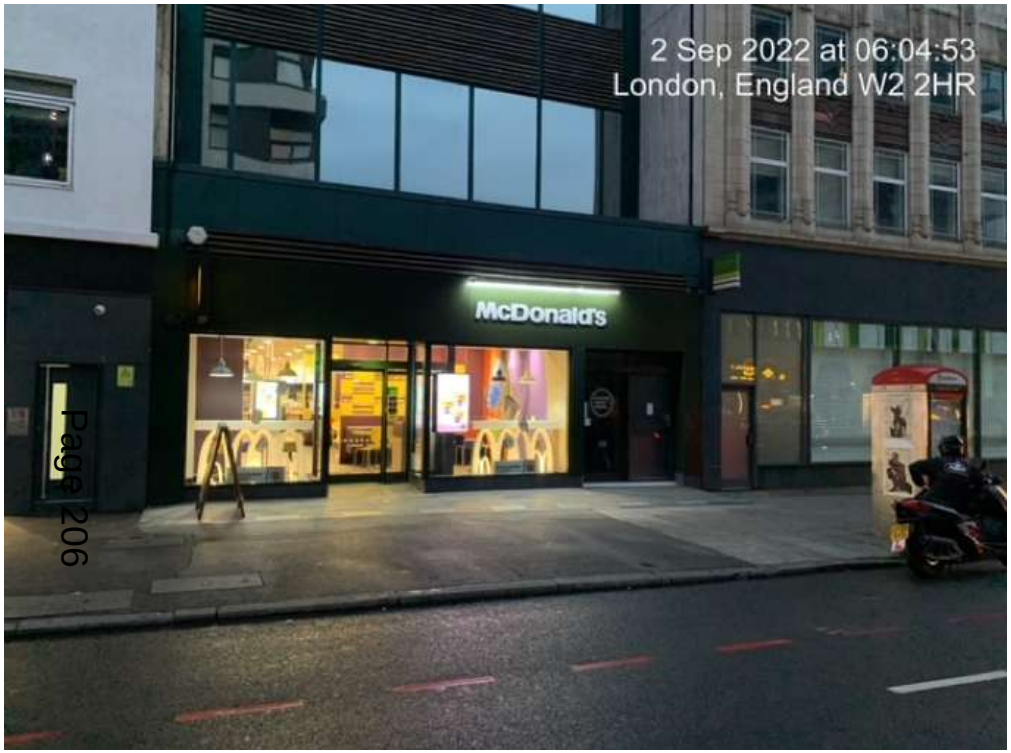


Image A39

06:04hrs

McDonalds Edgware Road

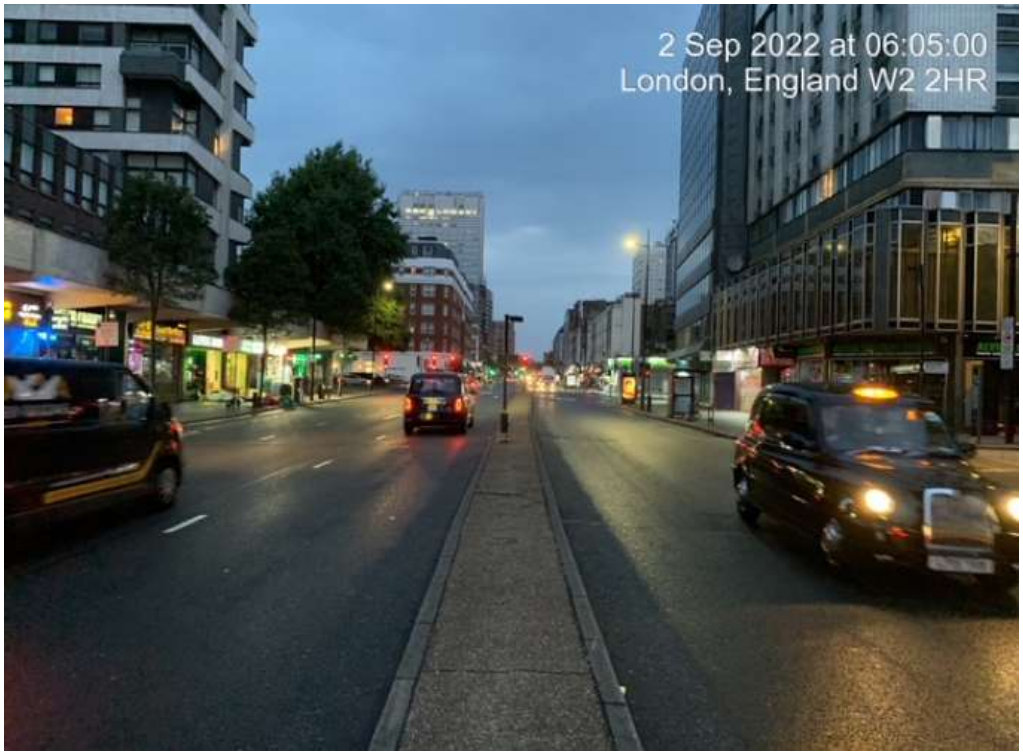


Image A40

06:05hrs

Edgware Road looking north



Image A41

06:05hrs

Edgware Road looking south

LEVECHE
ASSOCIATES LIMITED

Appendix B
Observation Images
15th September 2022

Merkur Slots
182 -184 Edgware Road
London
W2 2DS

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





Image B1

22:54hrs

Edgware Road looking north

Image B2

22:55hrs

Merkur Slots 182 -184 Edgware Road W2 2DS



Image B3

23:22hrs

Toilet Check Sheet
Merkur Slots 182 - 184 Edgware Road



Image B4

23:22hrs

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



Image B5

23:28hrs

Merkur Slots 182 - 184 Edgware Road

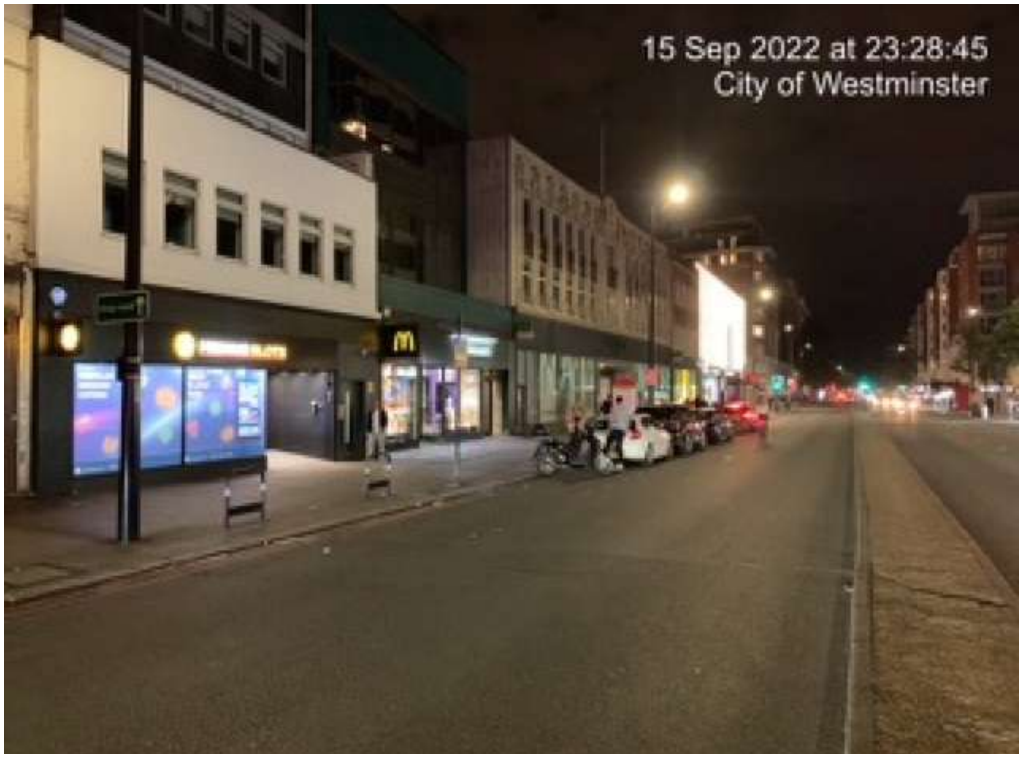


Image B6

23:28hrs

Edgware Road looking south

Full Observation Report

Stuart Jenkins – Licensing Consultant

Leveche Associates Limited

Merkur Slots Cashino

69 Tottenham Court Road London W1T 2HA

Executive Summary

1. Observations were conducted on Merkur Slots Cashino 69 Tottenham Court Road London W1T 2HA and the surrounding area between 20:30 hours on Wednesday 17th August 2022 and 06:00 hours on Thursday 18th August 2022 and between 00:05 hours and 00:20 hours on Friday 16th September 2022.

2. Two covert visits were made to the site and the surrounding area. The observations showed the premises are situated on Tottenham Court Road near Goodge Street Underground Station and are open 24-hours a day 7-days a week. The visits showed the premises to be well run with no issues on both occasions.

3. There are no other gaming premises with a similar operation to Merkur Slots in the immediate area. From the observations, it is clear that Merkur Slots operating 24-hours a day does not create anti-social behaviour, noise or any other crime and disorder and does not have a negative impact on nearby residents, the environment, local infrastructure, or wider local community.

Introduction

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

5. The premises has a 24-hour licence under the Gaming Act 2005 and is open 24-hours a day 7-days a week.

6. The premises come under the jurisdiction of Camden Council in the London Borough of Camden.

Personal – Stuart Jenkins

7. I am a former Police Officer having retired from the Metropolitan Police after completion of over 30 years exemplary service.

8. Throughout my police career the majority of my service was spent on specialist units engaged on proactive operations :- 1993–1997 Central Territorial Support Group (TSG) - Level 1 Public Order, firearms officer and dedicated surveillance officer; 1997–1998 CO14 Clubs & Vice Unit – test purchase officer and street offences investigations; 1998-2000 Charing Cross Division on promotion – overt and covert licensing operations; 2000-2008 CO14 Clubs & Vice Unit – lead officer for the investigation of serious criminal offences within licensed premises across London, test purchase officer, Pan-London licensing tactical advisor, Licensing Policy Development and Implementation for the Metropolitan Police Service (MPS) and intelligence unit supervisor; 2008-2018 Marine Policing Unit (MPU) – licensing lead for the MPU; licensing tactical advisor Notting Hill Carnival, covert licensing operations and intelligence unit supervisor. Marine intelligence and accreditation lead for the Queens Diamond Jubilee River Pageant and intelligence lead for the London Olympics 2012.

9. I have worked as an Independent Consultant in the Licensing and Security Industry for the last 5 years.

10. I was a Home Office qualified Crime Prevention Design Advisor.

11. I am the holder of the BTEC Level 3 Certificate (Security Industry Authority) – Close Protection Operative in the Private Security Industry.

12. I am the holder of a Personal Licence under the Licensing Act 2003.

Observations

13. I carried out my observations of Merkur Slots Cashino 69 Tottenham Court Road W1 2HA and the surrounding area between 20:30 hours on Wednesday 17th August 2022 and 06:00 hours on Thursday 18th August 2022 and between 00:05 hours and 00:20 hours on Friday 16th September 2022.

14. The area felt safe with members of the public going about their business, working, shopping, and socialising.

15. The area is well lit and illuminated from street lighting and shop front lights. I had clear and unobstructed views throughout the observations.

16. During observations I concentrated on the pedestrian footfall, signs of criminality, begging, anti-social behaviour including any additional noise, vulnerable persons, other persons at risk and the general environment.

17. The premises are located on a busy high street within a parade of shops in the heart of London. Mainstream shops line both sides of Tottenham Court Road. Many of these shops have residential properties above them – Image A1.

18. Tottenham Court Road generally runs north to south. Immediately outside the venue is a wide footpath and then the road itself. Two-way vehicular and pedestrian traffic can pass the venue in either direction. During the observations vehicular and pedestrian traffic was varied.

19. North of and next to the premises is the entrance to Xen-Do Martial Arts Centre which shares the same postal address of 69 Tottenham Court Road and building as Merkur Slots Cashino. Next to the Martial Arts Centre entrance is CEX Entertainment Exchange 70 Tottenham Court Road and then Kentucky Fried Chicken 71 Tottenham Court Road. To the south of and next to the premises is Dianetics & Scientology Life Improvement Centre 68 Tottenham Court Road. Other retail premises, shops and restaurants line the rest of Tottenham Court Road.

20. The area of observations was from Warren Street in the north and Store Street in the south. This area is densely populated with many retail premises, that include small food shops, pubs, cafes, bookmakers, restaurants, fast-food shops, and furniture stores which service the transient and residential population alike.

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

22. Tottenham Court Road is well served by public transport with a variety of bus routes, taxis, hire bikes and the nearby underground train stations of Goodge Street and Warren Street. There was ample car parking available in a nearby pay and display car park and restricted parking in the side roads. These transport mediums allow the public to arrive and leave the area safely and quickly.

23. Bus Stops are nearby and opposite Merkur Slots Cashino with the Marylebone Mainline and Underground Station in Melcombe Place NW1 6JJ, a 12-minute walk (1.8 miles).

24. There are two other gambling premises in the Tottenham Court Road area of observations, all of which close by 22:00 hours:

    i. Betfred Bookmakers 116 Tottenham Court Road W1T 5AJ
    ii. Coral Bookmakers 75 Warren Street NW1 3AD

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

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

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

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

    i. Rising Sun Public House 46 Tottenham Court Road W1T 2EL which is advertised as operating Monday to Thursday 11:00 hours to 00:00 hours, Friday and Saturday 11:00 hours to 01:00 hours, and Sunday 11:00 hours to 22:30 hours – Image A14.

    ii. The Court Public House 108A Tottenham Court Road W1T 5AA which is advertised as operating Sunday to Wednesday 12:00 hours to 00:00 hours, and Thursday, Friday and Saturday 12:00 hours to 01:00 hours – Image A25.

    iii. Fitzrovia Belle Bar & Hotel 174 Tottenham Court Road W1T 7NT which is advertised as operating Monday to Sunday 07:00 hours to 00:00 hours – Image A26.

    iv. TCR 183 Tottenham Court Road W1T 7PE which is advertised as operating Monday to Wednesday 12:00 hours to 00:00 hours, and Thursday, Friday and Saturday 12:00 hours to 01:00 hours and Sunday 12:00 hours to 22:30 hours – Image A27.

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

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

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

Covert Observations

Deployment One

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

32. At 20:30 hours I arrived in the area of the Merkur Slots Cashino premises 69 Tottenham Court Road and started my observations by monitoring the venue, the immediate area around it and the pedestrian footfall.

33. Pedestrian and vehicular traffic passing the premises was constant throughout my observations but varied dependent on the time of the day. Most of the shops had closed when I arrived. The bookmakers were still open but soon closed without any issues.

34. Between 22:00 hours and 03:00 hours a continuous flow of pedestrians walked past the venue transiting the area or visiting restaurants and late-night takeaway shops. During this time there were no groups of youths hanging around the premises or in the nearby streets. Pedestrians and vehicles made their way along Tottenham Court Road with purpose. Delivery riders were parked on the road and footpaths outside fast food shops whilst servicing fast food deliveries.

35. Between 03:14 hours and 03:32 hours I conducted a covert visit to the Merkur Slots Cashino 69 Tottenham Court Road – Image A32.

36. The front display of the premises above the liveried shop glass front had been removed and was clearly being refurbished. Even though the signage was removed the shop front was clean, well maintained and looked professional.

37. At 03:14 hours I went to the entrance door which was closed. I saw that entry could be controlled by using a bell security entry system. On the glass of the door, I saw signage stating no under 18's, CCTV in operation, no alcohol and that a time delay lock was in operation.

38. I pushed the door and entered the premises. I saw to my left a board with the premises policies, rules and licences on display. I passed the policies board and entered the main area. I saw it was on two levels which were carpeted and there were gaming machines of various types throughout the premises.

39. Halfway down the right-hand wall was a reception area where refreshments were also prepared. At the reception desk were two male members of staff who were both wearing smart corporate clothing. After the reception desk there was an upper level with further gaming machines.

40. On seeing me one of the members of staff approached and welcomed me to the premises. He asked if I had been to this Merkur Slots premises previously and I said I had. He then asked me if I needed any help with the gaming machines or choosing one to play. I stated I was fine and chose a machine towards the middle of the premises.

41. Whilst I was playing the machine he asked if I would like a soft drink, water, coffee, tea or a snack. I asked if I could get an alcoholic drink and he explained the premises weren't licensed for alcohol but the non-alcoholic drinks they provided were free for customers. I accepted his offer of a coffee.

42. After a couple of minutes, the staff member brought over my coffee and stated if I needed any help to ask him or his colleague.

43. The staff member then left me to enjoy playing the machines. I was not pressurised or encouraged to spend money.

44. There were six other customers in the venue at the time of my visit. All six were male and aged between 27 and 45 years. During my visit one other customer came into the venue.

45. The hot and soft drinks were prepared at a reception desk area which was clean and tidy.

46. Whilst I was in the venue, I saw the staff cleaning, wiping down surfaces and completing a low-profile patrol checking on customers' needs and making sure they weren't underage or vulnerable. I felt safe, I was not pressurised to use the machines or to spend vast sums of money. The staff were friendly, polite, informative and I found the premises clean and tidy.

47. Before leaving I used the toilets which were clean and tidy and located in the basement area. The toilets were regularly checked as shown by the toilet check sheet and there were Gamcare leaflets available for customers to take away – Image A33, A34.

48. At no time during my observations did I see anyone hanging around the premises. Customers arriving went straight into the premises and customers leaving left the area straight away. I left the premises at 03:32 hours – Image A35.

49. Local Authority Street Cleaning vehicles and buses operated throughout the night.

50. Throughout my continuing observations I recorded further photographic images that demonstrate there was no anti-social behaviour in the vicinity of the Merkur Slots premises – Image A36, A37, A38, A39, A40, A41, A42, A43, A44.

51. I remained in the area until 06:00 hours when I concluded my observations.

Deployment Two

52. I conducted my covert observations from between 00:05 hours and 00:20 hours on Friday 16th September 2022.

53. At 00:05 hours I arrived in the area of the Merkur Slots Cashino premises 69 Tottenham Court Road and started my observations by monitoring the venue and the immediate area around it – Image B1.

54. I saw that since my visit new signage had been installed above the glass shop front saying 'Merkur Cashino'. Pedestrian and vehicular traffic passing the

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

55. Between 00:06 hours and 00:17 hours I conducted a covert visit to the Merkur Slots Cashino 69 Tottenham Court Road – Image B2, B17.

56. At 00:06 hours I went to the entrance door which was closed. The time delay lock was in operation. I pressed the entry button and after a few seconds the door was opened by a male member of staff and I entered. I saw to my left the board with the premises policies, rules and licences on display. I passed the policies board and entered the main area. The layout of the premises was as I have previously described.

57. As I followed the staff member through the premises he asked if I would like a soft drink, water, coffee, tea or a snack. I politely declined his offer.

58. I saw on the upper level another male member of staff monitoring customers. Both members of staff were dressed in smart corporate clothing.

59. At the time of my visit there were three other customers in the venue. They were all male, aged between 30 years and 40 years.

60. I found a gaming machine towards the back of the premises on the upper level. The staff left me to enjoy playing the machines. I was not pressurised or encouraged to spend money.

61. Whilst I was in the venue, I saw the staff cleaning, wiping down surfaces and completing a low-profile patrol checking on customers' needs and making sure they weren't underage or vulnerable. I felt safe, I was not pressurised to use the machines or to spend money. The staff were friendly, polite, informative and I found the premises clean and tidy.

62. At no time during my observations did I see anyone hanging around the premises. Customers arriving went straight into the premises and customers leaving left the area straight away. I left the premises at 00:17 hours.

Summary

63. I found Merkur Slots Cashino in Tottenham Court Road to have a smart, well-lit, and professional looking frontage. The premises were carpeted, with music playing in the background and the atmosphere was relaxed and welcoming.

64. At the time of my visits to the location, I saw no evidence of crime and disorder, anti-social behaviour, excessive noise, littering, street drinking, drug dealing, begging or groups of youths hanging around. There were, however, homeless people sleeping rough, but this wasn't anywhere near the Merkur Slots Cashino premises.

65. People entering these premises were vetted before entering or immediately upon entry to ensure drunken or other vulnerable people didn't gain access to the premises.

66. It is clear the presence of Merkur Slots in Tottenham Court Road does not lead to or result in people, who have been on a night out, staying in the area any longer than they had planned to.

67. Merkur Slots UK takes safer gambling seriously. This can be evidenced with the use of safeguarding programs such as:

    i. Merkur 360 Program - To achieve higher standards of player protection Merkur have worked with G4 Global Gambling Guidance Group, which focuses on the provision of responsible gambling and has also implemented its own 360 responsible gambling program.

    ii. Think 25 Policy – Strict Over 18 Policy. All venues operate a Think 25 Policy whereby photographic ID is required to gain entry.

    iii. In View Tools – Staying in control is a key part of messaging in the Merkur venues. Leafleting and posters such as BeGambleAware and GamCam, can be found in the venues main area and in private places such as toilets.

    iv. Staff Training – Merkur Slots has developed a detailed training programme for all staff members including its own City and Guilds accredited training developed in partnership with YGAM and Betknowmore.

68. From my visits to many Merkur Slots Premises, I have found professional and attentive staff managing them. The premises are well run and there are clearly defined systems in place to ensure the premises operate in support of the gambling objectives and don't attract or take advantage of juveniles or other vulnerable persons.

69. The demographic is much older and doesn't attract young people or children. The environment is very different to a loud busy arcade, it is a low-key carpeted style lounge with no more than a handful of mature customers in at any one time.

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

71. In conclusion, from my visits it is my opinion Merkur Slots UK Limited are well run, and their operation significantly reduces the risk of crime and disorder and vulnerable people being taken advantage of.

72. From my observations it is clear that the Merkur Slots premises do not impact on the environment, infrastructure, or local community.

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

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

Appendix A

Observation Images

17th - 18th August 2022

Merkur Slots Cashino

69 Tottenham Court Road

London

W1T 2HA

Leveche Associates Ltd

Nightingale House

46-48 East Street

Epsom

Surrey KT17 1 HQ

Image A1

20:48hrs

Merkur Slots Cashino
69 Tottenham Court Road W1T 2HA

Image A2

20:48hrs

Tottenham Court Road looking south

152



Image A3

20:48hrs

Tottenham Court Road looking north



Image A4

20:51hrs

Tottenham Court Road j/w Chenies Street looking north



Image A5

20:51hrs

Tottenham Court Road looking north



Image A6

20:52hrs

Tottenham Court Road j/w Goodge Street looking west



Image A7

20:53hrs

Merkur Slots Cashino
69 Tottenham Court Road W1T 2HA

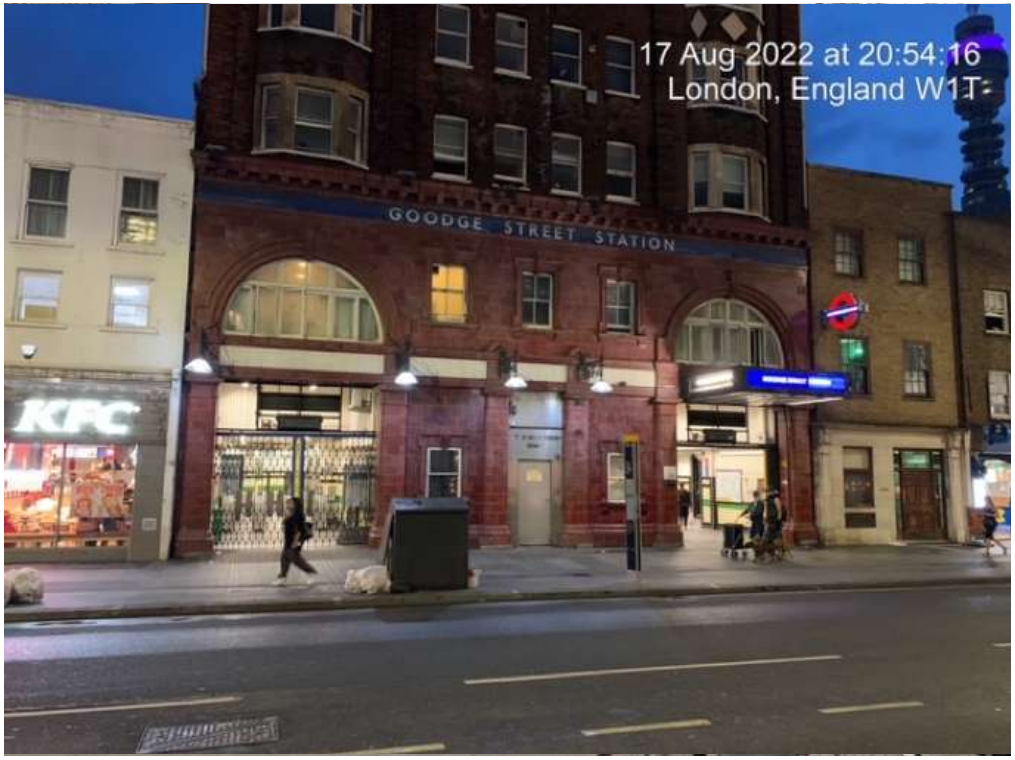


Image A8

20:54hrs

Goodge Street Underground Station
Tottenham Court Road



Image A9

20:54hrs

Whitfield Gardens Tottenham Court Road
j/w Tottenham Street



Image A10

20:55hrs

Heals Furniture Store
196 Tottenham Court Road



Image A11

21:00hrs

Betfred 116 Tottenham Court Road W1T 5AJ



Image A12

21:02hrs

Warren Street Underground Station
Tottenham Court Road



Image A13

21:23hrs

Tottenham Court Road j/w Store Street looking north



Image A14

21:23hrs

Rising Sun Public House
46 Tottenham Court Road W1T 2EL



Image A15

22:32hrs

Merkur Slots Cashino Tottenham Court Road



Image A16

22:33hrs

Tottenham Court Road looking south



Image A17

22:33hrs

Tottenham Court Road looking north



Image A18

22:34hrs

Whitfield Gardens Tottenham Court Road
j/w Tottenham Street



Image A19

23:54hrs

Tottenham Court Road looking south



Image A20

23:54hrs

Whitfield Gardens Tottenham Court Road
j/w Tottenham Street



Image A21

23:54hrs

Goodge Street Unground Station
Tottenham Court Road

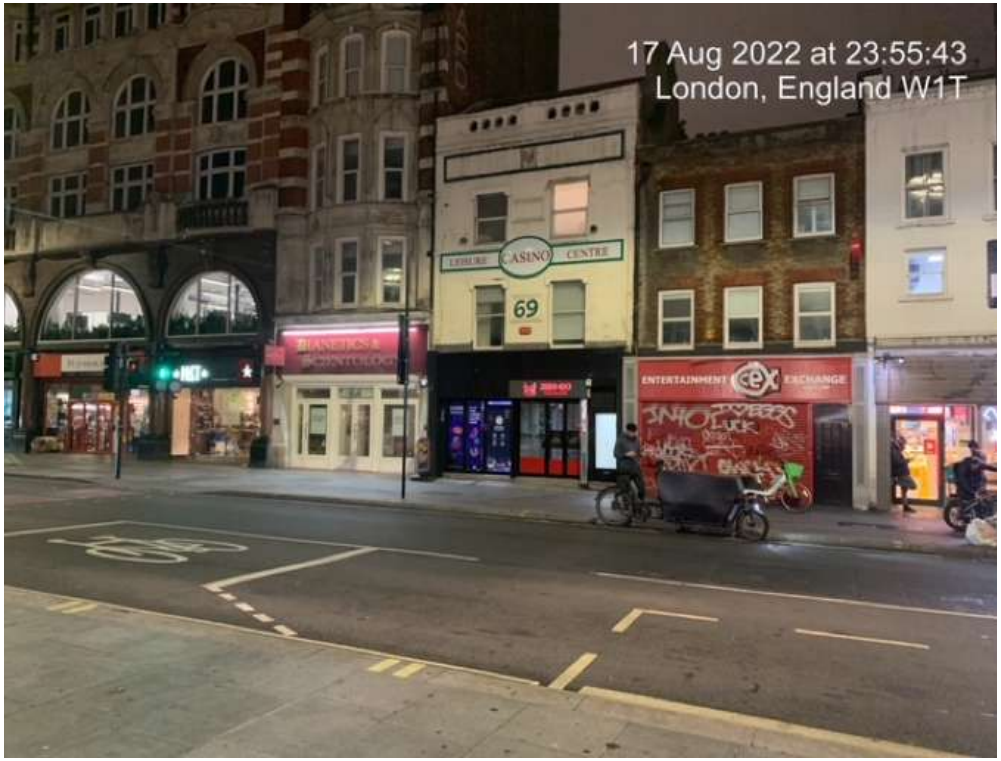


Image A22

23:55hrs

Merkur Slots Cashino Tottenham Court Road



Image A23

23:55hrs

Tottenham Court Road looking south



Image A24

00:12hrs

Coral Bookmakers 75 Warren Street NW1 3AD

Image A25

00:16hrs

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

Image A26

00:17hrs

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

Image A27

00:18hrs

TCR Bar 183 Tottenham Court Road W1T 7PE

Image A28

00:22hrs

Pa Station 76 Tottenham Court Road W1T 2HG

Image A29

03:10hrs

Tottenham Court Road looking north

Image A30

03:12hrs

Whitfield Gardens Tottenham Court Road j/w Tottenham Street

166

Image A31

03:12hrs

Tottenham Court Road looking south

Image A32

03:13hrs

Merkur Slots Cashino Tottenham Court Road

Image A33

03:24hrs

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

Image A34

03:25hrs

Toilet Check Sheet Merkur Slots Cashino
Tottenham Court Road

Image A35

03:32hrs

Merkur Slots Cashino Tottenham Court Road

Image A36

03:36hrs

Goodge Street Underground Station
Tottenham Court Road

Image A37

03:37hrs

Tottenham Court Road looking north

Image A38

03:37hrs

Tottenham Court Road looking south

Image A39

03:39hrs

Tottenham Court Road looking south

Image A40

05:51hrs

Tottenham Court Road looking north



Image A41

05:52hrs

Tottenham Court Road looking south



Image A42

05:54hrs

Merkur Slots Cashino Tottenham Court Road





Image A43

05:57hrs

Goodge Street Underground Station
Tottenham Court Road

Image A44

05:58hrs

Whitfield Gardens Tottenham Court Road
j/w Tottenham Street

LEVECHE
ASSOCIATES LIMITED

Appendix B
Observation Images
16th September 2022

Merkur Slots Cashino
69 Tottenham Court Road
London
W1T 2HA

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



Image B1

00:06hrs

Merkur Slots Cashino
69 Tottenham Court Road W1T 2HA



Image B2

00:06hrs

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

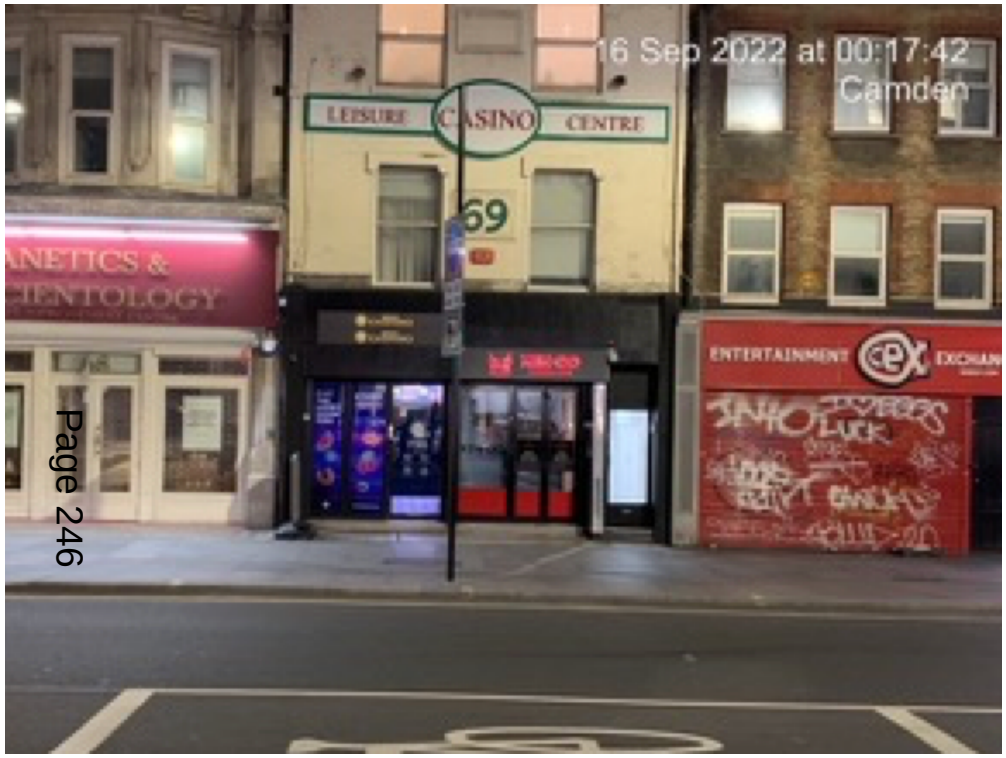


Image B3

00:17hrs

Merkur Slots Cashino
69 Tottenham Court Road W1T 2HA



Image B4

00:17hrs

Tottenham Court Road looking north

1.1.3 - Responsibility for third parties – remote

Social responsibility code

Applies to:

All remote licences.

1. Remote licensees must ensure in particular:
    a. that third parties who provide user interfaces enabling customers to access their remote gambling facilities:
        i. include a term that any such user interface complies with the Commission's technical standards for remote gambling systems; and
        ii. enable them, subject to compliance with any dispute resolution provisions of such contract, to terminate the third party's contract promptly if, in the licensee's reasonable opinion, the third party is in breach of that term.

2.1.2 - Anti-money laundering – other than casino

Ordinary code

Applies to:

All licences except casino licences.

1. As part of their procedures for compliance with the requirements in respect to the prevention and detection of money laundering in the Proceeds of Crime Act 2002 and the Terrorism Act 2000, licensees should take into account the Commission's advice on the Proceeds of Crime Act 2002, *Duties and responsibilities under the Proceeds of Crime Act 2002 – Advice for operators (excluding casino operators). *

3.1.1 - Combating problem gambling

Social responsibility code

Applies to:

All licences.

1. Licensees must have and put into effect policies and procedures intended to promote socially responsible gambling including the specific policies and procedures required by the provisions of section 3 of this code.

2. Licensees must make an annual financial contribution to one or more organisation(s) which are approved by the Gambling Commission, and which between them deliver or support research into the prevention and treatment of gambling-related harms, harm prevention approaches and treatment for those harmed by gambling.

3.2.5 - Bingo and FEC SR code

Social responsibility code

Applies to:

All non-remote bingo and family entertainment centre licences.

1. Licensees must have and put into effect policies and procedures designed to prevent underage gambling, and monitor the effectiveness of these.

2. This must include procedures for:

    a. checking the age of apparently underage customers
    b. refusing entry to any adult-only areas to anyone unable to produce an acceptable form of identification
    c. taking action when there are unlawful attempts to enter the adult-only areas.

3. Licensees must ensure that their policies and procedures take account of the structure and layout of their gambling premises.

4. Licensees must not permit children or young people to gamble in the adults-only areas of premises to which they have access. If there is a 'no under-18s' premises policy, licensees must pay particular attention to the procedures they use at the entrance to the premises to check customers' ages.

5. Licensees must take all reasonable steps to ensure that all staff understand their responsibilities for preventing underage gambling. This must include appropriate training which must cover:

    a. all relevant prohibitions against inviting children or young persons to gamble on age-restricted products or to enter age-restricted areas;
    b. the legal requirements on returning stakes and not paying prizes to underage customers; and
    c. procedures for challenging any adult who may be complicit in allowing a child or young person to gamble.

6. Licensees must only accept identification which:

    a. contains a photograph from which the individual can be identified
    b. states the individual's date of birth
    c. is valid
    d. is legible and has no visible signs of tampering or reproduction.

7. All licensees must conduct test purchasing or take part in collective test purchasing programmes, as a means of providing reasonable assurance that they have effective policies and procedures to prevent underage gambling, and must provide their test purchase results to the Commission, in such a form or manner as the Commission may from time to time specify.

    Read additional guidance on the information requirements contained within this section.

3.2.6 - Bingo and FEC ordinary code

Ordinary code

Applies to:

All non-remote bingo and family entertainment centre licences.

1. The Commission considers acceptable forms of identification to include: any identification carrying the PASS logo (for example Citizencard or Validate); a military identification card; a driving licence (including a provisional licence) with photocard; or a passport.
2. Licensees should require a person who appears to relevant staff to be under the age of 25 to be asked to produce proof of age, either at the point of entry to the gambling area or as soon as it comes to the attention of staff that they wish to access gambling facilities.
3. Licensees should have procedures for dealing with cases where an adult knowingly or recklessly allows a child or young person to gamble. These procedures might include refusing to allow the adult to continue to gamble, removing them from the premises, and reporting the incident to the police or local authorities, or taking action where forged identification is produced.
4. Procedures should be put into effect for dealing with cases where a child or young person repeatedly attempts to gamble on their premises, including oral warnings, reporting the offence to the Gambling Commission[1] and the police, and making available information on problem gambling to the child or young person concerned.
5. Where it is likely that customers' young or otherwise vulnerable children will be left unattended on or adjacent to their premises, licensees should consider reminding customers of their parental responsibilities and assess whether there is a need to develop procedures for minimising the risk to such children.
6. In providing training to staff on their responsibilities for preventing underage gambling, licensees should have, as a minimum, policies for induction training and refresher training.

   Read additional guidance on the information requirements contained within this section.

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[1] These matters are to be reported to us online via our 'eServices' digital service on our website.

3.3.1 - Responsible gambling information

Social responsibility code

Applies to:

All licences, except gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino and remote betting (remote platform) licences.

1. Licensees must make information readily available to their customers on how to gamble responsibly and how to access information about, and help in respect of, problem gambling.

2. The information must cover:

    a. any measures provided by the licensee to help individuals monitor or control their gambling, such as restricting the duration of a gambling session or the amount of money they can spend
    b. timers or other forms of reminders or 'reality checks' where available
    c. self-exclusion options
    d. information about the availability of further help or advice.

3. The information must be directed to all customers whether or not licensees also make available material which is directed specifically at customers who may be 'problem gamblers'.

4. For gambling premises, information must be available in all areas where gambling facilities are provided and adjacent to ATMs. Information must be displayed prominently using methods appropriate to the size and layout of the premises. These methods may include the use of posters, the provision of information on gambling products, or the use of screens or other facilities in the gambling premises. Information must also be available in a form that may be taken away and may also be made available through the use of links to be accessed online or using smart technology. Licensees must take all reasonable steps to ensure that this information is also readily accessible in locations which enable the customer to obtain it discreetly.

3.3.2 - Foreign languages

Ordinary code

Applies to:

All licences, except gaming machine technical, gambling software, host, ancillary remote bingo and ancillary remote casino licences.

1. Licensees who market their services in one or more foreign languages should make available in that, or those, foreign languages:
    a. the information on how to gamble responsibly and access to help referred to above
    b. the players' guides to any game, bet or lottery required to be made available to customers under provisions in this code
    c. the summary of the contractual terms on which gambling is offered, which is required to be provided to customers as a condition of the licensee's operating licence.

3.3.4 - Remote time-out facility

Social responsibility code

Applies to:

All remote licences except: any remote lottery licence the holder of which does not provide facilities for participation in instant win lotteries, ancillary remote betting licences, remote betting (remote platform), gaming machine technical, gambling software, host, ancillary remote bingo, ancillary remote casino and remote betting intermediary (trading room only) licences.

1 Licensees must offer a 'time out' facility for customers for the following durations:

a. 24 hours
b. one week
c. one month or
d. such other period as the customer may reasonably request, up to a maximum of 6 weeks.

3.4.1 - Premises-based customer interaction

Social responsibility code

Applies to:

All non-remote licences (except non-remote lottery, gaming machine technical, gambling software and host licences); only the following remote licences – ancillary remote bingo, ancillary remote casino, ancillary remote betting, remote general betting limited, and remote betting intermediary (trading rooms only).

1. Licensees must interact with customers in a way which minimises the risk of customers experiencing harms associated with gambling. This must include:

    a. identifying customers who may be at risk of or experiencing harms associated with gambling.
    b. interacting with customers who may be at risk of or experiencing harms associated with gambling.
    c. understanding the impact of the interaction on the customer, and the effectiveness of the Licensee's actions and approach.

2. Licensees must take into account the Commission's guidance on customer interaction.

3.5.1 - Self exclusion – Non-remote and trading rooms SR code

Social responsibility code

Applies to:

All non-remote licences (except lottery, gaming machine technical and gambling software licences) and remote betting intermediary (trading rooms only) licences.

1. Licensees must have and put into effect procedures for self-exclusion and take all reasonable steps to refuse service or to otherwise prevent an individual who has entered a self-exclusion agreement from participating in gambling.

2. Licensees must, as soon as practicable, take all reasonable steps to prevent any marketing material being sent to a self-excluded customer.

3. Licensees must take steps to remove the name and details of a self-excluded individual from any marketing databases used by the company or group (or otherwise flag that person as an individual to whom marketing material must not be sent), within two days of receiving the completed self-exclusion notification.

4. This covers any marketing material relating to gambling, or other activities that take place on the premises where gambling may take place. However, it would not extend to blanket marketing which is targeted at a particular geographical area and where the excluded individual would not knowingly be included.

5. Licensees must close any customer accounts of an individual who has entered a self- exclusion agreement and return any funds held in the customer account. It is not sufficient merely to prevent an individual from withdrawing funds from their customer account whilst still accepting wagers from them. Where the giving of credit is permitted, the licensee may retain details of the amount owed to them by the individual, although the account must not be active.

6. Licensees must put into effect procedures designed to ensure that an individual who has self-excluded cannot gain access to gambling. These procedures must include:

    a. a register of those excluded with appropriate records (name, address, other details, and any membership or account details that may be held by the operator);
    b. photo identification (except where the Licensee can reasonably satisfy themselves that in the circumstances in which they provide facilities for gambling an alternative means of identification is at least as effective) and a signature;
    c. staff training to ensure that staff are able to administer effectively the systems; and
    d. the removal of those persons found in the gambling area or attempting to gamble from the premises.

7. Licensees must ensure that their procedures for preventing access to gambling by self-excluded individuals take account of the structure and layout of the gambling premises.

8. Licensees must, when administering the self-exclusion agreement, signpost the individual to counselling and support services.

3.5.2 - Self-exclusion – non-remote ordinary code

Ordinary code

Applies to:

All non-remote licences and remote betting intermediary (trading rooms only) licences, but not gaming machine technical and gambling software licences.

1. Self-exclusion procedures should require individuals to take positive action in order to self-exclude. This can be a signature on a self-exclusion form.

2. Individuals should be able to self-exclude without having to enter gambling premises.

3. Before an individual self-excludes, licensees should provide or make available sufficient information about what the consequences of self-exclusion are.

4. Licensees should take all reasonable steps to extend the self-exclusion to premises of the same type owned by the operator in the customer's local area. In setting the bounds of that area licensees may take into account the customer's address (if known to them), anything else known to them about the distance the customer ordinarily travels to gamble and any specific request the customer may make.

5. Licensees should encourage the customer to consider extending their self-exclusion to other licensees' gambling premises in the customer's local area.

6. Customers should be given the opportunity to discuss self-exclusion in private, where possible.

7. Licensees should take steps to ensure that:

    a. the minimum self-exclusion period offered is of a duration of not less than 6 nor more than 12 months
    b. any self-exclusion may, on request, be extended for one or more further periods of at least 6 months each
    c. a customer who has decided to enter a self-exclusion agreement is given the opportunity to do so immediately without any cooling-off period. However, if the customer wishes to consider the self-exclusion further (for example to discuss with problem gambling groups), the customer may return at a later date to enter into self- exclusion
    d. at the end of the period chosen by the customer, the self-exclusion remains in place for a further 6 months, unless the customer takes positive action in order to gamble again
    e. where a customer chooses not to renew the self-exclusion, and makes a positive request to begin gambling again during the 6 month period following the end of their initial self-exclusion, the customer is given one day to cool off before being allowed access to gambling facilities. The contact must be made via telephone or in person
    f. notwithstanding the expiry of the period of self-exclusion chosen by a customer, no marketing material should be sent to them unless and until they have asked for or agreed to accept such material.

8. The licensee should retain the records relating to a self-exclusion agreement at least for the length of the self-exclusion agreement plus a further 6 months.

9. Please note that the Commission does not require the licensee to carry out any particular assessment or make any judgement as to whether the previously self-excluded individual should again be permitted access to gambling. The requirement to take positive action in person or over the phone is purely to a) check that the customer has considered the decision to access gambling again and allow them to consider the implications; and b) implement the one day cooling-off period and explain why this has been put in place.

10. Licensees should have, and put into effect, policies and procedures which recognise, seek to guard against and otherwise address, the fact that some individuals who have self-excluded

might attempt to breach their exclusion without entering a gambling premises, for example, by getting another to gamble on their behalf.

11. Licensees should have effective systems in place to inform all venue staff of self-excluded individuals who have recently attempted to breach a self-exclusion in that venue, and the licensees neighbouring venues.

12. In providing training to staff on their responsibilities for self-exclusion, licensees should have, as a minimum, policies for induction training and refresher training.

6.1.1 - Complaints and disputes

Social responsibility code

Applies to:

All licences (including ancillary remote licensees) except gaming machine technical and gambling software licences.

1. Licensees must put into effect appropriate policies and procedures for accepting and handling customer complaints and disputes in a timely, fair, open and transparent manner.

2. Licensees must ensure that they have arrangements in place for customers to be able to refer any dispute to an ADR entity in a timely manner if not resolved to the customer's satisfaction by use of their complaints procedure within eight weeks of receiving the complaint, and where the customer cooperates with the complaints process in a timely manner.

3. The services of any such ADR entity must be free of charge to the customer.

4. Licensees must not use or introduce terms which restrict, or purport to restrict, the customer's right to bring proceedings against the licensee in any court of competent jurisdiction. Such terms may, however, provide for a resolution of a dispute agreed by the customer (arrived at with the assistance of the ADR entity) to be binding on both parties.

5. Licensees' complaints handling policies and procedures must include procedures to provide customers with clear and accessible information on how to make a complaint, the complaint procedures, timescales for responding, and escalation procedures.

6. Licensees must ensure that complaints policies and procedures are implemented effectively, kept under review and revised appropriately to ensure that they remain effective, and take into account any applicable learning or guidance published by the Gambling Commission from time to time.

7. Licensees should keep records of customer complaints and disputes and make them available to the Commission on request.

In this Code, 'ADR entity' means

a. a person offering alternative dispute resolution services whose name appears on the list maintained by the Gambling Commission in accordance with The Alternative Dispute Resolution for Consumer Disputes (Competent Authorities and Information) Regulations 2015 and,
b. whose name appears on the list of providers that meet the Gambling Commission's additional standards found in the document 'Alternative dispute resolution (ADR) in the gambling industry – standards and guidance for ADR providers'.

Both lists are on the Commission's website and will be updated from time to time.

Read additional guidance on the information requirements contained within this section.

7.1.2 - Responsible gambling information for staff

Social responsibility code

Applies to:

All licences, including betting ancillary remote licences, but not other ancillary remote licences.

1. Licensees must take all reasonable steps to ensure that staff involved in the provision of facilities for gambling are made aware of advice on socially responsible gambling and of where to get confidential advice should their gambling become hard to control.

8.1.1 - Ordinary code

Ordinary code

Applies to:

All licences.

1. As stated earlier in this code, the Commission expects licensees to work with the Commission in an open and cooperative way and to inform the Commission of any matters that the Commission would reasonably need to be aware of in exercising its regulatory functions. These include in particular matters that will have a material impact on the licensee's business or on the licensee's ability to conduct licensed activities compliantly and consistently with the licensing objectives.

2. Thus, licensees should notify the Commission, or ensure that the Commission is notified, as soon as reasonably practicable and in such form and manner as the Commission may from time to time specify[1] , of any matters which in their view could have a material impact on their business or affect compliance. The Commission would, in particular, expect to be notified of the occurrence of any of the following events in so far as not already notified in accordance with the conditions attached to the licensee's licence[2] :

    a. any material change in the licensee's structure or the operation of its business
    b. any material change in managerial responsibilities or governance arrangements
    c. any report from an internal or external auditor expressing, or giving rise to, concerns about material shortcomings in the management control or oversight of any aspect of the licensee's business related to the provision of gambling facilities.

    Read additional guidance on the information requirements contained within this section.

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[1] These matters are to be reported to us online via our 'eServices' digital service on our website.

[2] Events which must be reported, because the Commission considers them likely to have a material impact on the nature or structure of a licensee's business, are set out in general licence condition 15.2.1

9.1.2 - Bingo

Social responsibility code

Applies to:

All non-remote bingo operating licences.

1. Gaming machines may be made available for use in licensed bingo premises only where there are also substantive facilities for non-remote bingo, provided in reliance on this licence, available in the premises.
2. Facilities for gambling must only be offered in a manner which provides for appropriate supervision of those facilities by staff at all times.
3. Licensees must ensure that the function along with the internal and/or external presentation of the premises are such that a customer can reasonably be expected to recognise that it is a premises licensed for the purposes of providing bingo facilities.

10.1.1 - Assessing local risk

Social responsibility code

Applies to:

All non-remote casino, adult gaming centre, bingo, family entertainment centre, betting and remote betting intermediary (trading room only) licences, except non-remote general betting (limited) and betting intermediary licences.

1. Licensees must assess the local risks to the licensing objectives posed by the provision of gambling facilities at each of their premises, and have policies, procedures and control measures to mitigate those risks. In making risk assessments, licensees must take into account relevant matters identified in the licensing authority's statement of licensing policy[1] .
2. Licensees must review (and update as necessary) their local risk assessments:
    a. to take account of significant changes in local circumstances, including those identified in a licensing authority's statement of licensing policy;
    b. when there are significant changes at a licensee's premises that may affect their mitigation of local risks;
    c. when applying for a variation of a premises licence; and
    d. in any case, undertake a local risk assessment when applying for a new premises licence.

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[1]This is the statement of licensing policy under the Gambling Act 2005.

10.1.2 - Sharing local risk assessments

Ordinary code

Applies to:

All non-remote casino, adult gaming centre, bingo, family entertainment centre, betting and remote betting intermediary (trading room only) licences, except non-remote general betting (limited) and betting intermediary licences.

1. Licensees should share their risk assessment with licensing authorities when applying for a premises licence or applying for a variation to existing licensed premises, or otherwise on request.

Other provisions and legislation

4.7 Conditions on premises licences should relate only to gambling, as considered appropriate in light of the principles to be applied by licensing authorities under s.153 of the Act. Accordingly, if the Commission's *Licence Conditions and Codes of Practice* (LCCP) or other legislation places particular responsibilities or restrictions on an employer or the operator of premises, it is not necessary or appropriate to impose similar conditions on a premises licence issued in accordance with the Act.

4.8 Similarly, where other legislation confers powers on inspection and enforcement agencies in relation to separate activities or concerns, the Act does not affect the continued use of such powers, for example, the powers of an environmental health officer in respect of statutory nuisance under the Environmental Protection Act 1990.

Licensing authority decisions

4.9 S.153 provides that licensing authorities shall aim to permit the use of premises for gambling in so far as they think it is:

a. in accordance with any relevant code of practice under s.24
b. in accordance with any relevant guidance issued by the Commission under s.25
c. reasonably consistent with the licensing objectives (subject to a and b above)
d. in accordance with the licensing authority's statement of licensing policy (statement of policy) (subject to a to c above).

4.10 Therefore, a licensing authority has no discretion in exercising its functions under Part 8 of the Act, to grant a premises licence where that would mean taking a course which it did not think accorded with the Guidance contained in this document, any relevant Commission code of practice the licensing authority's own statement of policy or were reasonably consistent with the licensing objectives.

Delegations

4.11 The decision making powers of licensing authorities may be delegated, as set out in s.154 of the Act for England and Wales and s.155 for Scotland. Decisions that are delegated to a licensing committee, may be further delegated to a sub-committee, which may then arrange for the decision to be taken by an officer of the authority.

4.12 It is open to licensing committees to choose not to delegate decisions. An important consideration in determining whether any particular decision should be delegated will be whether delegation might give rise to a risk of judicial review challenge, particularly on the basis of appearance of bias.

4.13 The tables at Appendix G set out a summary of licensing authority delegations permitted under the Act for England and Wales, and for Scotland.

Part 5: Principles to be applied by licensing authorities

Licensing objectives

5.1 In exercising their functions under the Act, particularly in relation to premises licences, temporary use notices and some permits, licensing authorities must have regard to the licensing objectives set out in s.1 of the Act, namely:

- 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.

5.2 It is expected that the licensing authority will have set out their approach to regulation in their statement of policy, having taken into account local circumstances. This is dealt with in more detail at Part 6.

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

5.3 Among other matters, licensing authorities may need to consider the location of premises in the context of this licensing objective. For example, in considering an application for a premises licence or permit that is in an area noted for particular problems with disorder, organised criminal activity etc, the licensing authority should think about what, if any, controls might be appropriate to prevent those premises being associated with or used to support crime. That might include conditions on the premises licence, such as a requirement for door supervisors. The requirement for conditions might be determined by the operator's own risk assessment or the local area profile carried out by the licensing authority, as detailed in Part 6.

5.4 A licensing authority will need to consider questions raised by the location of gambling premises when:

- formulating its statement of licensing policy
- receiving relevant representations to an application
- dealing with applications as a responsible authority in its own right
- considering applications before it.

5.5 In the context of gambling premises licences, licensing authorities should generally consider disorder as activity that is more serious and disruptive than mere nuisance. Factors to consider in determining whether a disturbance was serious enough to constitute disorder would include whether police assistance was required and how threatening the behaviour was to those who could see or hear it. There is not a clear line between nuisance and disorder and the licensing authority should take the views of its lawyers before determining what action to take in circumstances in which disorder may be a factor.

5.6 Regulatory issues arising from the prevention of disorder are likely to focus almost exclusively on premises licensing, rather than on operating licences. However, if there are persistent or serious disorder problems that an operator could or should do more to prevent, the licensing authority should bring this to the attention of the Commission so that it can consider the continuing suitability of the operator to hold an operating licence.

5.7 Of course, licensing authorities are experienced in making judgements in relation to the suitability of premises, particularly those for which they have responsibilities under the Licensing Act 2003 / Licensing (Scotland) Act 2005, in which context they have wider powers to also take into account measures to prevent nuisance.

5.8 In relation to preventing disorder, licensing authorities have the ability under s.169 of the Act to attach additional conditions to premises licences, and are entitled to include a requirement for door supervision, as provided for in s.178 of the Act. If a person employed on door supervision would be required to hold a licence issued by the Security Industry Authority (SIA), that requirement will have force as though it were a condition on the premises licence. Further information on conditions on premises licences can be found in Part 9 of this Guidance.

5.9 There are a number of voluntary initiatives that the gambling industry participates in to address issues such as underage access, staff safety and security. These change from time to time and licensing authorities are advised to check with local operators, for example when conducting inspections, as to which (if any) scheme the operator is a part of. Further information can often be found on the website of industry trade associations[5].

5.10 Licensing authorities do not need to investigate the suitability of an applicant for a premises licence, including in relation to crime. The issue of suitability will already have been considered by the Commission, because any applicant (except occupiers of tracks who do not propose to offer gambling themselves) will have to hold an operating licence from the Commission before the premises licence can be issued. However, if the licensing authority receives information during the course of considering a premises licence application or at any other time, that causes it to question the suitability of the applicant to hold an operating licence, these concerns should be brought to the attention of the Commission without delay.

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

5.11 Generally the Commission would not expect licensing authorities to find themselves dealing with issues of fairness and openness frequently. Fairness and openness is likely to be a matter for either the way specific gambling products are provided and therefore subject to the operating licence, or will be in relation to the suitability and actions of an individual and therefore subject to the personal licence. However, if licensing authorities suspect that gambling is not being conducted in a fair and open way this should be brought to the attention of the Commission so that it can consider the continuing suitability of the operator to hold an operating licence or of an individual to hold a personal licence.

5.12 In relation to the licensing of tracks, the licensing authority's role will be different from other premises in that track owners will not necessarily have an operating licence. In those circumstances the premises licence may need to contain conditions to ensure that the environment in which betting takes place is suitable. Further information can be found in Part 20 of this Guidance.

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

5.13 In exercising their powers under s.153, licensing authorities should consider whether staff will be able to adequately supervise the gambling premises, as adequate staffing levels is a factor to consider regarding the prevention of underage gambling. The Commission would expect the operator and the licensing authority to work together to consider how any impediments to the supervision of premises might be most appropriately remedied. Supervision also applies to premises that are themselves not age-restricted (eg bingo and family entertainment centre (FEC) premises) but which make gambling products and facilities available.

[5] For example, The Safe Bet Alliance's Voluntary Code of Safety and Security National Standards for Bookmakers

5.14 Where a licensing authority considers the structure or layout of premises to be an inhibition or potential inhibition to satisfying this licensing objective, the licensee should consider what changes are required to ensure the risk is mitigated. Such changes might include the positioning of staff or CCTV, the use of floor-walkers and the relocation of the staff counter to enable direct line of sight. Licensing authorities will need to consider the proportionality of changes to the physical layout in relation to other measures that could be put in place.

5.15 If the operator fails to satisfy the licensing authority that the risks are sufficiently mitigated, it may be appropriate to conduct a review of the premises licence.

5.16 In relation to casinos, the Commission has issued a code of practice on access to casino premises by children and young persons, as provided for by s.176 of the Act. The code of practice is available as part of the *Licence Conditions and Codes of Practice* (LCCP) In accordance with s.176 of the Act, adherence to the code will be a condition of the premises licence. Further information can be found in Parts 9 and 17 of this Guidance.

5.17 The Act does not seek to prohibit particular groups of adults from gambling in the same way that it prohibits children. The Commission does not seek to define 'vulnerable persons' but it does, for regulatory purposes, assume that this group includes people who gamble more than they want to, people who gamble beyond their means and people who may not be able to make informed or balanced decisions about gambling due to, for example, mental health, a learning disability or substance misuse relating to alcohol or drugs.

5.18 Licensing authorities need to consider, in relation to particular premises, whether any special considerations apply in relation to the protection of vulnerable persons. This could be a local risk that is reflected in the licensing authority's statement of policy. Any such considerations need to be balanced against the authority's objective to aim to permit the use of premises for gambling.

S.153 principles

5.19 S.153 of the Act provides that, in exercising its functions under Part 8 of the Act, a licensing authority shall aim to permit the use of premises for gambling in so far as it thinks it is:

a. in accordance with any relevant code of practice under s.24 (ie the LCCP)
b. in accordance with any relevant guidance issued by the Commission under s.25 (ie this Guidance)
c. reasonably consistent with the licensing objectives (subject to a and b above), and
d. in accordance with the licensing authority's statement of licensing policy (subject to a to c above).

5.20 Whilst there is a presumption in favour of permitting the relevant premises to be used for gambling, the licensing authority may not do so unless satisfied that such use would be in accordance with this Guidance, any relevant Commission code of practice, its own statement of policy, and the licensing objectives.

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

5.22 In determining applications for premises licences, the Act explicitly sets out two principles that licensing authorities should **not** have regard to:

- s.153 makes it clear that in deciding whether or not to grant a licence, a licensing authority must not have regard to the expected demand for gambling premises that are the subject of the application
- s.210 (1) of the Act states that 'in making a decision in respect of an application...a licensing authority should not have regard to whether or not a proposal by the applicant is likely to be permitted in accordance with law relating to planning or building'.

5.23 A licensing authority is therefore afforded significant scope to exercise its powers under s.153 on the grounds that it does not encroach on the two principles set out above.

5.24 The requirements in s.153 are subject to the licensing authority's power under s.166 to resolve not to issue casino premises licences. This means that a resolution not to issue a casino premises licence applies regardless of the matters set out in s.153.

Codes of Practice

5.25 The LCCP sets out the Commission's general licence conditions and associated codes of practice provisions under the Act. The codes of practice are set out within Part II of the LCCP.

5.26 To assist licensing authorities in determining premises applications and inspecting premises, all the codes of practice are also available as a single document. The codes specify a number of requirements, many of which relate to social responsibility issues and these may be of particular interest where a licensing authority has concern about matters such as protection of the young and vulnerable. It should be noted that the codes also apply to situations in which the gambling being offered is not normally the responsibility of an operating licence holder. Examples include the *Code of practice for equal chance gaming* and the *Code for gaming machines in clubs and premises with an alcohol licence*.

Good practice in regulation

5.27 Under the Legislative and Regulatory Reform Act 2006, any person exercising a specified regulatory function has a legal duty to have regard to the statutory principles of good regulation[6] in the exercise of the function. These provide that regulatory activities should be carried out in a way which is transparent, accountable, proportionate, and consistent and should be targeted only at cases in which action is needed. The Commission has regard to these principles in relation to its responsibilities and also has regard to the requirements of the Regulators' Code[7]. The purpose of the Code is to promote efficient and effective approaches to regulatory inspection and enforcement which improve regulatory outcomes without imposing unnecessary burdens on business.

5.28 The statutory principles of good regulation and the Regulators' Code also apply to local authorities, who are under a statutory duty to have regard to them when fulfilling their regulatory functions under the Act[8].

[6] Legislative and Regulatory Reform Act 2006, section 21

[7] Regulators' Code (previously the Regulators' Compliance Code), Department of Business, Innovation and Skills, 2014, issued under section 23 of the Legislative and Regulatory Reform Act 2006

[8] The Legislative and Regulatory Reform (Regulatory Functions) Order 2007, was amended by the Legislative and Regulatory Reform (Regulatory Functions) (Amendment) Order 2009, which, amongst other things, extended the application of the 2007 Order to local authorities in Wales and Scotland exercising regulatory functions under the Gambling Act 2005 - see Parts 3 and 7

5.29 Guidance produced by the Better Regulation Delivery Office seeks to assist local authorities in interpreting the requirements of the Regulators' Code, for example in developing their Compliance and Enforcement Policy[9], and in delivering risk-based regulation in relation to age restrictions[10].

Human Rights Act 1998

5.30 The Secretary of State has certified that the Act is compatible with the European Convention on Human Rights. In considering applications, and taking enforcement action under the Act, licensing authorities should bear in mind that they are subject to the Human Rights Act 1998 and in particular:

- Article 1, Protocol 1 – peaceful enjoyment of possessions. A licence is considered a possession in law and people should not be deprived of their possessions except in the public interest
- Article 6 – right to a fair hearing
- Article 8 – respect for private and family life. In particular, removal or restriction of a licence may affect a person's private life
- Article 10 – right to freedom of expression.

Other considerations

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

5.32 In determining applications for premises licences and permits, a licensing authority may request as much information as it requires to satisfy itself that all the requirements set out at s.153 of the Act are met.

5.33 Where concerns remain, licensing authorities may choose to attach conditions to the premises licence. Further details are provided in Part 9.

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

[9] *Template: Compliance and Enforcement Policy*, Better Regulation Delivery Office. This template policy was developed by the Local Better Regulation Office, with local authorities, to assist local authorities in developing a policy that is in line with the requirements of the Regulators' Compliance Code, or to review their existing policy. It is available on the BRDO website at http://www.bis.gov.uk/brdo/resources/risk-based-regulation/compliance-policy

[10] *Age restricted products and services framework / updated April 2014* sets out an agreed set of shared responsibilities and reasonable expectations for young people, their parents and carers, businesses, employees and regulators with regards to access to age restricted products and services. The document forms the foundations of the *Age restricted products and services: a code of practice for regulatory delivery / updated April 2014*

7.50 A licence application, and any licence subsequently issued, is not valid if the relevant notifications have not been made.

Application for Premises Variation (s.187): 'material change'

7.51 Previous guidance from the Department for Culture, Media and Sport (DCMS) and the Commission has been that an application for a variation will only be required where there are material changes to the layout of the premises. What constitutes a material change will be a matter for local determination but it is expected that a common sense approach will be adopted. When considering an application for variations, the licensing authority will have regard to the principles to be applied as set out in s.153 of the Act.

Representations

7.52 In dealing with an application, licensing authorities are obliged to consider representations from two categories of person, referred to in the Act as 'responsible authorities' and 'interested parties'. Representations from other parties are inadmissible. Further information on these categories can be found in Part 8 of this Guidance.

7.53 Having determined that the representation is admissible, the licensing authority must consider its relevance. Only representations that relate to the licensing objectives, or that raise issues under the licensing authority's statement of policy, or the Commission's Guidance or Codes of Practice, are likely to be relevant.

7.54 The licensing authority will also need to consider if representations are 'frivolous' or 'vexatious'. This is a question of fact and licensing authorities are advised to seek help from their legal advisers in interpreting these phrases although relevant considerations may include:

- who is making the representation, and whether there is a history of making representations that are not relevant
- whether it raises a 'relevant' issue
- whether it raises issues specifically to do with the premises that are the subject of the application.

7.55 The Commission does not routinely make representations on premises licence applications. However, the fact that the Commission has not made a representation on a particular premises licence application should not be taken as indicating the Commission's approval of that application. Exceptionally, where an application for a premises licence, or the operation of a current premises licence, raises matters of wider or national significance, the Commission will consider making representations or requesting a review.

Making a decision

7.56 As explained earlier, the licensing authority's primary obligation under s.153(1) is to permit the use of premises in so far as it thinks that to do so is:

a. in accordance with any relevant code of practice issued by the Commission
b. in accordance with any relevant guidance issued by the Commission
c. reasonably consistent with the licensing objectives (subject to a. and b. above), and
d. in accordance with the licensing authority's statement of licensing policy (statement of policy) (subject to a. to c. above).

7.57 Further information and guidance as to the meaning and effect of s.153 is set out at paragraph 5.19 above.

9.28 Licensing authorities should make decisions on conditions on a case-by-case basis, and in the context of the principles of s.153. They must aim to permit the use of premises for gambling and so should not attach conditions that limit their use except where it is necessary in accordance with the licensing objectives, the Commission's codes of practice and this Guidance, or their own statement of policy. Conversely, licensing authorities should not turn down applications for premises licences where relevant objections can be dealt with through the use of conditions.

9.29 Licensing authority statements of policy will need to consider the local circumstances which might give rise to the need for conditions. Where there are specific risks associated with a particular locality, the licensing authority might decide to attach conditions to the premises licence to mitigate those risks. For example, local issues associated with a high crime rate may put a premises at risk of not being consistent with the licensing objectives, and specific conditions may be necessary to address the risk.

9.30 Where there are risks associated with a specific premises or class or premises, the licensing authority may consider it necessary to attach conditions to the licence to address those risks, taking account of the local circumstances.

9.31 Conditions imposed by the licensing authority must be proportionate to the circumstances which they are seeking to address. In particular, licensing authorities should ensure that the premises licence conditions are:

- relevant to the need to make the proposed building suitable as a gambling facility
- directly related to the premises (including the locality and any identified local risks) and the type of licence applied for
- fairly and reasonably related to the scale and type of premises
- reasonable in all other respects.

Conditions that may not be attached to premises licences by licensing authorities

9.32 The Act sets out certain matters that may not be the subject of conditions:

- s.169(4) prohibits a licensing authority from imposing a condition on a premises licence which makes it impossible to comply with an operating licence condition
- s.172(10) provides that conditions may not relate to gaming machine categories, numbers, or method of operation
- s.170 provides that membership of a club or body cannot be required by attaching a condition to a premises licence (the Act specifically removed the membership requirement for casino and bingo clubs and this provision prevents it being reinstated)
- s.171 prevents a licensing authority imposing conditions in relation to stakes, fees, winnings or prizes.

Hansard Extract

On 9 November 2004 (Standing Committee B) there was a debate in the House of Commons over whether to amend the Licensing Objectives to include "the prevention of public nuisance.) Below are the relevant paragraphs from Hansard.

The amendment was withdrawn. The following are material extracts from Hansard:

Column Number: 012

Mr Foster - Amendment to include prevention of public nuisance in Licensing Objectives:

Why is it important that we deal with that in the objectives? The answer is simple. As the Bill stands, the local authority is unable to take account of effects that may occur not in a new casino or on gambling premises, but further afield, outside those premises. It is crucial that local authorities have the opportunity to do so. Indeed, the Local Government Association said when it wrote to all Members about the Second Reading debate that the prevention of public nuisance should be a licensing objective:

"The licensing objectives set out in Clause 1 of the Bill do not address potential problems of nuisance arising in the street outside gambling premises. This is particularly likely late at night and when alcohol has been consumed. While the Environmental Protection Act 1990 places a duty on local authorities to deal with statutory nuisances arising from the premises itself, and to investigate residents' complaints, it is not possible to use this legislation to deal with street nuisance, even where the problem is directly attributable to a particular venue."

Use of the Environmental Protection Act for such matters is therefore not possible. The LGA goes on to say:

"This omission will seriously hamper the ability of councils to ensure effective management of the environment around gambling premises and provides residents with little scope to make representations should street nuisance occur. The LGA believes that a new licensing objective of the prevention of public nuisance should be added to Clause 1."

Column Number: 037

The Minister for Sport and Tourism ***Mr Richard Caborn, addressing the amendment***

Some gambling premises (casinos and bingo clubs) are allowed to serve alcohol to their customers, and the Bill will not stop that happening. Their entitlement does not spring from gambling laws: as one or two of my hon. Friends have said, it comes from the licensing law itself. Casinos and bingo clubs in England and Wales get their entitlement from the Licensing Act 1964. However, by the time the Bill is on the statute book, the Licensing Act 2003 will have come into force. The equivalent licensing laws govern casinos and bingo clubs in Scotland. The 2003 Act includes the prevention of public nuisance as a licensing objective, understandably so given the unfortunate connection between excess alcohol intake and bad behaviour. That was referred to by a number of hon. Members this morning.

The relevant risks associated with licensing of pubs, bars and other premises on which alcohol is sold include noise and antisocial conduct, particularly at night. That has been referred to in connection with Guildford. Accordingly, it will be open to licensing authorities, when considering applications for casinos and bingo halls to be licensed premises under the 2003 Act, to take account of the public-nuisance risk just as they do when considering any other application. If any casino were to put its alcohol licence at risk by allowing public nuisance, it would almost certainly put its continued existence and its licence at risk. Therefore, it is unnecessary in the case of casinos and bingo clubs to duplicate provisions that are already in licensing law.

There is no intention of allowing other gambling premises, such as betting shops and machine arcades, to sell alcohol, and there is no reason to apply to them a nuisance test over and above the

law on noise and other nuisance. There is no well-established association between betting and nuisance of the sort that unfortunately exists between alcohol and nuisance. We do not believe that there is any reason to single out betting shops for special treatment in contrast to grocery shops, newsagents or any other shop.

There are provisions in the general criminal and civil law on the control of public nuisance. If they are not thought to be adequate, I am not expressing a Government view on this, the solution is to strengthen the general law, not to adopt specific measures for gambling premises on the basis of no

Column Number: 038

evidence of need. In practice, all licensed gambling premises are more likely to conduct themselves responsibly than the general run of premises, if only because they will have to satisfy not just the local licensing authority concerning their present licence, but the powerful gambling commission in relation to their operating licence.

Amendment No. 1 would be regulatory overkill. The official Opposition, who continually badger us about red tape and over-regulation, should reflect on their amendments in the light of my explanation. Amendment No. 1 would only reinforce the apprehension in the gambling industry that local authorities will be over-zealous in regulating premises, and I do not believe that those fears are well grounded. It would impact significantly on the matters that could be taken into account by local authorities and would go beyond what is reasonable. I cannot advise the Committee to accept it.

https://publications.parliament.uk/pa/cm200304/cmstand/b/st041109/pm/41109s02.htm
https://publications.parliament.uk/pa/cm200304/cmstand/b/st041109/am/41109s03.htm

[6] Standing Committee B, Thursday, 2nd December 2004 (Afternoon) Col 359.

Determination of application

[5.158]

In determining an application the licensing authority must hold a hearing[1] if:

- representations have been made by an interested party or responsible authority and have not been withdrawn;
- the authority intend to use their discretion under s 169(1) to attach a condition to a licence; or
- the authority intend to use their discretion under s 169 to exclude a default condition (ie a condition automatically attached to the licence under s 168 unless excluded by the authority in its discretion)[2].

A hearing may, however, be dispensed with if the applicant and any interested party or responsible authority who have made representations consents to this course[3], or the authority think that the representations are vexatious or frivolous or will certainly not influence their determination of the application[4]. If the authority do propose to dispense with a hearing on these latter grounds they must as soon as is reasonably practicable notify the person who made the representations[5], presumably to enable him to seek a remedy by way of judicial review if so advised.

Where the applicant for the premises licence is an applicant for an operating licence[6] the authority cannot determine the application until the relevant operating licence has been issued[7].

On considering an application for a premises licence (whether at a hearing or not) the licensing authority must either grant it or reject it[8]. In making that determination the licensing authority will be subject to the provisions of s 153 which sets out the principles to be applied by the authority in exercising all their functions under Part 8 GA 2005 (ie including, but not limited to, the grant or refusal of an application for a premises licence). Section 153(1) provides as follows:

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

(a) in accordance with any relevant code of practice under s 24,

(b) in accordance with any relevant guidance issued by the Commission under s 25,

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

(d) in accordance with the statement published by the authority under s 349 (subject to paras (a) to (c))."

The subsection starts by imposing a general duty on the authority to 'aim to permit the use of premises for gambling' and then sets out a series of four factors which may, in any individual case, qualify or override the general duty. The first point to note is that the provision imposes a duty on the licensing authority: it must, subject to the qualifying factors, aim to permit the use of premises for gambling. What is the scope of this duty? It is suggested that there are two elements: first, it creates a presumption in favour of granting the premises licence since it is only if the licence is granted that the premises may lawfully be used for gambling. But the duty seems to go further than that. The verb 'to aim' is defined by the *OED*[9] as meaning: '5. To calculate one's course with a view to arriving (at a point); to direct one's course, to make it one's object to attain. Hence fig To have it as an object, to endeavour earnestly'. The *Shorter OED*[10] defines it as: '3. Direct one's course, make it one's object to attain, intend, try'. A person who 'aims' to achieve a result will usually take active steps to bring it about. The provision appears to place a duty upon the licensing authority to exercise their powers so far as is lawfully possible to achieve a position in which they can grant the premises licence and thus permit the premises to be used for gambling. The most obvious way in which the authority will be able to exercise their powers in this way will be by an imaginative use of their power to frame and impose conditions (see para 5.159 below) so as to overcome objections to the application which might, in the absence of suitable conditions, lead to the application being rejected. No doubt the authority could also, in a case where a licence application gave rise to issues which could not be addressed by suitably drafted conditions, seek to consider with the applicant whether amendments to the application might overcome the objections and enable it to be granted. However, it is also necessary to recognise that the language of s 153(1) stops short of being mandatory; `aim to permit' provides a strong steer to look favourably on an application, but no more.

As to the list of qualifying factors, these are set out in s 153(1)(a)–(d). Section 153(1)(a) qualifies the duty to aim to permit use of premises for gambling to the extent that such use must be in accordance with any relevant code of practice issued by the Gambling Commission under s 24. That section requires the Gambling Commission to issue codes of practice about the manner in which facilities for gambling are to be provided (whether by the holder of a licence or by another person). In issuing a code of practice the Gambling Commission will be subject to a duty under s 22 to promote the licensing objectives. Accordingly any code of practice should be consistent with those objectives. Section 153(1)(b) qualifies the licensing authority's duty to aim to permit the use of premises for gambling to the extent that such use must be in accordance with any relevant guidance issued by the Gambling

Commission under s 25. This section requires the Gambling Commission to issue guidance to local authorities[11] as to the manner in which they are to exercise their functions under the Act and the principles that they should apply in exercising those functions. Again the effect of s 22 is that in issuing such guidance the Commission will be under a duty to promote the licensing objectives, so again such guidance should be consistent with those objectives. The effect of all this is that any code of practice and any guidance to local authorities ought to promote the licensing objectives and no inconsistencies between the two should arise. On that basis codes of practice and guidance are placed (by s 153(1)(a) and (b)) as enjoying equal importance at the top of the hierarchy of factors set out in s 153(1)(a)–(d).

Next comes s 153(1)(c): this provides that the duty of the licensing authority to aim to permit the use of premises for gambling is qualified to the extent that such use must be reasonably consistent with the licensing objectives, but it goes on to provide that this condition is 'subject to paras (a) and (b)'. In principle there should, of course, be no conflict between (a) and (b) (which will both reflect the Gambling Commission's duty to promote the licensing objectives) and (c) (which will reflect the licensing authority's view of what the licensing objectives require). However the effect of the legislation appears to be that should there be any conflict between the two then the guidance set out in codes of practice or guidance emanating from the Gambling Commission will 'trump' any factors which the licensing authority themselves would otherwise have taken into account as relevant to the licensing objectives under s 153(1)(c).

Finally, s 153(1)(d) provides that the duty of a licensing authority to aim to permit the use of premises for gambling is qualified to the extent that such use must be in accordance with the authority's own statement issued under s 349. In preparing that statement the authority are not themselves expressly required to have regard to the licensing objectives, but they are obliged to have regard to guidance issued by the Gambling Commission under s 25 and such guidance deals, amongst other things, with the formulation by the authority of their licensing policy (see para AM5.6655). Since the s 25 guidance must itself promote the licensing objectives the effect should be that the authority's licensing policy will itself be consistent with those objectives so that it should not conflict with any code of practice or guidance issued by the Commission nor with the licensing objectives themselves. However, s 153(1)(d) provides that consideration of the licensing authority's own policy is 'subject to paras (a) to (c)' which appears to mean that in the case of an inconsistency a relevant Commission code of practice, relevant guidance or the licensing objectives themselves would 'trump' the authority's licensing policy.

In determining the application the authority may not have regard to the expected demand for the facilities which it is proposed to provide[12], nor may they have regard to the question whether or not the proposal is likely to be granted planning permission or building regulation approval[13]. Where the authority have resolved under s 166 not to issue casino premises licences an application for such a licence will, of course, necessarily fail and be rejected[14].

Where the application is granted the authority must as soon as reasonably practicable give notice of the grant in the form prescribed to the applicant, the Commission, any person who made representations, the chief officer of police for any area in which the premises are wholly or partly situated and HMRC[15] and must issue the licence to the applicant and must give him a summary of the terms and conditions in the prescribed form. If they have attached a condition to the licence under s 169(1)(a) or have excluded a default condition[16] they must give their reasons[17]. If representations were made by an interested party or a responsible authority they must give their response to the representations[18].

Where the application is rejected the authority must as soon as reasonably practicable give notice of the rejection in the form prescribed to the applicant and to the same parties as are entitled to be notified of a grant[18]. The notice must give the authority's reasons for rejecting the application[19].

1 As to procedure at hearings in relation to applications see SI 2007/173.

2 GA 2005, s 162. See further para 5.159 below.

3 GA 2005, s 162.

4 GA 2005, s 162(3).

5 GA 2005, s 162(4).

6 Ie under GA 2005, s 159(3)(b).

7 GA 2005, s 163(2).

8 GA 2005, s 163(1).

9 *The Oxford English Dictionary* (2nd edn, 1989).

10 (5th Edn, OUP).

SCHEDULE 2 Regulations 10 and 11

Conditions attaching to bingo premises licences

PART 1

Mandatory conditions attaching to bingo premises licences

1. A notice stating that no person under the age of 18 years is permitted to play bingo on the premises shall be displayed in a prominent place at every entrance to the premises.

2. No customer shall be able to enter the premises directly from any other premises in respect of which one of the following permissions has effect—

(a) a casino premises licence;

(b) an adult gaming centre premises licence;

(c) a betting premises licence other than a track premises licence; and

3.—(1) This paragraph shall apply where children or young persons or both are permitted by the licence holder to enter the premises, and Category B or C gaming machines are made available for use on the premises.

(2) Any area of the premises to which category B and C gaming machines are located—

(a) shall be separated from the rest of the premises by a physical barrier which is effective to prevent access other than by an entrance designed for the purpose;

(b) shall be supervised at all times to ensure children or young persons or both do not enter the area; and

(c) shall be arranged in such a way that ensures all parts of the area can be observed by the persons mentioned in sub-paragraph (3).

(3) The reference to supervision in this paragraph means supervision by—

(a) one or more persons whose responsibilities include ensuring children or young persons or both do not enter the area; or

(b) closed circuit television which is monitored by one or more persons whose responsibilities include ensuring that children or young persons or both do not enter the area.

(4) A notice stating that no person under the age of 18 years is permitted to enter the area shall be displayed in a prominent place at the entrance to any area of the premises in which Category B or C gaming machines are made available for use.

4.—(1) In the case of a charge for admission to the premises, a notice of that charge shall be displayed in a prominent place at the principal entrance to the premises.

(2) In the case of any other charges in respect of gaming, a notice setting out the information in sub-paragraph (3) shall be displayed at the main point where payment for the charge is to be made.

(3) The notice in sub-paragraph (2) shall include the following information—

(a) the cost (in money) of each game card (or set of game cards) payable by an individual in respect of a game of bingo;

(b) in respect of each game card (or set of game cards) referred to in paragraph (a) the amount that will be charged by way of a participation fee for entitlement to participate in that game; and

(c) a statement to the effect that all or part of the participation fee may be waived at the discretion of the person charging it.

(4) The notice may be displayed in electronic form.

(5) A reference in this paragraph to a charge in respect of gaming does not include an amount paid for an opportunity to win one or more prizes in gaming to which section 288 of the 2005 Act (meaning of "prize gaming") applies.

5.—(1) The rules of each type of game that is available to be played the premises other than games played on gaming machines shall be made available to customers within the premises.

(2) The condition in sub-paragraph (1) may be satisfied by—

(a) displaying a sign setting out the rules,

(b) making available leaflets or other written material containing the rules, or

(c) running an audio-visual guide to the rules prior to any bingo game being commenced.

6. Any ATM made available for use on the premises shall be located in a place that requires any customer who wishes to use it to cease gambling in order to do so.

PART 2

Default conditions attaching to bingo premises licences

1. Subject to paragraph 2, no facilities for gambling shall be provided on the premises between the hours of midnight and 9am.

2. The condition in paragraph 1 shall not apply to making gaming machines available for use.

MERKUR SLOTS UK LIMITED

REFERENCE BUNDLE INDEX

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THE 3 LICENSING OBJECTIVES

1. Keeping crime out of gambling

Whilst crime is considered 'low/medium risk' in our business, we have to be mindful of the fact crime still exists and our venues could be considered as a target for money laundering gained from the proceeds of crime and terrorist financing, i.e., drug money, using TITO technology to conceal 'fake notes', lifestyle and spending habits.

2. Ensuring gambling is conducted fairly and openly

We must ensure the terms we offer with regards to our business practices are fair and transparent to our customers and as Licensees we must comply with the Consumer Rights Act 2015. This means ensuring our machines and marketing are promoted in a fair and open way.

3. Protecting children and vulnerable people from being harmed or exploited by gambling

We have a duty of care to ensure children and young persons do not enter our premises, which are strictly for OVER 18's only. As a company MERKUR Slots operate a 'Think 25' policy and ID checks are carried out if we suspect a person is under 18. Ensuring we protect people who may be 'at risk' from gambling and protecting them from harm, customer interaction and helpful advice is vital to ensure we promote our business in a socially responsible way.



Bingo Express 2

Technical Features Information

Version 1.2 June 2024

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INTRODUCTION

Bingo Express 2 is a fully featured scalable Ticket on Demand / Tablet Bingo platform for Bingo licenced premises, packaged up in a standalone small footprint terminal.

The platform allows an operator to deliver, manage and fully report on Ticket on Demand and tablet-based Bingo.

This document describes the technical features and overall architecture of the platform.

BINGO EXPRESS 2 TERMINAL



24 inch operator touch screen with attract mode. Option for Top screen

Barcode Scanner for ticket check, tablet crediting, login

3" thermal print for Bingo Tickets, TiTo tickets and reports

Electronic Coin Mech

Tito Compatible Note Acceptor

20 Tablet built in charge capability

Optional external charge racks expand capacity. Available in 10, 16 and 32 slot formats.

- Dimensions:
  - 700mm Width
  - 550mm Depth
  - 1850 Height (w/o optional top screen)
- Rear casters for local manoeuvring
- Power Supply 2 x 230v 13 amp sockets
  - Charge Rack (timed supply)
  - PC and Server (24 Hour supply)
- Up to 8 x RJ45 network connections
- Public Display Output on HDMI (Required for LCCP)
  - Operator to provide screens / distribution

Optional Chip and Pin functionality Currently integrated using Ocius Sentinel payment solution, with a Verifone VX820 PED. Merchant accounts to be supplied and held by operator. All transactions, processing accounts and charges are operator's responsibility

Optional Membership Scan Point functionality. Members can scan a virtual or plastic card to register their visit.

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GAMING TABLETS (OPTIONAL)

The Bingo Express 2 platform uses Lenovo tablets which offer excellent performance, reliability and battery life.

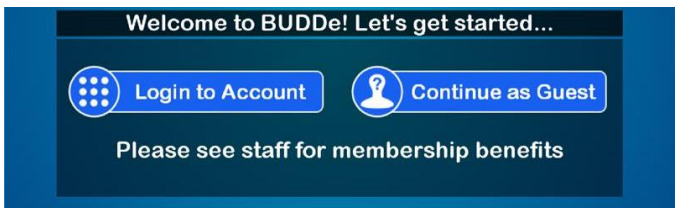




- Android Operating System
  - Locked down for security
- 10.1" Full HD Screen
- 7000 mAh battery
- Over 10 hours battery life
- Adaptive charging prolongs the life of devices and provides an average of 20% per hour charge rates
- Magnetic charge cables
- Remote Software management
- Customisable Skins
- Advertising whilst idle
- Built in kick stand
- Vertical or Horizontal orientation

GUEST OR MEMBERSHIP LOGIN

The system supports full membership integration if required. Users can log on to the tablet with a membership number and secure PIN, or where appropriate securely login as a guest.



Membership login allows storage of customer preferences and a personal account balance to be held on the server. For Bingo variant games it also enables catch-up play, where a player can purchase tickets one day and play them off later.

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TITO

- GBG standard TiTo functionality
- Supported versions:
    - 1.3(a)
    - 2.1
- Option to disable Ticket In if required.

INFRASTRUCTURE – NETWORKS

The platform uses a server-based architecture that is fully scalable. For the Bingo Express 2 application the terminal is self-contained, housing the server and separate control PC for the user interface and public display output.

The system provides support for up to three networks depending on the configuration of the operator's IT infrastructure.

1. Main network
    - Internet connected for secure connection to central Bingo Express server, support and email reports.
    - Subject to provision of suitable V-Lan's can carry TiTo

2. Gaming Network (tablet sites only)
    - Independent to other networks
    - Internal WiFi access point
    - POE outputs for multiple external access points (scalable to suit all venue sizes)

3. TiTo Network (Optional)
    - Allows an independent network connection for TiTo, if this cannot be accessed on main network via operator V-Lan.

USERS AND SECURITY

To keep the system secure, each member of staff is supplied with a unique PIN number and their own staff card that must be entered or scanned before full access to the Bingo Express 2 application is permitted.

Two levels of user access are provided, Manager and Staff, giving access only to appropriate functions.

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BINGO EXPRESS 2 INTERFACE

The Bingo Express 2 system is multi-functional, allowing a player the option to play Bingo on paper tickets (printed on demand) or on tablets (where fitted).

The intuitive interface not only allows users to view and buy a full day's worth of paper Bingo tickets, but also allows users to Add or Withdraw credit on their tablet account directly without the need for staff interaction.



REPORTING ACCOUNTS AND AUDITS

The server-based backend is fully LCCP compliant for both Bingo and Slots content in suitably licenced premises.

The system supports true account-based play with secure PIN controlled access if required. Optionally it can link to NRM's membership backend or others through an API. This allows automatic syncing of customer details and self-exclusion status.

Where membership login/account-based play is not required operators can use guest accounts; these are tied to a tablet with a secure algorithmically generated PIN. They are audited in just the same way as an individual membership account would be, but must be cashed out at the end of a session otherwise credit is forfeited.

A full timestamped breakdown of all transactions to and from accounts is available from the interface.

The system has a configurable maximum AML credit limit and the latest version of tablet software includes safer gambling controls for the users.

A promo credit system is available, accessed through the Managers level login. Promo credit amounts can be setup as 'packages' and applied to accounts individually by scanning a tablet/membership card. Promo credit can't be cashed out, can be set with an expiry date and is fully audited.

The system audits on daily/sessional basis. For Ticket on Demand Bingo operations there will typically be a single session per day. The system tracks the last seen dates and times of each tablet.

At the end of each day/session printed (and optional Email) reports are generated:

Bingo/Terminal Activity:

- Non-resetting meters for:
  - Cash In (Notes and Coins)
  - TiTo (voucher) out
  - Tito (voucher) in
- All Played Bingo Game, sold, won and void
  - Separate entries for Paper and Electronic sales.

Tablet Activity is separately reported, including:

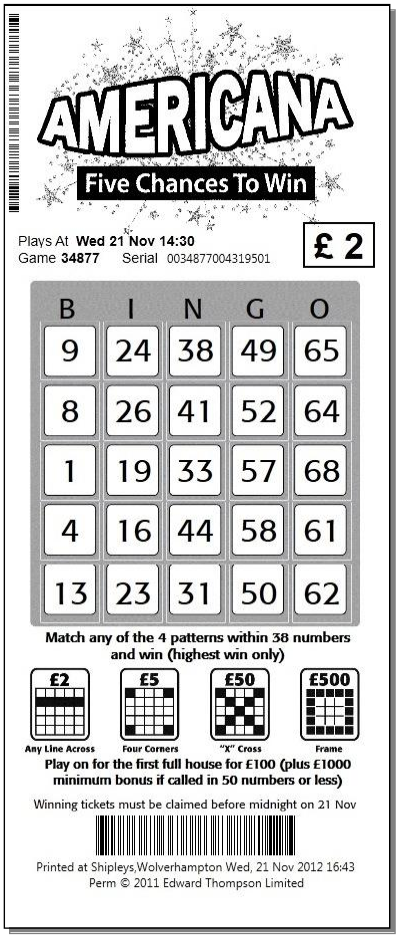
- Full session start/finish times and dates
- Total credits applied to Tablets
- Staked and won figures broken down for each game type
- Total credits withdrawn from the tablets

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SAMPLE BINGO CONTENT

Bingo Games are scheduled typically every 6 -10 minutes, they start and play automatically with all required game information shown on public screens. Games are constantly reviewed and the schedule can vary. At the time of writing the following games are scheduled and enabled for both paper ticket and tablet.

Americana – Classic 75 number style bingo game



Americana is a two part game with a guaranteed Full House winner every time plus a fixed odds element.

It does not have to be played live, but tickets must be marked and be validated within the timeframe identified in the game rules in force at the time.

Game times will be displayed on the Bingo Express screen(s). The game is 'linked', with tickets sold in a number of venues and not just in this site.

The Americana ticket has a 5 by 5 grid of 25 numbers between 1 and 75. Prizes are awarded for the stages as follows:

1. After 38 numbers are called, any tickets which match the following patterns win prizes as shown (highest prize only paid):
   - Any complete horizontal line across of five numbers eg £2
   - Four corners eg £10
   - St Andrews Cross (X shape) eg £50
   - Picture Frame (all numbers on the outside edges) eg £500

2. The game then continues for a full house, and the first ticket to achieve this across all participating sites wins a defined prize. If two or more tickets have a full house on the same lowest number of calls, then the defined prize is split equally between those winning tickets.

The game features an additional progressive prize available on the full house if it is achieved in less than a specified number of calls. The number of calls to win the progressive prize is normally 50, but may be varied during promotional periods.

The value of the progressive prize will be displayed on the Bingo Express screen(s) at the start of each game.

In the event of a win the progressive prize is split as follows:

a. The full house winner takes 50% of the advertised Jackpot value
b. The remaining 50% to be shared equally between ALL ticket holders for the Jackpot winning game

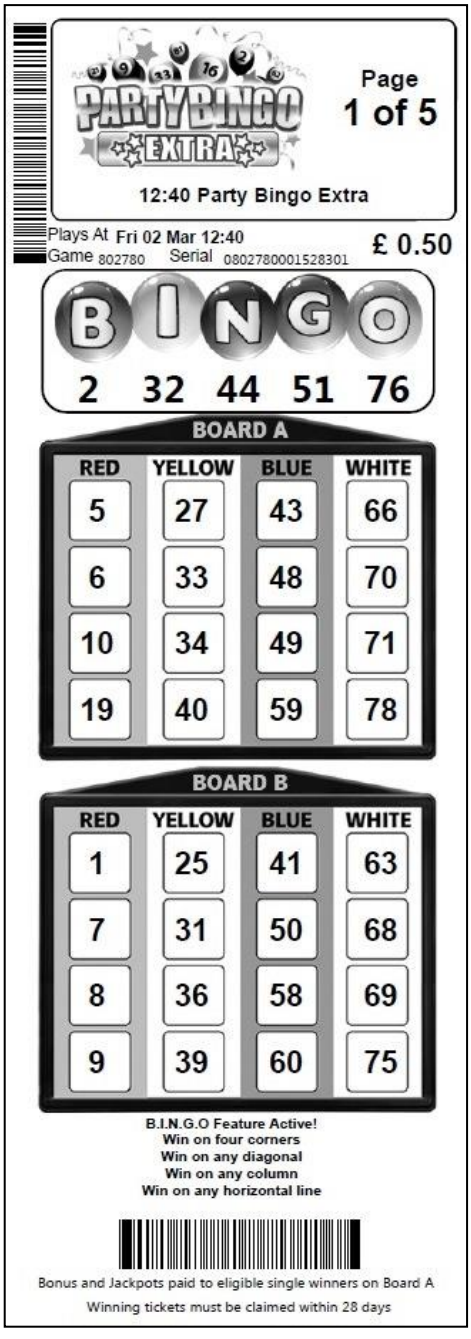
At game time numbers are called randomly via the Bingo Express system and displayed on a screen(s) while it is being played; players can mark their tickets as the game is being played. If you think you have won, just scan your ticket or ask a member of staff to check it for you.

Alternatively, players can mark their ticket from a printed call sequence, available directly from the terminal.

Players are required to confirm that they have marked their ticket when it is validated. Tickets are easily checked by scanning tickets under the barcode reader at the Bingo Express control point.

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Party Bingo Extra - 80 Number Cash Bingo style



1. Party Bingo Extra operates as a Bingo Variant game whereby tickets do not have to be played live and can be validated up to 28 days from the day in which the game has been started. Game times will be displayed on the Bingo Express screen(s). Game tickets are sold in a number of venues and not just in this site.

2. The Party Bingo Extra game includes two types of tickets.

a. Type 1 includes the B.I.N.G.O feature and allows for win patterns of any horizontal, vertical or diagonal line of four numbers or four outside corner numbers.

b. Type 2 does not include the B.I.N.G.O feature and plays for either a Full House or Picture frame. Optionally there can also be Jackpots for either prize.

Type 1 Ticket: Line and Corners Game

3. The Type 1 Party Bingo Extra tickets have two parts:

a. Two 4 by 4 grids of 16 numbers out of a range from 1 to 80.
b. One B.I.N.G.O feature with 5 numbers one each from the ranges 1-16, 17-32, 33-48, 49-64, 65-80.

4. Random numbers are called from the full range of 1- 80 numbers until the first card across all participating sites matches one of the following patterns:

a. Any horizontal, vertical or diagonal line of four numbers.
b. All four outside corner numbers.
c. B.I.N.G.O feature - all numbers under the B.I.N.G.O.

5. The main prize is set in advance. Once a minimum prize value has been satisfied the prize value will increase proportionally with the number of tickets sold. Prizes may be different for wins on Board A and Board B.

6. The optional BONUS feature allows a multiplier on a particular win, so for example a blue line bonus means if a ticket wins on a blue line then they get the main prize multiplied by the bonus multiplier.

7. BONUS wins are only possible on the TOP board (Board A).

8. B.I.N.G.O feature and BONUS wins are only paid to a single winner, split wins default back to the Main Prize.

9. If two or more tickets match a pattern on the same number of calls, then the Main prize is split equally between those winning tickets.

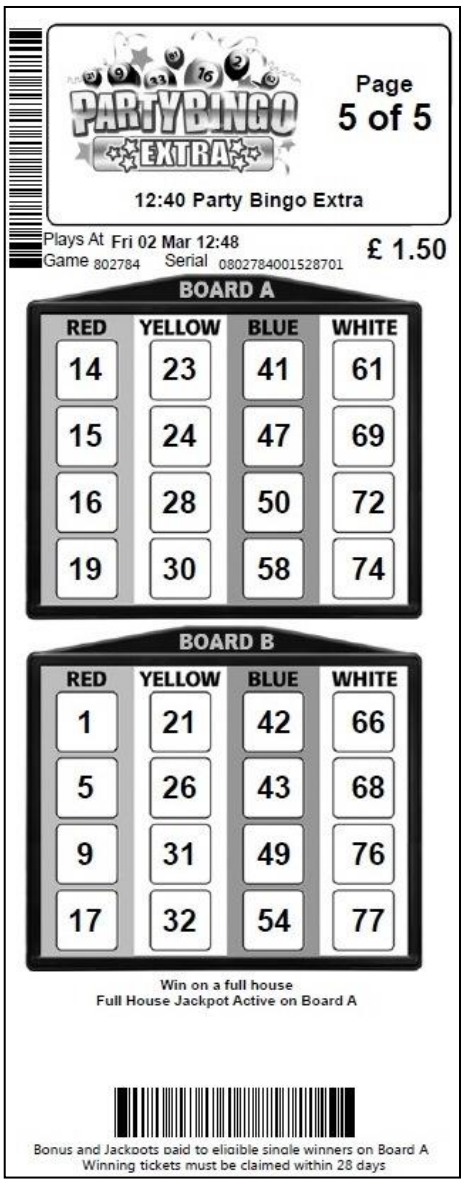
10. Should a player mark all 5 numbers of their B.I.N.G.O feature before the main prize is claimed, that player will be awarded the feature prize.

11. The game will be closed once a main prize or a B.I.N.G.O feature winner has been found. A main prize claim made on the same number of calls as a feature win will result in the Main prize being shared.

12. Numbers are called randomly via the Bingo Express system and displayed on a screen(s) while it is being played. Called numbers for any game on the same day are available to any player with a ticket for that game via the terminal.

13. The cost of each type 1 Party Bingo Extra ticket is clearly shown on the ticket, a portion of which is retained from each ticket to fund the feature prize which is paid out in the event of a player marking all five numbers associated with the B.I.N.G.O feature on their ticket before the game is closed. The value of the prize will be displayed on the Bingo Express screen(s) at the start of each Party Bingo Extra game.

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Type 2 Ticket: Full House Game

14. The Type 2 Party Bingo Extra ticket has one part:

a. Two 4 by 4 grids of 16 numbers out of a range from 1 to 80.

b. Type 2 tickets do not include the B.I.N.G.O feature and play for either a Full House or Picture Frame pattern only. Optionally there can be Jackpots for either prize. Number of calls to win the jackpot is displayed during the game.

c. Random numbers are called from the full range of 1- 80 numbers until the first card across all participating sites marks the winning pattern.

15. The main prize is set in advance. Once a minimum prize value has been satisfied the prize value will increase proportionally with the number of tickets sold. Prizes may be different for wins on Board A and Board B.

16. Jackpots are only paid to a single winner, split win defaults to the Main prize.

17. Jackpots can only be won on the Top card (Board A).

18. The cost of each type 2 Party Bingo Extra ticket is clearly shown on the ticket, a portion of which is retained from each ticket to fund the Jackpot.

19. The total number of tickets sold for any game within the last 7 days is available from staff if required.

20. Players are required to confirm that they have marked their ticket when it is validated.

21. Winning tickets must be verified within 28 days from the date that the game started, be presented wholly intact and given up to a member of staff. Tickets are easily checked by scanning tickets under the barcode reader at the Bingo Express control point. Tickets presented after 28 days will be void.

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SUPER 6 – Pick Your Own Numbers Fixed Odds Game



1. SUPER 6 operates as a Bingo Variant game whereby tickets do not have to be played live and can be validated up to 28 days after the game has been started. Game times will be displayed on the Bingo Express screen(s). Game tickets are sold in a number of venues and not just in this site.
2. The Super 6 ticket has six lucky numbers, these can be any six unique numbers from the range 1- 49.
3. Players have the option to allow the system to allocate six lucky numbers or can choose their own numbers. In either event the system will ensure that the permutation of six numbers on every ticket is unique for each game; players will be requested to re-select if a duplicate ticket exists.
4. Numbers are called randomly from the full range of 1- 49 and there are prizes for matching all six lucky numbers before the prize grid is fully populated.
5. Prizes are awarded according to the number of calls released at the point when a player's last number is matched. Prizes will be clearly displayed on the game screen and could be varied from time to time. Prizes will be highest for players matching all six numbers in the first 6 calls and will typically reduce for each successive call down to the last prize. There may be multiple different winning tickets on any single game.
6. Prizes are displayed based on the win amounts for a £1 ticket. Winners on other value tickets will receive a proportional prize, for example a 50p winning ticket will receive 50% of the displayed prize.
7. Numbers are called randomly via the Bingo Express system and displayed on a screen(s) while it is being played. Called numbers for a game within the last 28 days are available to ticket holders from staff on request.
8. Super 6 tickets cost 50p or £1 each, a portion of which is retained from each ticket to fund a variable progressive bonus prize which is paid out in full for £1 tickets (or in part for tickets less than £1) as an additional amount for matching 6 numbers on a specific number of a calls. The value of the progressive prize will be displayed on the Bingo Express screen(s) at the start of each Super 6 game.
9. The total number of tickets sold for any game within the last 7 days is available from staff if required.
10. Players are required to confirm that they have marked their ticket when it is validated.
11. Winning tickets must be verified within 28 days of the start of the game and be presented wholly intact and given up to a member of staff. Tickets are easily checked by scanning tickets under the barcode reader at the Bingo Express control point. Tickets presented after 28 days will be void.

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Super 6 Prize Table:

Prizes are awarded according to the number of calls released at the point when a player's last number is matched.

Prizes will be clearly displayed on the game screen and could be varied from time to time.

The Prize Table correct as at the 21st June 2024 is as follows:

Call No:	Prize:		Call No:	Prize:		Call No:	Prize:
1	-		13	£250		25	£8
2	-		14	£250		26	£8
3	-		15	£100		27	£7
4	-		16	£100		28	£7
5	-		17	£75		29	£5
6	£10,000		18	£75		30	£5
7	£5,000		19	£50		31	£3
8	£2,000		20	£50		32	£3
9	£1,000		21	£25		33	£2
10	£1,000*		22	£25		34	£2
11	£500		23	£10		35	£2
12	£500		24	£10		36	£1

All prizes shown for a £1 Ticket.

* Plus Super Bonus Jackpot

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Rainbow Bingo – 80 Number Local Game

A key function of the Bingo Express 2 terminal is its ability to run local Bingo games. With Rainbow Bingo all aspects of pricing, win conditions and prizes are controlled locally.

The games appear between other Bingo Express games on the schedule; they typically will be played twice an hour at 25 and 55 minutes past, but can be available at any time.

The settings are accessed directly on the terminal via the purple highlighted buttons below:

Admin > Config > Rainbow



Ticket Price

- The price per ticket.
- The price can be a minimum of £0.00 for a free game and currently has no upper limit.
- Ticket price changes do not affect games which already have sales.

Main Prize Min

- This is the minimum amount paid out for each game.
- The Rainbow Bingo prize is given to the first player to mark one number in each coloured column.
- This value will be shared in the event of multiple winners.

Per Ticket Prize

- The contribution per ticket towards the main prize.
- The main prize value displayed will remain at the minimum value until total contribution across all tickets sold exceeds that value.
- If the per ticket prize is set to £0.00 then the Main Prize Min remains fixed.

Jackpot Prize

- This is won if a customer marks at least one number from each coloured column within the jackpot win criteria.
- The jackpot is not shared, it is only paid to a single eligible winner.
- If there is more than one winner even if they are within the jackpot criteria, they share the main prize only.
- If Jackpot Prize is set to £0.00 then there is no Jackpot for the game.

Min Calls

- The minimum number of calls required to win the jackpot.

Max Calls

- The maximum number of calls to win the jackpot

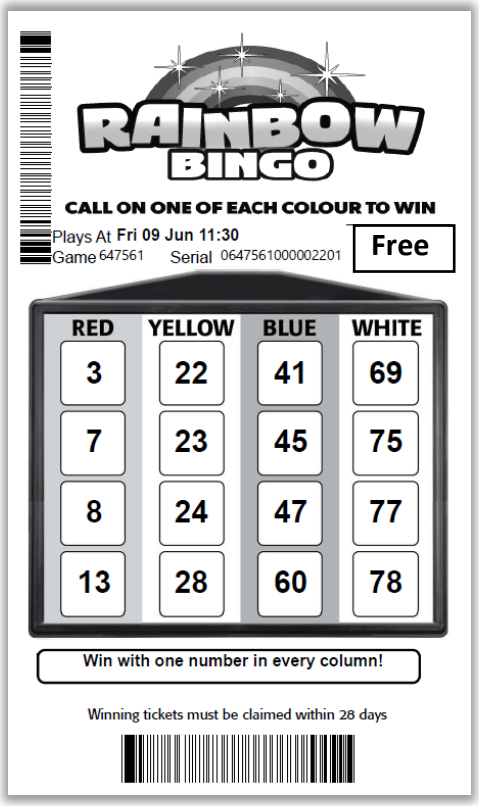
Jackpot win criteria examples:

Min Calls	Max Calls	Win Parameters
1	50	Win between 1 & 50 Calls
0	50	50 Calls or Less
50	50	Win on 50 Calls

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Playing the Game

Multiple instances of the game will appear on the Bingo Express schedule, with sales opening typically 15 minutes before each game.



Tickets can be purchased as normal by adding them to your basket and pressing 'Buy and Print'.

In self-service sites if the ticket cost is Free (£0), then tickets can only be printed by a logged in member of staff. Tablets will be limited to a single ticket if the cost if Free.

At Game time the game will start and run through automatically until a winner is found.

Alternatively, staff can control the speed of the game using the controls on the 'Caller' tab.

Winners will be declared automatically at the end of the game and can be checked up to 28 days later by scanning the ticket.

In Game Screen:



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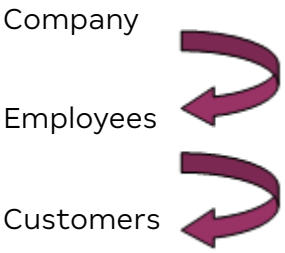
1. Social Responsibility Statement

STATEMENT OF INTENT

The responsibility for an individual's gambling is their own. Merkur Casino UK, operating the brands Merkur Slots and Merkur Bingo, recognises that for a very small minority of its customers gambling can become addictive which can lead to a range of problems for both individuals and their families. As a result of this we (the Company) believe that we have a social responsibility to act positively in relation to sensible gambling.

WHAT IS SOCIAL RESPONSIBILITY?

Social responsibility is about going above and beyond what is called for by the law. Ideally, proactively identifying signs of problem behaviours is better than reacting to a problem. We apply our social responsibility through three levels:



Social responsibility is being responsible to people, for the actions of people, and for actions that affect people. Merkur Slots has clear policies, procedures and codes of practice which outline and support the development of the way in which employees intervene where there is a suspected problem, and the Company then monitors and supports the development of the awareness and knowledge of its employees in dealing with such interventions.

The idea of being responsible to customers has long been embedded in the ethics of business, treating a customer with respect, attention and genuinely caring about what the customer wants and needs. As a Company we understand our responsibility to help people.

The Gambling Commission regulates gambling in the public interest. The regulatory framework introduced by the Gambling Act 2005 is based on three licensing objectives.

These are to:

- Keep crime out of gambling,
- Ensure that gambling is conducted in a fair and open way; and
- Protect children by preventing their entry and vulnerable people from being harmed or exploited by gambling.

It is our responsibility to ensure that we always comply with these licensing objectives.

1. Social Responsibility Statement

COMPANY

Our Statement of Intent is published and available to all our employees.

To support the licensing objectives and in addition to our Social Responsibility Policy we also have: -

- Socially Responsible procedures including Self Exclusion
- 'Think 25' policy.

EMPLOYEES

The Company ensures that all employees are inducted responsibly into our organisation through: -

- Induction checklist.
- Employee Handbook.
- Reviews and sign off at 4,8,12 weeks.

The above documentation includes comprehensive coverage of the following: -

- Safer Gambling Policy.
- Social Responsibility procedures.
- 'Think 25' policy.

Ongoing training is available to all our employees, and we provide a Customer Care training programme, that specifically trains our employees about problem gambling and how to interact with customers who may be affected (including arrangements for self-exclusion), whilst also covering the following areas:

- Customer care.
- Conflict management.
- Social responsibility.

In addition, employees will receive refresher training every 6 months.

1. Social Responsibility Statement

CUSTOMER

Information is clearly provided to the customer to enable them to understand the machine/game they are playing and the percentage returns that apply on all games.

The customer is made aware of and given advice on problem gambling through appropriate advertising, notices, information and Staying In Control leaflets on site. Further information including sources of help and support is available via the following organisations: -

- Citizens advice https://www.citizensadvice.org.uk
- Gamble Aware https://www.begambleaware.org
- GamCare https://www.gamcare.org
- GamesAid https://www.gamesaid.org
- Gam-Anon https://www.gam-anon.org
- Gamblers Anonymous https://www.gamblersanonymous.org.uk
- Gordon Moody Association https://www.gordonmoody.org.uk
- Action for Children Charity https://www.actionforchildren.org.uk
- National Debtline https://www.nationaldebtline.org
- Betknowmore UK https://www.Betknowmore.org
- YGAM (Young Gamers & Gamblers Education Trust) https://www.YGAM.org.uk
- Leeds Community Gambling Service (via Gamcare)

The implementation of the following policies and procedures and through Customer Care and Interaction and Evaluation Training ensures that this is consistent throughout the Company: -

- Social Responsibility Policy.
- Safer Gambling Policy.
- 'Think 25' policy.

Mark Schertle
Chief Operating Officer

Egemen Coskun
Chief Financial Officer

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2.2	Licence-conditions-and-codes-of-practice-for- Bingo – November 2024	November 2024
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8.	SMART Tablet – Quick Guide	January 2024 V1.1
9.	Acronyms and Abbreviations	January 2024 V1.1
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11.	Local Area Risk Assessment	January 2024 V1.1
12.	Powers of Local Authorities – premise inspections	January 2024 V1.1
12.1	BINGO Premise Inspection Guide (example)	October 2019
12.2	AGC Premise Inspection Guide (example)	October 2019

STATEMENT

The Company recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice.

LCCP 14.1.1 – Access to Premises
Licensees must have and put into effect policies and procedures (including staff training programmes) designed to ensure that their employees co-operate with the Commission's enforcement officers in the proper performance of their compliance functions and are made aware of those officers' rights of entry to premises contained in Part 15 of the Act.

The Company acknowledges its obligation to ensure that employees co-operate with the Gambling Commission's Enforcement Officers in the proper performance of their compliance functions and that they are made aware of those officers' rights of entry to premises.

- The Company must provide the Gambling Commission with any information that they suspect may relate to the commission of an offence under the Act, including an offence resulting from a breach of a license condition or a code of practice provision having the effect of a license condition. Changes in key circumstances must be reported within five days of their occurrence in accordance with the terms set out in the Operating License.

- The Company must provide the Gambling Commission with such information as the Commission may require from time to time about the use of facilities provided such as: -

    - the numbers of people making use of the facilities and the frequency of such use.

    - the range of gambling activities provided by the licensee and the number of staff employed in connection with them.

    - the licensee's policies in relation to, and experience of, problem gambling.

- The Appointed Manager will be informed immediately a Gambling Commission Enforcement Officer properly identifies himself on the premises and will attend to the Officer without undue delay. Staff will co-operate at all times with the Commission's Enforcement Officers.

- Members of staff are trained as part of their induction process; in the understanding of, and the strict adherence to this policy, and required to sign to this effect, retaining a copy for their future reference. The original is retained on the employee's personnel file.

RIGHTS OF GAMBLING COMMISSION ENFORCEMENT OFFICERS

- A constable, enforcement officer or authorised person under the Act, may enter premises for the purpose of assessing compliance or assessing whether an offence is being committed.
- A constable or enforcement officer can enter a premises if he reasonably suspects that an offence may be being committed or is about to be committed.
- Entry may also be for the purpose of discovering whether facilities for gambling are being provided, to determine whether an operating license or premises license is held and to determine whether facilities are being provided in accordance with terms and conditions of an operating license.
- Entry may also be made to assess the likely effects of activity when application has been made for a premises license.
- The powers of the constable, enforcement officer or authorised person can include inspection of any part of the premises or any machine, anything on the premises, questioning any person, access to written or electronic records, remove or retain evidence of committing an offence or beach of terms and conditions.
- The power of inspection must be exercised only at a reasonable time.
- The enforcement officer or authorised person must provide evidence of his identify and authority.
- A constable, enforcement officer or authorised person may use reasonable force to enter a premise.
- It is an offence to obstruct a constable, enforcement officer or authorised person in carrying out their duties.

Please refer to the training section where you will find the Compliance Training document to be used for training purposes. Our online Litmoss Training platform hosts Essential of Compliance & Social Responsibility, Age Verification and Safeguarding Children & Vulnerable modules, all with an online knowledge check to be completed every 6 months by all employees.

PROCEDURE

Visits by Gambling Commission Enforcement Officers may be pre-arranged or unannounced, however, in all circumstances the employee must ask for identification from the visitor to establish that they a Gambling Commission Enforcement Officer.

The visitor must also be requested to sign into the visitor's logbook.

Employees are to co-operate at all times with the Commission's Enforcement Officers in the proper performance of their compliance functions.

The Enforcement Officer may remove copies of documents as required.

Any visits by a Gambling Commission Enforcement Officer must be reported to your Area Manager and Amanda Kiernan, Head of Compliance - any supporting documents/visit reports to be copied to Compliance_UK@merkur-casino.com

Gambling Commission Sample ID



Front of card Contains the Following:

1. Officers Name
2. Photo ID
3. Serial Number
4. Date of Issue
5. Gambling Commission Contact Details

Back of card contains the following:

1. Evidence of the Officers Identity
2. Signature of the Gambling Commission Chief Executive

5.2. Keeping Alcohol & Drugs Out

At Merkur Slots we have clear rules on the consumption of alcohol and guidelines to manage individuals found to be under the influence of excessive alcohol consumption or use of drugs.

It is the duty of all licensed premises to create a safe and secure environment for their customers and to take steps to promote the below licensing objective:

• Keeping crime out of gambling.

It is therefore vital that all licensed premises remain vigilant when it comes to illegal drugs.

INDIVIDUALS UNDER THE INFLUENCE OF ALCOHOL/DRUGS ON ENTRY

In all venues, individuals who are deemed to be under the influence of excessive alcohol or drugs must be prevented from entering. Employees are trained to identify the potential signs of someone who is under the influence of excessive alcohol or drug use.

PROCEDURE

When such a situation occurs, an employee should politely refuse entry to the site on the grounds of being under the influence and ask the individual to leave the premises.

Should the individual resist or refrain from leaving the premises in the first instance a Manager or Duty Manager should be called. They should also request that the individual leave the premises immediately. If an individual fails to leave the premises or becomes a nuisance that cannot be dealt with by the employees on duty, the police should be called to assist.

All incidents should be recorded fully on the Smart Tablet Incident App and, where appropriate as an Interaction/Conversation on Maxim.

ALCOHOL CONSUMPTION ON SITE

Slots Venues

Alcohol is not available for purchase or offered free in any Slots venue and customers must not bring alcohol onsite to be consumed.

6.1. Complaints Procedure

The Company's written complaints procedure is available as a separate leaflet.
Slots venues operate a 4 stage complaints procedure as below.

If you receive a visit from the Gambling Commission/Local Authority, they may ask you who our **Alternative Dispute Resolution** (ADR) provider is so ensure you know the answer – see details below.

Stage 1 – Duty Manager

Stage 2 – Area Manager

Stage 3 – Operations Director

Stage 4 – Alternative Dispute

Alternative Dispute Resolution (ADR) provider is IBAS -



COMPLAINTS & DISPUTES POLICY

At MERKUR, we aim to provide our customers with the very best high street venue experience. We appreciate that sometimes things may not meet our high standards.

Our teams in venue will aim to resolve the issue for you there and then. We have a four stage process to resolve your issue.

Stage 1: In the first instance your issue will be escalated to the Duty Manager to discuss with you.

Stage 2: If the Duty Manager is unable to resolve the issue, they will advise you of this and the matter will be referred to the Area Manager for action. We understand a timely response is essential to your experience and our aim is to contact you within 7 days.

Stage 3: If the matter requires further attention, it will then be referred to the Operations Director. We hope at this point we can reach a satisfactory outcome and you can continue to enjoy our venues.

PLAY SENSIBLY
PLAY ENJOYABLY
PLAY AFFORDABLY
Safer Gambling
Think 25
18+
BeGambleAware.org®

MERKUR SLOTS

Stage 4: If your complaint is solely relating to betting or gambling activity, and after our internal complaints process you are unhappy with our resolution, you can submit in writing to the independent third-party alternative dispute resolution provider: IBAS (Independent Betting Adjudication Service).

IBAS (Independent Betting Adjudication Service)
P.O.Box 62639
London
EC3P 3AS

If you wish to contact us directly, the quickest way to do this is via our online Customer Care:

https://customercare.merkurcasinouk.com/

Here you can find help if anything has affected your experience, submit feedback, and manage the status of your complaint.
Alternatively, you can reach us:

- In writing:

  Customer Care,
  MERKUR Casino UK,
  Second Floor,
  Matrix House,
  North Fourth Street,
  Milton Keynes
  MK9 1NJ

- By phone:

  01908 351265 (Please note this an automated phone service)

Version 2.0

Protecting children and vulnerable people from being harmed or exploited by gambling

MERKUR Slots have a duty of care to ensure children and young persons do not enter our premises, which are strictly for OVER 18's only. As a company we operate a 'Think 25' policy and ID checks are carried out if we suspect a person is under 18. Ensuring we protect people who may be 'at risk' from gambling and protecting them from harm, customer interaction and helpful advice is vital to ensure we promote our business in a socially responsible way.

LCCP 3 – Protection of Children and Other Vulnerable Persons
(SRCP 3.2.3, 3.2.5, 3.3.1, 3.4.1, 3.5.6) and (OCP 3.2.4, 3.2.6, 3.5.2, 3.5.7, 3.6.2, 3.6.5, 3.6.6, 3.8.2)

7.1.1. Proof of Age Documents

ACCEPTABLE PROOF OF AGE DOCUMENTS INCLUDE

MILITARY ID CARD



ANY IDENTIFICATION CARRYING THE 'PASS' LOGO



DRIVING LICENCE WITH PHOTOCARD



PASSPORT



The law states that licensees must only accept Identification which:

1. The ID contains a photograph from which the Individual can be identified
2. Clearly states the Individuals date of birth
3. Is valid
4. Is legible and has no visible signs of tampering or reproduction

The Proof of Age Standards Scheme (PASS)

The UK's national proof of age accreditation scheme, endorsed by the Home Office, the National Police Chiefs' Council (NPCC) and the Security Industry Authority (SIA).

Every card that carries a PASS hologram will have been issued by a provider who has been through a stringent application and accreditation process which examines the procedures they adopt to check and verify identity.

The PASS Scheme accredits seven national and local suppliers of PASS hologrammed cards; two have ceased trading but are valid for the duration of the card.

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https://www.citizencard.com/</td>
<td> 

https://www.oneid4u.co.uk/</td>
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https://www.totum.com/proof-of-age-id-card</td>
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<td>Bracknell Forest Council 12-25
https://www.bracknell-forest.gov.uk/e-card/apply-e-card</td>
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https://young.scot/the-young-scot-card</td>
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https://www.milton-keynes.gov.uk/highways-and-transport-hub/bus-and-taxi/bus-passes-and-cards/all-in-1-mk-card-junior-concessionary-travel-scheme</td>
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https://www.myidcard.co.uk/</td>
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Scheme ended in 2021. Existing cards should be accepted anywhere in the UK.</td>
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Validate UK ceased trading. Existing cards should be accepted anywhere in the UK.</td>
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7.2. Employment of Children and Young Persons

STATEMENT

The Company recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice.

LCCP 3 - Protection of Children and Other Vulnerable Persons (OCP 3.6.2, 3.6.5, 3.6.6)

COMPLIANCE

It is an offence for children (under-16s) and young persons (those aged 16 and 17) to be engaged, or permitted to be engaged in: -

- Providing facilities for gambling.
- Performing any function (including cleaning) in connection with a gaming machine at any time.
- Carrying out any other function on the Licensed Premises, whether directly employed or not, whilst any gambling activity is being carried on in reliance on the premises licence. All relevant staff, including children and young persons, employed by this Company have been trained about the laws relating to access to gambling by children and young persons.

IT IS STRICT COMPANY POLICY THAT:

- Children and young persons are not employed to carry out any work in an adult-only area of family entertainment licensed premises at a time when any gambling is taking place.
- Gaming machines sited in Licensed Premises are turned off if children and/or young persons are working on the premises outside the hours when the premises are open for business.
- Due diligence is given to verifying the age of all new members of staff where there is reason to doubt authenticity of birth dates supplied.

Customer interaction – formal guidance for remote gambling operators

Formal guidance note under SR Code 3.4.1

1 Introduction
Your regulatory responsibilities
How to use this guidance
How the Commission will use this guidance

2 Identify
Identify – what we expect you to do
Identifying the right customers
Understanding the impact of gambling harms
Using the right indicators for your business
Affordability and a customer's personal circumstances
Vulnerability
Spotting harmful gambling
The role of staff
Identify – questions to consider

3 Interact
Interact – what we expect you to do
Interacting with the customer
Tailoring messages for your customers
Offering help and support
The role of staff
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4 Evaluate
Evaluate – what we expect you to do
Understanding the impact of individual interactions
Evaluating the effectiveness of the approach
The role of staff
Evaluate – questions to consider

5 Summary of research and information

1 Introduction

Your regulatory responsibilities

1.1 All licensees are required to interact with customers in a way which minimises the risk of customers experiencing harms associated with gambling, as set out in Social Responsibility Code 3.4.1 of the Licence Conditions and Codes of Practice (LCCP).

Social responsibility code provision 3.4.1 (From 31 October 2019)
Customer interaction

All licences, except non-remote lottery, gaming machine technical, gambling software and host licences

1. Licensees must interact with customers in a way which minimises the risk of customers experiencing harms associated with gambling. This must include:
- **a.** identifying customers who may be at risk of or experiencing harms associated with gambling.
- **b.** interacting with customers who may be at risk of or experiencing harms associated with gambling.
- **c.** understanding the impact of the interaction on the customer, and the effectiveness of the Licensee's actions and approach.

2. Licensees must take into account the Commission's guidance on customer interaction.

1.2 A requirement to LCCP with effect from 31 October 2019 requires licensees to take into account the Commission's guidance on customer interaction. This guidance is structured along the three key outcomes operators will be expected to meet: to **identify – interact – evaluate.**

1.3 This guidance sets out why customer interaction is a requirement, makes our expectations clear, and suggests ways you could meet them. This includes learnings from research and some ways that gambling operators have found worked for them and their customers.

How to use this guidance

1.4 The purpose of this guidance is to share knowledge based on research, current practice and lessons learned in order to support licensees in determining how they can meet the outcomes. It sets out why customer interaction is important and makes our expectations clear. Not all of the content of the guidance will be relevant to all operators, but licensees must take it into account and be able to demonstrate how they have done so.

1.5 Following the guidance is no guarantee that all customers experiencing or at risk of harm will be identified. The guidance is not the only source of information which operators should use to help them develop their own

processes, and licensees should also keep up to date with published research and other sources.

How the Commission will use this guidance

1.6 For compliance and enforcement purposes, we will expect licensees to demonstrate how their policies, procedures and practices meet the required outcomes. This can be through implementing relevant parts of the guidance or demonstrating how and why implementing alternative solutions equally meet the outcomes.

1.7 Our understanding of gambling harms and how they manifest is constantly evolving, so for the purposes of raising standards, protecting consumer interests, and preventing harm to consumers, we will update and re-issue guidance where new evidence or risks emerge which may have a meaningful impact on how the outcomes can be met.

2 Identify

Identifying the right customers

2.1 You need to know:

- the types of markers and behaviours that could indicate harm relevant to online gambling, and
- how to spot when those indicators should trigger an interaction.

2.2 You need to put together what you know about the customer, with the relevant indicators of harm, to decide whether you need to interact. More knowledge about what to look for, with effective processes for monitoring customer behaviour, can mean quicker and better-informed decisions.

2.3 Some indicators of harm, such as high staking behaviour, can look similar to VIP and high-value customer activity. Even if you think the customer can afford it, they may still be experiencing gambling harms. Your enhanced contact with your VIPs means you have many opportunities to get to know them well and make better informed decisions.

Identify – what we expect you to do

- Use a range of indicators relevant to your business. Do not rely on financial indicators alone. You should use realistic thresholds and trigger points, and remember that not every customer who is experiencing or at risk of harm will trigger every indicator.
- Monitor customer activity so that you are able to interact early and quickly. Invest in systems and staff to manage your customer interaction process effectively.
- Monitor customer accounts from the time that they are opened.
- Make sure your process keeps pace with any increase in demand – through growth, mergers or other internal changes.

- Train your staff to know their roles and responsibilities, and ensure they are supported and able to act promptly when they spot or are alerted to indicators of harm. This includes your VIP teams.
- Aim to minimise the risk of harm for customers, whatever time of day they play, as well as for new customers.
- Take safer gambling seriously for *all* customers, including VIPs, and not let commercial considerations override customer protection. This means your VIP customers get the same level of protection as your other customers.
- Make meaningful records of all interactions with customers. Make these records available to staff and use them to aid decision-making. This should also take place in circumstances where an interaction has been ruled out e.g. because the customer is displaying signs of agitation.
- Even if you think your sector is "lower risk", *all* forms of gambling present risks and you should understand the prevalence of gambling harms for the type of gambling products you offer and implement appropriate processes.
- Actively promote and encourage the use of gambling management tools to all customers, and in particular where you have carried out a customer interaction. Research (Behavioural Insights Team, 2018) has shown that reducing friction in applying a gambling management tool leads to increased numbers taking it up.

Understanding the impact of gambling harms

2.4 In 2018, the Gambling Commission published research (Wardle et al 2018) on understanding the full range of gambling harms and the impact this can have on society. This research defined gambling harms as '*the adverse impacts from gambling on the health and wellbeing of individuals, families, communities and society'.* This can include loss of employment, debt and crime – gambling harms can also have detrimental impacts on physical and mental health and relationships, and at its worst, gambling can contribute to loss of life through suicide.

2.5 Gambling harms cannot be solely measured in terms of finance and resources. This is why we expect you to use a range of indicators in order to identify customers who may be experiencing harms.

Using the right indicators for your business

2.6 Change compared with previous gambling activity is a general trigger for customer interaction. Building up your knowledge of your customers is key to helping you spot changes in their behaviour.

2.7 You should use a range of indicators based on research, experience and shared practice. The PWC remote gambling research (2017) identified some account and play indicators, but they are not a definitive list. Your list should include:

a. **Time and spend indicators:** amount and frequency of time and deposits, time of day (according to research (PWC 2017), a higher

percentage of overnight gamblers were found to be problem gamblers, than during other times of day), increasing length of sessions or escalation in deposit levels, large losses.

b. **Account indicators:** cancelled withdrawals, failed deposits, multiple or more expensive payment methods, pre-loaded cards and e-wallets which could indicate gambling with money the customer does not have.

c. **Use of gambling management tools:** changing deposit limits, trying to 'switch off' the reverse withdrawal option to prevent re-staking prior to withdrawal, previous self-exclusions, frequent or repeated use of the time out facility or previous customer interactions.

d. **Customer-led contact:** information or hints from customers, frequent complaints about not winning, requests for bonuses following losses, or talking about the negative impacts of their gambling.

e. **Play indicators:** chasing losses, erratic betting patterns, gambling on higher risk products or unusual markets or outcomes on which the customer is unlikely to have been able to make an informed choice. People who bet in-play may place a higher number of bets in a shorter time period than people who bet in other ways, as in-play betting offers more opportunities to bet (Gambling Commission, In play betting position paper 2016). Some studies have shown that placing a high number of in-play bets can be an indication that a customer is at an increased risk of harm from gambling.

f. **A 'big win' or a windfall:** research shows (Parke and Parke 2017) high staking following a win could hide or even lead to harmful behaviour. Suddenly having more money than usual can lead to increasing staking, which can lead to harms not associated with wealth or resources.

Affordability and a customer's personal circumstances

2.8 Historically, gambling operators have not systematically considered customer affordability when developing their customer interaction policies. Many have used deposit or loss thresholds as a main or sole prompt for a customer interaction, but these have often been set at levels that were inappropriately high, in comparison to the average amount of money that the majority of people have available to spend on leisure activities. This has led to a number of examples of customers spending more than they could afford, and this not being identified sufficiently early, as seen in much of the Commission's compliance and enforcement casework since 2017.

2.9 Operators should aim to identify those experiencing or at risk of harm and intervene to try to reduce harm at the earliest opportunity. Reliance on deposit or loss thresholds that are set too high will result in failing to detect some customers who may be experiencing significant harms associated with their gambling. It is therefore imperative that threshold levels are set appropriately.

2.10 Open source data exists which can help operators assess affordability for their GB customer base and improve their risk assessment for customer interactions. Thresholds should be realistic, based on average available income for your customers. This should include the Office of National Statistics publications on levels of household income.

2.11 In considering these thresholds, you should be aware of the difference between 'disposable income' and 'discretionary income' which refers to the amount left *after* living costs are taken into account, but it does still include many other unavoidable costs. Most people would consider it harmful if they were spending a significant amount of their discretionary income on gambling.

Vulnerability

2.12 Life events or changes to an individual customer's circumstances may mean that a person becomes more or less vulnerable to experiencing gambling harms. Those circumstances could include bereavement, loss of income or other factors (see below). It will not always be obvious or clear to an operator when such events have occurred, but knowing your customers, and ensuring staff ask questions when there are potential signs of vulnerability, will help to determine whether those individual circumstances present an increased risk.

2.13 As part of 'know your customer' and developing customer interaction policies and procedures, operators should consider the factors that might make an individual more vulnerable to experiencing gambling related harm. Factors include:

- **Personal and demographic**: if the individual is experiencing poor physical or mental health, physical or cognitive impairment, suffering side effects from a brain injury or medication or has an addiction.
- **Situational**: if the individual is experiencing financial difficulties, is homeless, is suffering from domestic or financial abuse, has caring responsibilities, experiences a life change or sudden change in circumstances.
- **Behavioural**: if an individual has a higher than standard level of trust or high appetite for risk.
- **Market related**: if an individual is engaged in an activity which is highly complex; that they have a lack of knowledge and/or experience of the market.
- **Access**: if an individual has difficulty accessing information because of poor literacy or numeracy skills, knowledge, dyslexia.

2.14 We have seen examples through our casework of customers who should have received some interaction but did not, including customers who were particularly vulnerable, and more susceptible to experiencing gambling harms.

Spotting harmful gambling

2.15 How you monitor activity depends on your business. Larger operators with more active customers will need comprehensive systems, which could include a mix of automated and manual processes, and should draw on all available sources of data to give a comprehensive picture of the customer's gambling. Options for spotting harmful gambling include:

- In-play real time monitoring to identify harmful behaviour as it occurs.
- Daily reports on activity.
- Chatroom monitoring and moderation.

2.16 The right information can mean better and quicker decisions. You should aim to integrate your systems so that staff have a more complete picture of the customer's activity, and this includes records of previous customer interactions.

2.17 Unmonitored overnight gambling carries an increased risk. Remote gambling research (PWC 2017) found that the highest risk customers were much more likely to gamble overnight than non-problem gamblers. Some operators have full 24-hour dedicated safer gambling monitoring and support, so that customers have the same level of protection overnight as during the day. Another option could be more training and extra responsibilities for customer service staff or chat hosts to provide that support.

2.18 Because VIP customers can also experience gambling harms, it is good practice to carry out a safer gambling check when upgrading a customer to VIP status, and to keep this under review. You should also use these opportunities to carry out checks for AML. This could also help you to support customers who have had major wins.

The role of staff

2.19 It is important that all staff receive training so that they are aware of the signs that could indicate that a customer may be experiencing harms associated with gambling. This is not an exhaustive list, but you should ensure that:

a. Staff are trained to identify the signs of harm and are able to refer back to documents that include the types of behaviour that may trigger customer interaction at an appropriate moment. Staff should know how to escalate a situation if they are unsure or require support.

b. Staff understand how indicators of harm could be displayed differently in VIP or 'high value' customers, and know how to spot the signs.

c. As a minimum, staff receive training at induction as well as refresher training.

Identify – questions to consider

- *Are you curious about your customers?*
- *Are your indicators relevant to your products and customers?*
- *Do you rely too much on financial indicators like deposit levels or losses?*
- *Do you consider all types of vulnerability?*
- *How do you decide the right level of your thresholds? Do you set your thresholds based on the staff you have to manage the workload, or do you think about what is right for your customers?*
- *Do you take into account all relevant information, and act quickly?*
- *Do all appropriate staff have access to customer interaction records?*
- *How could you assess the risks around new customers? What can you find out about your customers? What protections could you put in place until you know enough about your customers?*
- *Can your monitoring process keep up with demand?*
- *Do you offer the same level of protection for all your customers, no matter how long they have been a customer, what time of day they play, or whether they are VIPs?*
- *Do you track customers across your different platforms and do enough to spot multiple customer accounts?*
- *Is staff training on customer interaction meaningful and engaging?*

3 Interact

3.1 When you are concerned that a customer may be experiencing harm, acting early and quickly could help stop or prevent the harm worsening.

3.2 For some customers, making them aware of why you are concerned may be enough to prompt them to think and make a change. Some customers will need more support or advice.

3.3 Your interactions should have an outcome. Knowing what impact your interaction has had will help you support the customer and help to keep improving your approach. To achieve this, it is vital to keep good records and make them available to staff to inform decisions.

Interact – what we expect you to do

- We expect you to be curious, and if you spot behaviour or vulnerabilities that could indicate harm, to act on it.
- Make all reasonable efforts to make contact and interact with a customer, and find out what impact your interaction had.
- You should choose the type of interaction based on the extent of the potential harm – from automated responses to human contact – and adapt your messaging to try to get the best outcome. You should trial and evaluate

different approaches to achieve this. **Importantly this may include refusing service or ending the business relationship.**

- Think about what information you should give the customer, such as describing the type of behaviour they display or practical help or support where appropriate.

Interacting with the customer

3.4 There are a number of ways for you to interact with your customers, including email, telephone calls, live chat or pop-up messages. The best way may depend on the circumstances:

a. What you need to know from the customer, and what you already know about them.

b. What information you want to give to the customer.

c. How urgent it is to make contact.

d. How many times you have already interacted with the customer.

e. The outcome you want to achieve.

3.5 A customer interaction has three parts:

- **Observation** – behaviour or activity you have spotted or something the customer tells you.
- **Action** – contact to prompt the customer to think about their gambling, for you to find out more, and an opportunity for you to offer information or support.
- **Outcome** – what you or the customer did next. In some cases, you may need to monitor the customer's gambling to spot any change which may prompt further action.

Tailoring messages for your customers

3.6 You may already target your marketing messages to different customers. You could also use insight about your customers, such as how the customer prefers to contact you, to decide the best way to interact with them about their gambling.

3.7 Industry-led research (Revealing Reality 2017) shows that messages that get customers to think and make their own decisions based on the information they are given can be more effective than messages that seem to be 'nagging'. Research (Auer and Griffiths 2015) also shows that personalising feedback can also improve the impact it has on customers. You should test different types of messaging to see what works best.

Offering help and support

3.8 Encourage customers to think about their gambling. Their responses will help you work out the right kind of help and support to offer.

3.9 It is good practice to suspend direct marketing to customers who show signs of harm so that you do not actively encourage them to keep gambling while you consider them to be experiencing or at risk of harm.

3.10 If you have difficulty making contact with a customer, you could suspend account access until you are able to interact with them.

3.11 A self-assessment questionnaire can help customers think about their own gambling. Their shared responses, alongside their gambling behaviour, can help both you and the customer work out the right kind of help and support they may need.

3.12 You will need to direct some customers to information about safer gambling, and/or suggest suitable gambling management tools. You might need to signpost them to sources of help and specialist support from organisations who deal with advice and treatment for problem gambling.

3.13 You will need to interact with some customers a number of times. Your records of previous interactions with customers will help you decide how to provide the right help and support.

3.14 Feedback from consumers shows that they often respond better to being informed about their behaviour and why, rather than being "told" what to do. But for some customers, and particularly if the behaviour continues to cause concern, you may need to take a more proactive approach. In some cases, you may need to take action for the customer, such as setting limits or refusing service by closing their account.

The role of staff

3.15 You should ensure that your staff:

- **a.** understand the types of interaction that could take place and how to interact appropriately e.g. only need a brief intervention may be needed.
- **b.** know the type of help or support to offer, such as information, signposting customers to specialist support or the gambling management tools which are available. These may be the minimum required under the LCCP or the Remote Technical Standards, or tools you offer which go beyond minimum requirements.
- **c.** know the circumstances and process for refusing service to customers, such as by applying limits or closing an account.
- **d.** understand their respective responsibilities and who is designated to carry out customer interactions, if only certain staff members are authorised to interact.

3.16 Whilst training on the legislative framework is important, staff also need to be trained on the skills and techniques they need to help them carry out customer interactions, including what to do if a customer becomes distressed.

Keeping records

3.17 Good record keeping allows you to demonstrate when and why you have interacted with customers, and helps with ongoing monitoring of customers. You should:

a. Keep records of all customer interactions, including where an interaction didn't take place, the reasons for this, and how it was followed up.

b. Make use of and record all relevant sources of information to guide and deliver effective customer interactions, including your records of previous interactions.

3.18 Good records should include:

- the behaviour or activity before the interaction.
- the change in behaviour or prompt for the interaction.
- how you interacted and what was said or done, for example advice or suggestions to help the customer manage their gambling, or to take a break from their gambling, and
- what happened next.

3.19 You should also record situations where an interaction was prompted but did not take place, and how you followed that up.

3.20 In some cases, you will need to monitor the customer's gambling to spot behaviours which could indicate further harm.

Interact – questions to consider

- *Where concerns arise, are you able to intervene early and engage with a customer?*
- *How do you decide the best way of interacting with a customer? Do you use different methods for different groups of customers?*
- *Do you tailor your method and message depending on the extent of the harm?*
- *Do you know if the customer received and acted on the information you gave?*
- *Have you allocated sufficient resources to be able to interact with customers early and effectively when you have concerns?*

4 Evaluate

4.1 By evaluate, we mean to understand *impact* and *effectiveness* in two ways: did an individual customer interaction have a positive outcome for the customer, and does your overall approach to customer interaction work? To help with the latter, the Responsible Gambling Strategy Board (now known as the Advisory Board for Safer Gambling) published an evaluation protocol in 2016 for the industry to use when designing evaluations. More information on

evaluation and links to the evaluation protocol and other resources can be found via the National Strategy to Reduce Gambling Harms website.

Evaluate – what we expect you to do

- Understand the impact of individual interactions on a consumer's behaviour and whether/ what further action is needed.
- Evaluate the effectiveness of your approach by trialling and measuring impact.
- Embed lessons learned and best practice across the business and collaborate to share across the industry.

Understanding the impact of individual interactions

4.2 In this context, by impact we mean *a change in the customer's gambling activity* which could be attributed to the interaction. An important part of this is whether the customer has understood the information or advice you gave.

4.3 Not every customer who receives an interaction will require active follow up, but many will. In these cases, follow up activity should be proportionate to the severity or extent of the harm being displayed. This approach will help you target your resources where they are most needed.

4.4 Understanding the impact of the interaction on the customer includes being able to look at and compare:

- the behaviour before the interaction.
- the change in behaviour or prompt for the interaction.
- how you interacted and what was said or done, and
- what happened next.

4.5 Some ways to work out that impact include:

a. Did the customer start using gambling management tools; independently or following your advice?

b. If you are tracking links from emails, did the customer click through to safer gambling information?

c. Was there a positive change in behaviour? Did the customer's gambling seem to change after the interaction?

d. You could also follow up and ask the customer whether they found the interaction helpful or not.

e. Is there a need for further or follow up action?

4.6 You may already quality assure individual customer interactions by spot-checking chat records and emails. As well as checking that customers are getting the right support, this can also identify staff development needs and

highlight good practice that you can share across your business and across the industry.

Evaluating the effectiveness of the approach

4.7 Records of interactions provide useful evidence of what types of indicators, methods of interacting and options for support work well for customers. They will help to inform an evaluation of the effectiveness of your overall approach to customer interaction. Good evaluation helps you to understand which aspects of your approach are the most effective at identifying the right customers, and the types of tools or support that work well to help customers manage their gambling in a way that works for them. The following measures could help to work out whether your approach is working well:

- Gambling management tools – increased take up and more customers sticking within their limits.
- Customer retention.
- Reduction in complaints.
- Numbers of customer interactions appear to be in line with the prevalence of gambling harm for the product (see below).

4.8 Statistics which estimate the numbers of problem and 'moderate risk' gamblers are published regularly, based on the combined health surveys in England, Scotland and Wales (NatCen 2018). This data is broken down to gambling activity type, and by region, and can help you to work out the percentage of your customers you should be interacting with. When looking at the potential percentage of your customers who may be experiencing harm, remember to consider the percentage of gamblers participating in that activity and not the percentage of the adult population.

4.9 Currently the only industry-wide quantitative measure of identifying and interacting with customers who may be experiencing harms associated with gambling is data on the numbers of customers who received an interaction, submitted to the Commission as part of regulatory returns. We have clarified the definitions in regulatory returns to offer guidance on what should be included in a customer interaction (incident) log and make clearer what should be recorded. Your log should include as a minimum:

- the identity or other identifier of the customer involved
- the behaviour or activity that prompted the interaction
- the advice or support given, and
- the outcome of the interaction.

4.10 Keeping your policies and procedures under review and up to date by taking into account research and industry best practice will help you to identify customers you should be interacting with, which will help you target your resources where they are most needed, in ways which may lead to better outcomes. You should also review your internal controls following the

publication of a regulatory settlement, to address any similar weaknesses which could exist in your own processes.

The role of staff

4.11 Your staff have an important role to play to understand whether your approach works, and as a minimum, you should:

a. Ensure that staff make records of all customer interactions and use them to aid decision making. Such records should be used for evaluation purposes e.g. dip sampling for quality assurance purposes or to assess whether a customer changed their behaviour as the result of an interaction.

b. Train staff to recognise when follow-up activity to an interaction is required.

c. Ensure that staff use customer interaction records as a decision-making tool.

d. Ensure that staff are properly supported in carrying out effective interventions.

Evaluate – questions to consider

- *Do you know how many of your customers may be experiencing some level of harm associated with gambling?*
- *How do you know you are delivering positive outcomes for your customers?*
- *How could you improve on your policy and procedures? How do you plan to make improvements over time?*
- *How could you share your good practice with the industry?*

5 Summary of research and information

Can behavioural insights be used to reduce risky play in online environments? (Behavioural Insights Team, 2018)

A framework for measuring gambling related harms (Gambling Commission, RGSB, GambleAware, 2018)

Gambling Behaviour in Great Britain in 2016 (NatCen, 2017)

Responsible Gambling: Collaborative Innovation (Revealing Reality, 2017)

Getting Grounded in Problematic Play (Jonathan Parke and Adrian Parke, 2017)

Remote Gambling Research (PWC, 2017)

Testing normative and self-appraisal feedback in an online slot-machine pop-up in a real-world setting (Auer and Griffiths, 2015)

Office for National Statistics household income data (ONS, 2017)

Further information on research to inform action will be made available on www.reducinggamblingharms.org

July 2019

Terms and Conditions

Welcome to SmartEXCLUSION – Please note, if you selected to be excluded from an Adult Gaming Centre (AGC), High Street, MSA/Airport or Holiday park or Bingo High Street or Holiday Park then your exclusion data is currently shared with the operators using SmartEXCLUSION. A list of Operators and their trading names can be found here Operator listing (/operator_listing). There may be other operators in the chosen exclusion zone(s) who are not signed up to the scheme.

The AGC Industry Self-Exclusion Scheme - SmartEXCLUSION

Anyone wishing to engage in self-exclusion from gambling premises does so of their own volition. By engaging in the self-exclusion process, self-excluders are agreeing to abide by the terms and conditions of that process hereunder;

1. The self-excluder will determine which gambling premises they wish to be self-excluded from.
2. The self-exclusion system will notify all other venues selected by the self-excluder of their inclusion.
3. The self-excluder will determine how long the self-exclusion period lasts; between a minimum of 6 x months and a maximum of 12 x months.
4. Once the self-exclusion request is registered with SmartEXCLUSION, the excluder cannot terminate the self-exclusion before the selected date of expiry.
5. Self-exclusion will continue to be effective for a further 6 x months after the selected expiry date unless the self-excluder informs the SmartEXCLUSION system at the end of the core expiry period that they no longer wish to be self-excluded. If and when they do, a 24 hour 'cooling off' period will elapse before reinstatement can become effective and gambling activity can take place again.
6. During the self-exclusion period employees working in the selected gambling premises will endeavour to identify all self-excluders and prevent them from breaching their self-exclusion, but this cannot be guaranteed. If a self-excluder successfully and/or purposely gains access to gambling premises from which they have self-excluded there is no responsibility or obligations upon the operators of that premise for any actions of the self-excluder whilst on those premises.
7. In the event that a self-excluder enters a selected gambling premise during the self-exclusion period they will be required to leave the premise immediately. Self-excluders in breach of these terms will, if necessary, be removed by the use of reasonable force.
8. The self-excluder can only be self-excluded from land bases premises and not from UK online gambling platforms. The self-exclusion scheme for online operators can be found at www.gamstop.co.uk. By completing the self-exclusion via Gamstop the system will notify all online gambling companies licences in Great Britain of their inclusion. Any withdrawable funds will be returned to you following the online operator's policies.

SmartEXCLUSION includes a register of individuals who have chosen to self-exclude from entering specific gambling premises. In order to support the individual with their self-exclusion, staff working in those gambling premises need to be able to identify the excluder and to notify other selected gambling premises using the information they have provided.

1. The self-excluder will provide the following information, where applicable, to be recorded onto SmartEXCLUSION;
    - A passport style photograph, which can be taken at the point of self-exclusion in the premises.
    - Vehicle details including registration number.
    - Confirmation of home address
    - Mobile number or Email address

All self-exclusion registrations and the details provided will be recorded onto a database maintained by SmartEXCLUSION.

3. Personal details and a photograph will be kept by SmartEXCLUSION and used by selected participating AGC's to support the exclusion.
4. In order to support self-excluders to maintain their exclusion, photographs will be available and displayed on tablet devices in the selected premises to help with observation and detection. However, it is the sole responsibility of the self-excluder to refrain from entering any of the selected premises for the duration of the self-exclusion period.
5. The details of all self-exclusions will be retained by SmartEXCLUSION for a period of up to three years beyond the expiry of the self-exclusion period.
6. SmartEXCLUSION has a legal obligation to record and report all interactions with self-excluders, including breaches or attempted breaches. These records have to be made available to those gambling premises selected during registration, and also to the UK Gambling Commission.

The Operators of SmartEXCLUSION and the gambling premises selected for the purpose of self-exclusion will take all reasonable steps to refuse admittance or otherwise prevent self-excluders from gambling. However, it is the responsibility of the self-excluder to ensure that they do not enter any gambling premises, or ask anyone to gamble on their behalf during the self-exclusion period.

Retention of Winnings

You acknowledge and agree that in the event that you breach or circumvent your self-exclusion request during your self-exclusion period you will not be entitled to receive winnings.

Deposited Funds

If you have any funds deposited on any electronic device on the premises at which you have self-excluded, these will be returned to you in accordance with the operator's usual policies.

Data Protection

I acknowledge that in order to process my request for self-exclusion I may be required to disclose personal details about me, including providing a photograph. I will be asked for sensitive personal data about my decision to self-exclude and the reason for reaching it. SmartEXCUSION and its members may make use of NON personal data for the purpose of statistical analysis on problem gambling, which may be shared with governing bodies like the Gambling Commission and Responsible Gambling Trust. Neither SmartEXCLUSION nor its members will share or sell personal data to third parties.

The Bingo Industry Self-Exclusion Scheme

Your Commitment to Self-Exclusion

By requesting to proceed with the self-exclusion process, you agree to provide full and accurate personal details, now and in the future, to enable bingo operators who are members of The Bingo Association (BA) to prevent you from accessing and/or gambling on their premises. A list of premises which are part of this self-exclusion scheme can be found on The Bingo Association's website: www.bingo-association.co.uk (http://www.bingo-association.co.uk)

Some members of The Bingo Association operate a self-exclusion scheme based on locality which may include other gambling sectors, these premises are identifiable on the list on the BA website.

The details relating to your self-exclusion and any image provided will be held on the BA's self-exclusion non-public secure database for the duration of your self-exclusion. Reasonable checks and safeguards will be undertaken to ensure that whilst you are self-excluded, you cannot access or gamble at any BA member premises.

Once you have requested self-exclusion, BA members will use all reasonable endeavours to comply with your self-exclusion request. However, by signing the self-exclusion agreement you also declare and accept that you are responsible for your actions and will not seek to circumvent your request to self-exclude by attempting to gain access to or gamble at any BA member premises or to use any online gambling service that you have similarly requested self-exclusion from during this application process.

Accordingly, the BA, the operator of the bingo premises at which you have submitted your request to self-exclude and all other members of the BA accept no responsibility or liability for any consequences or losses, however caused, that you may suffer or incur:

- If you continue to gamble
- If you have provided misleading, inaccurate or incomplete details
- If you successfully circumvent your self-exclusion

Retention of Winnings

You acknowledge and agree that in the event that you breach or circumvent your self-exclusion request during your self-exclusion period you will not be entitled to receive winnings which may, at the discretion of the BA and/or the operator of the premises at which you breach your self-exclusion, be re-distributed to other players at the club or be given to a charity.

Deposited Funds

If you have any funds deposited on any electronic device on the premises at which you have self-excluded, these will be returned to you in accordance with the Club's usual policies.

Processing your request

The premises from which you self-exclude will take reasonable steps to promptly process your self-exclusion request and to notify the BA and other BA members of your decision. You should be aware however, that it may take up to seven days for other bingo companies to implement similar changes to their systems. You acknowledge and agree that neither the BA nor the premises from which you initiated your self-exclusion nor any other BA member will be held liable to you or any third party, if you successfully breach or circumvent your self-exclusion request or if any marketing material gets sent to you.

Online Self-Exclusion

Self-Excluding in a Bingo licensed venue does not exclude you from UK online gambling sites. The self-exclusion scheme for online operators can be found at www.gamstop.co.uk By completing the self-exclusion via Gamstop the system will notify all online gambling companies licensed in Great Britain of their inclusion. Any withdrawable funds will be returned to you following the online operator's policies.

Counselling and Support Services

Problem gambling information will be available to you at your self-exclusion interview. The BA also provides factsheets within The Bingo Association's Operators' Handbook with details of a selection of national counselling and support services. Please ask the Duty Manager of the premises where you self-excluded if you wish to receive these factsheets.

GamCare is the national association for gambling care, educational resources and training and provides information, advice and counselling to individuals, their family and friends, who have concerns about problem gambling. The Helpline number for GamCare is 0808 8020 133 (tel:08088020133) and their e-mail address is: info@gamcare.org.uk (mailto://info@gamcare.org.uk). Help can also be found on the gambleaware website: www.gambleaware.co.uk (http://www.gambleaware.co.uk)

Reinstatement

You will not under any circumstances be permitted to terminate your self-exclusion agreement before the end of the period that you have applied for. At the end of your self-exclusion period, including any extension to the period that you may subsequently make, the self-exclusion remains in place for a further six months unless you take positive action in order to gamble again. To do this, you must complete the Reinstatement Request Form. You may make this request at the end of your period of self-exclusion or at any time during the six month period following this. Once a request to reinstate has been received by a club, a 24 hour cooling-off period will be enforced.

If you do not request re-instatement, your period of self-exclusion lapses on the expiry of six months after your self-exclusion agreement ends. You may then be able to gamble again, should you choose. Nevertheless, some companies may additionally and independently ask you to formally request reinstatement if your self-exclusion has lapsed. No marketing material will be sent to you unless you request it as part of the reinstatement process.

I acknowledge that in order to process my request for self-exclusion I may be required to disclose personal details about me, including providing a photograph. I will be asked for sensitive personal data about my decision to self-exclude and the reason for reaching it. The BA and its members may make use of NON personal data for the purpose of statistical analysis on problem gambling, which may be shared with governing bodies like the Gambling Commission and Responsible Gambling Trust. Neither the BA nor its members will share or sell personal data to third parties.

MANUAL SELF-EXCLUSION REQUEST FORM (*Only to be used should the SMART Tablet malfunction)*

Site Name: .....

Site Address: .....

Customer Name: .....

Customer Date of Birth: .....

Customer Address: .....

.....

.....

Customer Mobile Number: .....

Customer Email Address: .....

Start Date: .....

I request that I be refused entry to the following MERKUR SLOTS venues:

.....

.....

.....

.....

for a period of 6 or 12 months* (Customer to specify) *..... (minimum six months/maximum 12 months) from the date of signing and acknowledge that I am not allowed to rescind my self-exclusion during this period.

I understand that I will be contacted within 24 hours to provide a photograph of myself and further ID verification for GDPR purposes to enable the self-exclusion to be activated.

Signed : ..... **(Customer)** **Date**: .....

Witnessed : ..... **(Duty Manager)** **Date**: .....

Upon completion of the above verification this self-exclusion application will be entered onto our IHL SMART Exclusion system and the Terms and Conditions of the self-exclusion agreement will be sent directly to confirm activation.

You will be contacted within 24 hours by a member of the Compliance department to complete your self-exclusion if you have not been contacted within 24 hours contact us via MERKUR Customer Care https://customercare.merkurcasinouk.com/index.php

Once the term has elapsed (minimum 6 months/maximum 12 months), the customer needs to inform the Duty Manager that they wish to re-instate. The customer must then wait a further 24 hour period before they are permitted to gamble.

OFFICE USE ONLY

Instructions: To be completed by the Duty Manager:

- Hand a copy of this completed form to the customer
- Scan/email a copy to the Head of Compliance
- DO NOT obtain photographs or retain copies of ID documentation
- The original copy must be retained securely then shredded once Self-Exclusion is active on the SMART Tablet

Free Multi Operator/National Self-Exclusion Schemes

This page provides a brief explanation of the multi operator gambling self-exclusion schemes that are available for free to people in Great Britain.

Online Gambling (via websites/apps)

GAMSTOP helps you put controls in place to restrict your online gambling activities. Once registered, you will be prevented from using any gambling websites and apps run by companies licensed in Great Britain, for a period of your choosing.

www.gamstop.co.uk

Land Based Gambling (in premises)

Betting Shops

Call the MOSES help line to self-exclude from multiple bookmakers in your area.

Freephone: 0800 294 2060

www.self-exclusion.co.uk

Casinos

SENSE self-exclusion programme offers self-exclusion from all licensed land based casinos in Great Britain. Register in person anytime at a casino venue or to enrol by email contact

info@sensescheme.com

www.sensescheme.com

Bingo Premises

The Bingo Industry Self-Exclusion Scheme (BISES) offers self-exclusion from all licensed land-based bingo premises across Great Britain. You can register either in-person at a licensed bingo venue or by telephoning the venue directly.

www.bingo-association.co.uk/self-exclusion

Adult Gaming Centres/High Street Arcades/ Motorway Service Areas/ Family Entertainment Centres

If you want to self-exclude from one or more Adult Gaming Centres, High Street Arcades, Motorway Service Areas and Family Entertainment Centres with age-controlled sections in your area for up to 12 months, you can do so in person at the venue, by telephoning the venue or by telephoning BACTA on 020 3930 9769 Monday to Friday between 9am and 5pm.

www.bacta.org.uk/self-exclusion

High Street Bingo/Motorway Service Areas/Holiday Parks

If you would like to self-exclude from High Street Bingo premises, Adult Gaming Centres, or both at once, you can do so using SmartEXCLUSION. This is easy to do in person at a premises or by calling our support line on 0844 884 3433.

www.selfexclusion.com

SOCIAL RESPONSIBILITY & CODES OF PRACTICE LOGS



Age Verification app - all ID checks for customer(s) you suspect being under the age of 25 are to be recorded on the tablet (remember we operate a Think 25 policy).



SmartINTERACTION app - If you are approached by a customer, or you instigate a conversation with regards to "AT RISK" customers who may have a gambling problem, if you offer a "Staying In Control" Leaflet, and discussions regarding self-exclusion, you need to record the incident on the tablet.

SmartINCIDENT App – the app should be used to record all incident types 1-6 as listed below. You can view this information by selecting "View Incidents" and "Incident Type" on the tablet.

Listed below are the incident types on the tablet. Further information can be recorded by selecting the drop-down box.
Incident Types:

1. Incident relating to aggressive behavior.
2. Incident relating to barred or previously barred customer.
3. Incident relating to alcohol.
4. Incident relating to drugs.
5. Incident relating to disturbance inside / outside / near premises.
6. Venue Staff Training (Training Only).



SmartEXCLUSION On the Smart tablet, is to be completed if a customer wishes to self-exclude. Ensure all staff check the tablet daily at the start of each shift to familiarise themselves with any new photos which will appear in the top left-hand corner of the photo carousel for new self-excluded customers, as the tablet will update automatically each day! Please refer to the Self Exclusion Policy page 7.4 in the Compliance folder for staff training information.

A copy of all User Guides for the tablet are available in your Venue Floor Folder for reference purposes.

You can also view and download these documents on Upskill > Knowledge Base > Categories.

10. Premises Licence

All venue have a Premises Licence which allows them to operate machines and Bingo, if it is a Bingo licence. A copy of the licence must be displayed at the front of the venue on the Information Board.

Licenses are issued by the Local Authority Licensing Department.

All premise licences contain 'mandatory licence conditions' detailing how the premise must be operated and some may contain 'special conditions' such as opening hours specific to that premise.

It is the Manager's responsibility to adhere to the conditions applied to the premise licence.

11. Local Area Risk Assessment LARA

All venues must have a Local Area Risk Assessment (LARA), produced as part of the Initial Licence Application, or for venues opened before 2017, as part of the requirement introduced by the Gambling Commission.

LCCP 10.1 – Assessing Local Risk

The LARA is unique to the venue and surrounding area and must record any local risks that are relevant to the venue operation.

The LARA must be reviewed annually and updated in-line with any changes in and around the surrounding area. Any changes to the identified risks in the local area must be communicated to the Compliance Department.

Compliance_UK@merkur-casino.com

The LARA must be made available to any Local Authority, Gambling Commission or Police Officer upon request.

12. Powers of Local Authorities

The Company recognises its responsibility and obligation to comply with the Licensing Objectives of the Gambling Act 2005 and the Licence Conditions and Codes of Practice.

Under the Statutory powers of inspection under the Gambling Act 2005 (information note 2017) local authority authorised personnel are lawfully permitted to enter our venues to deal with legal compliance and to investigate suspected offences.

Inspect gambling: Under s.307 authorised persons may enter a premises if they reasonably suspect that facilities for gambling are being provided, are about to be provided, or have been provided on the premises. Similarly, an authorised person may enter to determine whether an operating or premises licence is held in respect of the provision of facilities for gambling, and to determine whether facilities are being, will be or have been provided in accordance with the terms and conditions of an operating licence or premises licence.

The Company acknowledges its obligation to ensure that employees co-operate with the Local Council Authority Compliance Officers in the proper performance of their compliance functions and that they are made aware of those officers' rights of entry to premises.

- Local Authorities will conduct premise inspections, these may be announced or unannounced visits.
- Entry may also be for the purpose of discovering whether facilities for gambling are being provided, to determine whether an operating license or premises license is held and to determine whether facilities are being provided in accordance with terms and conditions of an operating/premise license.
- The powers of a compliance officer or authorised person can include inspection of any part of the premises or any machine, anything on the premises, questioning any person, access to written or electronic records, remove or retain evidence of committing an offence or breach of terms and conditions.
- The appointed Manager will be informed immediately a Local Authority Compliance Officer identifies himself on the premises and will attend to the Officer without undue delay. Staff will co-operate at all times with the Compliance Officer.
- The enforcement officer or authorised person must provide evidence of his identify and authority.
- The visitor must also be requested to sign into the visitor's logbook.
- It is an offence to obstruct a constable, enforcement officer or authorised person in carrying out their duties.

12. Powers of Local Authorities

It is essential the below are in place at all times:

- Premise Licence on display.
- Local Area Risk Assessment (LARA) available – any significant changes within your local area should be reported to AKiernan@merkur-casino.com.
- B3 machine ratios are maintained at all times and machines are available for use.
- BACTA or Bingo Association Certificates. Please contact AKiernan@merkur-casino.com.

Examples of Premise Inspection templates can be found in the Social Responsibility and Compliance Manual.

12.1 Bingo Inspection Guide
12.2 AGC Inspection Guide
12.3 FEC Inspection Guide
12.4 Unlicensed FEC Inspection Guide

Any visits by a Local Authority Compliance Officer must be reported to your Area Manager and Amanda Kiernan, Head of Compliance - any supporting documents/visit reports to be copied to Compliance_UK@merkur-casino.com

Please refer to the training section where you will find the Compliance Training document to be used for training purposes. Our online LITMOS Training platform hosts the Essential of Compliance & Social Responsibility workbook and online quiz to be completed every 6 months by all employees.

Inspection guide – Bingo

Premises name and address	
Premises person(s) present	
Authorised Officer(s)	
Signature of Authorised Officer(s)	
Date and time of the assessment	

	Please tick sections completed
1. Pre-Assessment	
2. Visual Assessment	
3. Operator Policies - Protection of Children	
4. Operator Policies – Customer Interaction	
5. Additional Questions	
6. Action Points	

1) Pre-assessment

Establishing compliance with these provisions may require prior knowledge/ preparation

1.1) Relevant when assessing policies for preventing Under Age Gambling (SRCP 3.2) **(England and Wales only) Has the operator formed a Primary Authority partnership with another Local Authority? If so, who is the Primary Authority?**	Primary Authority Name:

If the operator has agreed a National Inspection Plan or primary authority advice in place, officers do not need to review policies and procedures relating to age verification. However, they are encouraged to ask questions/ test knowledge to check that children are protected from being harmed or exploited by gambling.

A list of current Primary Authority Partnerships relating to gambling operators is available on the Gambling Commission website

1.2) Reviewing the following documents may be useful when preparing for an assessment:

- **The premises licence and any attached conditions**
- **The premises plan attached to the licence**
- **The operator's Local Risk Assessment (if a copy has been submitted to you)**

2) Visual Assessment

Compliance with these provisions can usually be established through a visual assessment, but may require further information from staff members

2.1) Gaming Machines in Gambling Premises (SRCP 9.1.1)			
Could a customer be reasonably expected to recognise that the premises is licensed for bingo?	Yes	0	☐
	No	10	☐
Are there substantive facilities for non-remote bingo available in the premises?	Yes	0	☐
	No	10	☐
Is there appropriate supervision of gambling activities at all times?	Yes	0	☐
	No	10	☐
2.2) Plan (MC - SI 2007 / 1409/SSI 2007/266) **Does the plan match the layout of the premises?**	Yes	0	☐
	No	10	☐
ⓘ Plans must include: the boundary of the premises, external and internal walls, points of exit and entry (plus a description of where exit leads to and entry leads from). A variation application (s.187 of the Gambling Act 2005), along with an updated Local Risk Assessment, will be required if there has been a 'material change' to the layout since the licence was last issued. ⓘ Any gaming machines authorised by the premises licence must be located within the licensed area shown on the plan.			
2.3) Premises Summary Display (MC – SI 2007 / 1409/SSI 2007/266) **Is a summary of the premises licence displayed in a prominent place within the premises?**	Yes	0	☐
	No	10	☐
2.4) Under 18 Notices (MC - SI 2007 / 1409/SSI 2007/266) **Is there a notice stating that no person under the age of 18 is permitted to play bingo on the premises and is the notice displayed in a prominent place at every entrance?**	Yes	0	☐
	No	10	☐
2.5) Rules of Variants of Bingo and Prize Gaming (SRCP 4 and MC - SI 2007 / 1409/SSI 2007/266 **Are the rules about each variant of bingo and any prize gaming made available?** **Are the rules of each type of game available to customers within the premises by either displaying a sign, making leaflets or other written material available, or running an audio-visual guide prior to any game commencing?**	Yes	0	☐
	No	10	☐
2.6) Admission Charge (MC - SI 2007 / 1409/SSI 2007/266) **If there is an admission charge, is there a notice of this charge displayed in a prominent place at the principal entrance to the premises?**	Yes/ N/A	0	☐
	No	10	☐
2.7) Notice of Other Charges (MC - SI 2007 / 1409/SSI 2007/266) **If there are any other charges in respect of the gaming, is there a notice displayed at the main point where payment is made which sets out these charges?**	Yes/ N/A	0	☐
	No	10	☐
ⓘ Notices of other charges must include the cost (in money) of each game card or set of game cards payable in respect of the game of bingo and the amount that will be charged by way of a participation fee. There should also be in the notice a statement that all/part of the participation fee may be waived at the discretion of the person charging it. This notice can be displayed in electronic form.			

2.8) Problem Gambling Materials (SRCP 3.3) **Is information readily available to customers on how to gamble responsibly and seek help in respect of problem gambling?** Things to consider and evidence:	Yes	0 ☐
	Improvement Needed	5 ☐
	No	10 ☐
Is information displayed prominently on posters appropriate to the size and layout of the premises?		☐
Is information contained in leaflets that may be taken away or through the use of links for online or smart technology?		☐
Can information be obtained by customers discreetly?		☐

2.9) Lottery Tickets (MC - SI 2007 / 1409/SSI 2007/266) **Is the premises being used to sell tickets for a lottery?**	Yes	10 ☐
	No	0 ☐

ⓘ The mandatory conditions attached to premises confirm that neither National Lottery products nor tickets in a private lottery may be sold on the premises. In England and Wales tickets for customer lotteries also cannot be sold. Operators can sell society lottery tickets subject to the society holding the relevant permission (an operating licence from the Commission if a large society lottery or a local authority registration if a small society lottery.)

In some instances the operator may also require an External Lottery Manager licence from the Commission (for more detail see para 34.15 of the GLA 5th edition)

2.10) Gaming Machines Available for Use Bingo premises licences in existence before 13 July 2011: **Is the premises offering a maximum of 8 Category B3/B4 Machines or do Category B3/B4 Machines make up no more than 20% of the total number of machines?** Bingo premises licences granted on or after 13 July 2011: **Do Category B3/B4 Machines make up no more than 20% of the total number of machines?** Premises can also offer any number of Category C and D machines	Yes	0 ☐
	No	10 ☐

ⓘ Gaming machine content can be made available on hand held bingo terminals and this will contribute to the total number of machines. However, for this to apply the devices must be 'available for use' i.e. if a player could take steps to use the device without the assistance of the operator.

ⓘ Stakes may be paid by cash or non-cash forms of payment, except that credit cards cannot be used directly or indirectly to pay for any gaming machine use. Debit cards may only be used as an indirect form of payment e.g. to purchase a token or smart card that is subsequently put in the machine. (SI 2007 / 2158 and SI 2007 / 2319).

2.11) Gaming Machine Display Requirements SI 2007 / 2319 and SI 2007 / 2320 **Do all gaming machines display:** • What category it is? • The name and telephone number for assistance with problem gambling? • That the machine is not to be used by child/ young person unless it is a category D? • The percentage return to player?	Yes	0 ☐
	No	10 ☐

ⓘ The information above needs to be readily accessible by a person using the machine. It may be found on the machine cabinet or within the information shown on screen.

2.12) ATM Location (MC - SI 2007/1409/ SSI 2007/266) **Is the ATM located in a place that requires any customer who wishes to use it to cease gambling at any gaming machine in order to do so?**	Yes/ N/A	0 ☐
	No	10 ☐

2.13) Access Between Licensed Premises (MC - SI 2007/1409/SSI 2007/266) **Is there direct access to the bingo premises from a premises with:** • A casino premises licence • An adult gaming centre premises licence • A betting premises licence other than a track premises licence	Yes	10	☐
	No	0	☐
2.14) Hours of Operation (DC - SI 2007 / 1409/SSI 2007/266) No facilities for gambling shall be provided on the premises between the hours of midnight and 9am. This condition does not apply to making gaming machines available for use. **Is the premises compliant?**	Yes	0	☐
	No	10	☐
ⓘ If a variation to the hours of operation has been granted, this will be shown on the premises licence.			
2.15) Christmas Day (GA05 Section 183). The premises shall not be used to provide facilities for gambling on Christmas day. **Is the premises compliant?**	Yes	0	☐
	No	10	☐

3) Operator Policies - Protection of Children

Establishing compliance will require viewing policies and discussion with staff members

3.1) Policies for preventing Under Age Gambling (SRCP 3.2) ⓘ In England and Wales please also check Primary Authority status before asking these questions (see section 1.1 above) **Does the licensee have and put into effect policies and procedures designed to prevent underage gambling?**	Yes	0	☐
	Improvement needed	5	☐
	No	10	☐
Things to consider and evidence when answering the question above:			
Are staff members trained on the prevention of underage gambling on induction to the company?			☐
Is training regularly updated – can this be evidenced within staff training logs?			☐
Are checks of age carried out on apparently underage customers? Can this be evidenced?			☐
Is there a procedure in place for challenging any adult who may be complicit in allowing a child or young person to gamble?			
Are only suitable forms of I.D. accepted by the operator? (Driving Licence, Passport, Military I.D, PASS Logo I.D?)			☐
Is there an awareness of the legal requirements on returning stakes and not paying prizes to underage customers?			☐
Does staff training cover all relevant prohibitions against inviting children or young persons to gamble or to enter gambling premises? (GA05 sections 46 and 47)			☐
3.2) Test Purchasing (SRCP 3.2) Larger Operators • **Does the licensee conduct test purchasing or take part in collective test purchasing programmes?** Smaller Operators • **Does the licensee monitor the effectiveness of their policies and procedures for preventing underage gambling?**	Yes	0	☐
	No	10	☐
	Staff unable to answer/ Unknown		☐
ⓘ Smaller operators could monitor effectiveness through participation in collective test purchasing programmes. ⓘ A distinction between larger and smaller operators is made based on their operating licence fee category within SRCP 3.2. This information may not be available at the time of assessment. Please contact your local Gambling Commission Compliance Manager if clarification is needed.			

3.3) Under 18s Employment **Is the operator employing anyone under the age of 18 to carry out the functions shown below?**	Yes	10	☐
	No	0	☐

It is an offence to employ:

- a person under 18 to provide facilities for gambling (GA05 Section 51)
- a person under 18 to perform any function on the premises where gaming machines are sited or in connection with a gaming machine (GA05 Section 54)
- a person under 18 to perform any function on the premises where a premises licence has effect and where the gambling activity is being carried on (GA05 Section 53)

3.4) Over 18s Gaming Machines Area (MC - SI 2007 / 1409/SSI 2007/266) **Where children/ young people are permitted to enter the premises, and category B or C gaming machines are made available for use on the premises, are the gaming machines:**	Yes	0	☐
	Improvement Needed	5	☐
	No	10	☐

Separated from the rest of the premises by a physical barrier to prevent access other than via an entrance designed to be the entrance?	☐
Supervised at all times to ensure children or young persons do not enter the area?	☐
Arranged so that the area can be observed by persons responsible for supervision or closed circuit television which is monitored?	☐

The gaming machines area must also have a notice at the entrance stating that no person under the age of 18 years is permitted to enter the area

4) Operator Policies – Customer interaction/Protection of customers

Establishing compliance will require viewing policies and discussion with staff members

4.1) Policies for Customer Interaction (SRCP 3.4.1) **Has the licensee put into effect policies and procedures for customer interaction where they have concerns that a customer may be at risk of or experiencing harms associated with gambling** Things to consider and evidence:	Yes	0	☐
	Improvement needed	5	☐
	No	10	☐

Are staff members trained on the protection of customers on induction to the company?	☐
Is training regularly updated – can this be evidenced within staff training logs?	☐
Are employees trained in recognising types of behaviour that may be indicative of being-at risk of or experiencing harms associated with gambling?	☐
Are staff members trained to deal with customers showing signs of distress?	☐
Does the licensee use all available sources of information to identify customers who may be at risk of or experiencing harm?	☐
Is the licensee able to evidence that customer interaction has been undertaken in appropriate circumstances?	☐
Do records show circumstances where customer interaction has been ruled out?	☐
Are staff members able to talk about how a customer interaction has had a positive impact?	☐

Is the licensee able to evidence that there is an evaluation process to understand the impact of customer interaction?			☐
4.2) Policies for Self Exclusion (SRCP 3.5) **Does the licensee have and put into effect procedures for self-exclusion?** These procedures must include:	Yes	0	☐
	Improvement needed	5	☐
	No	10	☐
Employee induction and refresher training to ensure the system is enforced			☐
A register of those excluded, with appropriate records (i.e. name, address)			☐
Photo ID (or an effective alternative) and a signature			☐
Signposting to counselling and support services			☐
The removal of excluded persons found on the premises			☐
Consideration of the premises layout - Is the premises appropriately supervised to ensure that customers adults are protected?			☐
Minimum exclusion period of between 6 and 12 months with the option to extend for periods of at least 6 months			☐
Following a period of self-exclusion, customers who make a request to begin gambling again must be given one day to cool off before being allowed access to gambling facilities. The contact must be made via telephone or in person.			☐
Removal of customer from marketing databases during period of exclusion			☐
Policy to guard against self-excluded individuals using another person to gamble on their behalf			☐
Informing staff of individuals who have breached agreements			☐
4.3) Multi-Operator Self-Exclusion Scheme (SRCP 3.5.6) **Does the licensee offer the ability for customers to exclude from similar local venues through participation in a multi-operator exclusion scheme?**	Yes	0	☐
	No	10	☐
4.4) Free and Discounted Alcohol (SRCP 5) **If customers are offered free or discounted alcohol, is this linked to whether or when they begin or continue to gamble or made at times when they are participating in gambling activities?**	Yes	10	☐
	No/ N/A	0	☐
4.5) Advising Employees on Socially Responsible Gambling (SRCP 7) **Has the licensee ensured that employees involved in the provision of facilities for gambling are made aware of advice on socially responsible gambling and where to get help should their own gambling become hard to control?**	Yes	0	☐
	No	10	☐

5) Additional Questions

5.1) Premises Licence Availability (GA05 s185) **Is the premises licence (including the premises plan) kept on the premises and available on request?**		Yes 0 ☐ No 10 ☐
5.2) Reward Schemes – Terms and Conditions (SRCP 5) **Are the terms and conditions of any customer incentive or reward schemes clearly set out and readily available to customers?**		Yes 0 ☐ No 10 ☐

Things to consider:

- Marketing and advertising must not be misleading
- 'Free bet' or 'bonus' offers must comply with the CAP/BCAP 'Guidance on the rules for gambling advertisements
- Terms and conditions must be made available for their duration of the promotion
- Staff members should be able to explain the terms and conditions of incentives and reward schemes offered to customers.

5.3) Complaints and Disputes (SRCP 6) **Has the licensee put into effect appropriate policies and procedures for accepting and handling customer complaints and disputes in a timely, fair open and transparent manner?** Things to consider and evidence:		Yes 0 ☐ Improvement needed 5 ☐ No 10 ☐

Can customers refer any dispute to an Alternative Dispute Resolution (ADR) entity if not resolved to their satisfaction within 8 weeks?

Is dispute resolution free of charge for customers?

Terms must not restrict the customer's right to bring court proceedings against the licensee. Terms may provide for the resolution to be binding on both parties if the customer agrees to a resolution with the assistance of an ADR.

There must be clear and accessible information on how to make a complaint, the complaints procedure, timescales for responding and the escalation procedure.

Policies and procedures must be implemented effectively and kept under review

In this Code, 'ADR entity' means a person offering alternative dispute resolution services whose name is on the Gambling Commission's list of approved providers. The list is on the Commission's website and is updated from time to time.

5.4) Local Risk Assessment (SRCP 10)		
Can the operator evidence policies, procedures and control measures to mitigate risks identified within the Local Risk Assessment?		Yes 0 ☐ No 10 ☐
Has the operator taken into account relevant matters identified in the Licensing Authority's policy statement?		Yes 0 ☐ No 10 ☐

5.5) Licensing Authority Conditions **Is the premises adhering to any additional premises licence conditions?**		Yes/ N/A	0 ☐
		No	10 ☐



Licensing Authorities may have requested/ received further information relating to physical aspects of the premises during the application stage (for example: CCTV, supervision of gaming machines, floor staff location). The appropriateness of these arrangements can be checked at assessment.



Where a condition is attached to a premises licence to require door supervisors, if the Private Security and Industry Act 2001 means that they must be SIA registered then that also becomes a condition of the premises licence (GA05 Section 178).



Registration of S.I.A licence holders can be found at www.sia.homeoffice.gov.uk

	Assessment Score: ……/ 320

6) Action Points

Question Number	Issue/ Resolution



'Assessment outcome letters' are available for you to use and can be downloaded from the LLEP website. Where possible please share this letter, or the notes shown above, with your Gambling Commission Compliance Manager.

9. Acronyms & Abbreviations

ACRONYM ABBREVIATION	MEANING	COMPLIANCE & SOCIAL RESPONSIBILITY DEFINITION
ADR	ALTERNATIVE DISPUTE RESOLUTION	If we are unable to resolve a customer complaint internally within our organisation, we would use the services of a "Alternative Dispute Resolution" provider. (See details below regarding our ADR provider IBAS).
AML	ANTI MONEY LAUNDERING	As a company we have to have procedures and policies in place to prevent anti money laundering and terrorist financing within our business. A new electronic AML button is now available on the IHL Tablet for reporting incidents of £50 or more of stained notes/dyed notes/foreign coins.
AML OFFICER	ANTI MONEY LAUNDERING OFFICER	Our Licence conditions and codes of practice state that we have an appointed Anti Money Laundering Officer. The appointed officer is: AMANDA KIERNAN Email: akiernan@merkur-casino.com
BCAP	BROADCAST COMMITTEE OF ADVERTISING PRACTICE	As a company we have to comply with the advertising codes of practice issued by the Broadcast Committee of Advertising Practice. The code applies to the way in which we advertise gambling facilities and services. We are not allowed to use images of a child or young person and no-one who is, or appears to be, under the age of 25 years of age. This includes being compliant with what we broadcast on electronic TV screens which are installed in some venues.
CAP	COMMITTEE OF ADVERTISING PRACTICE	As a company we have to comply with the advertising codes of practice issued by the Committee of Advertising Practice. The code applies to the way in which we advertise gambling facilities and services. We are not allowed to use images of a child or young person and no-one who is, or appears to be, under the age of 25 years of age.
IBAS	INDEPENDENT BETTING ADJUDICATION SERVICES	IBAS are the external company who provide "Alternative Dispute Resolution" (ADR) services, whereby we are unable to resolve a customer complaint. Details are available on the Complaints & Disputes Policy leaflet available in your Compliance folder/staff area. Address details: Independent Betting Adjudication Services, P.O. Box 62639, London, EC3P 3AS
LCCP	LICENCE CONDITIONS & CODES OF PRACTICE	All UK licensees have to abide by the rules and regulations of the Licence Conditions & Codes of Practice. The document is issued by the Gambling Commission who regulate the UK Gaming industry. New regulations have to be sanctioned by Central Government and the "Department of Culture Media & Sport" (DCMS) and agreed with the Gambling Commission.
MOSES	MULTI OPERATOR SELF EXCLUSION SCHEME	Multi Operator Self Exclusion Scheme came into effect on 6th April 2016. UK gaming operators have to use the scheme to allow customers to self-exclude from gaming premises. The scheme is sector specific i.e. AGC, Bingo, Licensed Betting Office and Casinos.
POCA	PROCEEDS OF CRIME ACT (2002)	Proceeds of Crime Act 2002 allows the authorities to enforce the law and prosecute criminals whereby criminal activity such as money laundering is taking place in gaming establishments. The authorities have the power to prosecute criminals which could lead to heavy fines and imprisonment!
TITO	TICKET IN TICKET OUT	TITO technology allows a player to insert cash into a machine to commence play. They then have the option to collect the credited amount, which is printed via a ticket. The ticket can be inserted into another machine with TITO, or redeemed for cash at a cash redemption machine or cash counter.

Why:

CCTV is an essential tool to help prevent crime and capture those responsible for breaking the law. In a business where cash is being transferred continuously between customers, machines and employees, it is important for the safety of employees and customers that all areas of the venue area covered by CCTV at all times.

Best Result:

The CCTV system is only accessed by those with authority to do so. Cameras angles are never changed without the correct authority. The security of the venue is increased.

Worst Result:

The CCTV is accessed by those who should have no access, data is lost. Cameras are moved without authorisation causing a loss of coverage of key areas. The security of the venue is compromised.

What:

- The CCTV system must be switched on and recording at all times
- Any faults with the CCTV System should be communicated to the Area Manager immediately, as well as the IT department
- CCTV should always cover: the front and rear exits, all machines, the offices and the GeWeTe. The CCTV should cover the inside of the GeWeTe when the door is open
- The CCTV should be checked daily to ensure its working correctly and the time and date are all correct
- Information in regards to the CCTV should never be disclosed to any 3rd parties
- Placing and adjusting of the cameras should only be completed by IT with authorisation from the Area Manager and Operations Director
- Records should be kept to show who has access to the CCTV password and username
- Decorations should be not placed in areas which obscure the CCTV camera's view
- The CCTV should be stored in a security cabinet
- The key to the security cabinet to be locked in the key cabinet

When:

- The CCTV should be checked daily to ensure correct function

Who:

- The Venue Manager has responsibility for the CCTV system being checked and fully functional
- The Area Manager is responsible for the placement/vision position of the camera

Order of who to contact if in need of help / advice:

- Area Manager
- IT Department

Why:

Machine fraud is a threat which is ever present. Employees should be aware of the ways in which fraud can take place, and what to do in the event of spotting a "customer" defrauding a machine.

Best Result:

All employees are aware of the potential of machine fraud and what to look out for. Machine fraud is reduced and Company revenue is protected.

Worst Result:

Employees fail to identify fraud taking place, resulting in a loss of revenue. The employees responsible may be subject to disciplinary processes.

What:

- The venue floor should never be left unattended, with the exception of an emergency situation occurring
- Employees should be thoughtful in regards to customers who they are not familiar with
- Employees should be given access to photos of known fraudsters by the Area Manager
- Known fraudsters shall be asked to leave immediately upon entrance with no explanation needed to be given
- Following any machine being defrauded, at the earliest opportunity the duty manager must send an email to the security email address, Security@Merkur-Casino.Com with as much evidence and information as possible
- Employees are not to endanger themselves or customers at any time when dealing with a fraudster

When:

Fraud may be taking place when

- Machines are being played with large amounts of credit. Normally people do not play with large credit in the machine (be aware that some customers may have won a jackpot and have that credit sitting in their balance)
- Machines going empty regularly or a large succession of tickets being collected
- Suspicious activity – Large amounts of customers coming into the venue and dispersing or trying to distract employees
- Customers with their hands over the coin mechanism, display or pay out tray
- Large amounts of coins (one pounds and ten pence coins) being separated into denominations in the payout tray
- Customers leaving the venue with machines still having money left in the bank

Who:

- All employees have a responsibility for protecting the business from machine fraud
- The Area Manager should provide employees with photos of known fraudsters
- The duty manager should inform the security email address following machine fraud taking place – Security@Merkur-Casino.Com

Order of who to contact if in need of help / advice:

- Venue Manager
- Area Manager
- Operations Director

How:

If you suspect that machine fraud is taking place either:

- Activate staff guard and ask the customer to leave the venue if you feel comfortable to do so

Or:

- Do not alert the suspect(s)
- Inform the duty manager who will telephone the police
- Continue to watch the suspect(s) and try not to alert their attention that you have identified them

Following a fraud

1. Information should be gathered from the CCTV and stored on a memory stick
2. This information should be provided by email to the security email address as soon as possible to prevent another venue being targeted in the local area
3. The Area Manager should be contacted to inform them of the event
4. Income protection should be informed

Operations Manual
Machine Ratio Check
M07 – Version 1

Why:

Under the conditions of the Company's Gambling Commission Operating Licence and venue local authority Premise Licence all venues must ensure they are operating within the B3 Ratio regulation of the 20%* rule for B3's and the Gambling Commission's guidance on 'Available for Use'.

*There are exceptions for licenses issued prior to 13 July 2007 - The Gambling Commission states licensed AGC and bingo premises in existence before 13 July 2011 will enjoy so-called 'grandfather rights', entitling them to make available four (AGCs) or eight (bingo) category B gaming machines, or 20% of the total number of gaming machines, whichever is the greater.

Best Result:

All employees are aware of the importance of maintaining the correct machine ratio throughout all hours of operation, therefore ensuring the business remains compliant in relation to the machine ratio allowances.

Worst Result:

Employees are not aware of the importance of maintaining the correct ratio. The business operates outside of the conditions of the operating licence, putting the operating licence at risk of being withdrawn.

What:

- All machine ratio checks are to be completed on the Smart Tablet.
- If there is an issue with the machine ratio which needs to be addressed in order to remain compliant with the 20% rule; the duty manager at the time should refer to MARS to identify the lowest revenue B3 to switch off and the machine must remain switched off until the faulty machine is available for use.
- Venues must take into consideration where they have Tablets that account towards the B3 ratio, faulty tablets must be factored into the B3 ratio in exactly the same way as gaming machines and appropriate action taken with switching off B3's where applicable.

When:

Checks must be completed when:

- Prior to a new venue opening its doors to trade for the first time
- A machine move has taken place
- A machine faults/failure occurs which results in the machine being not available for use/turned off
- After an engineer has fixed and faults on a machine and it is turned back on

Available for use

Tablet and Handheld machines – the Gambling Commissions guidance on machines available for use means it is imperative that where the number of B3 machines takes into account any tablets and handheld machines that they are available for use at all times.

This includes:

- Switched on and working at all times
- Not kept under lock and key so available to the customer without assistance
- All staff fully trained on how they operate

If any tablet/handheld machine needs to be sent away for repair a B3 Ratio check MUST be completed to ensure the venue ratio is within the 20% rule, switching off B3's as appropriate. In addition to the circumstances above venues should be entering regular B3's ratio checks on the SMART Tablet.

The Gambling Commission and/or Local Authority Compliance Officers may from time to time carry out venue inspections. One of their checks will be 20% ratio and they have the powers to review our licenses if we are found to be in breach.

Who:

- All venue employees hold responsibility for ensuring the 20% rule is maintained at all times of operation, however, the duty manager for any given shift holds ultimate responsibility.

Order of who to contact if in need of help / advice:

- Venue Manager
- Cluster Manager
- Area Manager
- MERKUR Technical Venue Technician and/or MERKUR Technical Gaming Support Representative.

Why:

The security of employees is of the upmost importance; therefore, personal alarm systems and the staff guard system have been installed to help deter aggressive incidents and give employees a way of contacting help when required.

Best Result:

The staff guard and MPA fobs are carried by employees at all times as per policy. This increases the security of our employees and guests. Employees become more comfortable in their roles knowing they have methods of contacting assistance in emergency situations.

Worst Result:

The staff guard and MPA fobs are not carried by employees which reduces the safety of employees and guests. During events when emergency assistance is needed, it is not acquired.

What:

- Employees should always carry a mobile panic alarm (MPA) or staff guard fob on their person while at work. (Ideally both should be carried)
- Activation of staff guard should be prioritised over using the MPA in circumstances which do not require immediate police attention
- Staff guard should be tested at least once per week – Recorded on MS141 (Note: it is recommended to test the system during times of higher customer numbers, as it makes the customers aware that staff have a communication link to a security service)
- Mobile Panic Alarms should be tested and recorded once per month MS116-V1 MPA test record
- Employees should not be hesitant to use staff guard when there is a genuine reason – This is a service which MERKUR pay for.
- Employees should be more thoughtful about using the MPA system, and should only activate it in times of imminent physical threat or robbery, or anything which police would usually be called for. This is a system which is linked directly to police. Inappropriate use of this device may lead to the venue losing the right to use it altogether.
- Staff guard and the MPA system should only be used if it is safe to do so – never endanger colleagues or customers during a situation arising when it would not be safe to active either system
- For static alarms ensure that the reset key is available at all times
- Some Venues have panic buttons on the intruder alarm – These will usually be found under the Service Desk and near the safe. These alarms require 2 red buttons to be pressed simultaneously which will trigger a silent alarm. These alarms will also work in the event of a network or power failure

When:

- The staff guard unit should be tested once per week
- The staff guard unit should be activated whenever employees are feeling uncomfortable, threatened or in danger
- The MPA system should be used only when immediate police assistance is required

Who:

- The MPA unit and/or Staff guard fob should be carried by employees at all times
- All venue employees should have access to these devices
- All venue employees should have received training on how to use these devices

Related / supporting documents:

- MS141 – Staff Guard Test Record

Order of who to contact if in need of help / advice:

- Area Manager
- IT Department
- For any technical issues regarding staff guard call: 01623 649013 (This is a 24hr line but it's best to call during normal business hours. Out of hours, the number transfers straight to an engineer so he may be woken by the call, do not press the fob if you have maintenance issues – dial this number as directed)

How:

Staff Guard Operation

1. Slide cover up on fob and press the red button – this dials Staff Guard.

2. A blue light will flash on the unit which shows that it's dialing.

3. The red light appears/will stay on continuously after a few seconds meaning the call has connected and someone is listening. They will not speak for the first 10 seconds.

IF YOU ARE IN IMMEDIATE DANGER, SAY:
CALL THE MANAGER - This is our pass phrase that tells them to call for IMMEDIATE POLICE ASSISTANCE

However, they will also call the police if they can hear that a crime is being committed, or anyone is in immediate threat.

If you say:" **Stand By"**
They will stay online and listen to whatever is happening so you can use this as a safety measure if you feel a situation could escalate. Again, they will call the appropriate authorities if required.

They will say **"Standing by"** every few minutes to assure/remind you that they are still there.
Say: **"Stand down"** once you no longer need assistance.





How to make a test call:

Once per week a test call must be made:

1. Press the fob (red button) and wait for a response. Say, "Just a test call" and give the password when asked.

The password is your venue name and number.

2. They will confirm the test and end the call

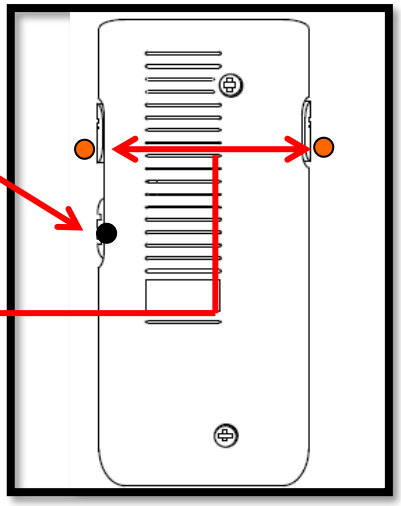


Mobile Panic Alarms (MPA)
Mobile Panic Alarms are designed to offer staff the security of a personal attack alarm at all times whilst they are at work. The MPAs should be worn by staff members and key holders should be issued with one to keep with them at all times. MPAs are not to be taken off site and should not be taken home.

1. Slide the black button downwards to unlock the orange buttons

2. Press the two orange side buttons together

The panic alarm does not work if you press only one button
The black button should be kept in the locked position to prevent false activations



How it works:
The MPA transmits a signal to a receiver on site. This signal is then transmitted INSTANTLY to an alarm control centre who inform the local Police. The Police will aim to attend site in less than 5 minutes when a MPA is activated as this is given priority over a normal 999 call.

CAUTION – The transmitter range will be affected by the condition of the MPA aerial, always ensure your MPAs are in good condition. If the MPA is defective or damaged, contact the Commercial Administrator to arrange a repair/replacement straight away.

Why:

The smoke free laws passed on 1st July 2007 prevent smoking in work places and other public places. Therefore, to remain compliant with the law, smoking should only be permitted in designated areas for employees and customers alike.

Best Result:

All employees and customers observe the smoke free policy and only smoke in areas in which smoking is permitted. We are compliant with the law.

Worst Result:

Employees and customers do not observe the smoking policy, the customer experience is negatively affected and we are not compliant with the law.

What:

- Smoking is strictly prohibited within venues
- Customers must not be allowed to smoke inside doorways or toilets
- Where possible there should always be a place to dispose of finished cigarettes
- Should the venue have no designated smoking area for customers, there should be steps taken to keep the front of the venue looking presentable at all times
- Vaping is allowed within our venues however these devices should not produce excess vapour
- Employees must not vape in the venue
- Employees who vape must take designated breaks to vape, as smokers do
- Employees who smoke must follow the employee smoking guidelines
- No smoking signs should be clearly displayed at the entrance

When:

- It is illegal for anyone to smoke inside the premises at any time
- This document is applicable at all times

Who:

- Smokefree laws are applicable to both employees and customers
- All employees are responsible for ensuring that these rules are followed at all times

Related / supporting documents:

- Venue Manager
- Area Manager

MERKUR Slots Lone Working Policy

1. Introduction
MERKUR Slots, like many companies operating in the gaming and entertainment industry, has several aims when it comes to lone working. These aims typically focus on ensuring the safety, security, and well-being of employees while maintaining operational efficiency.

MERKUR Slots aims to keep lone working periods to a maximum of 6 continuous hours alone for individual employees, whenever possible. However, there may be times when circumstances make this aim unachievable and longer periods of lone working are required to meet business needs. MERKUR Slots will only schedule lone working between the hours of 22:00 and 06:00 as a last resort in order to avoid business closure.

MERKUR Slots is committed to ensuring the health, safety, and welfare of all employees, including those who work alone. This Lone Working Policy and Procedures outline the measures and procedures in place to protect employees who work alone, ensuring they are not exposed to undue risk.

2. Scope
This policy applies to all employees engaged in lone working activities at MERKUR Slots Venues. Lone working is defined as any work activity carried out in isolation from other workers without close or direct supervision.

3. Objectives
- To identify lone working activities and assess associated risks.
- To implement control measures to minimise risks.
- To provide training and resources to support safe lone working.
- To establish communication and monitoring systems for lone workers.
- To review and improve lone working procedures regularly.

4. Responsibilities
4.1 Management
- Ensure a risk assessment is conducted.
- Provide appropriate training and resources.
- Implement and maintain effective communication systems.
- Monitor and review lone working practices.

4.2 Employees
- Follow the lone working procedures and guidelines.
- Complete all Company provided training.
- Report any hazards or incidents to management.
- Use provided communication devices and systems.

5. Risk Assessment
A comprehensive risk assessment must be conducted. This assessment will consider:
- Potential hazards and risks.
- The environment in which the task is performed.
- The health and safety of the lone worker.
- Emergency procedures and communication systems.

6. Control Measures
Based on the risk assessment, appropriate control measures will be implemented, including but not limited to:

- Ensuring the lone worker is medically fit for the task.
- Providing training on safe lone working practices.
- Supplying necessary personal protective equipment (PPE).
- Establishing a robust communication system, such as regular check-ins, emergency contact numbers, and lone worker alarms.
- Ensuring access to first aid supplies and emergency procedures.

7. Communication and Monitoring
Effective communication and monitoring are crucial for the safety of lone workers. Measures include:

- Scheduled check-ins at regular intervals.
- Use of mobile phones or two-way radios.
- Emergency contact procedures and escalation protocols.

8. Training
All lone workers will receive training on:

- The risks associated with lone working.
- Control measures and safety procedures.
- Emergency escalation and response.
- Use of communication and monitoring systems.

9. Emergency Procedures
Clear emergency procedures must be established, including:

- Access to emergency contact numbers.
- First aid and medical assistance procedures.
- Incident reporting and response protocols.

10. Review and Improvement
This Lone Working Policy will be reviewed annually or following any significant incidents or changes in work practices. Employee feedback on lone working issues is encouraged and should be provided to the Area Manager in the first instance. Feedback from employees will also be considered in order to improve the policy and procedures.

11. Policy Compliance
Non-compliance with this policy may result in disciplinary action. All employees are expected to adhere to the lone working procedures and report any concerns to management promptly.

12. Conclusion
MERKUR Slots is dedicated to providing a safe working environment for all employees. This Lone Working Policy is a testament to our commitment to the health and safety of MERKUR Slots employees. By following this policy, MERKUR Slots can ensure that lone workers are protected and supported in their roles

Why:

In order to ensure the safety of employees during periods of lone working, security precautions must be taken to ensure that risks to employees and the business are minimised. Employees should familiarise themselves with procedures which must be followed when lone working, before commencing any period of planned/unplanned lone working.

Best Result:

All employees adhere to the processes relating to lone working. The safety of the business, and more importantly employees and customers are improved as a result.

Worst Result:

Lone working processes are not followed, which compromises the safety of employees and customers and impacts the security of the business

Lone Working Procedure

Before commencing a period lone working in any venue, whether planned or emergency lone working, please ensure that the below processes are followed (step by step documents and guidance is included as per page numbers)

Ensure that a telephone (landline or mobile) is available on the shop floor at all times

Ensure that a Staff Guard Fob is carried at all times

1. **Refer to the order of contact list, and contact relevant Manager/Nominated lone working contact venue dependent on the time of day, to inform of lone working situation**
   Venue specific contacts list: Page 4 Order of contact list: Page 5

1.1 If the period of lone working will be longer than 6 continuous hours; in addition to the above, please also contact the relevant Manager to discuss how a break period will be managed
Venue specific contacts list: Page 4 Order of contact list: Page 5

2. **Review and Refresh understanding of emergency procedures and contact numbers to use in the event of an emergency**
   Venue specific contacts list: Page 4 Emergency contact list: Page 6

3. **Review and refresh understanding of the lone working risk assessment**

4. **Review and refresh understanding of the lone working "do's and do nots" list**
   Page 7

5. **Review and refresh understanding of the Checking in and Keeping In Touch procedures**
   Page 8

6. **Review and refresh understanding of Locked Door Operation**
   Page 9

Contacts List

Night Manager (Night Phone) 07887 416522
Between 22:00 and 06:00 only

Primary Nominated Lone Working
Contact Venue: _____

Telephone: _____

Secondary Nominated Lone Working
Contact Venue: _____
(if applicable)

Telephone: _____

Venue Manager: _____

Mobile: _____

Cluster Manager: _____
(if applicable)

Mobile: _____

Area Manager: _____

Mobile: _____

Operations Director: _____
(Emergency only)

Mobile: _____

1. **Employee to refer Non-Emergency Contacts list below, and contact relevant manager/Nominated lone working contact venue, dependent on the time of day, to inform of lone working situation;**

Non-Emergency Contacts

Order of contact between the hours of 22:00 and 06:00
- Nominated Lone Working Venue
- Night Manager

Order of contact between the hours of 06:00 and 22:00
- Venue Manager
- Cluster Manager
- Area Manager

1.1 If the period of lone working will exceed 6 hours, and a break is not able to be taken during the entirety of the shift; in addition to the above, please also contact the relevant Manager below, to discuss how break will be managed.

Between the hours of 22:00 and 06:00
- Night Manager

Between the hours of 06:00 and 22:00
- Venue Manager
- Cluster Manager
- Area Manager

2. **Review and refresh understanding of emergency procedures and contact numbers to use in the event of an emergency**

Emergency Procedure

Should a serious incident happen in your venue, in the worst-case scenario try and stay calm and REMEMBER; we do not expect you to be a hero. Your safety, along with that of other employees and our customers, are of paramount importance.

To help you stay calm and deal with a serious incident remember the following:

- ✓ The priority is always the safety of employees and customers
- ✓ Initial reaction is normally "fight or flight". Do neither. Stay calm and don't take any sudden action
- ✓ Keep calm, don't shout or scream
- ✓ Do as you are told and keep your hands in view at all times
- ✓ Only activate the Staff Guard/PA if it is safe to do so
- ✓ Do not make eye contact with offender(s)
- ✓ Try to memorise things like scars, tattoos, unusual accents as well as clothing. You must write these down as soon as it is possible and safe to do so

Following such an incident the below steps should be followed;

- Close the venue
- Do not touch anything
- Check everyone is OK and if anyone needs assistance
- If the robbers dropped anything do not pick it up
- Try not to stand in the areas that the robbers have stood in
- If Staff Guard or a Panic Alarm was not activated, call 999 and inform the police of the situation
- Inform your Area Manager via a telephone call, if the Area Manager is not available contact the Operations Director.

REMEMBER
If faced with a serious incident, only activate Staff Guard/ Static Panic Alarm if it is safe to do so and will not put any one at risk

Emergency Contacts List

Emergency contact telephone numbers can be found on page 4

Order of contact during day time lone working
Between the hours of 06:00 and 22:00

- Venue Manager
- Cluster Manager
- Area Manager
- Operations Director

During night time lone working
Between the hours of 22:00 and 06:00

- Night Manager
- Venue Manager
- Cluster Manager
- Area Manager
- Operations Director

Incident Reporting Process

Any unusual incidents must be recorded and reported using the Safety Culture template: "MERKUR Casino Security Report"

In instances where, for whatever reason, an incident cannot be recorded on Safety Culture, the "MS65 -V1 INCIDENT REPORT FORM"

The form can be found on my MERKUR; From the home page > Documents > Venue Documents > MERKUR Paperwork > "MS65 -V1 INCIDENT REPORT FORM"

It is recommended that a small stock of this document is kept alongside the "Lone Working Policy and Procedures" document, for ease of access.

3. **Review and refresh understanding of the lone working risk assessment**

4. **Review and refresh understanding of the lone working "do's and do nots" list**

The Do's of Lone Working

- Ensure that a Staff Guard fob is carried at all times
- Ensure that a telephone (mobile or landline) is available at all times
- If you are in need of non-emergency assistance/guidance, make contact with time relevant colleagues in the business via the non-emergency contacts list
- Keep all emergency contact numbers to hand at all times
- Make an assessment to whether Locked Door Operation should be used, if so, the Locked Door Operation guidance must be followed
- Ensure that you carry a Staff Guard Fob and remind yourself of Static Panic Alarm locations
- Keep all office doors locked
- Ensure that all safes are locked
- Ensure that all keys are stored inside time delay safes
- Ensure that all money is inside time delay safes – apart from a venue optional personal float (to be agreed by Venue Manager) of £500 which is to be stored in a safe without a time delay requirement for access
- Be mindful/wary of unfamiliar customers
- If there is a threat to the safety of employees or customers, do not hesitate to use Staff Guard, providing it is safe to do so
- In the event of an emergency situation Call 999, providing it is safe to do so
- Record all incidents, as per the incident recording process
- Remind yourself of the GeWeTe S.O.S code;
  The GeWeTe S.O.S code for this venue is; ……

The Do Nots of Lone Working

- Leave the premises unattended at any time, except in the case of an emergency
- Discuss security or operational procedures with anyone whilst working on the venue floor
- Access or remove cash from any time delay safe, GeWeTe, Machine or ATM
- Remove machine, GeWeTe or ATM keys from any time delay safe
- Undertake any maintenance involving electrics or heights within the venue
- Hesitate to contact a member of management using the emergency contact procedures if you are in doubt about anything
- Approach anyone who is threatening the security of the venue. Employee and customer safety must come first and you must co-operate at all times
- Activate the staff guard or static alarm system, if you feel it is unsafe to do so

5. **Review and refresh understanding of the Checking in and Keeping in Touch Procedures**

The Keeping in Touch Procedure

Employees must follow the keeping in touch procedure when lone working

1. When a period of lone working takes place, the lone working employee must contact their nominated keeping in touch venue and advise that they are lone working
2. The lone working employee should contact their designated venue every half hour for the full duration of the period of lone working
3. Following the period of lone working being completed, the nominated checking in venue should be informed
4. If no contact is made at the above times to check in, the nominated venue must try to make contact with employee who is lone working
5. If no contact is made following the above step; The nominated venue must contact the Area Manager or Night Manager (between the hours of 22:00 and 06:00) immediately

Checking In

Employees must follow the checking in when opening/closing a venue alone

When opening/closing a venue or re-opening a venue following a period of locked door operation:

- Be vigilant and aware of anyone suspicious in immediate surrounds of the venue
- Be alert and pay particular attention to parked cars with people sitting inside them and/or anyone waiting in the vicinity of the premises
- If you notice anything suspicious, please contact your Area Manager for advice before opening the venue
- If it is safe to do so, employees should enter the building and immediately lock the door behind them before turning off the venue alarm system
- Collect a Staff Guard fob immediately, and carry at all times.

Opening/Closing Venue - The Checking in Procedure

1. Prior to opening/closing the venue, a call must be made to the nominated contact venue, Area Manager or Night Manager (if between the hours of 22:00 and 06:00) to inform them that you will be opening/closing a venue alone
2. Once the venue is alarmed and closed, a call must be made to the same venue/manager to confirm that all is OK
3. If any issues occur which need reporting, these must be immediately reported to the Area Manager or Night Manager (if between the hours of 22:00 – 06:00)

6. Review and refresh understanding of Locked Door Operation

Locked Door Operation

If, while lone working, an employee feels that that the safety of themselves, and/or the safety of other customers is at significant risk, a locked door operation can be applied.

All employees are able to make the decision to apply a locked door operation without prior permission, however, as noted below, any occurrences of the door being locked during operational hours must be reported

- Where License Conditions or the Local Area Risk Assessment (LARA) specify that a locked door operation must be in place throughout set hours, venues must comply. The Venue Manager/Area Manger are responsible for ensuring licensing conditions are adhered to, and will provide employees with relevant information on this point.
- In any instances where there is a significant risk to the safety of employees or customers, locked door operation should be applied
- Where locked door operation is applied, and mag locks are in place, the door should be secured by maglock only. In venues which do not have a mag lock, the front door should be locked by key and the lone working employee should pay attention to the front door incase customers wish to enter or exit
- Throughout all hours of trade, a locked door operation should only be applied during hours of lone working, or if there is a safety concern for employees and/or customers
- Operating with a locked door is authorised. however, operating with a locked door must still be reported to either: Cluster Manager, Area Manager or Night Manager, relevant to the time of day as below;

Between the hours of 06:00 and 22:00
- Cluster Manager
- Area Manager

Between the hours of 22:00 and 06:00
- Night Manager - 07887 416522

- The length of the time which the locked door operation will be applied for, is to be agreed with the Cluster Manager, Area Manager or Night Manager at the time of reporting the door being locked
- While operating with a locked door, the front door should be manned for as much time as possible
- During operating with a locked door, employees should allow known customers access to the venue (providing they are no threat to safety)
- Employees should consider the access to non-known customers on a customer-by-customer basis, and should make an informed decision on whether to allow entry or not. However, there should be a clear reason as to why an unknown customer is not provided access to the venue

Other Relating Procedures

Reporting of Safeguarding Equipment Faults

It is of the highest importance that all equipment which acts as a safeguard for employees during lone working, and non-lone working periods alike, are always in working order.

In instances whereby safeguarding equipment is found to not be working correctly, this must be reported at the earliest opportunity. Ideally to the Venue Manager or as per the email contacts below.

Safe guard equipment which should always be working (or reported):

ITSupport@merkur-casino.com

- Staff Guard fobs
- Staff Guard unit
- Telephone
- CCTV

Fmhelpdesk@merkur-casino.com

- 60-minute time lock delay main safe
- Mag lock system
- Lock system on door of agreed panic room
- Fire alarm system

Venue Manager

- Door chimes (if in place/applicable)
- First aid kit – Agreed Company stock standards and up to date

Staff Guard Fob

The Staff Guard system helps to de-escalate and deter aggressive incidents and give employees a way of contacting help when required. We are not charged as a Company for individual usage of the Staff Guard System; therefore, it should be used freely when deemed necessary and is considered safe to do so. Never use the Staff Guard system if you believe it will cause the situation to become more dangerous.

1. Slide cover up on fob and press the red button – this dials Staff Guard.

2. A blue light will flash on the unit which shows that it's dialing.

3. The red light appears/will stay on continuously after a few seconds meaning the call has connected and someone is listening. They will not speak for the first 10 seconds in order to try and understand what is happening in the venue.

IF YOU ARE IN IMMEDIATE DANGER, SAY:
"CALL THE MANAGER" - This is our pass phrase that tells them to call for **IMMEDIATE POLICE ASSISTANCE**

However, Staff Guard will also call the police if they can hear that a crime is being committed, or anyone is in immediate threat.

If you say: **"Stand By"**
They will stay online and listen to whatever is happening so you can use this as a safety measure if you feel a situation could escalate. Again, they will call the appropriate authorities if required.

They will say **"Standing By"** every few minutes to assure/remind you that they are still there.
Say: **"Stand Down"** once you no longer need assistance.





Operations Manual
Locked Door Operation
S07- Version 1

Why:

MERKUR Slots venues may, at times, operate a venue with a locked door, in order to ensure the safety of employees and customers. There are certain considerations and reporting processes which must be followed when operating a locked door during operational hours.

Best Result:

All employees are aware of the importance of following Company processes, when operating with a locked door. Employee and customer safety is heightened as a result.

Worst Result:

Employees do not follow the process for operating the venue with a locked door. Resulting in decreased safety for employees and customers and a risk of impact to the businesses profitability.

What:

- Where License Conditions or the Local Area Risk Assessment (LARA) specify that a locked door operation must be in place throughout set hours, venues must comply.
- Employees of MERKUR Slots must always make the safety of themselves and customers a priority
- In any instances where there is a significant risk to the safety of employees or customers, locked door operation should be applied
- Throughout all hours of trade, a locked door operation should only be applied during hours of lone working, or if there is a safety concern for employees and/or customers
- Operating with a locked door is authorised. however, operating with a locked door must still be reported, as per below points
- Any locked door operation must be reported to either: Cluster Manager, Area Manager or Night Manager, relevant to the time of day
- The length of the time which the locked door operation will be applied for, is to be agreed with the Cluster Manager, Area Manager or Night Manager at the time of reporting the door being locked
- While operating with a locked door, the front door must be manned for as much time as possible
- During operating with a locked door, employees should allow known customers access to the venue (providing they are no threat to safety)
- Employees should consider the access to non-known customers on a customer-by-customer basis, and should make an informed decision on whether to allow entry or not. However, there should be a clear reason as to why an unknown customer is not provided access to the venue
- During times of locked door operations, employees should follow Company processes noted in the S1/01 Lone Working document, found in the Operations Manual

When:

- Locked door operation can be applied at any point during operational hours, however, as noted, there must be a clear reasoning behind the decision to do so

Who:

- All employees are able to make a decision to operate with a locked door, providing the circumstances warrant the decision

Who to contact if in need of help / advice:

- Cluster Manager
- Area Manager
- Night Manager (As per S1/01 Lone Working document)

Why:

The keeping in touch procedure is a safety and security procedure which promotes regular communication between venues during periods of lone working, or opening/closing a venue whilst alone.

Best Result:

All employees follow the keeping in touch procedure while lone working, increasing the safety and security of those employees undertaking lone working.

Worst Result:

Employees do not follow the keeping in touch process, resulting in an increased risk to employees who are lone working.

What:

- Employees must follow the keeping in touch procedure when lone working
- Employees must follow the keeping in touch procedure when opening/closing a venue alone

When opening a venue:

- Be vigilant and aware of anyone suspicious
- Be alert and pay particular attention to parked cars with people sitting inside them and/or anyone waiting in the vicinity of the premises
- If you notice anything suspicious, please contact your Area Manager for advice before opening the venue
- If you are alone when opening the venue, you must observe the "Checking In: Opening/Closing A Venue Alone" process
- If it is safe to do so, employees should enter the building and immediately lock the door behind them before turning off the venue alarm system

How:

Keeping In Touch

1. When a period of lone working takes place between the hours of 22:00 – 06:00, the lone working employee must contact their nominated keeping in touch venue and advise that they are lone working
2. The lone working employee should contact their designated venue on the hour and half hour for the full duration of the period of lone working
3. Following the period of lone working being completed, the nominated checking in venue should be informed
4. If no contact is made at the above times to check in, the nominated venue must try to make contact with employee who is lone working
5. If no contact is made following the above step; The nominated venue must contact the Area Manager or Night Manager (between the hours of 22:00 and 06:00) immediately

Checking In: Opening/Closing A Venue Alone

1. Prior to opening/closing the venue, a call must be made to the nominated contact venue, Area Manager or Night Manager (if between the hours of 22:00 and 06:00) to inform them that you will be opening/closing a venue alone
2. Once the venue is alarmed and closed, a call must be made to the same venue/manager to confirm that all is OK
3. If any issues occur which need reporting, these must be immediately reported to the Area Manager or Night Manager (if between the hours of 22:00 – 06:00)

When:

- This document applies to all periods of lone working

Who:

- This document is applicable to all employees during periods of lone working

Related/supporting documents:

- S1/01 Lone Working
- S7/01 Locked Door Operation

Order of who to contact if in need of help/advice:

- Venue Manager
- Cluster Manager
- Area Manager
- Night Manager (between hours of 22:00 and 06:00 only)
- Operations Director

Revision History

Version	Revision Date	Revised by	Section Revised
1.0	January 2024	Gill Clulow – Safer Gambling Compliance Manager	New Document
1.1	01/05/2024	Amanda Kiernan – Head of Compliance	1.5 The Compliance Team
1.2	01/09/2024	Amanda Kiernan – Head of Compliance	1.3 Licence Conditions and Codes of Practice (LCCP)

Version	Section	Reason	Sign-off
1.0	All	New Document	Amanda Kiernan – Head of Compliance
1.1	1.5 The Compliance Team	New Safer Gambling Compliance Manager appointed	Amanda Kiernan – Head of Compliance
1.2	1.3 Licence Conditions and Codes of Practice (LCCP	Updated LCCP 30 August 2024	Amanda Kiernan – Head of Compliance

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1. INTRODUCTION

MERKUR Slots is fully committed to delivering the highest standards in relation to Safer Gambling (SG). This policy outlines robust and effective procedures which have been implemented to ensure compliance with the current regulations and standards.

This policy provides guidance and a systematic approach for the Company's employees to follow, to ensure that they fully understand both their own and the Companies responsibilities under the Gambling Commission's Licence Conditions and Codes of Practice (LCCP), Gambling Commission/Wider Industry guidance/learning and the Company's own procedures. This policy is presented in an easy to read and understandable format which contains information on all relevant procedures and guidance relating to Safer Gambling (SG).

The latest version of this policy is available as a reference document and is available to all employees on MyMERKUR.

This policy extends to all employees, defined as: permanent, fixed term, temporary, third-party representatives, sub-contractors, agency workers, volunteers, interns, and agents engaged with the Company in the United Kingdom or Overseas.

It is the responsibility of all employees to ensure that they read and understand this policy and that they are familiar with its contents. Employees with personal licences (PML) are reminded that it is their responsibility to keep themselves updated with any changes in Gambling Legislation/Guidance or the LCCP. To keep up to date with Gambling Commission communications employees are recommended to subscribe for the fortnightly Gambling Commission e-bulletin/newsletter.

This policy does not form part of any employee's contract of employment and the Company can amend it at any time. Any employee who breaches this policy may face disciplinary action in accordance with the Company's disciplinary policy, which could result in dismissal for misconduct or gross misconduct. The disciplinary policy is available to view in the Employee Handbook

1.1 Responsibility for the document

The Head of Compliance has overall responsibility for the Company Safer Gambling Policy. This includes operational management of this policy and responsibility for Company Safer Gambling issues including reviewing, updating and the maintenance of Company Safer Gambling policies, procedures, and controls.

Any changes to this document will be devised and written by the Head of Compliance and/or the Safer Gambling Compliance Manager with approval from the Board. Changes and approval are to be recorded in the Revision History at the front of this document.

It is the responsibility of all Senior Employees and Managers to ensure that any changes to the Safer Gambling Policy are communicated and trained to all relevant employees at their site with training records updated accordingly.

The board will be advised of changes to the Safer Gambling Policy through the minutes of the Compliance Risk Monitoring Meetings and policy changes will be forwarded for review by Board Members with any comments documented in Compliance Risk Committee Meetings minutes.

1.2 Gambling Commission

The Gambling Commission was created under the provisions of the Gambling Act 2005 and is responsible for regulating the Gambling Industry within the United Kingdom.
Three key regulatory goals underpin the Gambling Commissions activity, these regulatory goals are defined by the Gambling Act 2005 and are known as the Licensing Objectives. These Licensing Objectives are mandatory and are detailed below.

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

Where the Company or a licensed employee fail to uphold the licensing objectives, for example ignoring their Safer Gambling responsibilities or failing to comply with the Licensing Conditions and Codes of Practice (LCCP), the Gambling Commission will consider reviewing the company operator's licence and/or the individual employee's personal licence (PML) under Section 116 of the Gambling Act. Where failings are identified sanctions can result in penalties from a warning up to revocation under Sections 118 and 119 of the Gambling Act 2005 (the Company can also be subject to financial penalties under Section 121 of the Gambling Act).

1.3 Licence Conditions and Codes of Practice (LCCP)

The LCCP sets out the mandatory conditions (issued under Section 24 of the Gambling Act 2005) which the Company must meet to hold its operating licence. The latest LCCP revision is dated 30 August 2024; https://www.gamblingcommission.gov.uk/licensees-and-businesses/lccp

The LCCP is broken down into three parts; Operating Licence Conditions attached to operating licences (mandatory), the Code of Practice Provisions (social responsibility and ordinary provisions) and Personal Licence Conditions attached to personal licences.

The principal codes of practice are divided into Social Responsibility Code Provisions (SRCP) which are mandatory and Ordinary Code Provisions (OCP) which are considered best practice. The key Operating Licence Conditions (both AML and Safer Gambling/Social Responsibility) relating to MERKUR Slots are.

- Qualified persons and personal licences (1.1.1, 1.2.1 and 1.2.2).
- General Fair and Open Provisions (7.1.1).
- Prevention of money laundering and terrorist financing (12.1.1).
- Access to Premises (14.1.1).
- Reporting suspicion of offences (15.1.1, 15.1.3).
- Reporting key events (15.2.1, 15.2.2, 15.2.3)
- General and regulatory returns (15.3.1).
- Responsible placement of digital adverts (16.1.1).

The key Code of Practice Provisions (Ordinary and Safer Gambling) relating to MERKUR Slots are.

- General (OCP 1.1.1) and (SRCP 1.1.2).
- Protection of Children and Other Vulnerable Persons (SRCP 3.2.3, 3.2.5, 3.3.1, 3.4.1, 3.5.6) and (OCP 3.2.4, 3.2.6, 3.5.2, 3.5.7, 3.6.2, 3.6.5, 3.6.6, 3.8.2).
- Fair and Open Provisions (SRCP 4.1.1, 4.2.2).
- Marketing (SRCP 5.1.1, 5.1.6, 5.1.9, 5.1.11) and (OCP 5.1.8, 5.1.10).
- Complaints and Disputes (SRCP 6.1.1).
- Gambling Licensees' Staff (SRCP 7.1.2).
- Information Requirements (OCP 8.1.1).
- Gaming Machines in Gambling Premises (SRCP 9.1.2).
- Assessing Local Risk (SRCP 10.1.1) and (OCP 10.1.2).

1.4 Trade Association – BACTA

As a responsible operator the Company are members of BACTA and as such are obliged to be committed to providing Safer Gambling and to provide confidence to the public, the Government, and the Gambling Commission, in the way the industry conducts its business. The trade association has created industry wide codes with the aim of understanding the importance of Safer Gambling. The key actions are outlined https://www.bacta.org.uk

1.5 The Compliance Team

The Company has a Compliance Team who can be contacted by any employee by email – Compliance_UK@merkur-casino.com

Head of Compliance/MLRO Nominated Manager
Name: Amanda Kiernan - Email: akiernan@merkur-casino.com

Safer Gambling Compliance Manager
Name: Stacey Irvine - Email: sirvine@merkur-casino.com

Deputy MLRO
Name: Merk Wells - Email: mwells@merkur-casino.com

2. REGULATORY FRAMEWORK

2.1 Legal Background

The Company Safer Gambling Policy is based on the following.

- The Gambling Act 2005 ('the Act') – The principal legislation that is used to regulate the United Kingdom Gambling Sector,
- https://www.legislation.gov.uk/ukpga/2005/19/contents
- The Gambling Commission Licence Conditions and Codes of Practice ('LCCP') – The Code of practice provisions provide.

- mandatory obligations under the Social Responsibility Code Provisions (SRCP),
- https://www.gamblingcommission.gov.uk/licensees-and-businesses/lccp

The Company has further considered numerous sources when identifying and assessing the key risks to its licensed activities such as.

- Gambling Commission Safer Gambling Hub, https://www.gamblingcommission.gov.uk/public-and-players/safer-gambling
- Gambling Commission Compliance Hub, https://www.gamblingcommission.gov.uk/licensees-and-businesses/compliance
- Advisory Board for Safer Gambling https://www.gamblingcomission.gov.uk/absg
- Wider industry learning including Gambling Commission guidance and enforcement actions, https://www.gamblingcommission.gov.uk/news
- GamCare https://www.gamcare.org.uk/

2.2 Information Requirements and Access to Premises

The Company conducts its gambling operation in accordance with both the licensing objectives and LCCP and works with the Gambling Commission in an open and co-operative way. Information is submitted to the Gambling Commission as required through Key Events.

Employees will cooperate with Gambling Commission officials and are made aware of entry requirements for Gambling Commission Enforcement Managers under Part 15 of the Gambling Act 2005.

3. FINANCIAL REQUIREMENTS

3.1 Anti-Money Laundering

The Company has in place its Anti-Money Laundering and Prevention of Terrorist Financing Policy and a Money Laundering and Terrorist Financing Risk Assessment. The Company takes into account the Gambling Commission guidance.

The latest version of Company AML Policy & Procedure document is available as a reference document and is available to Company employees on MyMERKUR.

4. THE RISK BASED APPROACH

4.1 Risk Based Approach for Safer Gambling

The Company has in place its Safer Gambling Policy to comply with the LCCP and has in place proportionate policies, procedures, and controls to mitigate and mange effectively the Safer Gambling risks identified.

The LCCP imposes compulsory requirements and a breach can constitute a failure to apply the Licencing Objectives. However, within this regulatory framework of requirements, the Company has flexibility to devise policies, procedures and controls which best suit its assessment of the possible safer gambling risks faced by its customers. The LCCP require the establishment and maintenance of proportionate policies, procedures, and controls to mitigate and manage effectively the risks identified.

The required risk-based approach involves a number of discrete steps in assessing the most proportionate way to manage and mitigate the safer gambling risks faced by its customers. These steps require the Company to:

- Identify the Safer Gambling risks that are relevant.
- Design and implement appropriate policies, procedures, and controls to manage and mitigate these assessed risks.
- Monitor and improve the effective operation of these controls.
- Record what has been done and why.

The Company uses an amended three lines of defence model to ensure that Safer Gambling policies, procedures and controls are effectively communicated to its Employees, to provide oversight from the Manager, the Safer Gambling Compliance Manager and Senior Management to identify weaknesses and provide improvements and/or remedial actions/training where necessary.

Company Employees (including Duty Managers) make up the first line of defence and are responsible for the following.

- Implementing Safer Gambling policies, procedures, and controls in MERKUR Slots venues.
- The conducting and recording of age verification checks aligned to the company Think 25 policy.
- To ensure that all employees are aware of their responsibility in the conducting and recording of customer Interactions/Conversations.
- Any subsequent reporting following a request from the Compliance Department or the Manager.
- The monitoring of customers for signs of behavioral changes that may indicate they are beginning to show signs of gambling harm
- Carrying out Interaction/Conversations with any customers identified as spending at an above average level, in line with the Safer Gambling Interaction and Evaluation process.
- Processing and guiding persons wishing to self-exclude through the exclusion scheme.
- Conducting effective re-instatement interviews with people wishing to return to gambling after a period of self-exclusion has expired and ensuring ongoing monitoring upon.

The Manager and Area Manager make up the second line of defence and are responsible for the following.

- Ensuring that Safer Gambling policies, procedures and controls are implemented and followed at each MERKUR slots venue.
- Reviewing breaches of Safer Gambling policies, procedures, and controls (including such breaches as identified by the Safer Gambling Compliance Manager).
- Provide oversight and guidance/advice to employees in the first line of defence.
- Ensuring that any policy, procedure, or control updates have been communicated, trained (where required) and implemented in relation to Company Employees.
- The identification of any training needs or remedial actions in relation to employees (including conducting additional training for employees identified by the Safer Gambling Compliance Manager as having a specific need).
- Reviewing and evaluating Safer Gambling Interaction/Conversations completed to determine if the correct outcome was delivered.
- Processing and guiding persons wishing to self-exclude through the exclusion scheme.
- Conducting effective re-instatement interviews with people wishing to return to gambling after a period of self-exclusion has expired.

Senior Management (including the COO, CFO, Head of IT & Head of Marketing, Head of Compliance, Operations Director, and the Safer Gambling Compliance Manager) make up the third line of defence as members of the Compliance Risk Committee and are responsible for the following.

- Setting of the Company's Safer Gambling strategy, framework, and risk appetite.
- Ensuring that there is the correct balance between the Company's compliance obligations and commercial activity.
- Ensuring that the Company is compliant under the LCCP.
- Reviewing breaches of Safer Gambling policies, procedures, and controls.
- Reviewing any weaknesses in the Company's Safer Gambling policies, procedures and controls and the recommendations of any improvements or remedial action made by the Safer Gambling Compliance Manager.
- Providing oversight of Employees in the first and second lines of defence.
- Ensuring that any policy, procedure, or control updates have been communicated, trained (where required) and implemented in relation to Company Employees, Senior Management, and the Board by the Safer Gambling Manager.
- The review of any minutes of meetings and reports to the Compliance Risk Committee in relation to Safer Gambling compiled by the Safer Gambling Compliance Manager.
- The completion and submission of any minutes of meetings and reports to the Board in relation to Safer Gambling.

The Safer Gambling Compliance Manager is integral to each line of defence under the Company Safer Gambling framework. Outside of the specified role of the Safer Gambling Compliance Manager (detailed in Section 6 of the Company Safer Gambling Policy), the Safer Gambling Manager is responsible for the following as part of the three lines of defence.

- Ensuring that Safer Gambling policies, procedures and controls are implemented and followed by all Company Employees.
- Reviewing breaches of Safer Gambling policies, procedures, and controls (including those escalated at site level by the Manager).
- Provide oversight and guidance/advice to all Company Employees within each line of defence.
- The identification of any training needs or remedial actions in relation to Company Employees.
- The review of age verification and customer interaction records.

5. PROTECTION OF CHILDREN AND OTHER VULNERABLE PERSONS

5.1 Combatting Problem Gambling

The Company makes annual financial contributions to organisations approved by the Gambling Commission which between them deliver or support research into the prevention and treatment of gambling related harms, harm prevention approaches and treatment for those harmed by gambling (the full list of Gambling Commission approved organisations can be found at.
https://www.gamblingcommission.gov.uk/licensees-and-businesses/guide/list-of-rganisations-for-operator-contributions

5.2 Access to Gambling by Children and Young Persons

It is an offence under Section 47(1) of the Gambling Act 2005 to permit a child (those under the age of 16) or a young person (those aged 16 – 17) to enter a gambling premise.

The Company will therefore maintain a strict approach of challenging any person who appears to be under the age of 25 (which is a legal requirement in Scotland and considered best practice in England/Wales). Employees are required to either challenge a person who appears to be or who they believe under the age of 25 who is on Company premises or refer any such concerns/observations to a Duty Manager.

Any approved visitor or contractor employed by the Company to conduct works within the Company's licensed premises must be informed that they and, or their employees must be aged over 18 years and that they may be asked to provide verifiable age-related identification before entry is permitted.

If there is any doubt as to a person's age the person will not be permitted entry unless verifiable age-related identification is provided.

If a child or young person is accompanied by an adult, service is to be refused and both persons are to be denied entry or asked to leave. The incident is to be recorded on the IHL Smart Tablet.

If a child or young person gains access to Company premises and gambles, it is a legal requirement that only stakes (initial buy-in) are to be returned and under no circumstances are winnings or prizes to be paid. Any identified winnings will be considered forfeit and will be donated to a gambling charity. The incident is to be recorded on the IHL Smart Tablet.

The Company does not use any signage, promotions, or marketing materials for the purposes of gambling that would appeal to children or young people.

It is a mandatory licence requirement that the Company displays signage at each entrance stating that entry by a person aged under 18 is not permitted. Marketing materials, other information, equipment, or other decorative items must not obstruct the signage. The Manager has a responsibility to replace any signage that is worn or defaced without delay.

5.3 Gambling Management Tools and Responsible Gambling Management Information

The Company displays information both within its premises and on its website that help customers to gamble responsibly and where to seek further help and advice should they experience problem gambling or gambling related harms.

The Company displays responsible gambling information on all marketing information and notices within its premises.

Staying in Control leaflets are available for customers to take away which provide information on help and advice for problem gambling. These leaflets are available at the following locations within the premises.

- Service Desk
- Entrance
- Customer Toilets
- Employee Rest Area

The Manager is responsible for ensuring that leaflets are available in the above locations and that enough stock is available for replenishment.

GamCare Helpline numbers and QR Code are also displayed on gaming machines, tablets, GeWeTe and ATM's. The Manager has a responsibility to ensure that any stickers that are worn or defaced are replaced without delay.

The Company has 'Set Your Limit' Features enabled on all its B3 category slot machines which allows customers to set time and deposit limits.

5.4 Customer Interaction

The Company aims for its employees to have Interaction/Conversations with customers as part of the Customer Journey to ensure employees 'know their customers' and minimises the risk of them experiencing harms associated with gambling and takes into account the Gambling Commissions guidance.

MERKUR Slots Employees attend Interaction and Evaluation Training workshops where, in addition to reviewing the language used in an Interaction/Conversation the evaluation of such conversations is considered. Employees are trained in.

- Observing any changes in customer behaviour which may indicate signs of them suffering from gambling harm.
- Identifying Customers who may be at risk of, or experiencing harms associated with gambling.
- Interacting with Customers who may be at risk of, or experiencing harms associated with gambling.
- Understanding the impact of the interaction on the Customer and Evaluating the interaction/conversation and the impact of the licensee's actions and approach.

The Company has set in place a number of intervention points where a customer may be at risk of or experiencing harms associated with gambling.

Behaviour signs or triggers can be displayed but are not limited to the following.

- Changes to appearance, demeanour and wellbeing brought about through non-gambling related negative events.
- Remaining on the premises for an extended period.
- Patterns of frequent leaving and returning to the premise.
- Repeated evidence of a customer being tired and/or sleep deprived.
- Mentioned self-exclusion or taking a break.
- Seeking to borrow money from associates or unknowns.
- Changes in the nature, patterns, or levels of play.
- A person affected by a health condition which may impair their judgement.
- Frequent use of ATMs on the premises.
- Family/partner/close friend visiting the premise to find Customer or receipt of information with respect to a concern about a customer.
- Mentions frequently about losses or hints that they have been treated unfairly, irrespective of whether they wish to make a complaint.
- Repeated aggressive behaviour, agitation, distress, or changes which would be an indication that gambling is having a negative impact on a customer's wellbeing.
- Admission of a gambling problem or direct request for help in respect of gambling problems.
- Intoxication/substance abuse or other suspected/known addictions.

Behaviour/Problem Gambling Signs – in all cases where a customer's behaviour has changed and it is believed they ae showing signs of problem gambling or gambling related harm, this must be immediately brought to the attention of the Duty Manager. A Safer Gambling interaction/conversation must be conducted and recorded on the SMART Tablet. Should the Interaction/Conversation give the employee any cause for concern the Customer should be offered advice on where to seek further help, and on self- exclusion (as with all interventions with people who may be in distress, the Duty Manager is required to consider the health and safety of themselves, the customer and other employees/customers within the premises). The Duty Manager must record details of the interaction, what behaviour triggers were observed and the outcome (ranging from customer self-exclusion to an enforced suspension with details of advice offered). The interaction/conversation is to be recorded on the SMART Tablet.

Long Periods of Play – While it is recognised that some Customers may only visit the premise with the sole aim of participating in gambling, employees should be vigilant to ensure that unusually prolonged periods of play are monitored and where appropriate measures taken to ensure that the Customer is to take rest breaks.

The Duty Manager or Authorised Person must record details of any Interaction/Conversation, the length of time observed etc. and the outcome (ranging from continuation of gambling to suspension) and why they made this decision. The interaction is to be recorded on the SMART tablet.

Visitation – Consideration should be given to the fact that the Customer may just be a regular visitor and the frequency of their visit may not be a concern. In these cases, an interaction/Conversation may not always be required.

The Duty Manager or Authorised Person must record details of the interaction, the number of visits recorded etc. and the outcome (ranging from continuation of gambling to suspension) and why they made this decision. The interaction is to be recorded on the SMART Tablet.

The Manager and the Safer Gambling Compliance Manager are to be informed and the Customer prevented from further gambling and/or entry at that time in cases where the Duty Manager/Authorised Person has concerns that the Customer may be at risk of gambling harm.

Significant Win – As with all types of play, it does not necessarily follow that because a customer has won an interaction must take place. However, there is a risk that high staking following a win could hide or lead to harmful behaviours and attention must be paid to this.

- As a guide, normal practice ticket wins of £1,000 will require intervention from an employee to approve pay-out.

- Or where the win is significant in relation to the Customers normal play history and information we hold on the Customer, upon their next visit a safer gambling interaction/welfare check may be undertaken before any gambling takes place.

The interaction is to be recorded on the SMART tablet.

Consecutive Losses – As with all types of play, it does not necessarily follow that because a customer has lost an interaction must take place. However, there is a risk that consecutive losses could hide or lead to harmful behaviours and attention must be paid to this.

- As a guide, normal practice where 3 or more consecutive losses are understood to have occurred, the customers play will be reviewed and depending on information known regarding the customer an Interaction/Conversation will be undertaken and recorded on The SMART tablet.

- Or where the loss is significant in relation to the Customers normal play history and information we hold on the Customer, upon their next visit a safer gambling interaction/welfare check may be undertaken before any gambling takes place

The interaction is to be recorded on The SMART tablet.

Return from a Period of Self-Exclusion – Customers who self-exclude do so for many reasons ranging from a short-term control mechanism to instances of potential or actual gambling related harms. Customers returning from periods of self-exclusion must be given options to regulate their gambling behaviours and an increased level of protection against gambling harm.

- A customer returning from a period of self-exclusion will be subject to a re-instatement interview and they will not be permitted entry until after a minimum 24 hrs cooling off period.
- The reinstatement is to be recorded on the Smart Tablet and further safer gambling interactions/welfare checks will be scheduled with the Customer, where deemed appropriate following reinstatement.

Intoxication/Substance Abuse - Where a customer is suspected of/or observed to be intoxicated/under the influence of an illegal substance either attempting to enter or on the premises the Duty Manager is to be informed immediately.

- Any Customers who are suspected of/or observed to be intoxicated/under the influence of an illegal substance either attempting to enter or on the premises are required to have a safer gambling interaction/conversation with the Duty Manager and entry may not be permitted. (As with all interventions with people who may be intoxicated, the Duty Manager is required to consider the health and safety of themselves, the Customer, and other employees/Customers within the premises).

- For instances that require police assistance such as refusal to leave, operating a motor vehicle etc. the Duty Manager will be required to record on the Smart Tablet Incident App and as an Interaction/conversation on The SMART tablet.

To evaluate an interaction, it is important to understand the impact on the Customer and the effectiveness of the Companies approach. See Appendix A for the safer gambling interaction process. The Company will consider the interactions with those Customers who may be at a higher risk of suffering gambling related harms or displaying signs of problem gambling by looking at the following.

- The Customer behaviour that led to the interaction.
- How the interaction was undertaken and how this was communicated to the Customer.
- Did the Customer understand the reason for the interaction and the purpose of any advice that may have been offered.
- What action was undertaken upon completion of the interaction.
- Is there a need for any follow up action to the interaction.

Safer Gambling Interactions that relate to Customers who may be at an increased risk of gambling harm will be reviewed by the Manager and the Area Manager who will report any situations they feel require escalation to the Safer Gambling Compliance manager.

The Safer Gambling Compliance Manager will report to the Compliance and Risk Committee and will consider the following as part of the evaluation process.

- The outcome and evaluations of the interactions, where Duty Managers have informed the Manager and Area Manager, and which have been escalated to the Safer Gambling Compliance Manager that they have concerns that the customer may be at risk of gambling harm.
- Are Company resources being correctly directed towards those customers that may be at risk of gambling harm.
- Any recommendations to strengthen Company safer gambling policy, identify Customers who may be at risk of gambling harm or to improve staff training.

The Safer Gambling Compliance Manager will conduct regular dip samples of the active Customer base with data available on The SMART tablet to ensure that the Customer interaction process is being followed by Venue Management and that customers who may be at risk of gambling harm are being identified and interacted with/evaluated where required.

5.5 Self-exclusion

The Company will help those who have identified themselves as having a problem with gambling or who may be suffering gambling harm by, offering enrolment into voluntary self-exclusion schemes.

The Company is part of the National Self- Exclusion schemes managed under BACTA, which covers all United Kingdom land-based premise operators.

Customers who wish to voluntarily enrol into the self-exclusion scheme can do so at the premise.

The Company are unable to accept any applications to enter self-exclusion from third parties, unless in exceptional circumstances. Any applications must be directed to the Head of Compliance.

Any customer that has entered a period of self-exclusion will have their marketing permissions checked. Any customers that have marketing enabled will have the permissions removed by the Head of Marketing before any further promotions are sent.

Any Customer entering a period of self-exclusion will be offered advice on where to seek additional help in relation to problem gambling/gambling harm and will be advised that the following applies.

- Minimum self-exclusion period is six months and not more than 12 months.
- Any self-exclusion period can be extended by the same time period upon request.
- If a self-excluded person manages to enter a premise and gambles any funds gambled or won may be considered forfeit, and the breach recorded.
- Following a self-exclusion period, the Customer may request for their self-exclusion period to be lifted, (the Company will not notify a customer that a self-exclusion period has, or is about to, expire).
- Following a self-exclusion lift request a 24hr cooling off period will apply.

Duty Managers are not trained treatment providers and as such can only offer advice to Customers on where to seek professional help and are not required/trained to offer counselling.

Should a customer who is enrolled on a self-exclusion scheme or who has been excluded on safer gambling grounds attempts entry, the Duty Manager is to be called and no entry is to be permitted.

Where a customer who is enrolled on a self-exclusion scheme or who has been excluded on safer gambling grounds gains entry, they must be told to leave, and the breach is to be recorded on the Smart Tablet Self-Exclusion App and an Interaction/Conversation recorded on The SMART tablet.

Where a customer who is enrolled on a self-exclusion scheme or excluded on safer gambling grounds gains entry and gambles, this must be immediately brought to the attention of the Duty Manager. Any identifiable stakes and or winnings will be considered forfeit, and the Customer may not be permitted to cash out. They must be told to leave, and the breach is to be recorded on the Smart Tablet Self-Exclusion App and an Interaction/Conversation recorded on The SMART tablet.

5.6 Employment of Children and Young Persons

The Company does not employ anyone under the age of 18. All new employees are required to verify their age as part of the application/employment process.

5.7 Money Lending Between Customers

Whilst it is accepted that there are occasions where customers may lend money to each other for the purpose of gambling, the Company is required to monitor and prevent organised or systematic money lending from individuals operating as loan sharks. Where money lending is observed or suspected to be taking place the Duty Manager is to be immediately informed (employees are not to approach customers directly in relation to this matter).

Where the Duty Manager believes that any money lending is non-commercial, a safer gambling interaction/welfare check is to be undertaken. The Duty Manager must record details of the interaction/conversation on The SMART tablet, the reason for non-commercial money lending etc. and the outcome (ranging from continuation of gambling to suspension) and why they made this decision.

Where the Duty Manager believes that any money lending is of a commercial (organised or systematic) nature the Customer must be asked to leave the premises, the Duty Manager is required to consider the health and safety of themselves, the Customer, and other staff/Customers within the premises. The Duty Manager must notify the Nominated Officer to submit a Suspicious Activity Report (SAR).

Where a report is made to the Nominated Officer in relation to systemic or organised money laundering the Nominated Officer will report to the Gambling Commission via a key event and will determine what action to take in relation to any SAR submissions.

Any customers who are believed to be borrowing money from other customers are required to have a safer gambling interaction/welfare check with the Duty Manager. The Duty Manager must record details of the interaction/conversation, reason for Customer borrowing money etc. and the outcome (ranging from continuation of gambling to suspension) and why they made this decision.

The interaction is to be recorded on The SMART tablet.

6. FAIR AND OPEN PROVISIONS

The Company ensures that its terms and conditions are not unfair within the meaning of the Consumer Rights Act 2015.

The Company displays the following information within its premises to assist customers in making an informed choice about which games they may intend to play and/or to provide further assistance if required. Information is available in the following locations.

- Machine information screens

The Company ensures that all gaming areas are correctly supervised. Duty Managers, Supervisors and other employees conduct regular checks of both gaming and non-gaming areas to ensure the safety and security of employees and Customers.

7. MARKETING

7.1 Rewards and Bonuses

Any rewards or bonuses that are offered to any existing or potential customers by the Company are subject to the following rules.

- Terms and Conditions are clear and available to all customers who are offered the reward or bonus.
- The reward or bonus is not subject to the customer gambling for a predetermined length of time.
- The reward or bonus is not subject to the customer spend.

From time to time the Company will send promotional offers in the form of free plays and match plays to its customer base. Any promotional offers will not be based on spend.

The Company does not designate any of its customers as VIP and as such does not offer any increased incentive or reward programs.

7.2 Alcoholic Drinks

The Company does not sell or offer complimentary alcoholic drinks to its customers in MERKUR Slots venues.

7.3 Promotion by Agents

The Company does not use agents for the promotion of any of its gambling activities or to promote its business.

7.4 Compliance with Advertising Codes

The Company undertakes all its marketing in a socially responsible manner and complies with the codes of conduct issued by the Committees of Advertising Practice, non-broadcast (CAP) and the Broadcast (BCAP) which are administered by the Advertising Standards Authority (ASA).

When conforming to the UK Code of Non-broadcast Advertising and Direct and Promotional Marketing (CAP Code, https://www.asa.org.uk/codes-and-rulings/advertising-codes/non-broadcast-code.html) particular attention is paid to the following sections;

- Section 3 – Misleading Advertising.
- Section 8 – Promotional Marketing.
- Section 16 – Gambling.

When conforming to the UK Code of Broadcast Advertising (BCAP) Code https://www.asa.org.uk/codes-and-rulings/advertising-codes/broadcast-code.html particular attention is paid to the following sections.

- Section 3 – Misleading Advertising.
- Section 17 – Gambling

The Company also complies with the Gamcare Industry Code for the display of Safer Gambling information (Gambling Venues). https://www.safergamblingstandard.org.uk/news/new-code-of-conduct-for-land-based-gambling-venues/

The Company currently has no partnership agreements in place.

7.5 Other Marketing Requirements

The Company ensures that any marketing promotions and new media are within the meaning of the Consumer Protection from Unfair Trading Regulations 2008 https://www.legislation.gov.uk/uksi/2008/1277/contents/made

All marketing material requires approval from the Head of Compliance and where necessary legal advice is sought.

Terms and conditions for all promotions are available to Customers for the duration of said promotion. Terms and conditions can be viewed both on the premises and websites.

The Company ensures that no marketing information or promotions are displayed on materials that are for the purposes of safer gambling.

7.6 Direct Electronic Marketing Consent

Upon initial registration for membership all customers are asked to give their consent to receive marketing and promotions by post, email, text, and social media. The default setting is for no permissions to be set and only customers who give consent (completing a privacy card) will have these permissions enabled on their profile.

All Customers who receive marketing or promotional contact can unsubscribe at any point.

Further information relating to the Privacy and Electronic Communications (PECR) are available on the Information Commissioners Office (ICO) website https://ico.org.uk

8. COMPLAINTS AND DISPUTES

8.1 Alternative Dispute Resolution

The Company has a mechanism in place for customers to refer gaming disputes to a recognised Alternative Dispute Resolution (ADR) provider. The Companies approved ADR provider is the Independent Betting Adjudication Service (IBAS www.ibas-uk.com) which is free of charge to customers and approved by the Gambling Commission.

A complaint as determined under the LCCP relates to licensed activities for the outcome of a gambling transaction or a concern over how the Company conducts its gambling business.

Dispute as determined under the LCCP is the non-resolution of a customer complaint which has not been resolved by the Company.

Only disputes of a gambling nature can be referred to IBAS. The Company will address Customer complaints within 8 weeks following receipt.

8.2 Non-Gambling Related Customer Complaints

Customers from time to time may wish to complain on issues relating to service (non-gambling)etc. These complaints will not qualify for ADR and will be dealt with internally by the Company via the Customer Care platform:

- Customer Complaint procedures are available for customers in the premise.
- Customer Care details are displayed on the Customer Information Board and via the company website.

9. COMPANY EMPLOYEES

9.1 Responsible Gambling Information for Employees

Employees are encouraged to report any issues they are experiencing in relation to safer gambling as soon as possible to ensure that the Company can provide both the correct and the right level of advice/support that is required.

The company provides a confidential Employee Assistance Programme (EAP), for free information, support, and counselling - available on the Hapi App or on Inform People.

The Company does not permit any of its employees to gamble within any of its premises.

10. SENIOR MANAGEMENT RESPONSIBILITY

10.1 Compliance Risk Committee

For the purpose of the Company Safer Gambling Policies, Senior Management means individuals within the Company with sufficient knowledge of the Company's Safer Gambling risks and with sufficient authority to take decisions that affect the Company's exposure to

Safer Gambling risk. The Company has determined that members of Senior Management will make up the Compliance Risk Committee and will report to the Board.

The Compliance Risk Committee will be chaired by the Head of Compliance and will include the COO, the CFO, Safer Gambling Compliance Manager, Operations Directors, Head of Product, Head of Marketing, Head of HR, Head of IT. In addition, there is a group Compliance Committee that meet quarterly which is attended by the Chief Executive Manager, Group Compliance Director, and the Company Licensing Advisors, Poppleston Allen. The Compliance Risk Committee makes up the third line of monitoring in the Company's risk-based approach for protecting its customers against the risks of gambling related harms.

The Company has a starting position that most of its customers gamble safely and are not at risk of suffering from gambling related harm and as such present a low risk. All policies, procedures and controls are proportionate to identified Safer Gambling risks.

The Head of Compliance will chair the Compliance Risk Committee meetings and as such they will set agendas and complete minutes.

10.2 Company Safer Gambling Obligations

The Head of Compliance and the Safer Gambling Compliance Manager will provide monthly (calendar), quarterly (calendar) and annual (calendar) reports to the Compliance Risk Committee covering the Company's operation and effectiveness of the systems and controls in place relating to Safer Gambling and will take any action necessary to remedy deficiencies identified by the report in a timely manner. The quarterly and annual reports will set out the following.

- Safer Gambling risks to the Company and/or its customers/employees that are either new/emerging or have changed.
- Remedial action identified through deficiencies or Company Safer Gambling weaknesses.
- Improvements to be made or progress reports on previous measures.
- Internal and independent audit results.
- Interactions with the Gambling Commission or other external bodies.
- Any key notifications (regulatory changes/guidance) from the Gambling Commission or other industry bodies complete with an explanation/interpretation, effects on the company operations/employees/ customers and any further recommendations.
- Senior Management and Relevant Employee Safer Gambling training.
- Safer Gambling resource considerations or concerns.
- Any other relevant information at the discretion of the Safer Gambling Compliance Manager.

10.3 Policies, Procedures and Controls

The Company has in place policies, procedures, and controls to mitigate and manage the Safer Gambling risks that have been identified. The Company Safer Gambling policies, procedures and controls are.

- Proportionate to the size and nature of the business using guidance issued by the Gambling Commission (and other relevant bodies such as The Bingo Association)

- Approved by the Head of Compliance and are submitted to both the Compliance Risk Committee, the Board and Group Compliance.

10.4 Safer Gambling Training

The Company provides training to its employees to ensure that they both understand the culture of the company and their personal responsibilities in relation to safer gambling. Safer Gambling training is undertaken upon commencement of employment and then on a six-monthly basis (the Company aims to deliver safer gambling training on a six-monthly basis consisting of a cycle of remote and face to face learning).

All Safer Gambling Training will be devised and supervised by the Safer Gambling Compliance Manager and L&D department and will be reviewed/updated in line with legislation/Gambling Commission guidance. Employees are made aware of.

- The Safer Gambling risks applicable to the Company's customers and how these risks are managed.
- Identifying behavioral changes which may indicate a customer is at risk of Gambling harm.
- Identify Customers at risk of Problem Gambling or Gambling Related Harm.
- Legal requirements of children and young people accessing company premises
- The Customer interaction process.
- Industry Self-Exclusion Scheme.
- Fair and Open provisions.
- The Customer Dispute process.
- The role and responsibilities of the Safer Gambling Manager.

It is the Manager of each venues responsibility to ensure that all employees receive Safer Gambling Training both upon commencement of employment and as a refresher on a minimum six-monthly basis throughout employment with the Company. The Manager will ensure that employee training records are complete and up to date.

Safer gambling Interaction and Evaluation workshops are held on a regular basis to ensure all senior MERKUR Slots Management are aware of the need to conduct Interaction/Conversations and evaluation of these interactions is conducted.

Safer Gambling Interaction and Evaluation workshops review real interactions, give examples of true to life scenarios and encourage open and honest discussions from the attendees.

Internal Compliance Auditors also attend Safer Gambling Interaction and Evaluation workshop to support their Compliance audit assessments.

11. THE SAFER GAMBLING MANAGER

11.1 Role of the Safer Gambling Manager

The Company has appointed a Safer Gambling Compliance Manager who is responsible for:

- Reviewing Safer Gambling documentation that has been collected/completed.
- Reviewing Safer Gambling interactions that have been completed by Duty Managers and approved by the General Manager in line with Company auditing procedures.
- Reviewing transaction data to determine potential Safer Gambling risks or patterns in line with Company audit procedures.
- Being the Company point of contact for all Safer Gambling issues.
- Preparing Safer Gambling training materials for all Company Employees and ensuring face-to-face Safer Gambling training is delivered for Senior Management, Managers and Head Office Employees and ensuring that online Safer Gambling training is relevant.
- Collating, preparing, and presenting Safer Gambling reports on a monthly, quarterly, and annual basis to the Compliance Risk Committee (and where required the Board).
- Providing additional support to the Head of Compliance, the Compliance Assistant or other areas of the business as determined by the Head of Compliance or were identified by the Safer Gambling Compliance Manager.

11.2 Standing of the Safer Gambling Manager

The Company has determined that the Safer Gambling Compliance Manager is responsible for the oversight of all the Company's Safer Gambling activities and is the key person relating to Safer Gambling.

The Safer Gambling Compliance Manager has.

- The authority to act independently in carrying out their Safer Gambling responsibilities (relating to the LCCP).
- Has the necessary seniority within the Company and the resources/information to discharge their duties in an objective manner which may conflict with short term operational concerns.

In the temporary absence of the Safer Gambling Compliance Manager Safer Gambling responsibilities will be undertaken by the Head of Compliance.

In the temporary absence of the General Manager (due to holidays/absence etc.) Safer Gambling responsibilities will be undertaken by a Designated Deputy.

12. GAMING MACHINES IN GAMBLING PREMISES

12.1 All non-remote operating licences

The Company makes available Gaming Machines within its licensed premises where there are substantive facilities for non-remote premise games.

All gaming areas are appropriately supervised by staff.

13. ASSESSING LOCAL RISK

13.1 Local Risk Assessment

The Company has in place Local Area Risk Assessments for each of its premises. Each Risk Assessment considers identified risks that are associated with the provision of gambling and the policies/procedures that the Company has in place to mitigate these identified risks.

Each Local Risk Assessment considers matters identified in the relevant licensing authority's statement of licensing policy.

The Safer Gambling Compliance Manager and Internal Compliance Auditors will review the local risk assessments and will update where necessary (at least on a yearly basis or where a notable change has been identified).

The latest version of the Local Area Risk Assessment is available as a reference document in each premise.

14. ONGOING MONITORING AND AUDITING

14.1 Monitoring Techniques

The Company uses various techniques to monitor Customers. The list below is non-exhaustive:

- Monitoring customer play on machines, customer behaviours and ensuring that relevant Safer Gambling interactions are completed and correct. Further to this any Customers of concern are reported to the Duty Manager.
- Monitoring customer behaviours and ensuring that relevant Safer Gambling interactions are completed and correct. Further to this any customers of concern are reported to the Duty Manager.
- Managers to review Safer Gambling Interactions providing rationale for decisions made, ensuring they are recorded correctly. Further to this providing oversight of employees, ensuring training is up to date, reviewing breaches/exceptions to Safer Gambling policy and forwarding information to the Safer Gambling Compliance Manager.
- Area Managers to review Safer Gambling Interactions on a regular basis.
- Safer Gambling Compliance Manager to review Safer Gambling documentation, outcomes and rationale for decisions made and Company documentation.

14.1 Regulatory Compliance Audits

The Company Internal Auditors conduct unannounced Regulatory Compliance audits to ensure both the Company and its employees are compliant with legislation, LCCP and Company policy.

15. ANTI-MONEY LAUNDERING AND SAFER GAMBLING

It is important to be aware that while some Customers may display signs that they may be engaged in some form of money laundering activity, the signs may also be an indication of problem gambling.

For instance, a customer whose playing habits increase may be chasing losses, rather than engaging in money laundering activity. Similarly, there may be occasions whereby a customer may be a problem gambler, but in fact, may be spending the proceeds of crime.

Whatever the circumstances, Duty Managers must be prepared to engage with the customer and ask pertinent questions to satisfy themselves, as to whether the Company shall commence or continue with the business relationship with the Customer or terminate it. In summary, it is perfectly plausible that an individual attempting to spend criminal proceeds or launder money could also be a problem gambler, but one does not necessarily follow the other.

The effective identification and management of these risks rests upon the ability to have a comprehensive knowledge of customer relationships and upon Duty Managers having a clear understanding of their responsibilities.

Commercial and business information should be considered for AML as well as safer gambling purposes when transacting with an individual.

If Customers expect that a customer interaction is likely, should they play with large amounts of money, or for lengthy periods and such interaction is consistently applied, there would be less reason for players to question or become suspicious of the motives for these interactions.

APPENDIX A – Safer Gambling Interaction/Conversation Process

Social Responsibility Code Provision 3.4.1 Customer Interaction has been in force since 31st October 2019. A Safer Gambling Interaction is broken down into three parts.

- Identify – What is the behaviour, activity or trigger that has led to the interaction.
- Interact – What has been discussed between the customer and the Duty Manager to find out more information relating to the behaviour, activity, or trigger.
- Evaluate – What was the outcome of the interaction (follow up action where required), did the Customer understand the interaction and why did the Duty Manager make their decision.

Identifying Customers who may be at risk of or are experiencing gambling harm at the earliest opportunity is a key factor in reducing any possible or actual harm. Duty Managers will interact with, observe Customers, and record any such safer gambling interaction.

Before any safer gambling interaction/conversation is undertaken the Duty Manager should where review and consider the following.

- Any previous interactions/conversations recorded with the Customer that are relevant and theiroutcome.
- What information do they know about the Customer.
- Is the reason for the interaction out of character or a cause of concern in relation to the Customer.
- What outcome is expected to be achieved from the interaction.

When conducting the safer gambling interaction/conversation, the Duty Manager is to consider the health and safety of themselves, the Customer, and other employees/customers within the premises as the Customer may be in distress. The Duty Manager is best placed to decide on when, where, and how an interaction will take place.

When interacting with a customer the Duty Manager must remain friendly and supportive. Questions are to be open ended (conversational) to stimulate a response from the Customer and closed questions (yes or no answers) are not recommended.

Examples of open questions are as follows.

- I have noticed that you are not having much fun lately, can you tell me if anything has changed.
- You seem to be spending more time in the premise lately, have things changed at work.

Duty Managers are reminded that the interaction is a conversation relating to customer welfare and is not an interview.

During the interaction/conversation the Duty Manager is to remain vigilant towards signs of gambling harm (agitation, behaviour, language etc). At the same time the Duty Manager is required to assess whether the Customer is showing signs of frustration or is upset for another non-gambling reason. The best outcome for the Customer will only be achieved through an honest and open dialogue.

When evaluating a safer gambling interaction, it is important that the Duty Manager looks at what is in the best interests of the Customer. The evaluation should give an assessment as to whether the Duty Manager feels that the Customer may be at risk of or suffering the effects ofgambling harm.

Considerations in the evaluation should include the following.

- Did the Customer understand the reasons for the safer gambling interaction.
- Did the Duty Manager feel that the Customer should be offered further information/advice in relation to problem gambling/Self-exclusion etc.
- Were other gambling management tools discussed such as the Customer reducing their visits, playing at a lower stake, or moderating spend etc.
- Was the Customer considered to be at risk of gambling harm.
- Was it determined that the Customer presents a minimal risk of gambling harm as such no follow up action is required.

The Duty Manager, as part of their evaluation is to give the reasoning for their decision and are to clearly determine what action is to be taken along with any advice that was offered to the Customer.

All Safer Gambling Interactions are to be recorded on The SMART tablet.

The Safer Gambling Compliance Manager will conduct regular reviews of the Safer Gambling Interactions to ensure that the Customer interaction process is being followed by venue staff and that customer who may be at risk of gambling harm, are being identified and interacted with/evaluated where required.

APPENDIX B – Industry Self-Exclusion Scheme (The Bingo Association & BACTA)

Self-exclusion social responsibility code provision 3.5.1 is a condition of our Operating Licence under the Licence Conditions and Codes of Practice – (LCCP). New regulations were implemented by the Gambling Commission (LCCP Self-exclusion 3.5.1) and as from 6th April 2016, all gaming operators must be part of a multi operator self-exclusion scheme.

The Bingo Association and BACTA national schemes covers all UK land-based premise. The system aids operators in preventing access to premises by those Customers who have declared themselves as problem gamblers and have expressed a wish to exclude within the scheme rules.

A customer can self-exclude for a minimum 6 months and a maximum 12 months.

Self-exclusion is sector specific:

- BINGO Licensed Premises 'Traditional Bingo Clubs' – National exclusion zone
- BINGO Licensed Premises 'High Street' - 1km exclusion zone
- AGC Licensed Premise 'AGC' – 1km exclusion zone

The Company has appointed the Head of Compliance as its Primary Administrator for the Self-exclusion system (SmartHub).

Where a customer has expressed a wish to enrol in self-exclusion the Customer is to cease gambling and will be enrolled via the Smart Tablet Self-Exclusion App after establishing the identity of the Customer and explaining how the scheme works.

Where a customer breaches their self-exclusion, the breach must be recorded on the SmartTablet against the persons exclusion.

As self-exclusion is a voluntary scheme a customer can ask to be reinstated once their minimum period of self-exclusion has elapsed. Following a reinstatement interview, a customer enters a 24 hours cooling off period before they can commence gambling.



Safer Gambling – Observation and Interaction

Safer Gambling – Observation & Interaction

Introduction



Safer Gambling – Observations & Interactions

Background

- Gambling Commission Recommendations
- Teams' having an awareness of their customers behaviours
- Teams' knowing their responsibilities and being accountable
- Understanding why interactions is an important part of the customer experience
- Changing how we approach and perceive a Safer Gambling Interaction

Safer Gambling – Observations & Interactions Aims

MERKUR Slots teams, gain confidence and knowledge on how to Identify and Interact with customers who may be at risk of suffering from gambling harms.

Retain MERKUR Slots Customers, so they play and visit at a level that is affordable to them and continue to enjoy their gaming experience.

MERKUR Slots teams, being balanced in their approach.



Safer Gambling – Observation & Interaction Objectives

- Understanding of why being proactive with interactions can benefit the overall Customer Experience and integrity of the MERKUR brand
- Understanding an Interaction is a ‘conversation’ and should be positive not just negative
- Observe customer behaviours, recognising any changes that will initiate an interaction
- Observe extended periods of play, and recognise when and how to interact appropriately
- Proactive interactions utilising the resources and tools available to the operation, demonstrating due diligence
- Utilising the WOW factor framework to observe and interact with our customers

Safer Gambling – Observation & Interaction
What is an Interaction



Safer Gambling – Observation & Interaction
What is an Interaction

Definition of interaction, (Oxford Dictionary)
The act of communicating with somebody, especially while you work, play or spend time with them.

Definition of customer service interaction, (Oxford Dictionary)
Help and advice that a company gives people who buy or use its products or services.

Safer Gambling – Observation & Interaction
What is Safer Gambling?



“ Safer Gambling is a term used to describe the industry's approach to limiting the risk of problem gambling and gambling related harm. The term is often interchangeable with social responsibility”

Safer Gambling – Observation & Interaction
What is Safer Gambling Interactions?

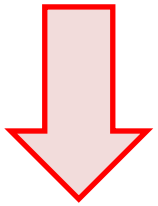
Pro – Active



Getting to know our customers
Observing behaviours for any changes

- Conversing and Listening
- Acting on concerns

Reactive



- Customer contacting the business
- Business reacting to the contact
- Business unaware of changes within the customer

Safer Gambling – Observation & Interaction Recording and Interaction



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What is the difference between a customer service interaction and a safer gambling interaction?

Darius

Darius is a regular customer, pleasant enough and keeps himself to himself when in MERKUR Slots .
Darius is usually found playing the £500 jackpot machines. You can tell that he is in the venue, as you can hear the buttons being pressed or tapped loudly.
Darius usually plays the machines approx 6 hours at a time and never complains . He usually comes in at 6pm and leaves at midnight. He visits at least twice a week but has been known to come in and play up to four times a week.
This week, he has been in every night. On Thursday night Darius could be hear complaining to himself at the machine he was playing. On Friday night, he stayed until early hours of Saturday morning leaving around 2am.
Saturday night Darius was heard banging the buttons, rather than loudly tapping the buttons. He then approached the staff asking how to self exclude.

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Safer Gambling – Observation & Interaction
Observe, Action and Outcome

OBSERVE	ACTION	OUTCOME
A regular customer enters the venue on a day she doesn't normally visits, she states that she has just come in to wait for her bus, and she has a spare £10. Her bus is in 10 mins and the bus stop is outside the venue front door. She finishes playing her £10, she starts to walk towards the cash machine (ATM)	Member of staff approaches customer and politely says, "Mary is your bus not due soon" Mary thanks the member of staff for reminding her, and leaves saying, "see you tomorrow if you're working".	Member of staff records the interaction. Mary returns the next day on her usual visit to the venue.

Safer Gambling – Observation & Interaction Observe, Action and Outcome Cont..

You notice a customer playing one of the games on our gaming machines on £2 stake, and on autoplay. You also notice they are going to the cash machine a bit more than usual	Whilst offering the customers a drink refill in the venue. You initiate a conversation and let them know that you have seen them go to the cash machine more than usual. Within conversation, inform them about set your limits, or that they could reduce to a £1 stake	Member of staff records the interaction. Customer initially thought the member of staff was being a bit of a job's worth, however reduce stake and disabled the Auto Play

Safer Gambling – Observation & Interaction Signs & Triggers

- Repeated aggressive behaviour
- Changes in appearance
- Remaining on the premises for extended periods of time
- Patterns of frequently leaving and returning
- Mentioning self – exclusion
- Repeated evidence of a customer being tired and/or sleep deprived
- Seeking to borrow money
- Changes in the nature, pattern, levels of play
- Judgement affected by a health condition
- Frequent use of cash machine on the premises
- Mentions frequently about losses, hints they are treated unfairly
- Multiple Profiles or profiles under different names
- Intoxication/substance abuse
- Family, partner or friends visiting the club to find a customer

Safer Gambling – Observation & Interaction Interaction Outcomes

Chris asked to self-excluded, was completely out of the blue did ask if this was what he wanted, and it was so he self-excluded

customer said that he was spending far too much and needed to take a break. a few days later he came back to self-exclude.

Peter is a regular but has increased visits recently, spoke to regarding this and he said his wife is in hospital which is why he is in more. discussed that he doesn't need to come in and play if he's feeling lonely, he can pop in for a coffee and chat without the need to spend more money. Will keep an eye on him

Left after spinning off money

self-excluded

customer was refused to play and left the venue

he wishes to be told what the fault is with either the game or machine. I will report this to the manager as requested by the customer.

Safer Gambling – Observation & Interaction Exclusion

Why is an interaction advised at self-exclusion?

- Actively listen to the “why” a customer wishes to self-exclude
- Is this the right option for the customer
- Sign post them on where to receive help

Why is an interaction advised at re instatement?

- Actively listen to the “why “ a customer wishes to return
- Evaluate and follow up with an interaction at a following date
- Record of the customer's journey

Interacting is preserving the customers business and helping them to gamble at a safe level, evaluating their interactions and acting upon any concerns.

CUSTOMER SERVICE JOURNEY



Safer Gambling – Observation & Interaction Summary and Best Practices

- Retain customers to play affordable
- Customer Experience use it as part of the journey
- Recording the right information
- Handover between shifts
- Prevention before a customer feels that they need to self – exclude
- Self - exclusion and re –instatement



Thank you!



Essentials of Compliance

Welcome to the Essentials of Compliance and Social Responsibility Training course

EVERYONE who works in one of our venues is responsible for making sure that our gaming and bingo operations are monitored and supervised correctly to prevent entry by underage people, to identify vulnerable people and to prevent crime.

This training module will ensure you have covered every element of the Gambling Act and the Gambling Commission's requirements of each and every one of us.

As this is such an important part of our business, this course will be refreshed every 6 months. Remember to go through it carefully when it refreshes as any changes and updates to the law will be updated in this training and quiz.

Click on the first lesson below to get started:

INTRODUCTION

- **Learning Outcomes**
- **Introduction**
- **The Law**

OBJECTIVE 1

Objective 1: The Protection of Children

Checking Age

Refusing Entry

Knowledge Check 1

Objective 1: The Protection of Vulnerable People

Self Exclusion

MERKUR Self Exclusion

OBJECTIVE 2

Objective 2: Fair & Open

The Complaints Procedure

OBJECTIVE 3

Objective 3: Crime Free

Theft and Fraud

Money Laundering

COMPLIANCE IN MY VENUE

The Compliance Folder

Around the Venue

Quiz

Learning Outcomes



Work through this online training module and complete the activities and quiz.

You must ask your Line Manager if you are unsure about any aspect of this training or the gaming operation you work in.

This training session will explain everything you need to know to stay compliant and operate within the law whilst at work.

IMPORTANT: The playing of any gaming machine by a member of staff within a venue is considered a Gross Misconduct offence under the Company's disciplinary rule.

LEARNING OBJECTIVES

By the end of this session you will be able to . .

1. List your responsibilities regarding gaming operations
2. Explain the 3 licensing objectives
3. Implement the Think 25 policy including identifying proof-of-age documentation and the procedure for confirming age
4. Identify the consequences of failing to identify and refuse entry to those who are underage
5. Recognise a potentially vulnerable person and take the appropriate action
6. Explain self exclusion and the action that should be taken

7 Recognise a potentially suspicious situation and take the appropriate action

8 Complete the relevant compliance logs at the appropriate time

9 Money Laundering – procedures and what to report

10 Explain the complaints procedure and the 4 stages to follow

Introduction

This training module will ensure you have covered relevant elements of the Gambling Act and the Gambling Commission's requirements of each and every one of us.



All across the UK

We operate gaming operations all over the country from Aberdeen in Scotland to Lowestoft in the South East and Plymouth in the South West. The majority are licensed as Bingo premises, however a number of them are operating as Adult Gaming Centres and some as a Family Entertainment Centre (FEC).

Your Manager will inform you of the license(s) held by the venue you are working in. All the venues have gaming machines that vary from low stake 10p play machines to high stake, high jackpot machines. Some venues and all those with a Bingo License venues will have one or more Bingo products - this may be a

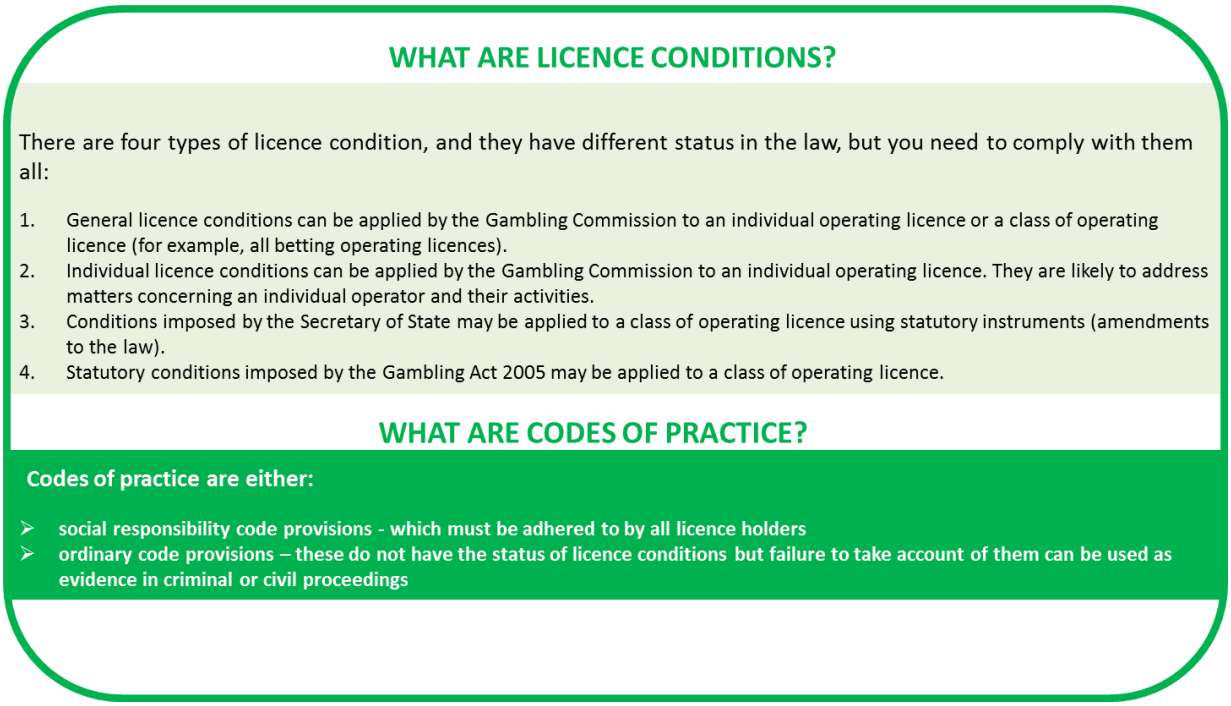
traditional Cash Bingo rig, Bingo Plus Terminal /G Tab Tablets, Bingo Express Terminal/Flexi Tablets, BETS in Bingo Clubs plus Bingo Video Terminals . All the venues apart from the FEC areas are restricted by law to those who are over the age of 18.

The Law

All gaming businesses need a **Premises Licence** to operate and are operated according to the **LCCP (Licence Conditions and Codes of Practice)**.and the **Gambling Act 2005**

The 3 Main objectives of the Act are:

1. The protection of children and vulnerable people
2. To be fair and open
3. To be crime free



Click on picture to enlarge

LCCP (Licence Conditions and Codes of Practice)

The Licence conditions and Codes of Practice set out the requirements you must meet in order to hold your operating licence and your personal licence.

It is a very important part of running your business

AGCs, FECs, Bingo and Casino premises are regulated by the Gambling Commission. Gambling Commission Officers, Local Authority Officers and the Police can visit your venue at any time.

If we, or our employees break the law with regard to the Gambling Act 2005, the Company could lose their licence and would not be allowed to operate gambling areas in the future.

The Company could also be heavily fined and individual employees could be prosecuted.



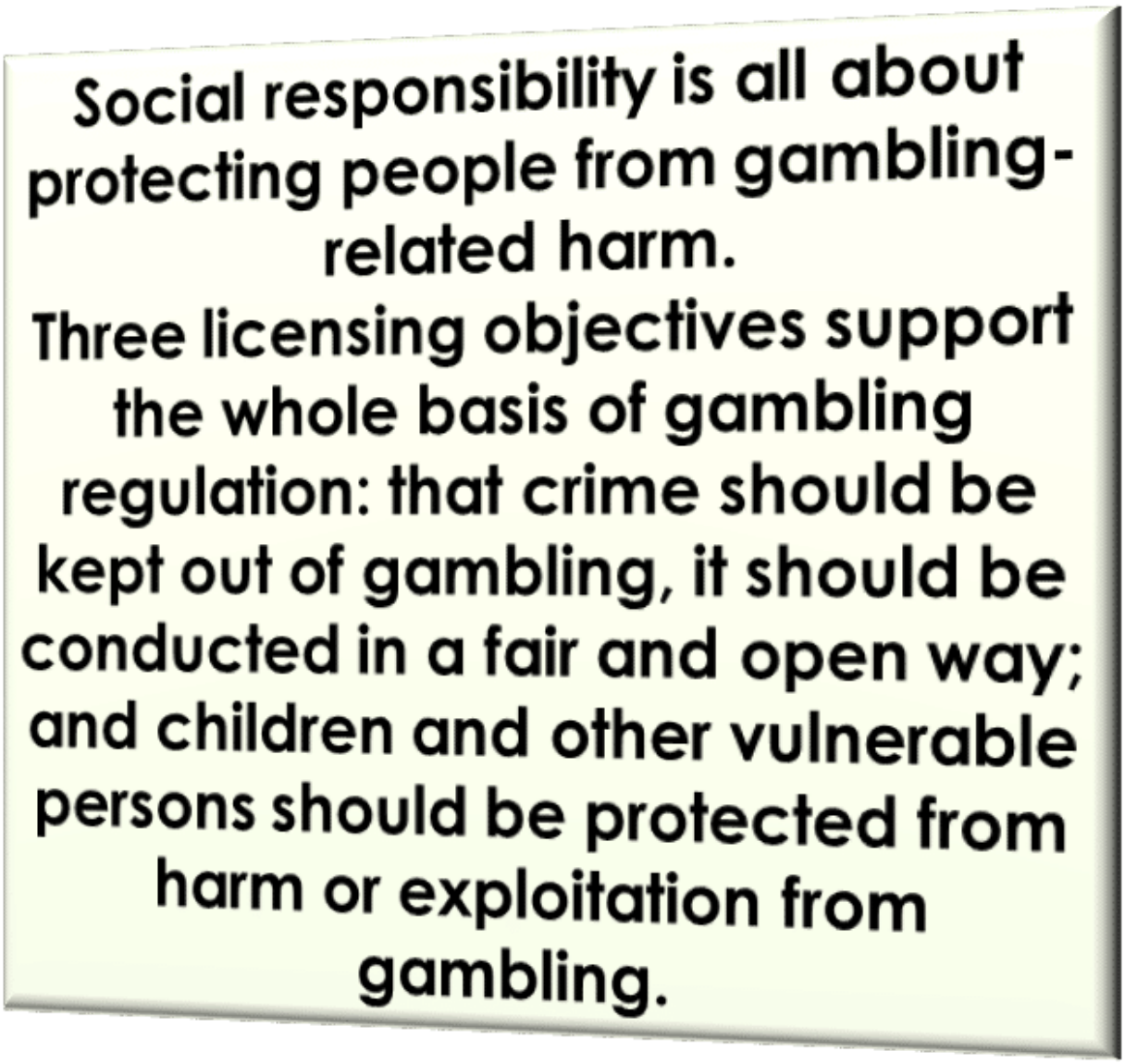
Any employee found breaking the law relating to the Gambling Act, playing any machine or not complying with the company's policies and procedures relating to gaming operations may face disciplinary action (including dismissal). If you work through this training you will have all the knowledge you need to get Compliance right.

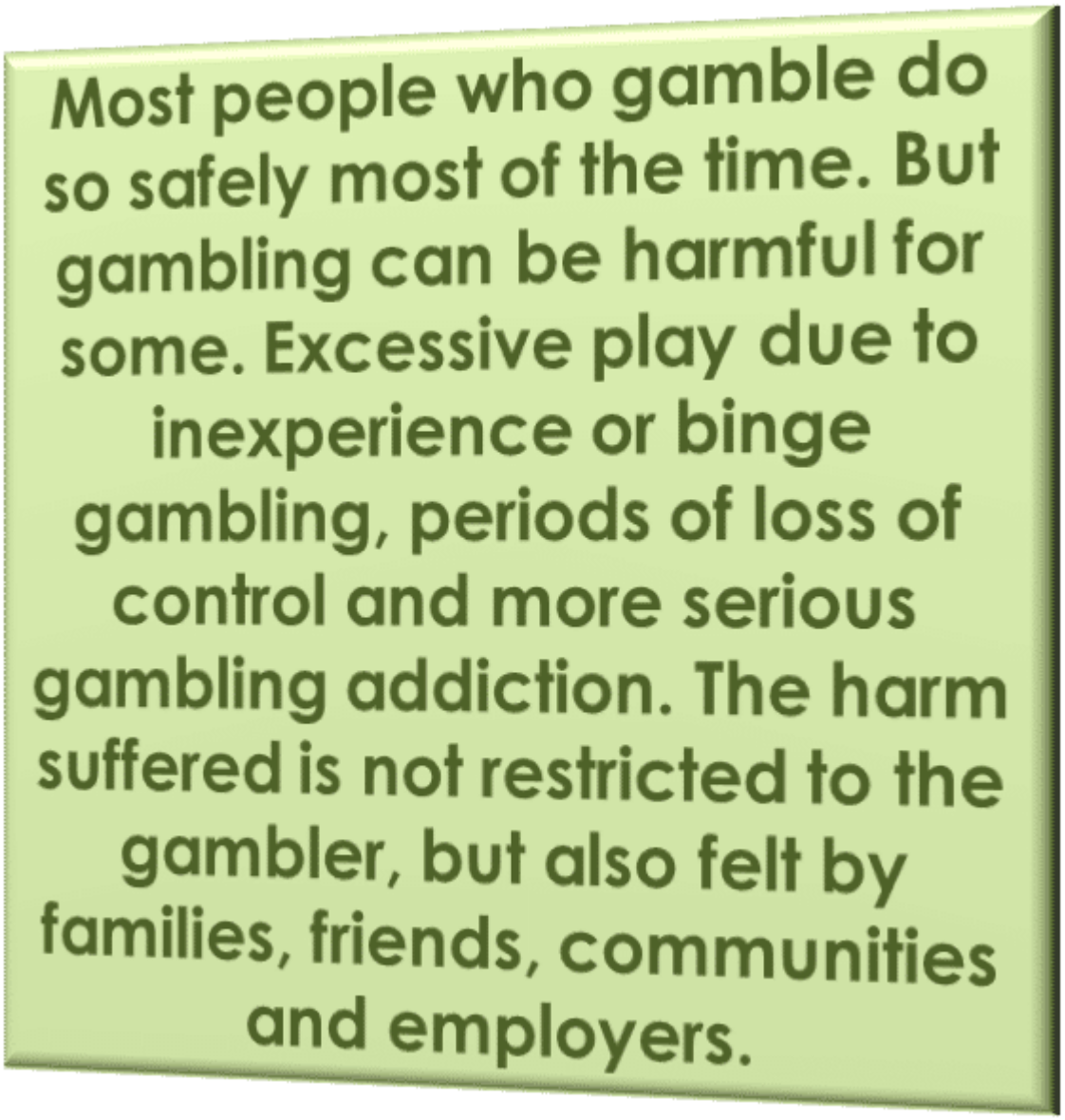
CONTINUE

The reason Compliance training is so important is so that you; our team in the venues and clubs can deliver Socially Responsible Gambling - but what does that mean . . . .

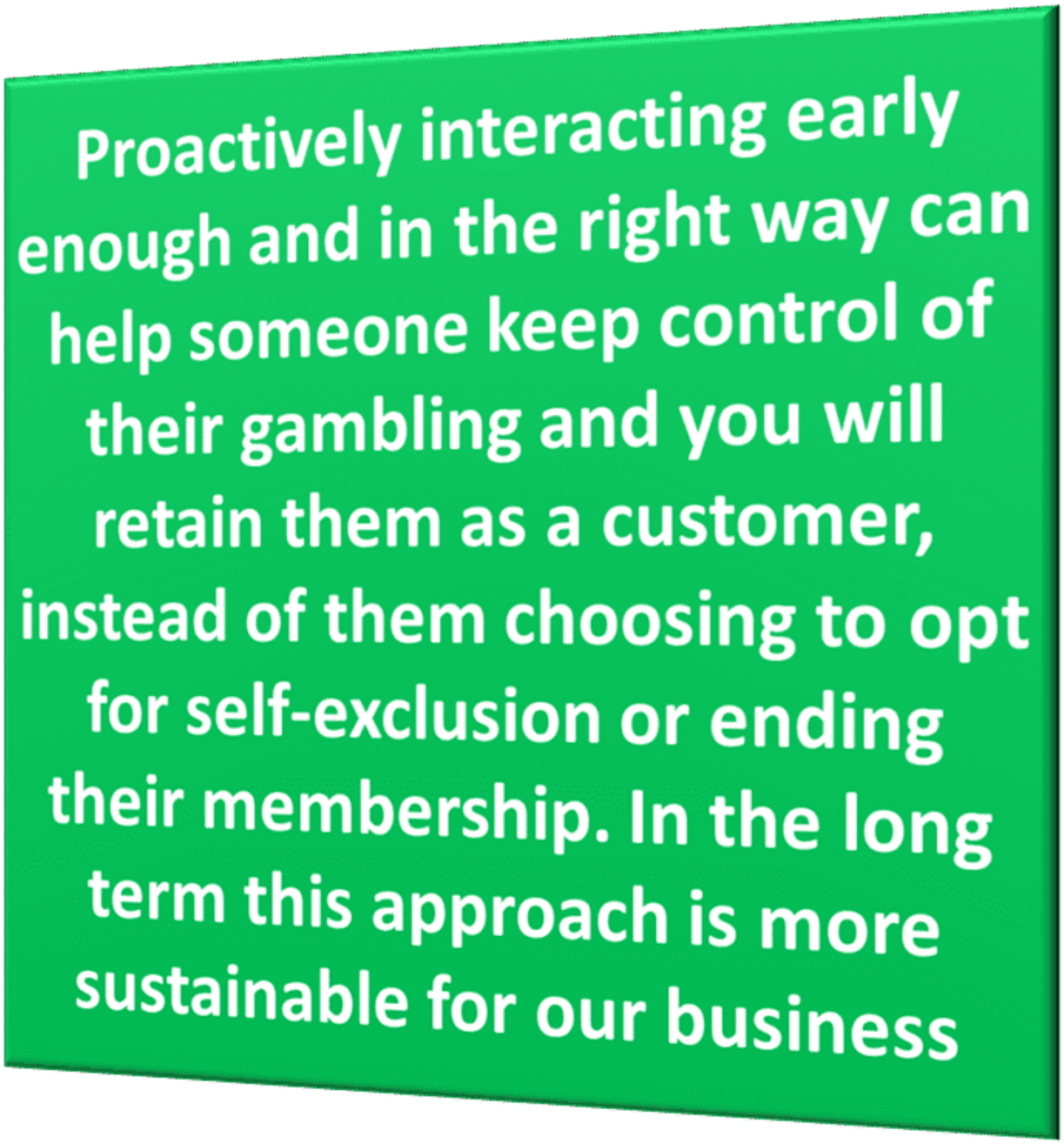
> "Social responsibility is all about protecting

PLEASE USE THE ARROWS TO CLICK THROUGH THE 4 CARDS





It's not always easy to know who may have a problem so Customer Service and Interaction are vitally important



Proactive interaction is about how we interact with our customers when they are in our venues & clubs

It's important we fully understand the 3 Objectives so we can deliver Socially Responsible Gambling. **YOU**; the staff who interact with Customers every day, are at the fore of how we deliver socially responsible gambling at MERKUR.

So lets get started with the 3 main objectives.

Licensing

In order for us to operate gaming premises the business is required to hold an operating licence. Several directors and key senior personnel must also hold a personal licence, just as you would to be able to own a pub or drive a car.

All these licences, at different levels, confirm that your venue is legal. These are checked for when officers from the Gambling Commission and local authorities visit venues.
Each individual venue/club must have a premises licence.

Objective 1: The Protection of Children

It is illegal for anyone under the age of 18 to enter any AGC, Bingo or Casino premises; even babies in pushchairs, toddlers wandering in by accident, or any child, even if they are with adult who is playing the machines, bingo or casino.

The first measure the company takes to prevent entry to under 18's is to make sure that signage stating the minimum age requirement (18) is displayed clearly at each entrance to the venue and on each machine.

If someone who appears to be under the age of 25 enters any AGC, Bingo or Casino premises, the only way we can be sure they are old enough to play is to check directly with them.



WE PROTECT CHILDREN UNDER THE LAW BY ASKING FOR PROOF OF AGE WHEN PEOPLE ENTER OUR PREMISES. IF YOU THINK SOMONE IS UNDER 18 YOU SHOULD CHECK BEFORE YOU LET THEM IN/PLAY. IN OUR BUSINESS WE OPERATE A 'THINK 25' POLICY; THIS MEANS WE ASK FOR PROOF OF AGE OF ANYONE WHO LOOKS UNDER 25 YEARS OLD.

Click to flip each card and reveal the answers:

WHAT DOES PROOF OF AGE MEAN IN OUR BUSINESS?

A business that has age restricted areas like ours must have a system to check the age of its customers, to prove that they are **over 18**; no proof - no play.

WHEN SHOULD I ASK FOR PROOF OF AGE?

The company operates a **Think 25 Policy**. If you think a person entering the AGC or Bingo premises looks under the age of 25, you must ask them for identification as proof of their age.

WHAT PROVES THEIR AGE?

A passport, a European photograph driving licence, a PASS accredited proof of age scheme. A military ID card can also be accepted as proof of age.

CONTINUE



PASSPORT



EUROPEAN PHOTOCARD LICENCE



PASS ACCREDITED SCHEME



mple Military ID Cards; these can diffe by Country

MILITARY ID

When checking the above documents you MUST CHECK for the following:

- **Date of birth** shows the person is old enough to be in the AGC or Bingo premises
- The **photograph** is a true likeness of the person attempting to play the machines
- That the **ID document** is **valid** by checking it, feel that it is smooth with no ridges,that it has not been altered or tampered with and that it has not expired
- The **hologram** is present on the proof of age scheme card

CONTINUE

How do I approach the Customer?

Please click on the boxes to show you have read and understood each point.

- [ ] If a customer (adult or child) who appears to be under 25 enters the gaming premises it is important that you approach them immediately.

- [ ] Explain politely that they have entered a restricted area where the company operates a Think 25 Policy. If it is...

  A) a child or baby accompanied by an adult wishing to play the machines, you must inform the adult that the child is not permitted to stay in the gaming area under any circumstances as it is against the law.

  B) an adult who wishes to play the machines, request politely that they provide ID to prove they are over 18.

- [ ] If ID proves the customer is over 18 and it is valid, thank the customer and serve as normal.

- [ ] If proof of age cannot be provided or the ID appears to be fake or invalid, politely and briefly explain that they cannot play; this is Company policy and a legal requirement.

00:14

Listen for how to apporach the customer

00:14

Listen for How to refuse Play

00:16

If you need to explain why we are asking . . this will help

NO ID = NO PLAY!

IF THIS HAPPENS WE MUST REFUSE ENTRY.

Let's take a quick quiz to see if we can tell how old people are. Click on the next lesson.

Checking Age

Is she Under 25?



- ◯ Yes
- ◯ No

I Don't Know - would need ID.

SUBMIT

Is he Under 25?



Yes I think he is

- ◯ No I don't think he is
- ◯ I'm not sure - I would ask for ID

SUBMIT

How old do you think this lady is?



- ◯ 18
- ◯ 24
- ◯ 28
- ◯ I don't know - I'd ask for ID

SUBMIT

CONTINUE

We cannot know these peoples ages for sure - if there is ANY DOUBT; ASK!

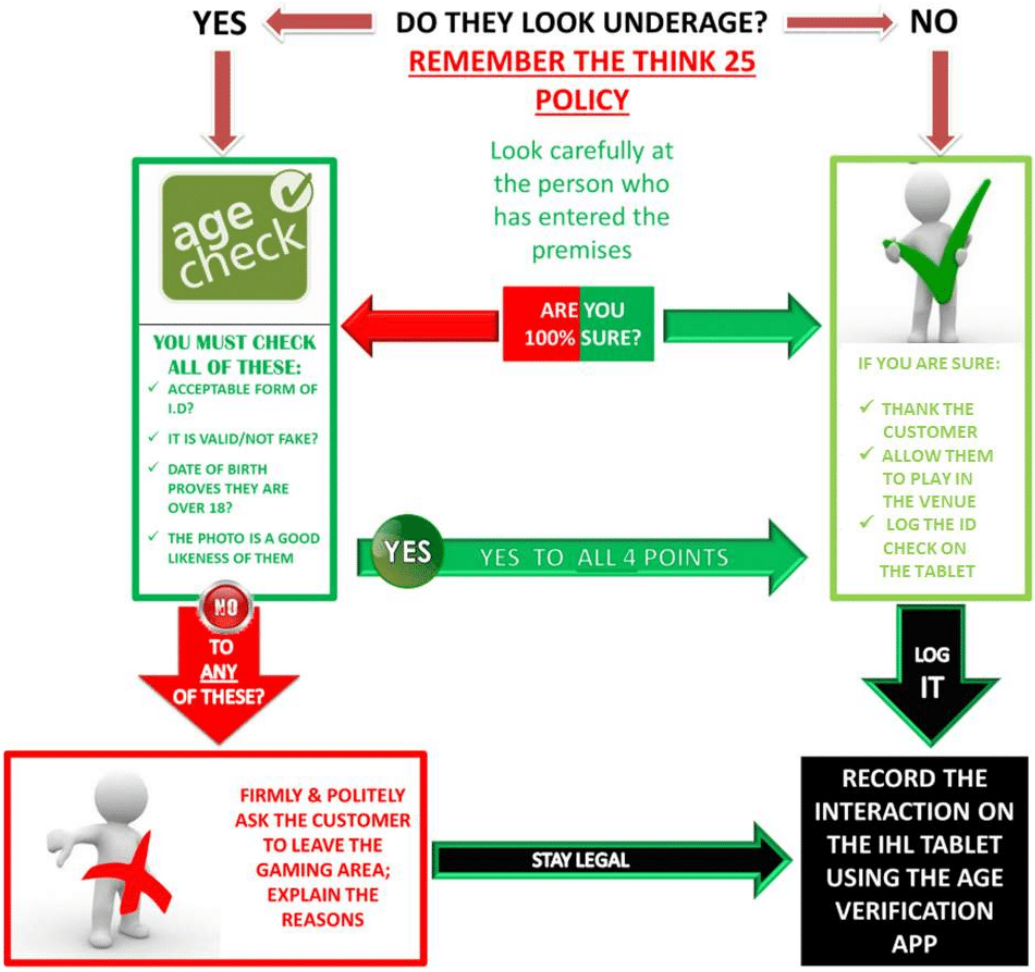
No ID = No PLAY

If someone has been challenged and cannot provide ID we must refuse them entry and not allow them to play the machines. In the next section we look at refusing entry so click to find out more.

Refusing Entry

Sometimes we have to refuse entry either because the person does not have ID or because their ID proves they are underage.

This section is about what to do



It is a legal requirement that licencees must have (and put into effect) policies and procedures designed to prevent underage gambling and monitor the effectiveness of these. This is a very important part of your role and to support you we have a separate training module dedicated to age verification - **please make sure you have completed this.**

PDF

Access-to-gambling-by-children-and-young-persons-may-2021-v-1-2.pdf

178 KB

Click continue for advice on how to refuse entry

CONTINUE

OK! So we know that you have to refuse anyone without ID that appears under 25. But what is the best way?

Click on each picture for some top tips for dealing with refusing entry



Always remain calm and be tactful and polite in your refusal to play



Use a firm tone of voice but do not humiliate the person. Be positive about what you are saying



Be Confident and maintain eye contact. Positive body language reinforces your message



Keep it light and avoid any conflict. Do not enter into a negotiation or argument



Maintain personal space and do not get too close to the customer



Make sure you have an easy and clear exit route away from the customer

If the customer continues to be uncooperative or you are in any doubt call your Duty Manager. If you are working alone and feel in danger then you should call the police.

WHAT HAPPENS IF AN UNDERAGE PERSON ACTUALLY PLAYS THE MACHINES BEFORE I CAN CHECK THEIR ID?

It is illegal for anyone under 18 to play machines or to gain from illegal gambling. This means that if an under age customer has not been asked for ID and has started to play the machines, they must be stopped immediately and given their stake (the money they have put into the machine) back.

If you discover either of these incidents has happened, you must call for a member of Management immediately or if you are working alone, you must deal with it. The under age customer must have their money refunded. This type of incident must be recorded on the tablet specifically as a 'child or underage person playing the machines'.

If you do not stop an underage person from playing YOU will be breaking the law.

Knowledge Check 1

Read each of the statements on the cards. Put them on the TRUE or FALSE piles.

TRUE

We operate a THINK 25 POLICY

Age restrictions are the law in our premises

For the purpose of the law a 17 year old is considered a child.

Anyone entering the premises must be 18 or over and be able to prove it

I can be personally prosecuted

The Gambling Commission is the Regulatory Body

I can accept a passport as proof of age

FALSE

I can accept a birth certificate as proof of age

I don't have to age check regular customers even if I think they are Under 25

If I refuse entry &they go quietly I don't have to record it on the Smart Tablet

Children of staff are allowed in if they are with the member of staff

Children in buggies are allowed in if they are with someone over 18

Objective 1: The Protection of Vulnerable People

Legislation states that the company must promote 'socially responsible' gambling and protect vulnerable people

Vulnerable People

A vulnerable person is someone who may become addicted to gambling. You may be concerned about someone who .....

- Plays the machine for a long time
- Goes to the cash machines frequently for more money
- Looks agitated
- Behaves aggressively
- Is visibly upset





Does this mean they have a gambling problem?

CONTINUE



Although the signs listed can signpost a problem with gambling, it's not clear cut so we should check.

But we should check!

If you are concerned about a player, you have an obligation to try and break or interrupt their play; do this by chatting to them; being in the areas close to them; cleaning the machines around them or simply making

your presence felt.

Try and make conversation; try some of the ideas below

(click play to listen)



Do you want a break?



Tea or Coffee?



Are you OK?

If they are OK and choose to carry on playing - that's OK. Keep an eye on them and if you are concerned, let your Line Manager know. If you are working alone, try talking to them again. Under no circumstances should you tamper with the machine they are playing.

If a customer is concerned about the level of their gambling, they may request help or information from you. REMEMBER; as a responsible Operator we may need to approach a customer who we think may have a problem with gambling - it is a 2 way process, so if you are concerned you should approach the customer.

Whether you approach them or they approach you for help; you **must** record it as this is an interaction and should be recorded.

Use the **Staying in Control** leaflets which are available in the machine area and the toilets. The helpline number is also on every machine.

Click the material below to see MERKUR Customer Interaction Procedures



Leaflets and Contact information are readily available in your venue

PDF

Customer-interaction-may-21-v-1-4.pdf

158.8 KB

What is a Vulnerable Person?

- [ ] Someone who IS or MAY become addicted to gambling
- [ ] Someone who comes in every day
- [ ] Someone who doesn't interact with staff

SUBMIT

What behaviour from a customer might cause you some concern about their gambling?

- [ ] Playing the machines for long time periods
- [ ] Frequently visiting the cash machine
- [ ] Agitated or upset
- [ ] Displays aggressive behaviour

- [ ] Any/all of these could indicate a gambling problem

SUBMIT

What should you do if you are concerned about a MERKUR Customer?

- [ ] Try and break their play by chatting or offering a tea/coffee
- [ ] Wait until they ask for help its not right to interrupt
- [ ] Ask 'Do you have a problem?'

SUBMIT

Self Exclusion

The majority of our customers are able to **enjoy gambling responsibly**, but the Company recognises that we have a **duty of care** to the very small number of people who may have problems and where gambling ceases to be fun.

This duty of care includes a **Self Exclusion** facility. Self exclusion is when a customer requests to be 'excluded' from your venue for a specific length of time. That way, they will not be allowed to gamble in your venue.

GAMBLING COMMISSION

What does the Gambling Act 2005 tell us about self exclusion?

The Law and Self Exclusion

If you interact with customers you must provide the option of self exclusion for those who would like to take steps to stop gambling. Click on each of the tiles below to find out more about how to do this

OFFER CUSTOMERS HELP

Entering into a self-exclusion is a significant step, and you should do what you can to ensure that the individual understands what it means

TIME RESTRICTED

For example, that it is a commitment not to attempt to gamble for a minimum period of six months. Generally speaking, it is considered that this length of self-exclusion is necessary to enable an individual to deal with their problem gambling behaviour.

IMMEDIATE	A customer who has decided to take the step of self-excluding should be able to do so immediately and should not be required to wait.
TAKE ACTION	The customer should be offered the opportunity to speak to someone appropriate about self-exclusion, in some circumstances this may not be possible immediately. However, arrangements should be made as soon as possible, and if a customer is certain that they wish to self-exclude and does not wish

SELF EXCLUSION TABLET	All our staff need to know how to self exclude. You have to be able to explain the process to the customer and complete the self exclusion on the tablet
OUR POLICIES & PROCESS	We have set processes to follow; continue with this section to find out WHAT you need to DO and HOW to do it.

What we need to do.

Please check/click each box to confirm you have read and understand:

- [ ] If a customer requests to be self excluded, you must call the Duty Manager to carry out the self exclusion process.

- [ ] If you are working alone, you **must** deal with the self exclusion process yourself.

- [ ] A customer can initially exclude themselves for a minimum of 6 months and a maximum of 12 months, the customer will have the option to extend their exclusion upon expiry.

- [ ] The exclusion is active in the immediate area and will include other operating premises of the same licence type in that area. Please note: this is defined by either AGC or Bingo, therefore you need to know which type of Premises Licence your venue holds, the Smart Tablet will default to your licence type and the customer has the option to select other licence types. Further details are available in the Self Exclusion Policy & Procedure.

- [ ] Once excluded the customer is NOT allowed to enter the premises during the exclusion period.

- [ ] Once a customer has excluded themselves they cannot change their minds - they must wait until the end of the exclusion period.

- [ ] If an excluded customer enters the venue and/or plays the machines whilst they are excluded, this is classed as a "BREACH" and they must be asked to leave. If they refuse to leave you must call for the duty manager. If you are working alone YOU must ask them to leave.

- [ ] A breach must be recorded on the tablet by selecting the customer photo and pressing the "BREACH" button.

- [ ] An excluded customer can only start using the venue once their exclusion period has expired and following the completion of a Self Exclusion Reinstatement. This is completed using the Smart Tablet EXCLUSION

App and must be followed by a 24 hour cooling-off period before the customer can play.

Please move on to the next lesson to look at the process of self exclusion in Merkur venues

YOU MUST UNDERSTAND THE PROCESS FOR YOUR VENUE/CLUB.

MERKUR Self Exclusion

It is very important to follow procedure.

It's the LAW - Regulations have changed in recent years:

- [ ] In April 2015 the length of time a Customer could self exclude for changed.
- [ ] Up to 5th April 2015 Customers could exclude for a minimum of 6 months and a maximum of 5 years.
- [ ] From 6th April 2015; Customers could exclude for a minimum of 6 months and a maximum of 12 months.
- [ ] In April 2016 - the paperwork used for self exclusions and reviews changed due to the introduction of the Multi Operator Self-Exclusion Scheme (MOSES)
- [ ] Once a reinstatement has been actioned the customer will need to wait for a 24-hour cooling off period before they can enter the venue.

Please tick the boxes to confirm you have read both statements above. You cannot continue until you have done this.

New regulations were implemented by the Gambling Commission and as from 6th April 2016, all gaming operators have to be part of a Multi Operator Self-Exclusion Scheme, referred to as MOSES.

Please take your time and work through this lesson and the updated policy attached so you understand the changes.

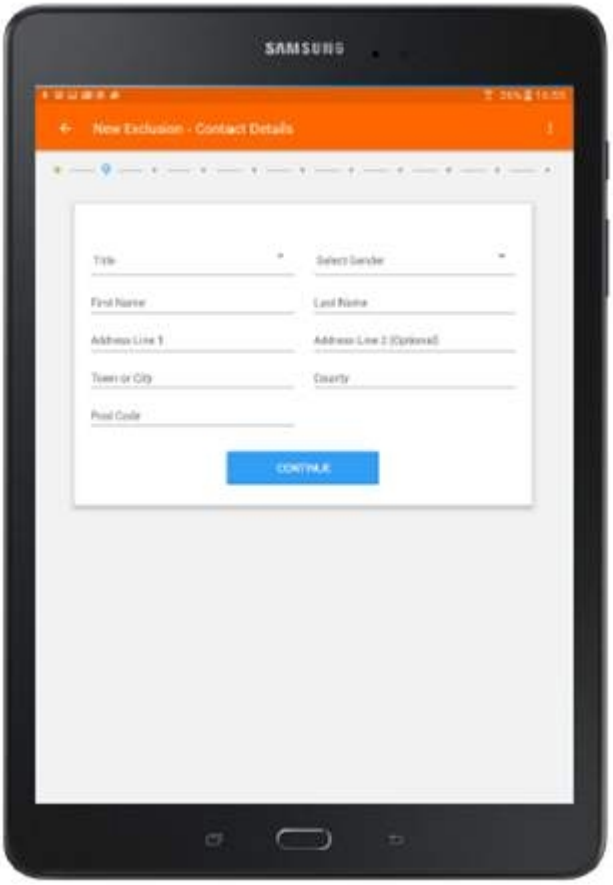
Here's what you need to know:

The procedures for MERKUR are set out below - **please open and read** the attached policy and make sure you understand it. Ask your Manager if you have any questions.

PDF

Self-Exclusion-Nov-21-v-1-4 (2).pdf
302.3 KB

What this means in practise:



SMART EXCLUSION TABLET

Customers Wishing to Self Exclude now

Customers who wish to self exclude should be excluded on the SMART EXCLUSION Tablet.

NB: A user guide on how to use the tablet can be found in knowledge base

REMEMBER:

If a customer requests to be self excluded, you must call the duty manager to carry out the self exclusion process.

Ask your manager to show you next time they complete one on the tablet. A user guide on how the tablet can be found in your venue/club. It is also available to view and download

in Knowledge Base.

When a customer's self-exclusion period has expired they are required to go through a reinstatement before they can commence gambling.

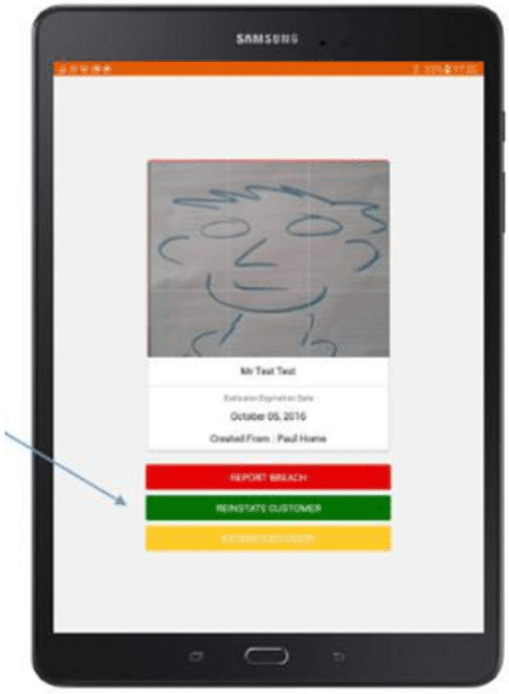
A customer reinstatement is actioned on the Smart Exclusion Tablet.

From the carousel you can click on an image and view in a larger format.

From here you can reinstate a customer.

NB. YOU CAN ONLY REINSTATE IN THE VENUE THE CUSTOMER COMPLETED THE EXCLUSION.

The option will not appear if the customer excluded from another venue.



Click on image to enlarge

As this is a legal requirement; let's check you got all that information right:

What is the minimum length of time a customer can exclude for currently?

- [ ] 4 months
- [ ] 6 months
- [ ] 12 months

SUBMIT

What is the maximum length of time a customer can self exclude for **since April 2016?**

- [ ] 6 months

- ◯ 12 months
- ◯ 18 months

SUBMIT

What does MOSES stand for?

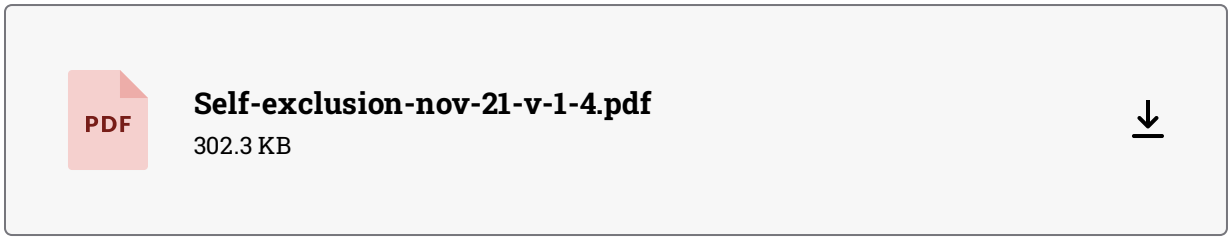
- ◯ Mandatory Operations Self-Exclusion Scheme
- ◯ Multi Operator Self-Exclusion Scheme

SUBMIT

Understanding how to deal with self exclusion is very important. If you are unsure on what to do

please ask your Manager to show you.

Self-Exclusion Procedure



Objective 2: Fair & Open

The company is required to operate a fair gaming operation. To achieve this there are complaints procedures which are well publicised, fair and effective.

The complaints procedure has an internal and an external element. We are also required to keep records of complaints and disputes in Casino, AGCS, FECS or Bingo premises and provide these records to the Gambling Commission annually and on request.

THE LAW STATES THAT . .

We must give full and unrestricted access to gambling premises and provide any information the Gambling Commission and/or local authorities requires about gambling facilities and activities.

IN OTHER WORDS . . .

….Running an 'open' and transparent gambling operation.
To achieve this, each venue must give full and unrestricted access to:

OUR GAMBLING PREMISES

ALL OUR GAMBLING DOCUMENTS

- ☐ The three main objectives of the Gambling Act and how you can help to achieve them.
- ☐ How to ask for proof of age documents and what to do if you need to refuse entry to under 18's.

- [ ] What you can do if someone asks for help with their gambling.
- [ ] What to do if you observe suspicious activity (covered in Objective 3 - Crime Free)
- [ ] What the rules of the gaming area are and where they are displayed.
- [ ] Where the premises licence is displayed.

The Complaints Procedure

The **law** requires us to have a clear Complaints Procedure.

CUSTOMERS CAN ONLY REINSTATE IN THE VENUE WHERE THEY COMPLETED THEIR EXCLUSION

PDF **complaints-and-disputes-policy.pdf**
1.4 MB

Complaints Procedure Process

The Gambling Commission requires the Company to record all complaints through MERKUR Customer care that are specifically about Casino, AGC, FEC or Bingo operations.

If it is the case that the complaint cannot be resolved in the first instance; we operate a four stage complaints procedure.

Should a customer wish to complain about any aspect of the gaming operation, you should deal with it in the first instance

COMPLAINTS & DISPUTES POLICY

At MERKUR, we aim to provide our customers with the very best in venue experience. We appreciate that sometimes things may not meet our high standards.

Our teams in venue will aim to resolve the issue for you there and then and in the first instance will escalate to the Duty Manager to discuss with you.

If the Duty Manager is unable to resolve, they will advise you of this and the matter will be referred to the Area Manager for action. We understand a timely response is essential to your experience and our aim is to contact you within 7 days.

If the matter requires further attention it will then be referred to the Operations Director. We hope at this point we can reach a satisfactory outcome and you can continue to enjoy our venues.

18+ BeGambleAware.org®

PLAY SENSIBLY | PLAY ENJOYABLY | PLAY AFFORDABLY

MERKUR SLOTS

If you wish to contact us directly you can do so via:

The quickest way to do this is to visit our online Customer Care:

https://customercare.merkurcasinouk.com/

Here you can find help if anything has aected your experience, submit feedback, and manage the status of your complaint.

Alternatively, you can reach us:

In Writing:

Customer Care,
MERKUR Casino,
Seebeck House,
1A Seebeck Place,
Knowlhill,
Milton Keynes,
MK5 8FR

- By Phone: **01908 351200**
  (please note our phones are not manned 24/7)

If your complaint is solely relating to betting or gambling activity, and after our internal complaints process you are unhappy with our resolution, you can submit in writing to the independent third-party alternative dispute resolution provider:

IBAS (Independent Betting Adjudication Service).
P.O.Box 62639,
London
EC3P 3AS.

18+ BeGambleAware.org®

PLAY SENSIBLY | PLAY ENJOYABLY | PLAY AFFORDABLY

MERKUR SLOTS

The process has 4 stages:

1st Stage; Deal with it Immediately

Make sure you follow the 8 stage process in the complaint handling training. It is important to listen attentively and acknowledge the impact to the customer. Any complaint resolved in venue must be documented on customer care and marked as resolved in venue.

2nd Stage; Escalate

If you are unable to resolve the complaint you must explain the next stages to the customer and record the complaint on Customer care marking as unable to resolve for this to then be passed to the Area Manager. It is essential at this point that you obtain contact information for the customer to enter on to the system.

3rd Stage; Operations Manager - Head Office

Should the customer be dissatisfied with the response from the Area Manager they are to inform the Operations Director and the customer that this has been escalated. The ticket on customer care will then be assigned to the Operations Director.

4th Stage; Alternative Dispute Resolution

The decision of the Operations Director is final. Should the customer not be satisfied and their complaint is solely in relation to gambling then the Operations Director is to provide the customer with the details of our alternate dispute resolution services (ADR). At this stage the customer is to be provided with a deadlock letter signed by the Operations Director.

Our ADR provider is: 'Independent Betting Adjudication Services (IBAS)'
http://www.ibas-uk.com/

What does ADR mean?

- ◯ Alternative Dispute Resolution
- ◯ Additional Dispute Resolution
- ◯ Another Dispute Received

SUBMIT

At what Stage of the Complaints Process would we use ADR?

- ◯ 1st stage
- ◯ 2nd stage

- ◯ 3rd Stage
- ◯ 4th/Final Stage

SUBMIT

Who is our chosen ADR Provider?

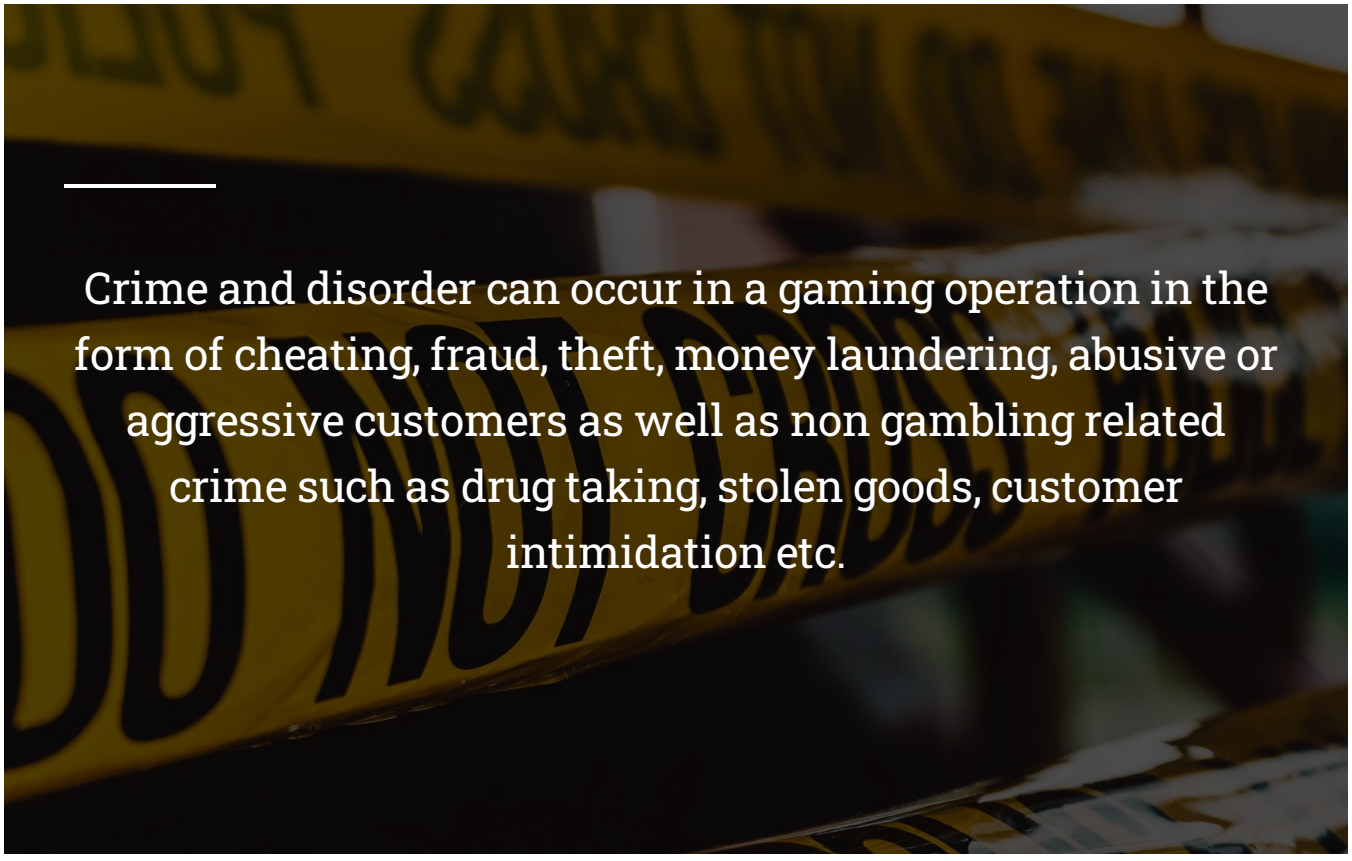
- ◯ **BASS** (Betting Adjudication Service System)
- ◯ **IBAS** (Independent Betting Adjudication Service)
- ◯ **BASI** (Betting Adjudication Services Independent)

SUBMIT

Objective 3: Crime Free

Objective 3: Crime Free

The Law states that: We must operate a crime free gambling business. This means that the business must also be free from disorder.



Crime and disorder is minimal in our venues. However, it is important that you are aware of the controls and procedures in place to help you, your colleagues, our customers and to keep the business safe.

Crime can take place in many forms but in our business there are 2 ways which we should all be aware of:

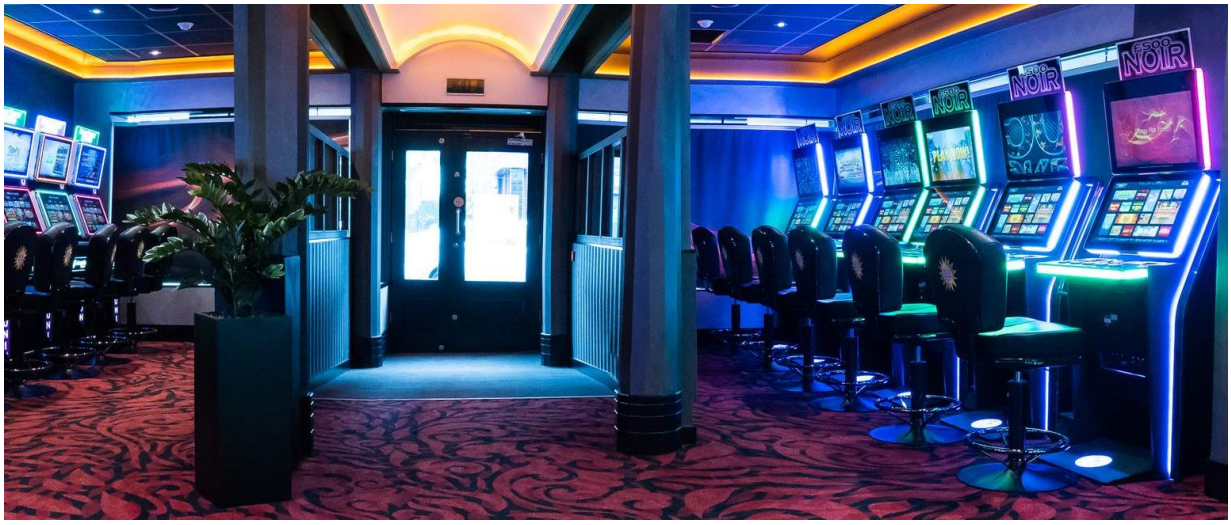


Theft and Fraud



Money Laundering

Theft and Fraud



All gaming operations are subject to fraud or theft at some point and your venue is no exception.

WHAT TO DO IF SOMEONE IS ACTING SUSPICOUSLY:

Tick each box to show you have read and understood the point

- ☐ For your own safety, NEVER approach a customer who is acting suspiciously unless you feel confident to do so.

- [ ] If you feel someone is acting suspiciously, make your presence felt - this is the biggest deterrent to a fraudster. Clean machines, check paperwork, or offer them refreshments - experience tells us that just by being in the area, 90% of frauds are prevented from happening.

- [ ] If you are confident that a fraud is taking place call your Duty Manager, or ask them to leave. If a fraudster becomes aggressive, or you are working alone and feel endangered, then call the Police.

- [ ] **NB - such incidents should be recorded on on the Smart Tablet Incident App and an email circulated on the group 'Security' email.**

Money Laundering

As a Company we have to comply with the Money Laundering Regulations 2007, to ensure we have processes to be adopted to avoid the possibility of money laundering in our premises.

The document explains new obligations which were imposed by the Proceeds of Crime Act 2002 (the "POCA") and the Money Laundering Regulations 2007.

The document explains New obligations in respect of money laundering were imposed by the Proceeds of Crime Act 2002 (the "POCA") and the Money Laundering and Terrorist Financing Regulation 2017 ("the Regulations").

MERKUR is committed to ensuring all necessary safeguards are in place with regards to the receipt of money in our venues, in order to avoid it being used to launder money that may originate from the proceeds of crime.

PDF

Money Laundering Policy Dec 21 V1.3.pdf

163.6 KB

What does this mean to us in the venue?

With the ever increasing use of digital payment methods and the reduction of cash on the high street Gambling premises are often a target for Money Laundering.

If suspected Money Laundering has taken place in a MERKUR venue, staff should record the incident on the Smart Tablet AML App.

When submitted a copy is automatically emailed to the Money Laundering Officer (MLO) for information purposes.

To answer the following questions correctly you will need to have read the Money Laundering Policy:

What does POCA stand for?

- [ ] Proceeds of Crime Act
- [ ] Proceeds of Cash Act
- [ ] Proof of Crime Act

SUBMIT

What amount of stained/dyed notes or foreign coins would you report if suspicious transactions were taking place in your venue?

- [ ] All venues need to report any suspicious cash transactions of any note denomination value, i.e. one stained/dyed note, and foreign coins to the value of £50 during one machine empty or cash collection.
- [ ] All venues need to report any suspicious cash transactions of any note over £20 in value, and foreign coins to the value of £50 during one machine empty or cash collection.
- [ ] All venues need to report any suspicious cash transactions of any note denomination value, i.e. one stained/dyed note, and

foreign coins to the value of £100 during one machine empty or cash collection.

SUBMIT

MERKUR has appointed a designated Money Laundering Officer (MLO), who is this?

- My Area Manager
- Mrs Amanda Kiernan
- Mr Mark Schertle

SUBMIT

The Compliance Folder

Every venue/club has a Compliance Folder which contains all the policies and procedures mentioned in this training. It is important you know where the folder is and are familiar with its contents.

Get the compliance folder and sort the following cards into the correct piles.

IN THE COMPLIANCE FOLDER OR ON THE IHL TABLET

AML POLICY

LICENSING CONDITIONS AND CODES OF PRACTICE (LCCP)

DEALING WITH AGGRESSIVE CUSTOMERS

COMPLAINTS PROCEDURE & COMPLAINTS LEAFLET

MARKETING AND PROMOTIONAL GUIDELINES

SELF-EXCLUSION T&C's

LOCAL AREA RISK ASSESSMENT (LARA)

NOT IN THE COMPLIANCE FOLDER

CONTRACTS

HOLIDAY FORMS

MEMBERSHIP LEAFLETS

PROMOTIONS POSTCARDS

EMPLOYEE HANDBOOK

HO CONTACT LIST

Around the Venue

The Law and Regulations have an impact on how we present ourselves in the venue. It covers the following areas:

1. Machine Standards/Point of Sale Stickers
2. Marketing & Promotions
3. The Information Board

PDF

marketing-code-of-practice-2021.pdf
2.1 MB

PDF

Information Board.pdf

100.6 KB

MACHINE STANDARDS - AWP'S | MARKETING & PROMOTIONS | INFORMATION BOARD

We **MUST** follow the below standards to ensure our machines are fully compliant and presented in a consistent manner throughout all venues. Please refer to the Machine Standards Document available in your venue or in knowledge base.

The following notices/stickers are required by law on every AWP (amusement with prize) machine:

- **No Under 18's to Play**
- **Gamble Responsibly (Gamcare UK Helpline)**
- **Minimum percentage payout**
- **Machine Category – either B3, Category C/D, Legacy or Non Legacy**

N.B.'Notices' refers to those that are already built into the machine
'Stickers' refers to those manually applied by us or machine supplier.



All advertising and marketing by the Company must comply with standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).

All advertising and marketing by the Company complies with standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).

We adopt the general principles that our advertising is:

- Legal, decent, honest and truthful.
- Prepared with a sense of responsibility to consumers and to society.
- Respectful to the principles of fair competition generally accepted in business.
- Not intended to bring advertising into disrepute.

More specifically *(click to enlarge)*:



Every venue has an information board displaying our license to operate and age restriction information.

This is usually by the entrance.

Take a look at what is on the board in your venue.
If you are unsure about anything you see ask your Manager.



Which notices/stickers do we need on every machine?

4 which are:

- No Under 18's to Play
- Gamble Responsibly (Gamcare UK Helpline)
- Minimum percentage payout
- Machine Category – either Legacy or Non Legacy (see below)

1 which is:

- No Under 18's to Play

2 which are:

- No Under 18's to Play
- Gamble Responsibly (Gamcare UK Helpline)

SUBMIT

What is BCAP?

Basic Cashino Advertising Practice

Broadcast Committee of Advertising Practice

SUBMIT

What is CAP?

- Committee of Advertising Practice
- Cashinos Advertising Policy

SUBMIT

Quiz

Read each question and the answer options carefully.

When you complete the quiz your score will be shown. You can then get feedback on the questions and see which you got right and wrong (if any!).

Read any feedback carefully and follow the instructions of what to do.

Good luck!

Question

01/26

Which of the following form part of the Licensing Objectives?

There are 2 correct answers

- [ ] Maximise cost savings
- [ ] Operate a crime free venue
- [ ] Protection of Children and Vulnerable People
- [ ] Ensuring promotions are carried out efficiently

Question

02/26

Having excluded for 12 months, a customer requests permission to re-enter the premises after 7 months. What do you do?

- Welcome them without question
- Say "I am sorry self exclusion periods cannot be altered" and politely ask them to leave and record on the “SmartHub ”
- Give them some free plays and see how they get on
- Say "I'll have to ask the Manager first"

Question

03/26

If the company were unable to resolve a customer complaint or dispute, which external organisation would we refer the complaint or dispute to?

- ◯ Gambling Commission
- ◯ Independent Betting Adjudication Services (IBAS)
- ◯ International Betting Association Services (IBAS)
- ◯ Compliance Director

Question

04/26

You recognise that a regular customer's behaviour changes whilst playing a machine. This is a sign that they may be having problem with gambling. What approach would you take?

There are 3 correct answers

- [ ] Ignore them and let them carry on playing
- [ ] Try chatting to them and ask if they are OK and offer them a drink
- [ ] Make your presence felt by cleaning the machines near them so you can keep an eye on their behaviour
- [ ] If you are concerned about the customer's behaviour inform your Line Manager

Question

05/26

Which areas, by law, are restricted to over 18's?

There are 2 correct answers

- [ ] Bingo
- [ ] Family Entertainment Centre (FEC)
- [ ] Adult Gaming Centre (AGC)
- [ ] All of these are restricted to over 18's

Question

06/26

During a machine empty you suspect money laundering has taken place in your venue. Which of the following would you report?

There are 3 correct answers

- [ ] Dyed/Stained notes
- [ ] Foreign Coins
- [ ] Forged/Fake notes
- [ ] I would not report anything

Question

07/26

As a company we operate a 4 stage complaints & disputes procedure. At what stage would the customer refer the complaint to the Alternative Dispute Resolution (ADR) provider?

- ◯ Stage 1
- ◯ Stage 2
- ◯ Stage 3
- ◯ Stage 4

Question

08/26

During a machine empty you find some dyed notes and foreign coins. What is the amount you would report on the Anti Money Laundering Form using the AML app at MERKUR Slots and MERKUR Bingo?

- ◯ £5
- ◯ £50
- ◯ £500
- ◯ £1000

Question

09/26

What would you do if you suspected a known machine fraudster was in your venue?

There are 2 correct answers

- [ ] Let them play the machines
- [ ] Offer them a coffee
- [ ] Call the Duty Manager
- [ ] Ask them to leave if you feel confident to do so and if necessary, call the police

Question

10/26

What type of Licence is required to operate gaming premises?

- An Operating Licence
- A Drivers Licence
- A Premises Licence
- A Liquor Licence

Question

11/26

Which proof of age documents are acceptable? (there's more than one answer)

There are 4 correct answers

- [ ] A European photographic driving licence
- [ ] A UK paper driving licence
- [ ] A passport
- [ ] A PASS accredited proof of age scheme document
- [ ] A Military ID card

Question

12/26

What is the maximum period of time a customer may self exclude from our venues?

- ○ 12 months
- ○ 18 months
- ○ 36 months
- ○ 5 years

Question

13/26

As a company we need to ensure all our advertising & marketing material is compliant and legal. This includes what we advertise on our TV screens, radio and marketing material for gambling facilities in our venues. Which 2 UK regulatory organisations are responsible for overseeing this function?

There are 2 correct answers

- [ ] Broadcast Committee of Advertising Practice
- [ ] British Compliance of Advertising Practice
- [ ] Committee of Advertising Practice
- [ ] Committee of Advisory Practice

Question

14/26

Where would you see signage displayed in your venue/club stating the minimum age requirement (18)?

- ◯ By the door
- ◯ At the entrance to a venue/club and on each machine
- ◯ Displayed on each machine and in the toilet
- ◯ By the door, on the machines, in the toilet and on all promotional posters

Question

15/26

When might you refuse entry to a customer?

There are 2 correct answers

- [ ] When they are not clean shaven
- [ ] When they are obviously under 18
- [ ] When they look under 25 and have no proof of age documents with them
- [ ] When they are over 65

Question

16/26

How would you identify a vulnerable person who you consider may have a problem with gambling?

There are 3 correct answers

- [ ] Someone who asks for help because they realise they may have a problem with gambling and are unable to control their habit
- [ ] Someone who goes to the cash machine frequently for money and you have concerns on their level of spend
- [ ] Someone who keeps on asking for coffee
- [ ] Someone who looks agitated and show signs of mood swings, keeps swearing at their machine and banging the buttons aggressively with possible threats of violence to staff and other customers

Question

17/26

Which authorised persons are allowed to visit your premises unannounced at any time?

There are 3 correct answers

- [ ] A police constable/officer
- [ ] Gambling Commission Enforcement Officer
- [ ] Local Authority
- [ ] Building Inspector

Question

18/26

What is the minimum period of time a customer may self exclude from our venues?

- ◯ 1 month
- ◯ 3 months
- ◯ 6 months
- ◯ 12 months

Question

19/26

What should you do if you suspect someone of being underage?

There are 2 correct answers

- [ ] Let them play and once they have played off their credits ask them to leave

- [ ] If they have managed to actually play a machine, stop them from playing, ask for suitable ID and if no suitable ID is available return only the stake monies but no winnings and politely ask them to leave the site and log it on the tablet using the Age Verification App.

- [ ] Offer them a drink and new membership

- [ ] Challenge them on entry for suitable ID if they look under 25; if no suitable ID is available politely ask them to leave the site and log it on the tablet using the Age Verification App, telling them they are welcome to return when they have the correct ID

Question

20/26

When would you complete a Self Exclusion Reinstatement/Review Form? (either using the Smart Exclusion tablet or in paper format for any existing exclusions you have on file)

There are 2 correct answers

- [ ] At the beginning of the Self Exclusion period
- [ ] When the Self Exclusion period has expired
- [ ] Before the 24 hours cooling off period
- [ ] After the 24 hours cooling off period

Question

21/26

You suspect a customer is underage and ask for proof of ID.

Where would you record the details?

- Smart Hub - Customer Interaction App
- Smart Hub - Self-Exclusion App
- Smart Hub - in the Age Verification App
- Smart Hub - Incident Disputes and Complaints

Question

22/26

What does the acronym POCA stand for when associated with money laundering activities?

- Prevention Of Criminal Activity
- Proceeds Of Criminal Activity
- Proceeds Of Crime Act
- Police Official Crime Administrator

Question

23/26

Name 3 of the stickers which are required to be displayed on AWP machines by law

There are 3 correct answers

- [ ] Machine category
- [ ] Percentage
- [ ] Gamble Responsibly
- [ ] Price of Play

Question

24/26

Which regulatory body oversees gambling in the UK?

- ◯ The Police
- ◯ The Gambling Commission
- ◯ The Local Council
- ◯ The National Lottery

247

Question

25/26

If a customer has a complaint regarding payouts or another unresolved issue, who should you report it to in the first instance?

- A team member
- A key holder
- A Duty Manager
- Nobody

Question

26/26

How often are staff required to refresh the Essentials of Compliance course and knowledge quiz?

- ◯ Every 6 months
- ◯ Every 3 months
- ◯ Every 12 months
- ◯ As often as they want to



Age Verification

The content of this course is designed to give you all the knowledge, information, and confidence to be able to effectively deal with a customer complaint in venue. It will introduce you to the Customer Care function on the Smarthub and how to effectively use this.

INTRODUCTION

- A reminder about the Law
- Over 18 - THINK 25

PROOF OF AGE/ACCEPTABLE ID

- Proof of Age
- What ID is acceptable?
- What do I need to look for when checking ID?

Spotting Fake ID

INTERACTION - WHAT AND HOW FOR OUR EMPLOYEES

What do I say and how do I say it?

REFUSING ENTRY

Refusing Entry

End of Module Quiz

A reminder about the Law

When you completed the Essentials of Compliance training you learnt about the Gambling Act 2005, the 3 main objectives of the Act and about LCCP (License Conditions & Codes of Practice)

This section is a recap on what you learnt in that training:



The Gambling Commission and Age Verification



The Gambling Commission

AGC, FEC and Bingo and Casino premises are regulated by the Gambling Commission. Gambling Commission Officers, local authority officers and the police can visit your premises at any time.

If we or our employees break the law with regard to the Gambling Act 2005, the company could lose their licence and may not be allowed to operate our premises in the future.

The company could also be heavily fined and individual employees could be prosecuted.

All gaming businesses are operated according to the Gambling Act 2005. The 3 Main objectives of the Act are:

1. The protection of children and vulnerable people

2 To be fair and open

3 To be crime free

Age Verification sits under Objective 1:

It is **illegal** for anyone **under the age of 18** to enter an AGC or Bingo premises; even babies in pushchairs, toddlers wandering in by accident, or any child, even if they are with an adult who is playing the machines or bingo. In terms of the law; a child is anyone under the age of 18

The first measure the company takes to prevent entry to under 18 is to make sure that signage stating the minimum age requirement (18) is displayed clearly at each entrance to the venue and on each machine, as shown below:



Clear Signage

Machine Stickers/Signage

Each machine should have clear signage showing the **age restrictions to play**

Clear Signage

On entry doors stating the minimum age requirement to enter the premises

Point of Sale

We have various different posters, stickers and leaflets that clearly state the age requirements to be on the premises and playing the machines

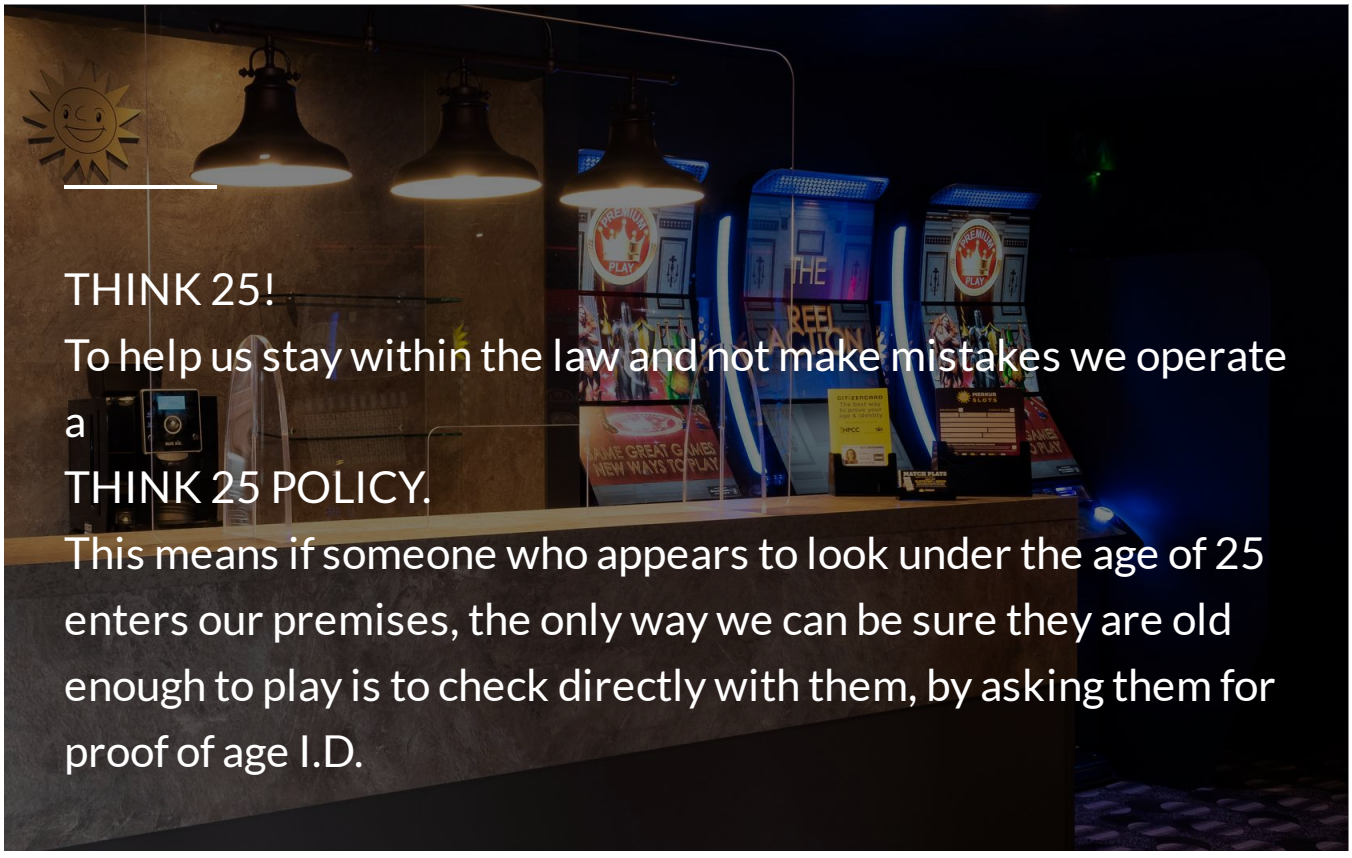
Let's be clear:

No one Under 18 can enter the premises

CONTINUE

Over 18 - THINK 25

MERKUR adopts a THINK 25 POLICY





Staff Think 25 Badge

All employees are required to wear a 'Think 25' badge. This MUST be worn as part of your uniform.

You can use this to show the customer that we adopt a Think 25 policy when you need to ask for I.D.

Its not just about playing the machines - its about being on the premises

Certain services we supply are not age restricted, for example using the ATM. We still have to be aware.

The proof of age policy applies to people on the premises. As the ATM is inside our premises you cannot allow under 18's into the venue to use the ATM machine. In this case, regardless of whether or not they intend playing the machines, they MUST be 18 years or over to enter our premises.

REMEMBER: You MUST always apply the Think 25 policy regardless of who they are and what services they may require.



This is not a choice; it's the Law.

To abide by the law we

MUST CHALLENGE ANYONE WHO LOOKS UNDER 25

CONTINUE

Proof of Age

Asking for Proof of Age

Lets start by understanding what Proof of Age is and why we must ask for it.

Click on the '+' symbols below to reveal the information:

What is meant by proof of age?

Proof of age simply means that you can be asked to PROVE your age.

In environments like ours this is a **LEGAL** requirement

Many businesses **legally** need a proof of age scheme such as pubs, clubs, casinos and our business too - Casino, Bingo and Adult Gaming Centres.

Age restricted areas **must have a system to check the age of its customers**, to prove that they are over 18;

NO PROOF = NO PLAY

When must I ask for proof of age?

This must be actioned as soon as a customer enters the premises. If you think a person entering the Casino, AGC or Bingo premises looks under the age of 25, you must ask them for identification as proof of their age.

If someone has entered the premises and is playing a machine or using the facilities you should ask as soon as possible - it's never 'too late' to ask and it is a legal requirement that you do if you have ANY doubt about their age.

What proof of age documents are acceptable?

Only the following forms of ID are legally acceptable:

1. A passport
2. Driving Licence with photocard
3. Any identification carrying the 'PASS' logo
4. A military ID card can be accepted as proof of age







Sample Military ID Cards; these can differ by Country

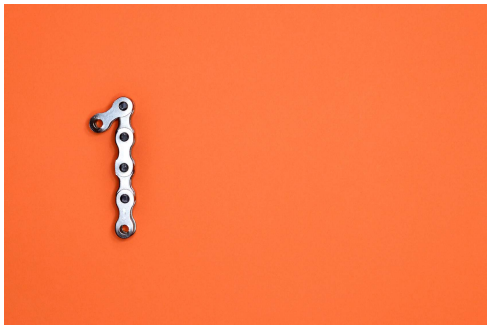


What process should I follow when asking for ID?

You should always be aware of who is entering your premises.

YOU need to apply the Think 25 policy at all times and we MUST STOP anyone that is underage from attempting to play the machines.

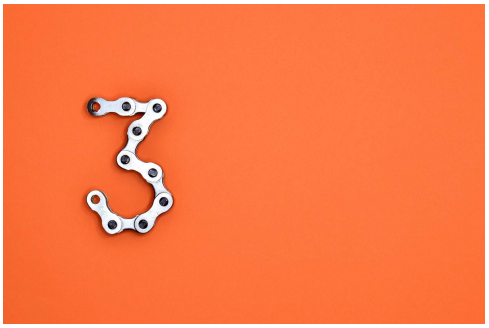
REMEMBER THESE POINTS:



If a customer (adult or child) who appears to be under 25 enters the gaming premises it is important that you approach them immediately.



If ID proves the customer is over 18 and it is valid, thank the customer and serve as normal.



If proof of age cannot be provided or the ID appears to be fake or invalid, politely and briefly explain that they cannot play; this is company policy and a legal requirement.

Would you ID these People?

Go through each question and pick the answer you think is right

Would you age verify this man?



- [ ] No
- [ ] Yes

SUBMIT

Does this person look over 25 ?



- ○ I'm not sure - would check
- ○ Yes she does - no need to check

SUBMIT

How old is this man?



- ◯ I don't know
- ◯ 25
- ◯ 30

SUBMIT

Would you ask for proof of age for this man?



- ◯ Yes
- ◯ No

SUBMIT

How did you do?

Remember we cannot tell how old someone is

If in doubt, ask for ID.

Some customers may not like being asked for Proof of Age and could get angry or annoyed - this is not very nice for you but you do still have to ask - remember it's the law. Think about it; most people that are old enough are happy to provide ID. If someone gets annoyed then they have probably been caught out and this means you are doing your job really well.

Know you are in the right, remain calm and professional and stay within the LAW - we know you can do it!

CONTINUE

What ID is acceptable?

What documents can I accept?

What proof of age documents are acceptable?

Click on the cards below to reveal the information:



A Passport



A Military ID Card



A Citizen card (A Pass accredited proof of age scheme)



A European Photocard Driving Licence

What to look for when checking ID:

When looking at these valid forms of ID, what specifically do you need to look out for? Click on the button to find out...

CHECKING ID

What do I need to look for when checking ID?

There are several things you must check on the persons ID:

- Check the date of birth
- Check the photo - is it true likeness?
- Check the document is authentic (holograms/watermarks etc.)
- Check the document is valid - could the details have been altered/photo changed
- Feel the edges of the document to check it is smooth and hasn't been tampered with

As an example we have shown these areas on PASS card.

Click on the markers below on the PASS card to reveal what you should be looking out for when checking ID, to verify their proof of age.


PASS Proof of Age Card
CITIZENCARD
1
Expires on 31 Dec 2023
3
Name
Lily Stewart
2
DoB
4
02 Oct 1999
PASS
5
5843 2166 4567 8901
NPCC
National Police Chiefs' Council
sia
Security Industry Authority
18+



Check the edges

Are they smooth and sealed - check the document hasn't been tampered with



Hologram

Check the document is authentic. For example; make sure that the hologram is present on the proof of age scheme card. All valid ID have holograms - check for them!



Valid Document

Ensure that the ID document is valid by checking it, feel that it is smooth with no ridges, that it has not been altered or tampered with and that it has not expired.



Date of Birth

Check that the date of birth shows the person is old enough to be in the AGC or Bingo premises



Photograph

Make sure that the photograph is true likeness of the person attempting to enter the premises

CONTINUE

Spotting Fake ID

The government have recently introduced guidance regarding checking ID. Although this new guidance is aimed primarily at the alcohol industry we can use it to learn about how to spot fake ID.

Below is the information from government about how to spot fake ID.

Click on each tab for full information:

TYPES OF FAKE ID | PASSPORTS | FAKE DRIVERS LICENCE | FAKE ID CARDS

Click to enlarge:

Types of Fake ID

Government guidance explains that there are five types of false document:

- A genuine document which is being used by someone else, e.g. a child using their older sibling's passport.
- A genuine document which has been altered, e.g. a driving licence with the date of birth scratched off.
- A genuine document which has been fraudulently obtained, e.g. a real passport that has been stolen and used by somebody else.
- A fake document which is a form of ID that does not exist, e.g. a provisional motorcycle licence.

The most common fake ID includes those that look like driving licences, such as national identification cards, European or international driving permits and provisional motorcycle licences.

Click to enlarge:

How to Spot a Fake Passport

The British government change UK passports slightly every 5 years to prevent the production of genuine-looking fake passports.

Authentic UK Passports Must:

- Be the right size (around 125 x 88mm).
- Passports issued after November 2015 have 34-pages.
- Passports issued before November 2015 should have 32pages (48 for a business book).
- Feature a digitally printed photograph with holographic overlay.
- Have a 9-digit number on page 1.
- Have a perforated serial number throughout the pages.
- Feature the holder's signature.

You may identify a fake passport by the following features:

- An invalid expiry date.
- Personal details that have been amended or tampered with.
- An incorrect number of pages for the time it was issued.
- A photograph that isn't digitally printed.
- No holograms or perforations.
- No passport chip.
- Words, signatures or pictures in the wrong places.

There are slight differences between older & newer passports. Differences include:

- The number of pages.
- The page designs.
- The presence of a chip: passports issued after 2010 have a chip in the cover of the passport whereas older passports have the chip located on page 32.

Click to enlarge:

How to Spot a Fake Driving Licence

You may identify a fake driving licence by the following features:

- An incorrect flag image.
- The wrong words across the top, e.g. 'National Identification' or 'International Driving Permit'.
- Different languages.
- A plain or simple-patterned background.
- A photograph in the wrong place.
- No signature/an incorrect signature.
- Fake holograms.
- Information in the wrong places.
  Driving licences are designed to be difficult to forge and possess many features that are hard to copy.

Authentic UK Driving Licences Must Have:

- A first name, surname, date and place of birth.
- A date of licence issue, photo expiry and issuing authority.
- A driver number.
- A valid photograph (black and white on newer photocards).
- The holder's signature.
- The holder's address.
- Entitlement categories.
- A hologram of a steering wheel over the person's photograph which 'turns' as you move the card.
- Further holographic images on the front.

TYPES OF FAKE ID	PASSPORTS	FAKE DRIVERS LICENCE	FAKE ID CARDS

Click to enlarge:

How to Spot a Fake ID Card

You may identify a fake PASS Card by the following features:

- A hologram that is stuck on top of the plastic, rather than being smooth.
- An artificial looking hologram in appearance.
- A photograph that is stuck on top of the plastic.
- A photograph that doesn't match the person presenting the ID.
- An incorrect date of birth.
- Details that have been altered or tampered with.
- A non-smooth surface.

Authentic UK PASS Cards Must Have:

- A 3D hologram with the characteristic 'A' in the lettering.
- A photograph that matches the person.
- A valid date of birth – you can calculate the person's age from their DOB or look for the '18+' symbol on the card.
- A flat, smooth surface.

If you suspect fake ID try these questions:

1. Ask for another form of ID, such as a bank or student card. If someone steals or borrows another person's ID, they are unlikely to take other forms and their purse/wallet will have their own ID in it.

2. Ask the person for their star sign – a person may have memorised the date of birth on the ID which they are using but are unlikely to know the corresponding star sign.

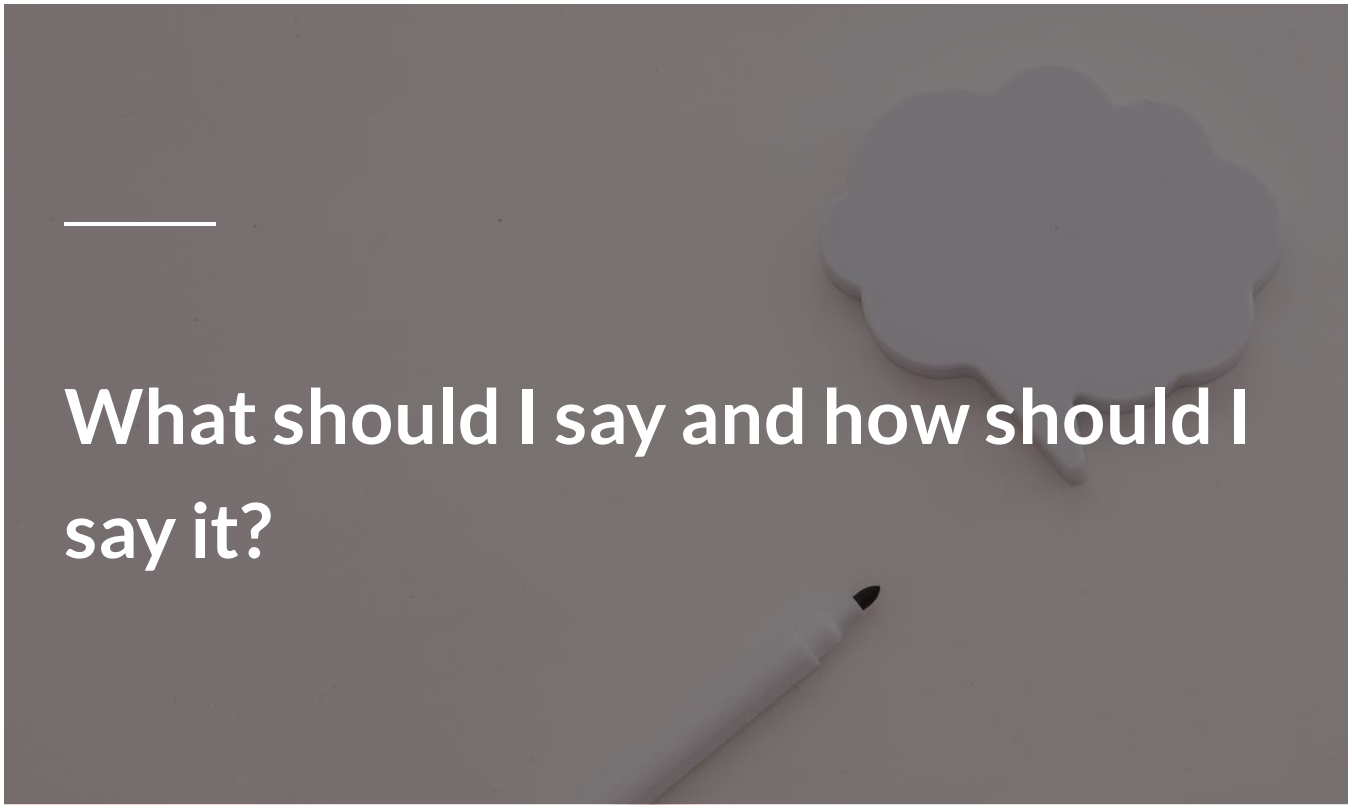
3. Ask the person for their date of birth – this can lead to them mixing their own with the one on the ID or not being able to recite the date on the ID on the spot.

4

Ask for the postcode on the ID; a person using borrowed ID may know the first line of the address but may have difficulty remembering the postcode under pressure

CONTINUE

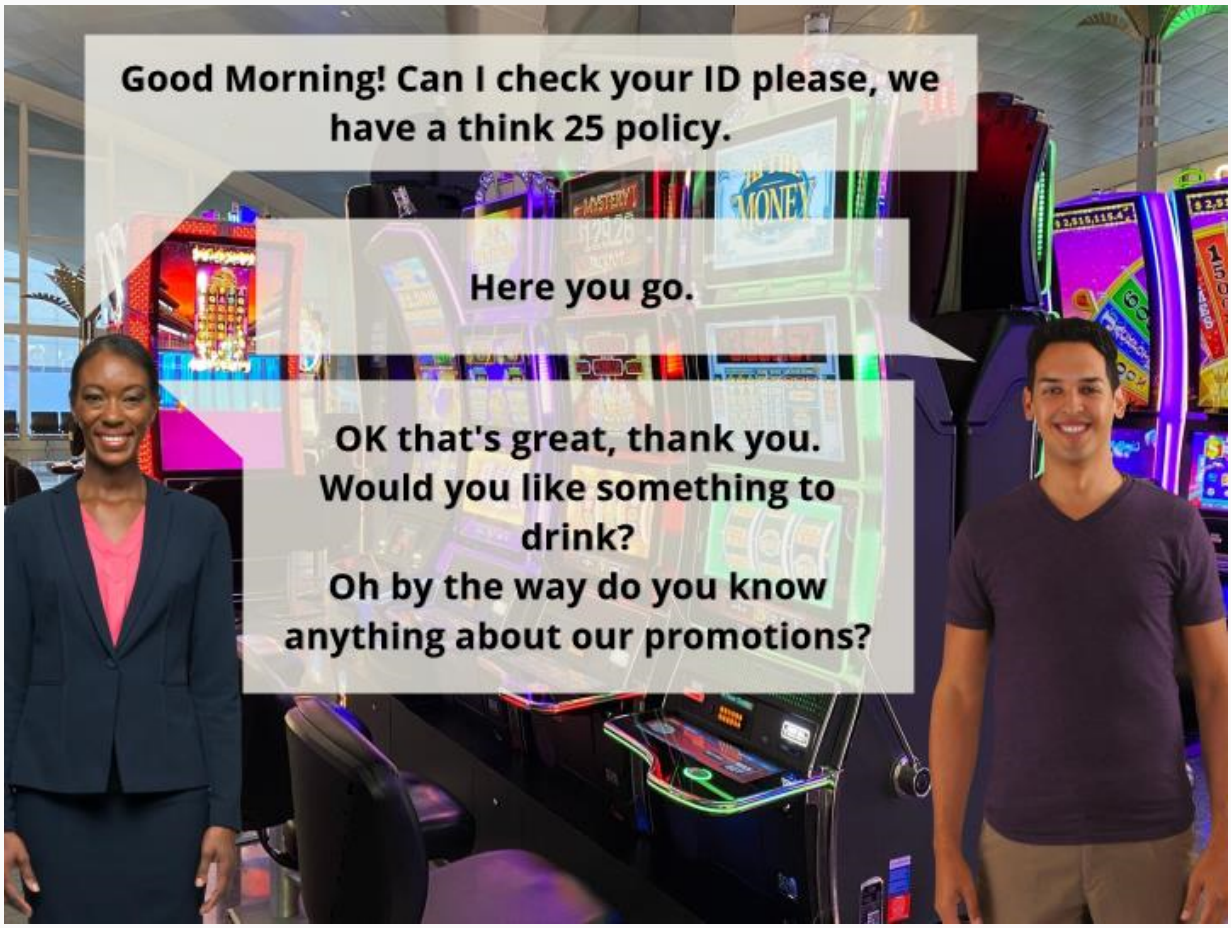
What do I say and how do I say it?



What do I need to say when asking for ID?

Let's look at some examples of what may happen when you ask for I.D. It is important you know what to say and how to say it so you are confident to act immediately if someone who looks under 25 enters the premises

Let's see 'Sylvia' to show us how it's done!



Sylvia was produced with sufficient I.D. by Javier; therefore she was within the law to allow him into the premises.

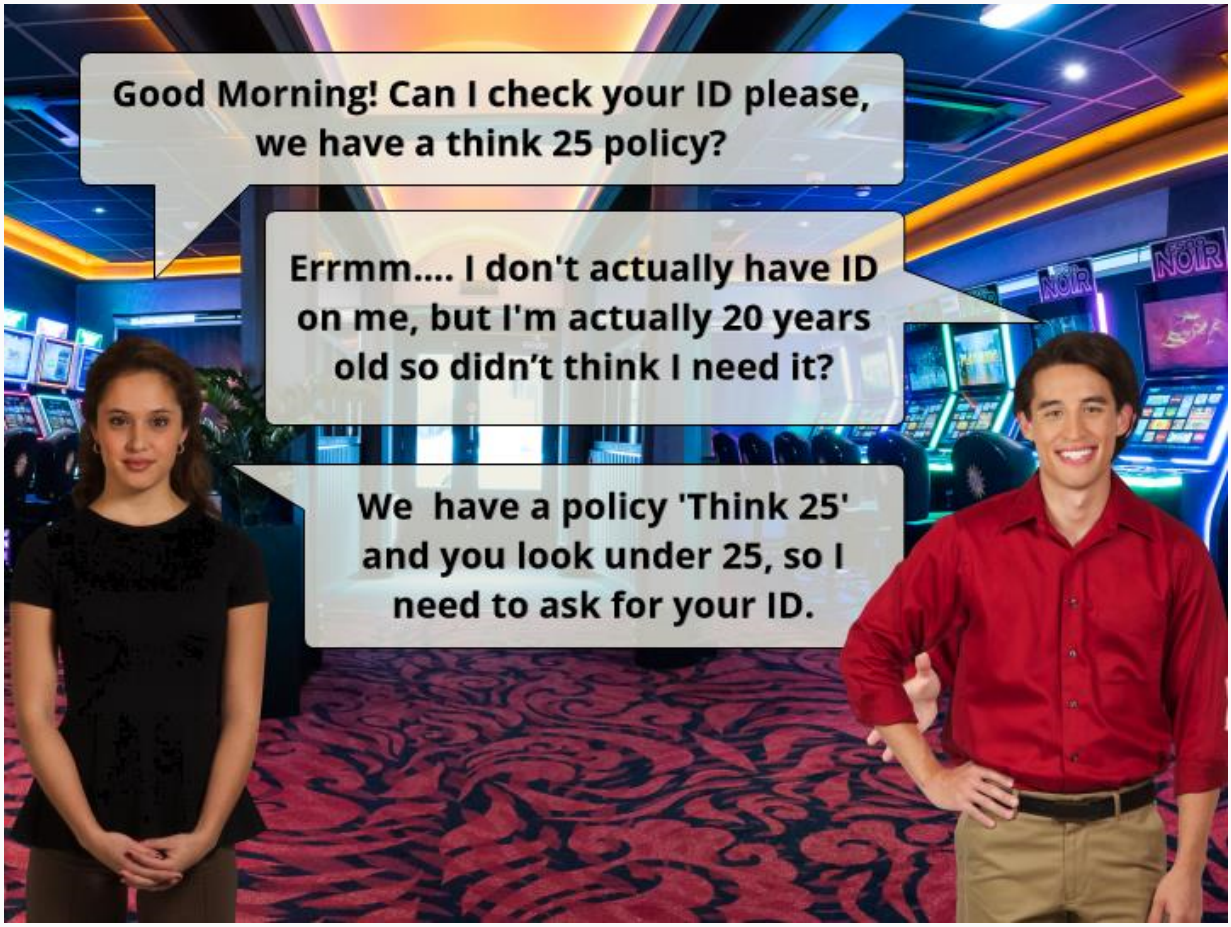
Remember to remain calm, professional and polite but be clear that we have to check age and need a photo ID.

A refusal is the law. A polite refusal and explanation is good customer service.

So what happens if the customer has no ID?

If the customer does not present you with any ID to confirm their proof of age.

Refusal is the law. A polite refusal and explanation is good customer service.



The ID is valid but it doesn't look like the person

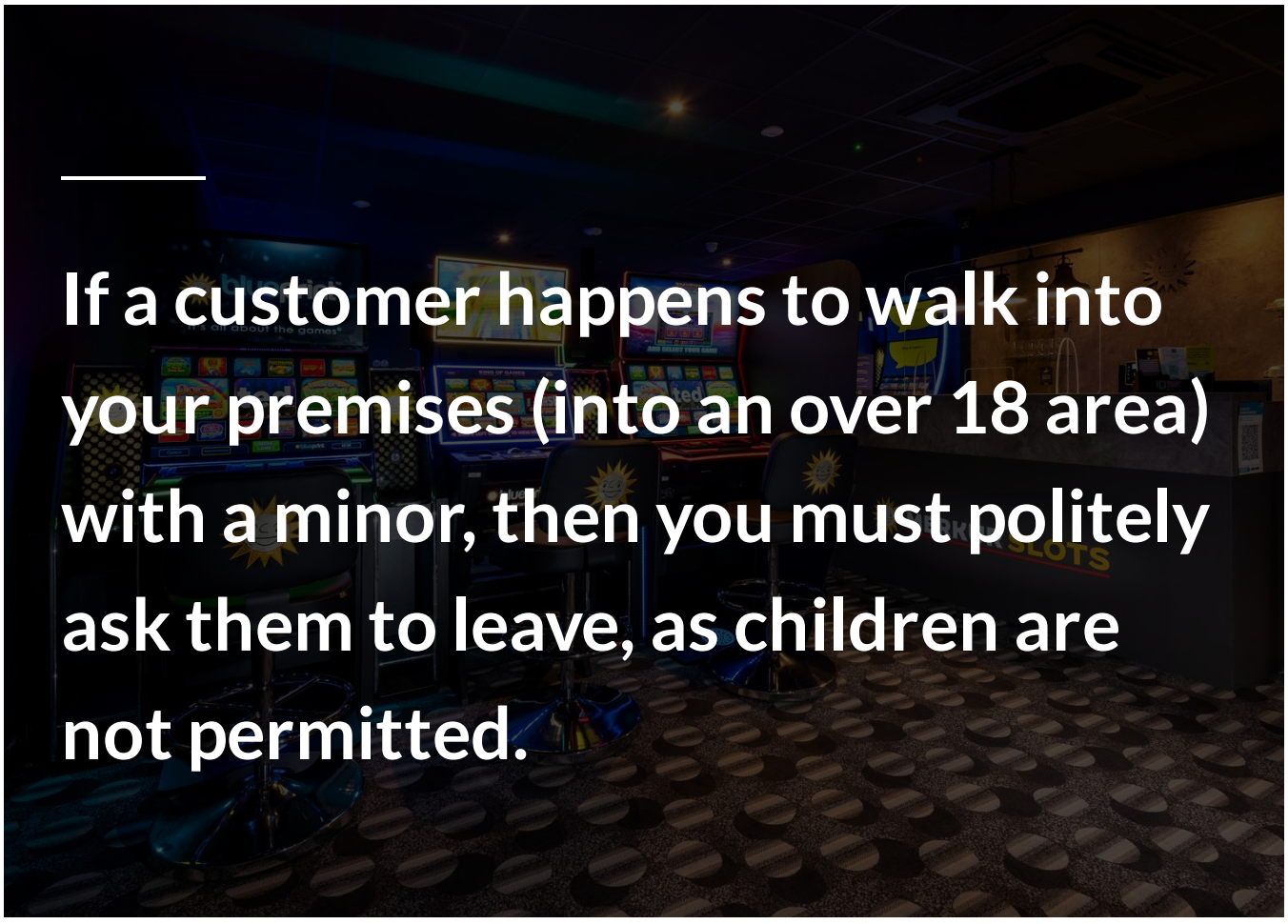
Its important that the photo is a true likeness; if we don't check this then the ID might be valid but it probably doesn't belong to the person trying to gain entry.

CONTINUE

What do you do if an adult brings in a child to your venue/club?

If a customer happens to walk into your premises (into an over 18 area) with a minor, then you must politely ask them to leave, as children are not permitted.

Customers can innocently enter the venue/club as they have seen a friend/relative they want to say 'hello' to or wanted to pop in an application form, as they have seen a job advert in the window. In either case, you **do need** to ask the adult to leave, as children are not permitted into over 18 areas.

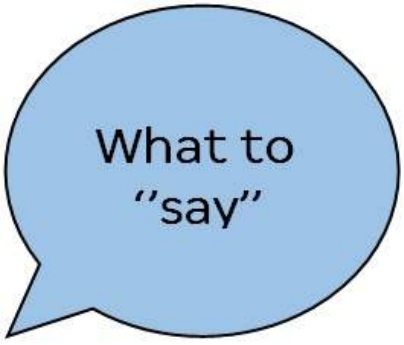




Here are some words/phrases you can use in your conversations:



"Please see the notice, we operate a Think 25 policy".



"I'm sorry, if I let you play on the machines I will be breaking the law"



"The law requires me to ask for proof of age".



"If you don't have ID I will have to ask you to leave; it is the law".



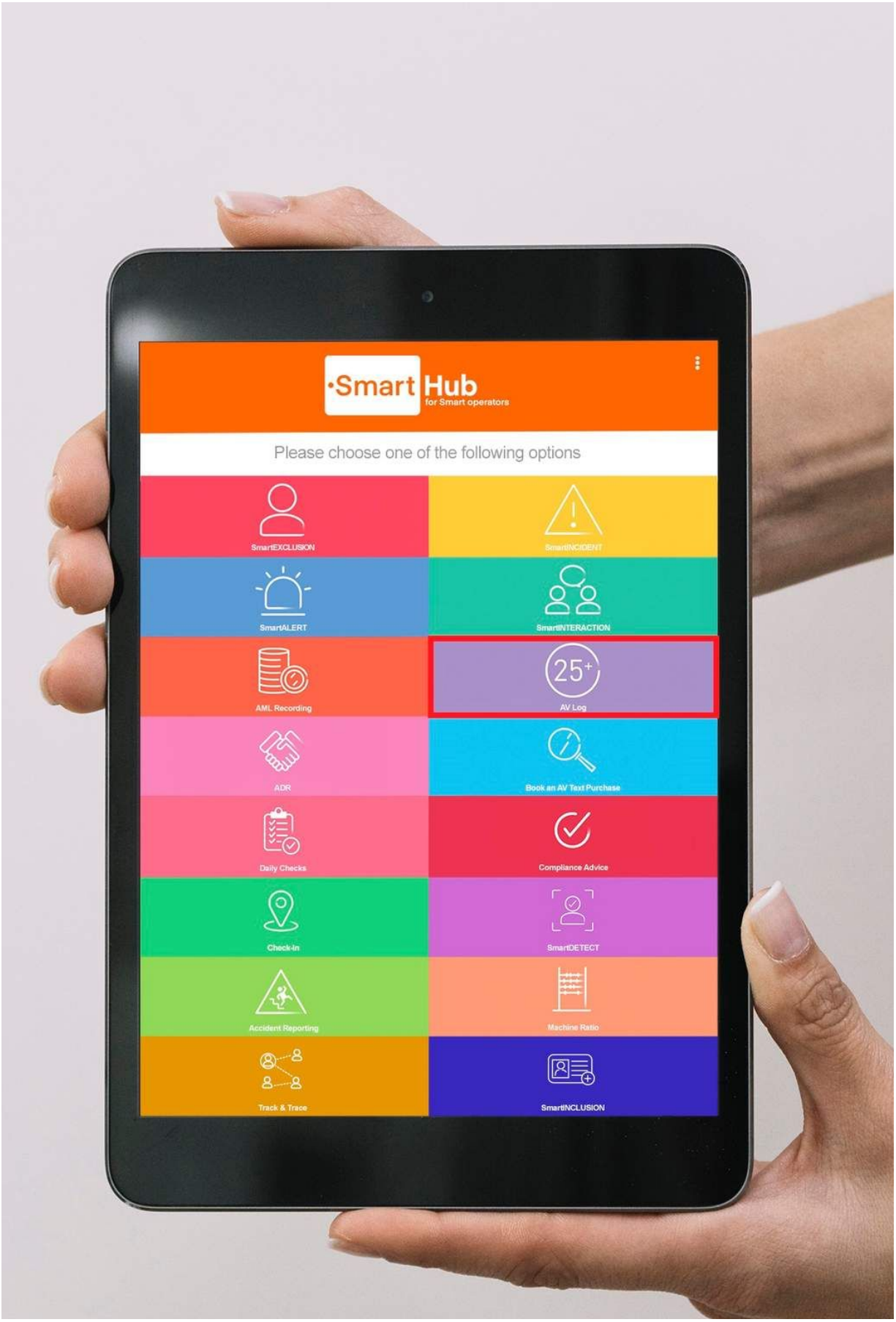
"If you want to go and get suitable ID then I can let you play but I can't let you play without it".



"The company has a policy of no proof of age, no play"

It is your responsibility to apply the Think 25 policy to all customers that look under 25 years old, but it is also your

responsibility to ask for it in a polite, friendly and professional manner.


Smart Hub
for Smart operators
Please choose one of the following options
SmartEXCLUSION
SmartINCIDENT
SmartALERT
SmartINTERACTION
AML Recording
25+
AV Log
ADR
Book an AV Test Purchase
Daily Checks
Compliance Advice
Check-In
SmartDETECT
Accident Reporting
Machine Ratio
Track & Trace
SmartINCLUSION

Record Age Verification Interaction

All Age verification checks must be recorded on the Smart Tablet AV Log

To evidence compliance with the LCCP requirements to prevent underage gambling, Gambling Operators must implement age verification test purchasing.

These test purchases must be conducted by an independent Age Verification Test provider. This test purchases must be unannounced and conducted at different times of the day (morning, afternoon, and evening) and at different times of the year.

For reporting purposes the Gambling Commission expects, test purchase results should be recorded as 'challenge before gambling activity', 'challenge during gambling activity', 'challenge after gambling activity', or 'unchallenged'

- the definition of a 'challenge before gambling activity' includes any challenges conducted at the entrance to a premises; noting that it is illegal for a child or young person to enter most types of gambling premises. In an FEC, this could be a challenge before or at the point that the tester attempts to enter the Category C gaming machine area

- where a premises fails a test purchase visit, we expect the premises staff to be informed of the result and for retesting to be carried out. We expect the retest to be conducted as soon as practicable after remedial action has been taken and no longer than three months after the failed test

If a venue fails an Age Verification test purchase the Area Manager will be informed and asked to investigate the reason for the fail.

CONTINUE

Refusing Entry



The key reasons to refuse entry are:

- [ ] The customer looks younger than 25
- [ ] Cannot produce valid photo ID
- [ ] The ID presented is not an acceptable format (e.g. a birth certificate)
- [ ] The ID document appears fraudulent or has been tampered with
- [ ] ID's photo doesn't match with the person trying to gain entry

Whatever the circumstances you must remain polite, friendly and professional.

If your refusal is said in the wrong tone, sounds rude, confrontational or aggressive, then the customer may not respond how you expect.

What should you do if the customer is uncooperative?



Angry Customer

If the customer continues to be uncooperative or you are in any doubt call your Duty Manager. If you are working alone and feel in danger then you should use the Staffguard system for support.

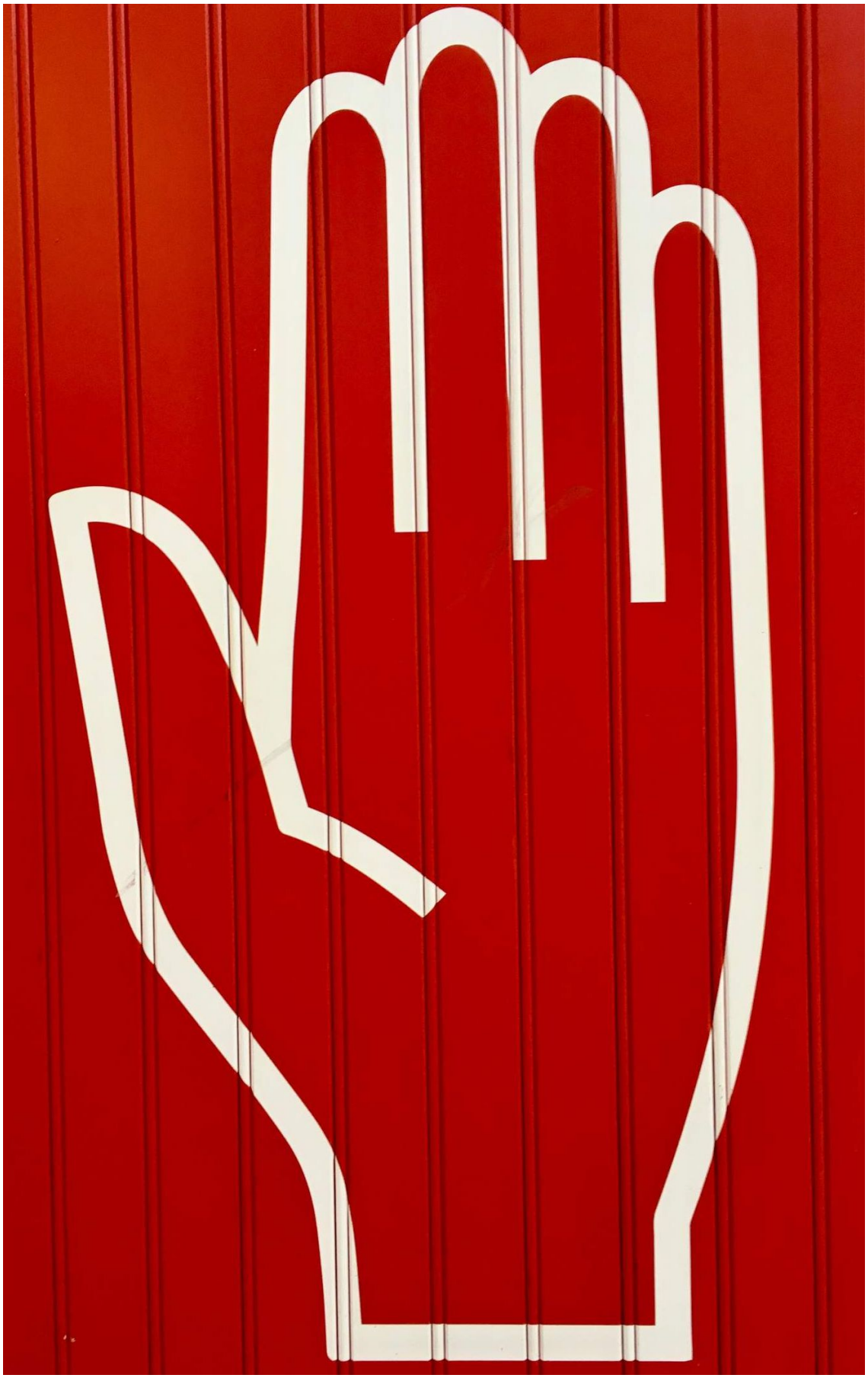
What happens if an underage person actually plays on the machines?

It is illegal for anyone under 18 to play machines or to gain from illegal gambling. This means that if an under age customer has not been asked for ID and has started to play the

machines, they must be **stopped immediately** and given their stake (the money they have put into the machine) back, excluding any winnings.

What to do?

If you discover either of these incidents have happened, you must call for a member of management immediately or if you are working alone, then you must deal with it. The under age customer must have their money refunded. This type of incident must be recorded on the IHL Tablet using the Age Verification App 'child or underage person playing the machines'.



If you do not stop an underage person from playing YOU will be breaking the law!

All potential underage entries should be challenged.

Every challenge/request interaction for ID, MUST be recorded on the IHL Tablet using the Age Verification App.

CONTINUE

End of Module Quiz

To conclude this module and to understand what you have learnt, you will need to complete the following quiz.

You must have a 100% pass mark to finish the course and all results will be recorded.

If you fail the quiz, you can either retake the quiz by clicking 'Take Again', or you can exit the course, by clicking 'Exit Course' in the top right hand corner of the results screen, to retake the quiz at another time.

Please note: Do not close the course via your browser, as your score may not be recorded.

Good Luck!

Question

01/09

What do you do if a person who looks under 25 wants to come in and use the ATM machine?

- ○ You politely ask them for ID and refuse entry if they are under 18.
- ○ You let them in regardless, as they only need to use the ATM.

Question

02/09

What must you do if an underage person is actually playing on the machines?

- Stop them immediately and ask to leave. Then log on the IHL Tablet using the Age Verification App.
- Pretend I haven't noticed
- Stop them immediately, and give them back their stake money, excluding any winnings. Then log it in on the IHL Tablet using the Age Verification App

Question

03/09

At what age are people allowed into the adult gaming area?

- 25 years or over
- 21 years or over
- 18 years or over

Question

04/09

What do you do if the customer is unable to provide you with ID?

- Let them in anyway, as you know they have the potential to spend a lot of money.
- Ask them to leave and not to return ever again.
- Politely ask them to leave, explaining that we operate a Think 25 policy and without proof of age, they are unable to enter our premises.

Question

05/09

Are babies and small children allowed into our venues/clubs if their parents are playing on the machines?

- ○ No
- ○ Yes

Question

06/09

What ID / Proof of age are acceptable?

- A Pass accredited proof of age scheme
  A birth certificate
  A driving licence
  A passport

- A passport
  A European Photocard licence
  A Pass accredited proof of age scheme
  A military ID card

- A passport
  A student card
  A military ID card
  A Pass accredited proof of age scheme

Question

07/09

When checking ID, what are the 4 areas you are looking for?

- Date of birth/ Photograph/ ID is authentic/ Hologram
- Date of birth/ Place of birth/ Photograph/ ID is authentic
- Date of birth/ Hologram/ Not fake

Question

08/09

What **must** you do when you have asked someone for their ID?

- Log details on the IHL Tablet using the Age Verification App
- Nothing, if they have proved they are over 25
- Add the details in the Premises Log: Log C

Question

09/09

What age policy do we operate?

- ◯ Think 21
- ◯ Think 25
- ◯ Think 18



Safeguarding Children & Vulnerable People

Our suite of Compliance training seeks to ensure you understand the Gambling Act and its 3 main objectives and that you follow the businesses defined processes to ensure we operate within the law.

Within the Gambling Act we have a duty to protect children and vulnerable people. Safeguarding is the responsibility of everyone in our business and this session explains why its so important and how you can play your part.

To get started click on the first lesson below:

SAFEGUARDING AND RESPONSIBLE GAMING

- **What is Safeguarding?**
- **Children**
- **Vulnerable People**
- **The Stages of Change**

TAKING ACTION

- **Taking Action**

 Observing & Listening

 Dealing with Anger & Aggression

OUTSIDE THE VENUE/CLUB

 Advertising Responsibly

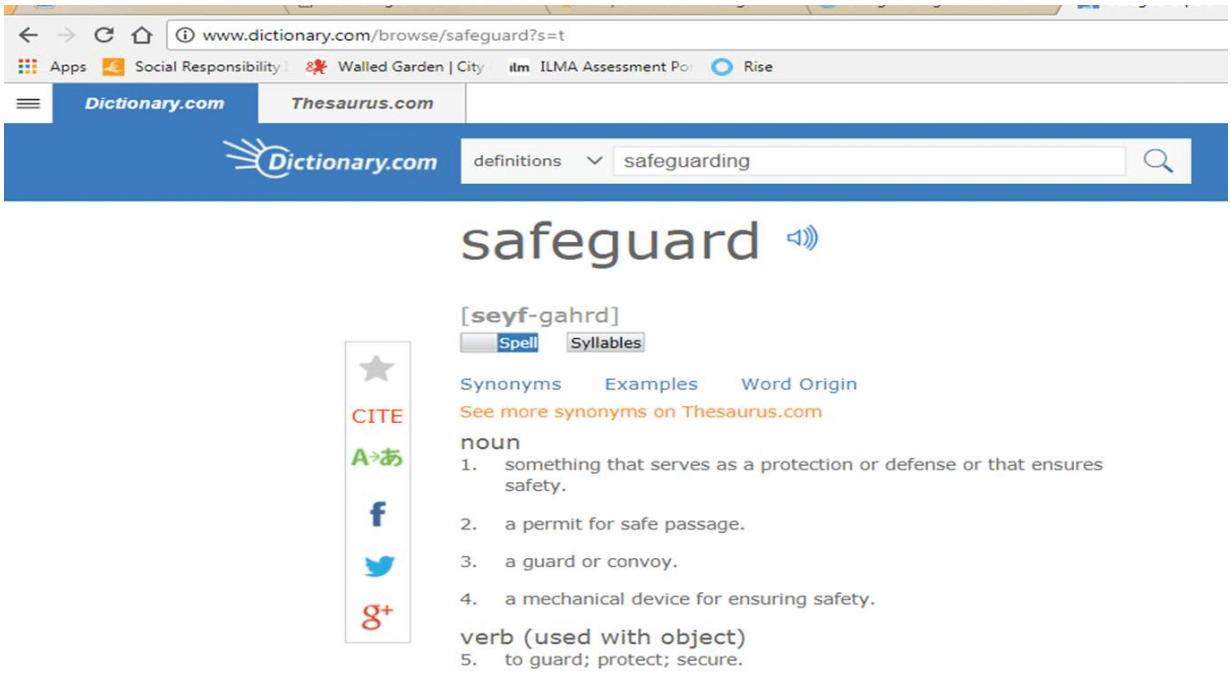
 GamCare/Support

 Behaviours

 Quiz

What is Safeguarding?

Safeguarding is a term usually associated with children; it makes us think about the protection of children, social services, abuse and the mistreatment of children. As a socially responsible operator, MERKUR and its operating businesses take a different view on Safeguarding and what it means:



CLICK TO ENLARGE IMAGE/READ THE DEFINITION OF SAFEGUARDING

The term actually means:

something that serves as a protection or defence or that ensures safety

For most of our customers, gambling is an enjoyable hobby and a social event, however; we must be aware of players that may become addicted to gambling.

When a Customer's gaming changes from enjoyment/social to a problem or addiction we MUST safeguard. Safeguarding is very much an action required within our business.

KEY POINTS:

The Commission's investigation found:

1

Due to a technical failure in 888's systems, over 7,000 customers who had chosen to self-exclude(1) from their casino/poker/sport platform were still able to access their accounts on their bingo platform. The issue went undetected for a prolonged period of time, meaning customers were able to deposit £3.5million into their accounts, and then continue to gamble, for over 13 months.
While 888 did have self-exclusion procedures in place, they were not robust enough and failed to protect potentially vulnerable customers.

2

888 also failed to recognise visible signs of problem gambling behaviour displayed by an individual customer, which was so significant that it resulted in criminal activity. The customer staked over £1.3million, including £55k stolen from their employer. During a 13 month period the customer placed a large number of bets, gambling on average 3-4 hours a day. The lack of interaction with the customer, given the frequency, duration and sums of money involved in the gambling, raised serious concerns about 888's safeguarding of customers at-risk of gambling harm

It is every employees responsibility to recognise the visible signs

Licensing objectives







- To keep crime out of gambling
- To keep gambling fair and open
- To protect children and other vulnerable people.

Safeguarding in our business is about the 3rd licensing objective PROTECT = SAFEGUARD

The Gambling Commission puts a high priority on the social responsibilities operators have to protect children and vulnerable adults from the harm associated with gambling and policies must be in place to support the protection of these people.

This means as a business have to manage the risks and be socially responsible.

We should:

- Train staff on how to recognise and respond to indicators of concern
- Train staff to know how to protect their own safety if customers behave aggressively
- Make information and advice about gambling responsibly generally and discretely available, and provide contact details about where to get help

- Interact with customers to spot warning signs of a problem
- Explain Setting Your Limits to set time limit or deposit limit
- If the customer opts to self exclude make sure you provide the right information and follow the process for self exclusion (detailed in Compliance training)
- Encourage customers to register or become members so we have a point of contact

This online session is designed to help you understand our responsibilities in terms of safeguarding our Customers. It looks at the potential signs of problem gambling and how we can interact with customers to intervene and support their choices.

Please complete this training module yourself and ask if you do not understand any of the information.

Children

The protection of children is vitally important to us as a business. We have a separate and detailed training module dedicated to this area (Age Verification) as well as the Essentials of Compliance training.

Research undertaken on behalf of the Gambling Commission in 2022 has shown the following figures for children aged 11-16 accessing gambling:

78%	Percentage of young people who spent their own money gambling in the last 12 months, did so because they regard it as a fun thing to do.
50%	Percentage of young people have had any gambling experience in 12 months with over a third (35%) playing on arcade gaming machines.
31%	Percentage of 11- to 16-year-olds spent their own money on any gambling activity in the twelve months prior to taking part in the survey. During that period, the most common types of gambling activity that young people spent their own money on were legal or did not feature age restricted products, namely: ▪ 22 % playing arcade gaming machines such as penny pusher or claw grab machines ▪ 15% placing a bet for money between friends or family ▪ 5% playing cards with friends or family for money
28%	Three in ten young people had seen family members they live with gamble, of which 7 percent indicated it had resulted in arguments or tension at home.
10%	One in ten young people said that their own experience of gambling had led them to talk to their parents about how they felt, either sometimes, often, or all of the time
0.9%	This figure has increased from 0.4% since 2016 of 11–16-year-olds that are defined as problem gamblers

Source: research project undertake for the Gambling Commission
NB: The study included 11 - 16-year-olds and from a representation of 2559 pupils using the Ipsos Young People Omnibus.

What are the risks to children of being exposed to Gambling?

The risks vary, depending on the type of gambling activities taking place at the premises.

For example: in MERKUR, safeguarding systems (such as Think 25) should be in place to prevent young people gaining access to the premises.



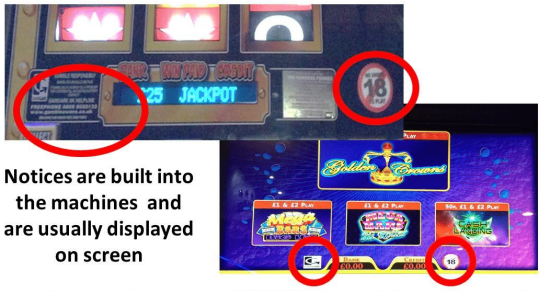
The Challenge 25 scheme MUST be operated by ALL staff and only recognised proof of age accepted (for example photo driving licence or passport; PASS cards)



Signage MUST BE prominently displayed at all points of entry regarding the prohibition of under 18's

ON MACHINES

NOTICES



Notices are built into the machines and are usually displayed on screen

STICKERS



'Stickers' refers to those manually applied by us or machine supplier



Signage MUST BE displayed on machines highlighting age restrictions

If children are permitted access to adult gaming activities, they may be at risk of being:



Exposed to information or advertisements encouraging them to gamble



Allowed or invited to gamble or bet in a commercial setting



Allowed to purchase and consume alcohol (Bingo & Casino)



Be financially exploited

We must ALL operate systems to ensure that under 18's are prevented from access to areas where adult activities (such as betting or high stakes gambling) take place; or where adult gaming machines are located.

REMEMBER: if in doubt, ask for I.D.

Make sure you complete our Age verification course for more on our age policies and how to check I.D.

If you work in one of our FEC's it is even more important that you are vigilant:

FECs are commonly located at seaside resorts, in airports and at motorway service stations, and cater for families, including unaccompanied children and young persons.

Children and young persons are permitted to enter an FEC and may use category D machines. They are not permitted to use category C machines and it is a requirement that there must be clear segregation between the two types of machine, so that under-18s do not have access to them.

Social Responsibility (SR) code 3.2.5(3) in the Licence conditions and codes of practice (LCCP) it states that 'licensees must ensure that their policies and procedures take account of the structure and layout

The Gambling Regulations requires operators to ensure that employees prevent access and challenge children or young persons who attempt to use category C machines.

Over-18 areas within FECs that admit under-18s, must be separated by a barrier with prominently displayed notices at the entrance stating that under-18s are not allowed in that area and with adequate supervision in place to ensure that children and young persons are not able to access these areas or the category C machines. Supervision may be done either by placing the terminals within the line of sight of an official of the operator or via monitored CCTV.

of their gambling premises' in order to prevent underage gambling.

Safeguarding is not just about children; as we have already seen we need to safeguard vulnerable adults too.
Let's look at this next!

CONTINUE

Vulnerable People

The **Gambling Commission** puts a high priority on the social responsibilities operators have to **protect** vulnerable adults from the harm associated with gambling and policies must be in place to support the protection of vulnerable adults.



Which one is a vulnerable adult?



Which person is at Risk?

- A
- B
- C

D

I don't know

SUBMIT

CONTINUE

It's not possible to tell who is at risk by looking at them. Most customers are in control and enjoy the social element of gambling

Safeguarding means we have to look a little deeper and think about those at risk of developing a problem.

It's about the signs and signals we see and hear whilst our customers are in our premises.

Social responsibility/Safeguarding is about using your eyes and ears to understand who is vulnerable.

Click on the + signs to understand more about those people at risk:

Risks Factors: Developing a problem

These are the situations that increase players risks of developing a problem (click to enlarge)

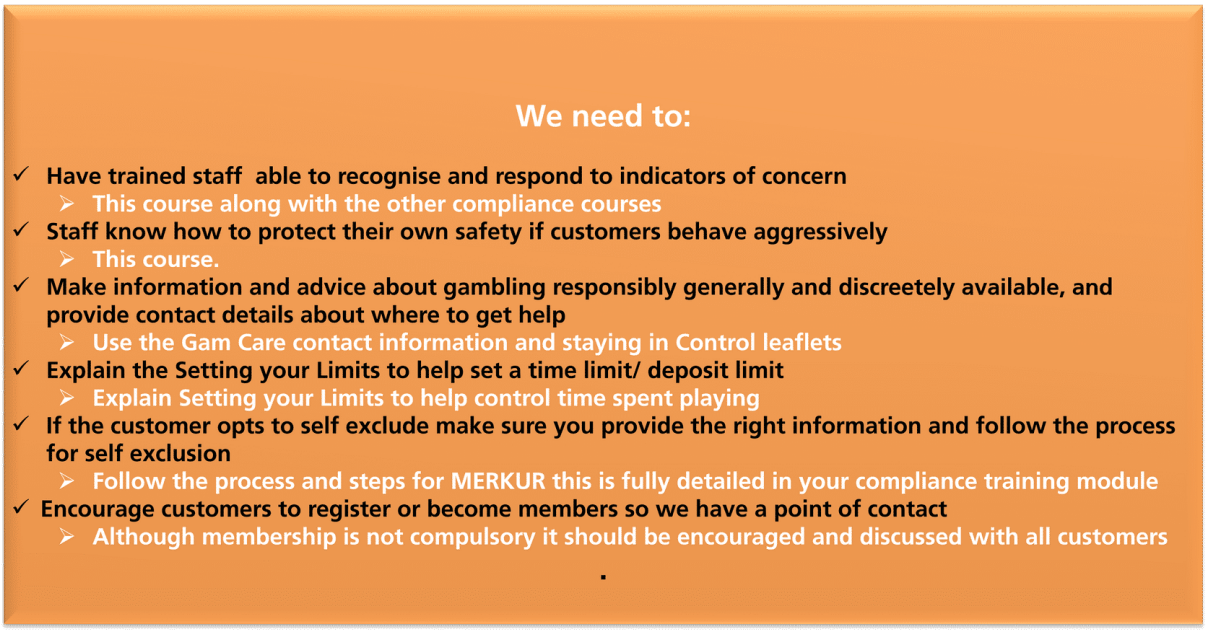


Risk Factors: Impact

If we don't take our social responsibilities seriously; vulnerable adults are at risk in many ways including (click to enlarge):

Managing The Risks

As a business we undertake to minimise the risks in the following ways (click to enlarge):



Some of the signs may be more obvious to loved ones at home but we should be aware

# of these signs when interacting with our customers; observe and listen for these indicators

(tick each box to show you have read each of the common signs of a problem with gambling):

- ☐ Spending more money and time on gambling than they can afford.
- ☐ Losing interest in usual activities or hobbies like going out with friends or spending time with family.
- ☐ Always thinking or talking about gambling.
- ☐ Chasing losses or gambling to get out of financial trouble.
- ☐ Gambling until all of their money is gone.
- ☐ Needing to gamble with larger amounts of money or for a longer time to get the same feeling of excitement or buzz.
- ☐ Feeling anxious, worried, guilty, depressed or irritable.
- ☐ Neglecting other responsibilities (work, family, chores) in order to gamble
- ☐ Having arguments with family or friends about money and gambling.

CONTINUE

There are warning indicators that show when someone is moving from having fun and responsible gambling to becoming more of an issue or problem.

Click play below for more info:

What is problem gambling?

When playing for fun moves across to playing for need, it could be a problem.





ANYONE WHO HAS....

CONTINUE


ANYONE WHO HAS....
EASY ACCESS TO PREFERRED GAMBLING ACTIVITY
FALSE BELIEFS ABOUT THE ODDS OR CHANCES OF WINNING
HAD CHILDHOOD EXPOSURE TO GAMBLING
EXPERIENCE OF MENTAL HEALTH PROBLEMS
A BELIEF THEY HAVE A SYSTEM TO BE ABLE TO 'BEAT THE ODDS'
HAD A BIG WIN AND NOW HAS FALSE EXPECTATIONS OF FUTURE CHANCES
OR ANYONE WHO IS LOSING CONTROL

The Stages of Change

Gambling becomes a problem when people are not in control. Staying in control is vitally important and is the ethos we at MERKUR Slots, MERKUR Bingo, MERKUR Casino all work to.

When someone starts to change their gambling behaviour, there are often different stages of awareness that they move through. These include:

Stage 1 – No problem

If customers are in this stage the positives of gambling outweigh the negatives. They enjoy gambling and don't see it as a problem.



Stage 2 – Awareness

People at this stage feel ambivalent (having mixed feelings) about their gambling.

Often they enjoy it, even though they know that it costs time and money. If they are in this stage they might be thinking about or considering making a change, like cutting down, limiting spend or restricting time spent gambling.



Stage 3 – Wanting to Make a Change

People in this stage feel ready to control their gambling and have made the decision to do something about it. Additionally, they have scheduled a time in the very near future in which to start making changes.



Stage 4 – Take Action

People in this stage say things like - "I am doing something to change my behaviour".

They might try various things such as setting limits on their time and/or deposits

Our support is important at this time as they may be experiencing different emotions as they reflect on the consequences of their gambling.

Stage 5 – Sticking to it

Maintaining change - This stage can be hard. It is when people have identified all the things they need to do to change their behaviour and they have started to put these things into practice.

You know the customers best so your personal support is invaluable too.

Setting Limits is one of the ways MERKUR supports our customers

Customers can choose to set their own limits on any Blueprint B3 machine by choosing the set limits option at the bottom left-hand side of the menu.





Stage 6 - Final Stage - Self Exclusion

The final stage of stopping gambling is if the customer decides they need an external intervention to stop them gambling. When a customer reaches this decision we should fully support them.

This is where MERKUR offer a self exclusion option for Customers.

For full details of self exclusion in Merkur Slots, Merkur Casino and Merkur Bingo, please ensure you have completed the Compliance Training and understand our policies and processes and can facilitate the customers choice. Make sure they are aware of the minimum/maximum time they can self-exclude for.

Often the person who's gambling doesn't think that he or she has a problem; they don't see the subtle changes. Sometimes YOU will spot the problem first, because the customer might be convincing him/herself that everything is fine when really it isn't. It's important to use positive communication rather than

being confrontational or critical. It's also important to be genuine and talk to the customer in a natural way.

For example:



"I can see you're not happy at the moment - I want to help."



"I sense you're getting frustrated – shall we take time out and have a cuppa and a chat"



“You’ve been in more often this week – is everything OK?”

Once you’ve started the conversation, listen carefully to what they have to say in response and be patient. Don’t jump in or cut them off mid sentence, as this might drive them back into their shell or make them turn defensive. Being calm and caring is really important as is knowing what advice and support we can offer

Ultimately we as a business have a responsibility to take action to safeguard vulnerable people so let's move to the next section and look at this next.

Next Section

Click the button to move to the next section of this training module

TAKE ACTION

Taking Action

As a business we have several processes and tools in place to ensure we are promoting responsible gambling. These include:

1. Think 25 Policy
2. Setting your Limits
3. Gamcare Information and Leaflets
4. Complaints Procedure and ADR (Alternative Dispute Resolution)
5. Responsible advertising
6. Self Exclusion Policy and Process
7. and most importantly - **YOU; OUR EMPLOYEES**

These processes and interventions only work if our employees know and understand them and to ensure you do we have the following training modules which refresh every 6 months to keep you up to date and trained to the latest standards











Your role

As we have seen your best tools are your eyes and ears, but observing people and listening for clues to gain insight takes practice; so lets take a look at this next:

Observing & Listening Tips

CLICK ON THE BUTTON FOR MORE INFORMATION ON WHAT YOU CAN DO TO BE SOCIALLY RESPONSIBLE AND SAFEGUARD OUR CUSTOMERS

OBSERVE/LISTEN

Observing & Listening

In this section we will take you through a series of tips and ideas to improve your listening and observation skills

Step 1 of 8

Interact

In order to gain insight into our customers we must interact.

This means approaching and talking to our customers as well as observing their behaviours.

Step 1 of 8

Interact

In order to gain insight into our customers we must interact.

This means approaching and talking to our customers as well as observing their behaviours.

Step 2 of 8

Understand habits

Start by getting a baseline understanding. A common way to get this is by simply observing a person's habits over time. For example how often, and when, do they come in?

Knowing this pattern will help you identify when it changes and you can ask about the behaviour change

This will help identify when gambling maybe developing from a social event to more of a problem

Step 3 of 8

Ask Questions

A seemingly innocent question such as "How are you doing today?" is a way to gauge peoples emotional state and sets you up to probe their answers if you are concerned.

If people are 'fed up' or 'tired' or 'bored' - or if they label any feeling or emotion **- ask them WHY?**

Step 4 of 8

Listen with your eyes and ears

Look for inconsistencies between the person's gestures and words. If they are saying all is fine and well but they are slouched, look tired or seem angry - there may be something bothering them.

- If someone closes their eyes for a moment (longer than a simple blink), takes the time to clear their throat, or asks you to repeat a question, they're probably stalling - reflect on why.
- A lack of eye contact, or excessive blinking or fidgeting are signs that a person may be lying and are also signs of anxiety

Keep an eye on their gaming and remember to offer refreshments and break play

Step 5 of 8

Spot Stress and Break Play

It's important to identify when people in our premises are getting stressed. Look for the following indicators and always attempt to break play:

- **When a person leans with their torso away from you, this can mean that the person is going through a moment of stress**
- **Gestures such as the touch to the forehead or the rubbing of palms against thighs are indicators of stress too**
- **Facial clues of distress and discomfort include the furrowing of the brow, clenching of jaws, lip compression, or the tightening of face and neck muscles**
- **Touching the notch in the front-middle of the neck can mean that the person is trying to protect themselves - suggesting discomfort, especially in women. Similarly, men usually stroke their necks, which is an attempt to lower heart rate**
- **A long, audible exhale - known as a cathartic exhale - means that the person is under severe emotional distress**

Step 6 of 8

Getting Angry?

Customers getting agitated and angry is easy to spot and is a sure sign they need to break play. But before the real shouting begins; what signs can you spot early to stop it escalating? Look out for:

- Pupil constriction and squinting at the machines - this can mean that a person is bothered by what they're seeing
- Clenching the jaws or grinding teeth
- Balled up hands or fists
- Shaking or trembling whilst playing at the machines
- Speech becoming more rapid or high-pitched.
- Head thrust forward
- 'Eye-balling' (staring in anger) at other customers, employees or the machines

Step 7 of 8

Handling Stress and Emotion in Customers

Sometimes we can see the signs but are not surehow to handle them. The next section will look at dealing with angry or agitated customers.

Step 8 of 8

PRACTISE AND DO IT!

Learning how to read people must occur over time - a quick training course won't be an instant solution! It is a behaviour that comes from YOU.

It takes practice and intent. You have to know what to look for and understand what certain gestures mean in order to stay socially responsible.

Keep in mind, there's no single surefire way to tell what someone is thinking but the best start is to take time to simply be present, observe, ask questions and listen - to the words and the body language.

Dealing with Anger & Aggression

It is true that when Customers start to lose control of their gambling they may become agitated or upset and get angry and perhaps become confrontational; remember - this is a sign of a problem and rather than ignore it we have to deal with the situation and help the customers.

Here are some top tips to help you in these situations. Click on each card to flip it for an explanation of what to do and then use the arrows to move to the next or previous cards:

STAY CALM

Stay calm and self-assured; make sure you are not displaying the same signs of agitation that can be seen in the other person

1 of 7

FACIAL EXPRESSIONS

Maintain a neutral facial expression, even our eyebrows can indicate we are surprised or angry, and similarly our mouths can betray our emotions unwittingly

2 of 7

ALLOW THEM SPACE

When a customer is agitated getting too close to them can indicate aggression on your part and escalate the situation. Staying some distance away will also help keep you safe should the customer become physically aggressive.

3 of 7

4 of 7

Control your breathing; when we are stressed, angry or tense, our

THINK ABOUT YOUR VOICE

Lower your voice and keep your tone even; it is hard to have an argument with someone who is not responding aggressively back to you.

5 of 7

BREAK PLAY

Distraction and diversion are extremely useful; when a person is aggressive, they are responding with their own fight-or-flight instincts and not thinking about their actions. Distraction can diffuse the fight response.

6 of 7

When the situation has

REFLECT

calmed down think about what happened and why. Talk to a colleague or your manager. If you know the customer well; ask them what caused it and provide them with support and information (such as the staying in control

threatening to remove the person.

- Do not be defensive or take it personally. What is being said may seem insulting and directed at you, but this is not really about you.
- Do not use humour unless you are sure it will help and you have a very good relationship with the customer
- Do not use sarcasm or humiliate the customer
- Do not put yourself at risk; use staffguard if you are alone and feel vulnerable

Advertising Responsibly

Whilst we do all we can to safeguard children and vulnerable people in our premises; we need to be aware of the messages that are reaching them outside of venues and clubs

When we run promotions locally we must adhere to the marketing code of conduct to ensure that we are safeguarding children and vulnerable people when we promote and advertise our business. Please read the code of conduct attached below. This is available as a printable poster in Knowledge base.




PDF
Marketing Code of Practice.pdf
6.6 MB

GamCare/Support

Our role is to be **aware** and provide **support** to any customer at risk. The industry has strong links to **organisations** that can help anyone who **thinks** they have a **problem with gambling.** It is our duty to provide this information readily and freely:



Every Venue and Club has Staying in Control Leaflets

Make sure you know where they are, the information in them and do not hesitate to share this information with customers who feel they need to make a change.

It's our responsibility to provide this information and support customers in their decision making.



Calculating the risk

Gambling is a fun and exciting form of entertainment, which provides an enjoyable experience.

Playing slot machines is an attractive way of taking a risk as long as the risk taking is kept under control.

The great majority of people who play slot machines or gamble in other ways enjoy the experience without any problems, but a very small number lose control of what they are doing.

For these players it ceases to be fun.

Their life can be dominated by gambling.

Checking it out

Someone who thinks they might have a gambling problem should ask themselves if:

- They lose time from education or work because of gambling.
- They gamble to get money to pay debts or solve financial difficulties.
- After losing they feel they must return as soon as possible to win back losses.
- They gamble until their last pound is gone.
- They borrow to finance their gambling.
- They are reluctant to use "gambling money" for normal expenditure.
- They have ever committed, or considered committing, an illegal act in order to finance their gambling.
- They have ever considered self destructive behaviour as a result of their gambling.

Problem Gambling

Problem gamblers will continue playing whether winning or losing. They will use their own and other people's money in order to keep playing. As gambling takes over their life, many other things can suffer: family life, their job, and other interests.

Gambling becomes a problem when you:

- Gamble until all your money has gone.
- Borrow or steal money to continue gambling.
- Gamble to chase your losses.
- Neglect other interests, family and friends to gamble.

Who can help

If you are in difficulty with your gambling or know someone who is, and would like help, call the GamCare helpline:

GamCare: 0808 8020 133

GamCare is the national centre for information, advice and practical help regarding the social impact of gambling.

The national helpline is answered by trained staff. They can offer counselling information and advice to problem gamblers, family members and to friends of a gambler. Information regarding counselling for problem gamblers is available on request.

What the Staying in Control Leaflet covers

Download a pdf of the leaflet below:

PDF

Staying in control leaflet.pdf

328 KB



responsible gambling trust

BeGambleAware

These organisations are free and accessible to all our customers who think they need help. They are active in promoting responsible gambling and a great source of information for both our employees and our customers.

If you have any questions or concerns about your responsibility to safeguard children, vulnerable people and our customers please talk to your Line Manager and ask for help.

The next stage is to look at what you have learned in this session. Click the button below to start on the knowledge checks.

Let's Go!

Click to get started on the behaviours card sorting activity

BEHAVIOURS KNOWLE...

Behaviours

What behaviours should YOU our employees adopt in order to safeguard?

Look at the words on each card. Each word describes either a positive behaviour and is what we should be doing or a negative behaviour and what we should NOT be doing

POSITIVE BEHAVIOURS

INTERACT

OBSERVE

BE AWARE

COMMUNICATE

AGE CHECK

THINK 25

LISTEN

ASK QUESTIONS

BREAK PLAY

NEGATIVE BEHAVIOURS

IGNORE

DISREGARD

GIVE UP

JUDGE

ACCUSE

CONFRONT

BLAME

Quiz

Read each question and the answer options carefully.

When you complete the quiz your score will be shown. You can then get feedback on the questions and see which you got right and wrong (if any!).

Read any feedback carefully and follow the instructions of what to do.

Good luck!

Question

01/09

What does the term ‘safeguarding’ mean?

- It is something that serves as a protection or defence or that ensures safety
- It is the protection or defence of children/minors
- It applies to FEC’s (family entertainment centres) as they have children in the premises

Question

02/09

What is the reason that 888 had to pay a penalty package of over £7.8million

---

- ○ as a result of allowing children into its premises
- ○ as a result of not upholding the 3 licensing objectives
- ○ As a result of serious failings in its handling of vulnerable customers

Question

03/09

How do we protect children in our business?

- By following the Think 25 policy and age-verifying anyone who looks under 25
- By age checking everyone
- By remembering to safeguard

Question

04/09

How can we tell who is at risk/vulnerable?

- [ ] By observing them
- [ ] By interacting with them
- [ ] By looking for signs of stress
- [ ] By looking for changes in behaviour
- [ ] All of the other answers

Question

05/09

Which policies and/or processes do we have in place to protect and safeguard our customers (tick all that apply)?

- [ ] Think 25 Policy
- [ ] GamCare Information
- [ ] Employee interaction with customers
- [ ] Self exclusion policy
- [ ] Responsible advertising
- [ ] ADR (Alternative Dispute Resolution)

Question

06/09

What should you do if customers are getting agitated/annoyed?

- Match their behaviour and firmly tell them to stop it
- Diffuse the situation by breaking their play
- Ignore them - everyone gets cross when they lose

Question

07/09

Who is at Risk of Problem Gambling?

- ○ Mainly men
- ○ Mainly women
- ○ Anyone who shows signs of losing control of their gambling.
- ○ Mostly people with mental health problem

Question

08/09

Which organisation/phone number is detailed on the 'Staying in Control' leaflet?

- ○ Head Office
- ○ GamCare
- ○ The Gambling Commission

Question

09/09

What is your role in safeguarding

- To report my concerns to one of the support organisations (e.g. gamcare)
- To listen, observe, interact and break play if concerned
- To wait for the customer to ask for help then give them the Staying in Control leaflet


THINK
25
If you are lucky enough to look under 25 years of age, we need to check your ID.
Please do not be offended.
Acceptable forms of ID are:
Driving Licence, Passport, Citizen Card.
18+ BeGambleAware.org
PLAY SENSIBLY
PLAY ENJOYABLY
PLAY AFFORDABLY
MERKUR SLOTS

PLAYING THE MACHINES

Staying in Control

If you feel you are in difficulty with your gambling or know someone who is and would like help,

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JOCUL LA APARATE:
CUM SĂ DEȚINEȚI CONTROLUL



玩角子老虎机时：
保持克制



ИГРАТЬ НА ИГРОВЫХ АВТОМАТАХ
ДЕРЖАТЬ СЕБЯ В РУКАХ



ИГРА НА РОТАТИВКИ: НЕ ГУБЕТЕ КОНТРОЛ



MAKİNELERDE OYNARKEN:
KONTROLÜ ELİNİZDE TUTUN



JUGAR CON LAS MÁQUINAS:
MANTENER EL CONTROL



HRANÍ NA AUTOMATECH:
MĚJTE TO POD KONTOLOU



LOJA ME MAKINERITË:
TË JESH NË KONTROLL



GRAJĄC NA AUTOMATACH:
NIE TRAĆ KONTROLI



A JÁTÉKGÉPEKEN VALÓ JÁTSZÁS:
MEGTARTANI A KONTROLLT



मेशनिहरू खेल्नु नयिन्त्रणमा रहनुहोस्



JOUER AUX MACHINES À SOUS : GARDER LE CONTÔLE



NUTZUNG VON SPIELAUTOMATEN:
DIE KONTROLLE BEHALTEN

18+ BeGambleAware.org

PLAY SENSIBLY | PLAY ENJOYABLY | PLAY AFFORDABLY

MERKUR SLOTS 383

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STAYING IN CONTROL

Whenever you play machines it is wise to remember that :

- You are buying entertainment, not investing your money
- You should only spend money you can afford to lose.
- In advance of playing you should set strict limits on how much you will spend
- Problems will arise if playing machines becomes the most important part of your life
- Playing should take up only a relatively small amount of your time and interest
- Playing within your means is likely to be fun and exciting
- Spending outside your means is likely to create problems for you and others.
- You shouldn’t play to escape from worries or pressure

CALCULAREA RISCULUI

Jocurile de noroc reprezintă o formă de divertisment plăcută și palpitantă, care oferă o experiență savuroasă.

Jocul la aparatele de tip slot-machine reprezintă o metodă atractivă de a risca, atât timp cât riscul este ținut sub control.

Marea majoritate a persoanelor care joacă la aparate de tip slot-machine sau la alte jocuri de noroc se bucură de experiență fără nicio problemă, însă un număr foarte mic de persoane pierd controlul asupra lucrurilor pe care le fac.

Pentru acești jucători, începe să nu mai fie distractiv.

Viața lor poate fi dominată de jocurile de noroc.

PROBLEMELE JOCURILOR DE NOROC

Jucătorii cu probleme vor continua să joace, fie că pierd sau câștigă.

Aceștia vor folosi banii proprii și banii altor persoane pentru a continua să joace. Pe măsură ce jocurile de noroc le acaparează viața, multe alte lucruri vor avea de suferit: viața de familie, serviciul și alte interese.

Jocurile de noroc devin o problemă atunci când:

- Jucați până când vă pierdeți toți banii.
- Împrumutați sau furați bani pentru a continua să jucați.
- Jucați pentru a încerca să vă recuperați pierderile.
- Neglijați alte interese, familia sau prietenii pentru a juca.

VERIFICAREA

O persoană care consideră că ar putea avea o problemă legată de jocurile de noroc trebuie să se întrebe dacă:

- Irosește timpul alocat educației sau serviciului din cauza jocurilor de noroc.
- Joacă pentru a obține bani în vederea achitării datoriilor sau a rezolvării dificultăților financiare.
- După ce pierde, simte că trebuie să revină cât mai repede posibil pentru a recupera pierderile.
- Joacă până când pierde ultimul ban.
- Împrumută bani pentru a-și finanța jocurile de noroc.
- Nu dorește să folosească „banii pentru jocuri de noroc” pentru o cheltuială normală.
- A comis sau s-a gândit să comită un act ilegal pentru a-și finanța jocurile de noroc.
- A luat vreodată în considerare un comportament autodistructiv ca rezultat al jocurilor de noroc.

CINE POATE OFERI AJUTOR?

În cazul în care vă aflați în dificultate privind jocurile de noroc sau cunoașteți pe cineva în această situație și care dorește ajutor, apelați linia de asistență telefonică a GamCare:

GamCare: 0808 8020 133

GamCare este centrul național de informații, sfaturi și asistență practică privind impactul social al jocurilor de noroc.

La linia de asistență telefonică națională se primește răspuns din partea unui personal instruit. Acesta poate oferi consiliere, informații și sfaturi pentru jucătorii cu probleme, membrii familiei și prietenii unui jucător. Informații privind consilierea pentru jucătorii cu probleme sunt disponibile la cerere.

CUM SĂ DEȚINEȚI CONTROLUL

Oricând jucați la aparate de tip slot-machine, este înțelept să vă amintiți că:

- Cumpărați divertisment, nu vă investiți banii.
- Trebuie să cheltuiți doar banii pe care vă permiteți să îi pierdeți.
- Înainte de a juca, trebuie să vă stabiliți limite stricte privind ce sumă veți cheltui.
- Vor apărea probleme dacă jocul la aparatele de tip slot-machine devine cea mai importantă parte a vieții dumneavoastră.
- Jocul trebuie să ocupe doar o parte relativ mică a timpului și interesului dumneavoastră.
- Jocul în limitele posibilităților este cel mai probabil distractiv și palpitant.
- Cheltuirea dincolo de posibilități poate genera probleme pentru dumneavoastră și pentru alții.
- Nu trebuie să jucați pentru a scăpa de griji sau presiuni.

LLOGARITJA E RREZIKUT

Loja e fatit është një formë argëtimi dhe emocionuese, e cila siguron përvojë të kënaqshme.

Të luash me makineritë e lojërave të fatit është mënyrë tërheqëse e marrjes së një rreziku për sa kohë që rreziku mbahet nën kontroll.

Shumica dërrmuese e njerëzve që luajnë lojëra fati ose bixhoz në mënyra të tjera e shijojnë përvojën pa ndonjë problem, por një numër shumë i vogël humbasin kontrollin e asaj që po bëjnë.

Për këta lojtarë pushon së qeni kënaqësi.

Jeta e tyre mund të sundohet nga lojërat e fatit.

BIXHOZI PROBLEMATIK

Bixhozxhinjtë problematikë do të vazhdojnë të luajnë qofshin fitues, qofshin humbës.

Ata do të përdorin paratë e tyre dhe të të tjerëve në mënyrë që të vazhdojnë të luajnë. Ndërsa bixhozi mbizotëron në jetën atyre, shumë gjëra të tjera mund të kenë probleme: jeta familjare, puna e tyre dhe interesa të tjera.

Kumari bëhet problem kur ju:

- Luani bixhoz deri sa të mbarojnë të gjitha paratë.
- Merrni borxh ose vidhni para për të vazhduar bixhozin.
- Luani bixhoz për të ndjekur humbjet tuaja.
- Neglizhoni interesat e tjera, familjen dhe miqtë për të luajtur bixhoz.

TA KONSTATOSH

Dikush që mendon se mund të ketë një problem bixhozi duhet të pyesë veten nëse:

- Humb kohë nga edukimi ose puna për shkak të lojërave të fatit.
- Luan me lojëra fati për të marrë para për të paguar borxhet ose për të zgjidhur vështirësitë financiare.
- Pas humbjes ata mendojnë se duhet të kthehen sa më shpejt për të fituar përsëri çfarë kanë humbur.
- Ata luajnë bixhoz derisa të humbasin lekët e fundit.
- Ata marrin borxh për të financuar lojën e tyre.
- Ata hezitojnë të përdorin “paratë e bixhozit” për shpenzime normale.
- Ata kanë kryer ose konsideruar kryerjen e një veprimi të paligjshëm që të financojnë lojën e tyre.
- Ata kanë konsideruar ndonjëherë sjelljen vetëshkatërruese si rezultat i lojërave të tyre të fatit.

KUSH MUND TË NDIHMOJË?

Nëse jeni në vështirësi me lojëra të fatit ose njihni dikë që është dhe dëshiron ndihmë, telefononi linjën telefonike të ndihmës GamCare:

GamCare: 0808 8020 133

GamCare është qendra kombëtare për informacion, këshilla dhe ndihmë praktike në lidhje me ndikimin shoqëror të lojërave të fatit.

Linja kombëtare telefonike e ndihmës përgjigjet nga stafi i trajnuar. Ata ofrojnë këshillim, informacion dhe këshilla për lojtarët problematikë, anëtarët e familjes dhe miqtë një lojtari të fatit. Informacioni në lidhje me këshillimin për lojtarët problematikë disponohet sipas kërkesës.

TË JESH NË KONTROLL

Kurdoherë që luani me makineri kujtoni me mençuri se:

- Ju po blini argëtim, nuk po investoni paratë tuaja.
- Duhet të luani vetëm me para që mund t'ia lejoni vetes të humbisni.
- Para se të luani, duhet të vendosni kufij të rreptë se sa të harxhoni.
- Problemet lindin nëse loja me makineri bëhet pjesa më e rëndësishme e jetës tuaj.
- Loja duhet të marrë vetëm një sasi relativisht të vogël të kohës dhe interesit tuaj.
- Të luani brenda mundësive tuaja ka mundësi të jetë argëtuese dhe emocionuese.
- Harxhimi jashtë mundësive tuaja ka mundësi të krijojë probleme për veten tuaj dhe të tjerët.
- Nuk duhet të luani për të shpëtuar nga shqetësimet ose presionet.

估算风险

赌博是一项十分有趣、令人兴奋的娱乐活动，可以为参与者提供愉快的体验。

玩老虎机是一种极富吸引力的冒险方式，前提是风险控制得当。

虽然绝大多数玩老虎机或以其他方式赌博的人均可以愉快地享受这种体验且不会出现任何问题，但也有极少数人无法控制自己的行为。

对于此类赌博参与者而言，赌博不再有趣。

他们的生活可以由赌博主宰。

问题赌博

问题赌徒无论输赢，均会不断进行赌博。

他们会用自己以及他人的钱不断进行赌博。随着赌博逐渐占据他们的生活，许多其他事情可能会受到影响：家庭生活、工作以及其他兴趣爱好。

当您出现以下情况，即成为一名问题赌徒：

- 不断赌博，直到将所有钱输光。
- 借钱或者偷钱以继续赌博。
- 不断赌博，试图弥补之前的损失。
- 因赌博而忽视其他兴趣爱好、家庭和朋友。

进行自查

对于认为自己可能存在赌博问题的人而言，应该自查一下是否属于以下情况：

- 因赌博而浪费接受教育或工作的时间。
- 利用赌博赚钱来偿还债务或解决财务困难。
- 在输钱后认为自己必须尽快用更多的赌博来赢回输掉的本钱。
- 不输得精光绝不离场。
- 靠借钱获得赌资。
- 不愿意将赌资用于正常支出。
- 曾经采取过违法行为或考虑过采取违法行为来获得赌资。
- 曾经考虑过因赌博而采取自毁行为。

向谁求助？

如果您在赌博时很难保持克制，或者认识存在这种情况的人并且他们希望寻求帮助，请拨打GamCare求助热线：

GamCare: 0808 8020 133

GamCare是就赌博的社会影响提供相关信息、建议和实际帮助的国家中心。

该全国性求助热线由经过专门训练的工作人员受理。他们可以为问题赌徒、其家庭成员以及赌徒的朋友提供咨询、信息和建议。有关问题赌徒的咨询信息，可应要求提供。

保持克制

赌博时切记以下几点：

- 您正在进行的赌博活动纯属娱乐，而非投资。
- 您应该仅在经济能力承受范围内参与赌博。
- 您应该在赌博前设定严格的赌资上限。
- 如果您的生活被赌博所主导，就会出现各种问题。
- 赌博应该仅占用您相应较少的时间，您应该仅仅将它作为一项不起眼的兴趣爱好。
- 在经济能力承受范围内赌博才有可能获得最大乐趣，让人兴奋不已。
- 超出经济能力承受范围的赌博可能会给自己和他人带来极大麻烦。
- 您不应将赌博作为一种逃避烦恼或减轻压力的方式。

OCEŃ RYZYKO

Hazard jest zabawną i ekscytującą formą rozrywki, która zapewnia przyjemne wrażenia.

Gra na automatach jest atrakcyjnym sposobem podejmowania ryzyka, o ile podejmowanie ryzyka jest pod kontrolą.

Większość ludzi grających na automatach lub uprawiających hazard w inny sposób korzysta z tego doświadczenia bez żadnych problemów, ale bardzo mała liczba traci kontrolę nad tym, co robi.

Dla tych graczy przestaje być zabawą.

Ich życie może być zdominowane przez hazard.

PROBLEM Z HAZARDEM

Problemowi hazardzistom będzie nadal grali, czy wygrywają czy przegrywają.

Będą korzystać z własnych i innych pieniędzy, aby dalej grać. Ponieważ hazard dominuje ich życie, wiele innych rzeczy może ucierpieć: życie rodzinne, praca i inne zainteresowania.

Hazard staje się problemem, gdy:

- Uprawiasz hazard, aż stracisz wszystkie swoje pieniądze.
- Pożyczasz lub kradniesz pieniądze, aby dalej grać.
- Uprawiasz hazard, aby pokryć swoje straty.
- Zaniedbujesz inne zainteresowania, rodzinę i przyjaciół, aby grać.

SPRAWDŹ

Ktoś, kto uważa, że może mieć problem z hazardem, powinien zadać sobie pytanie, czy:

- Czas przeznaczony na edukację lub pracę poświęca hazardowi.
- Uprawia hazard, aby zdobyć pieniądze na spłatę długów lub rozwiązać problemy finansowe.
- Po przegranej czuje, że musi jak najszybciej wrócić do gry, aby odzyskać przegraną kwotę.
- Gra, dopóki nie straci ostatniego grosza.
- Pożycza pieniądze, aby mieć na grę.
- Niechętnie przeznacza „pieniądze na hazard" na normalne wydatki.
- Popełnił lub rozważał popełnienie nielegalnego czynu, aby mieć pieniądze na grę.
- Zawsze uważał zachowania autodestrukcyjne za skutek hazardu.

KTO MOŻE POMÓC?

Jeśli uważasz, że masz problemy z hazardem lub znasz kogoś, kto ma i chciałby uzyskać pomoc, zadzwoń na infolinię GamCare:

GamCare: 0808 8020 133

GamCare jest krajowym centrum informacji, porad i praktycznej pomocy w zakresie społecznych skutków hazardu.

Na krajowej infolinii pracuje wykwalifikowany personel. Mogą zaoferować informacje i porady osobom, które mają problem z hazardem, ich rodzinom i przyjaciołom. Informacje dotyczące doradztwa osobom uzależnionym od hazardu są udostępniane na życzenie.

NIE TRAĆ KONTROLI

Zawsze, gdy grasz na maszynach, dobrze abyś pamiętał, że:

- Kupujesz rozrywkę, a nie inwestujesz pieniądze.
- Powinieneś wydawać tylko pieniądze, które możesz stracić.
- Przed rozpoczęciem gry powinieneś wyznaczyć ścisłe limity wydatków.
- Pojawią się problemy, jeśli gra na automatach stanie się najważniejszą częścią Twojego życia.
- Hazard powinien stanowić tylko stosunkowo niewielki procent Twojego czasu i zainteresowań.
- Granie w ramach swoich możliwości finansowych może być przyjemne i ekscytujące.
- Wydawanie ponad swoje możliwości finansowe może stworzyć problemy dla Ciebie i innych.
- Nie graj, aby uciec od zmartwień czy presji.

РАСЧЕТ РИСКА

Азартные игры - это забавная и увлекательная форма развлечения, доставляющая удовольствие.

Игра на игровых автоматах - это привлекательный способ рисковать, до тех пор, пока риск находится под контролем.

Подавляющее большинство людей, которые играют на игровых автоматах или играют в азартные игры другими способами, без проблем получают от этого удовольствие, но очень малое число людей теряют контроль над тем, что они делают.

Для таких игроков это перестает быть развлечением.

Азартные игры могут начать доминировать в их жизни.

ИГРОВАЯ ЗАВИСИМОСТЬ

Игроки с зависимостью будут продолжать играть, выигрывая или проигрывая.

Они будут использовать свои и чужие деньги, чтобы продолжать играть. Поскольку азартные игры захватывают их жизнь, могут пострадать многие другие стороны: их семейная жизнь, работа и прочие интересы.

Азартные игры становятся проблемой, когда вы:

- Играете, пока все ваши деньги не кончатся.
- Занимаете или крадете деньги, чтобы продолжить играть.
- Играете, чтобы отыграть свои потери.
- Игнорируйте другие интересы, семью и друзей.

ПРОВЕРЬТЕ ЭТО

Те, кто думает, что у них могут быть проблемы с азартными играми, должны спросить себя:

- Теряют ли они время на учебу или работу из-за азартных игр?
- Играют ли они, чтобы получить деньги, чтобы заплатить долги или решить финансовые проблемы?
- Чувствуют ли они после проигрыша , что должны вернуться как можно скорее, чтобы отыграть потери?
- Играют ли они до тех пор, пока не кончится их последний фунт?
- Занимают ли они деньги, чтобы финансировать свои азартные игры?
- Используют ли они неохотно «деньги на азартные игры» на обычные расходы?
- Совершали или рассматривали ли они когда-либо возможность совершения незаконных действий с целью финансирования своих азартных игр?
- Задумывались ли они когда-либо о саморазрушительном поведении в результате своих азартных игр?

КТО МОЖЕТ ПОМОЧЬ?

Если вы чувствуете, что у вас есть зависимость от азартных игр, или вы знаете такого человека и хотите ему помочь, позвоните на горячую линию GamCare:

GamCare: 0808 8020 133

GAMCARE - это национальный центр информации, советов и практической помощи в отношении социальных последствий азартных игр.

Их горячую линию обслуживает обученный персонал Они могут предложить информацию о терапии и советы игрокам с зависимостью, членам семьи и друзьям таких игроков. Информация о консультациях для игроков с зависимостью предоставляется по запросу.

ДЕРЖАТЬ СЕБЯ В РУКАХ

Каждый раз, когда вы играете на автоматах, следует помнить следующее:

- Вы покупаете развлечения, а не вкладываете деньги.
- Вы должны тратить только те деньги, которые можете позволить себе потерять.
- Перед игрой вы должны установить строгие ограничения суммы, которую вы потратите.
- Если игровые автоматы станут самой важной частью вашей жизни, у вас возникнут проблемы.
- Игра должна отнимать у вас относительно небольшое количество времени и интересов.
- Играть по средствам скорее всего будет весело и увлекательно.
- Игра не по средствам может создать проблемы как для вас, так и для других.
- Вы не должны играть, чтобы убежать от забот или давления.

A KOCKÁZAT KISZÁMÍTÁSA

A szerencsejáték a szórakoztatás vidám és izgalmas formája, amely élvezetes élményt nyújt.

A játékgépeken való játék a kockázatvállalás vonzó módja mindaddig, amíg a kockázatvállalást kézben tartja.

A játékgépekkel játszó vagy más módon szerencsejátékot játszó emberek nagy többsége minden gond nélkül élvezi az élményt, de nagyon kevés ember elveszíti az irányítást a tetteik felett.

Ezeknek a játékosoknak már nem szórakozás a játék.

Életüket a szerencsejáték uralhatja.

SZERENCSEJÁTÉK-FÜGGŐSÉG

A szerencsejáték-függők tovább játszanak, akár nyernek, akár vesztenek.

Saját és mások pénzét fogják felhasználni a játék folytatásához. Amint a szerencsejáték átveszi az életüket, sok minden más szenvedhet: a családi élet, a munkájuk és más érdekek

A szerencsejáték akkor válik problémává, ha:

- Addig játszik, amíg minden pénze el nem fogy.
- A szerencsejáték folytatásához pénzt kölcsönöz vagy lop.
- Játszik, hogy behozza a veszteségeit.
- Elhanyagolja el a többi érdekét, a családot és a barátokat a játékért.

ELLENŐRZÉS:

Valaki, aki úgy gondolja, hogy szerencsejáték-függősége van, tegye fel magának a következő kérdéseket:

- A szerencsejáték miatt időt veszít-e az oktatásból vagy a munkából?
- Szerencsejátékot űz, hogy pénzt szerezzen adósságai kifizetéséhez vagy pénzügyi nehézségei megoldásához?
- Veszteségük után úgy érzi, a lehető leghamarabb vissza kell térnie, hogy visszanyerje a veszteségeit?
- Addig játszik, amíg az utolsó fontja el nem fogy?
- Kölcsönözn szerencsejátéka finanszírozására?
- Nem szívesen használja a „szerencsejáték-pénzt” normál kiadásokra?
- Szerencsejátéka finanszírozása érdekében valaha törvénysértő cselekményt követett el, vagy fontolóra vette annak elkövetését?
- Szerencsejátéka eredményeként valaha is fontolgatott önpusztító magatartást?

KI TUD SEGÍTENI?

Ha úgy érzi, hogy nehézségei vannak a szerencsejátékkal kapcsolatban, vagy ismer egy olyan személyt, akinek segíteni szeretne, hívja a GamCare segélyvonalat:

GamCare: 0808 8020 133

A GamCare a szerencsejáték szociális hatásaival kapcsolatos nemzeti információs, tanácsadó és gyakorlati segítségnyújtási központ.

Segélyvonalukat képzett személyzet működteti. Ők tanácsadásra vonatkozó tájékoztatást és tanácsokat kínálnak a függőséggel küzdő szerencsejátékosoknak, családtagjaiknak és barátaiknak. Kérésre rendelkezésre állnak információk a szerencsejáték-függőknek való tanácsadással kapcsolatban.

MEGTARTANI A KONTROLLT

Bármikor játékgépeken játszik, bölcs dolog megjegyezni, hogy:

- Szórakozást vásárol, és nem pénzt fektet be.
- Csak olyan összeget, amelynek elvesztését megengedheti magának.
- A játék előtt szigorú korlátokat kell meghatároznia arra vonatkozóan, hogy mennyit költ.
- Problémák merülnek fel, ha a gépeken való játék válik az életének legfontosabb részévé.
- A játéknak csak viszonylag kis részét kell lefoglalnia az idejéből és érdeklődéséből.
- A lehetőségein belül való játék valószínűleg szórakoztató és izgalmas lesz.
- A lehetőségein felüli költekezés valószínűleg problémákat okoz Önnek és másoknak.
- Nem szabad azért játszani, hogy meneküljön gondok vagy nyomás elől.

ВЗЕМАЙТЕ ПРЕМЕРЕНИ РИСКОВЕ

Хазартът е забавно и вълнуващо развлечение, което предлага приятно изживяване.

Игрите на ротативки предлагат възможност да поемете риск, стига той да е премерен.

Повечето хора, които играят на ротативки или други хазартни игри, се забавляват без да имат проблеми, но малък брой хора губят контрол върху това, което правят.

За тези играчи, забавлението изчезва.

Хазартът контролира техния живот.

ПРОБЛЕМИ С ХАЗАРТА

Играчите с проблеми продължават да играят независми дали печелят или губят.

Те ползват собствените си пари, както и тези на други хора, за да продължат да играят. Докато хазартът завзема живота им, други негови аспекти страдат, като семейството, работата и другите интереси.

Хазарът се превръща в проблем, когато:

- Играете докато не изхарчите всичките си пари.
- Вземате пари назаем или крадете, за да продължите да залагате.
- Залагате, за да наваксате за загубите си.
- Пренебрегвате другите си интереси, семейството и приятелите си, за да залагате.

ЗАМИСЛЕТЕ СЕ

Играчите, които смятат, че имате хазартен проблем, трябва да се запитат дали:

- Бягат от работа или образование заради хазарта.
- Играят хазарт, за да изплатят дългове или да разрешат финансови проблеми.
- След като загубят, те чувстват, че трябва да се върнат възможно най-скоро, за да си върнат загубите.
- Залагат докато пропилеят и последната стотинка.
- Вземат пари назаем, за да финансират хазартните си навици.
- Отказват да използват парите спечелени от хазарт за ежедневни разходи.
- Извършват или мислят да извършат незаконни дела, за да финансират хазартните си навици.
- Имат поведение, което е заплаха за самите тях, заради хазартните им навици.

КОЙ МОЖЕ ДА ПОМОГНЕ?

Ако имате проблеми с хазарта, или познавате някой с такъв проблем, и искате да помогнете, позвънете на линията за помощ на GamCare:

GamCare: 0808 8020 133

GamCare е национален център за информация, съвет и практична помощ относно социалните последици от хазарта.

Националната линия за помощ се поддържа от обучени служители, които могат да предложат консултации, информация или съвети на играчи с проблеми, членове на семействата им или техни приятели. При поискване можете да получите консултации относно играчи с хазартни зависимости.

НЕ ГУБЕТЕ КОНТРОЛ

Когато играете на ротативки, е добре да помните, че:

- Вие си купувате забавление, а НЕ инвестирате пари.
- Трябва да харчите единствено толкова, колкото можете да си позволите да загубите.
- Преди да започнете да играете, трябва да поставите лимит на сумата, която ще изхарчите.
- Ако играта на ротативки стане най-важното нещо в живота ви, ще изпитате проблеми.
- Играта трябва да заема малка част от вашето време и интереси.
- По-забавно и вълнуващо е да играете в допустими граници.
- Харченето на повече, отколкото можете да си позволите на-вероятно ще създаде проблеми и на вас и на другите.
- Играта не бива да бъде начин да избегнете тревогите или проблемите си.

जोखमि आकलन गर्नु

जुवा मनोरन्जनको मजा र उत्तेजना पूर्ण रूप हो, जसले एउटा रमाइलो अनुभव प्रदान गर्दछ ।

जोखमि लनिलाई नयिन्त्रणमा राख्दासम्म स्लट मेसनिहरू खेल्नु जोखमि लनि आकर्षक तरीका हो

स्लट मेसनिहरू खेल्ने वा अन्य तरकिाले जुवा खेल्ने धेरै जसो मानसिहरूले कुनै समस्या नभइकन रमाइलोको अनुभव गर्ने गर्छन्, तर एक सानो संख्याका मानसिहरूले उनीहरूले के गररिहेछन् भन्ने कुराको नयिन्त्रण गुमाउँछन् ।

यी खेलाडीहरूको लागि यो रमाइलो हुँदैन ।

तनिीहरूको जीवनमा जूवाले प्रभुत्व जमाएको हुन्छ

समस्या युक्त जुवा खेलाइ

समस्या युक्त जुवा खेलाडीहरूले हारे पनि जिते पनि जुवा खेलरिहने गर्छन् ।

खेललाई जारी राख्नको लागि तिनीहरूले आफ्नै र अरू व्यक्तिको पैसा प्रयोग गर्ने गर्छन् । जुवा खेलले आफ्नो जीवन लनि भएकोले, अरू धेरै कुराले पीडति हुन सक्छन्: पारविारकि जीवन, तनिीहरूको जागरि, र अन्य रुचहिरू

जुवा खेल्ने समस्या बन्छ यदि तपाईं:

- तपाईंको सबै पैसा नसकएिसम्म जुवा खेल्नुहुन्छ ।
- जुवा खेल्नलाई जारी राख्नको लागि पैसा सापटी लनि वा चोरी गर्ने गर्नुहुन्छ ।
- तपाईंको घाटालाई लखेट्नको लागि जुवा खेल्नुहुन्छ ।
- जुवा खेल्नको लागि परविार र साथीहरू जस्ता अन्य रुचहिरूलाई बेवास्ता गर्नुहुन्छ ।

यसलाई नयिन्त्रण गर्नु

आफूमा जूवाको समस्या भएको हुन सक्ने सोच्ने कसैले आफैलाई सोध्नु पर्छ कि:

- जुवा खेलको कारणले तनिीहरूले शक्षिा वा कामबाट समय गुमाउँछन् ।
- ऋण तरि वा वत्तिीय कठनिाइहरू समाधान गर्नको लागि तनिीहरूले पैसा लनि जुवा खेल्छन् ।
- पैसा हारेपछि तनिीहरूले गुमेको पैसा फरि्ता जति सकेसम्म चाँडो फर्कनु पर्छ भन्ने महसुस गर्ने गर्छन् ।
- अन्तमि पाउन्ड नगइसकेसम्म तनिीहरू जुवा खेल्छन् ।
- तनिीहरू आफ्नो जुवाको लागि पैसा जुटाउन सापटी लनि्छन् ।
- सामान्य खर्चको लागि तनिीहरू "जुवा पैसा" प्रयोग गर्न अनचि्छुक हुन्छन् ।
- जुवा खेलको लागि पैसा जुटाउन उनीहरूले कहलि्यै गैहर कानुनी काम गर्छन्, वा गर्ने बारे सोच्छन् ।
- आफ्नो जूवाको परणिामको रूपमा उनीहरूले कहलि्यै आत्म वनिाशकारी व्यवहारको बारेमा सोचेका छन् ।

कसले सहयोग गर्न सक्छ ?

यदि तपाई आफ्नो जुवा खेल्नमा समस्या भएको महसुस गर्नुहुन्छ वा कसैलाई समस्या भएको थाहा छ र जसले सहयोग चाहन्छ भने, **GamCare** हेल्पलाइन लाई फोन गर्नुहोस्

GamCare: 0808 8020 133

GamCare जुवाको सामाजकि प्रभावको सम्बन्धमा सूचना, सल्लाह र व्यावहारकि सहयोगको लागि राष्ट्ररयि केन्द्र हो ।

राष्ट्ररयि हेल्पलाइनमा प्रशक्षिति कर्मचारीहरूले जवाफ दनि्छन् । तनिीहरूले जूवा खेल्नेहरू, परविारका सदस्यहरू र जूवा खेल्ने साथीहरूलाई परामर्श, सूचना र सल्लाह प्रदान गर्न सक्दछ । समस्या युक्त जुवा खेलाडीहरूको लागि परामर्श सम्बन्धी जानकारी अनुरोध गरेमा उपलब्ध हुन्छ ।

नयिन्त्रणमा रहनु

तपाईंले मेशनिहरू खेल्नुहुँदा नम्निलखिति कुरा सम्झनु बुद्धमिानी हुन्छः

- तपाईं मनोरञ्जन कनि्दै हुनुहुन्छ, तपाईंको पैसामा लगानी गर्दै हुनुहुन्न ।
- तपाईंले केवल आफूले हार व्यहोर्न सक्ने पैसा मात्र खर्च गर्नु पर्छ ।केवल पैसाले खेल्नुहोस् तपाईंले हार व्यहोर्न सक्नुहुन्छ
- खेल्नु भन्दा पहलिा तपाईंले कति खर्च गर्नुहुन्छ त्यसको सख्त सीमा तोक्नु पर्छ ।
- यदि खेल्ने मेसनिहरू तपाईंको जीवनको सबै भन्दा महत्त्वपूर्ण हसि्सा भयो भने समस्याहरू खडा हुनेछन् ।
- खेलले तपाईंको समय र रुचिको सापेक्ष रूपमा सानो मात्रा मात्र लनि पर्छ ।
- तपाईंको आय स्रोत भत्रि खेल्नुको अर्थ रमाइलो र उत्तेजना हुन सक्छ
- तपाईंको आय स्रोत भन्दा बाहरि खर्च गर्नाले तपाईं र अरुको लागि समस्या सर्जिना हुन सक्छ
- चन्ता वा दबाबबाट उम्कनको लागि तपाईंले खेल्नु हुँदैन ।

RISK HESAPLAMASI YAPIN

Kumar, keyifli bir deneyim sağlayan zevkli ve heyecan verici bir eğlence şeklidir.

Slot makinelerinde oynamak, kontrollü bir şekilde yapıldığı sürece cazip bir risk alma yoludur

Slot makinelerinde veya başka şekillerde kumar oynayan insanların büyük çoğunluğu herhangi bir sorun yaşamadan bu deneyimin tadını çıkarırken, bu kişilerin az da olsa bir kısmı kontrolünü kaybeder.

Bu durum oyuncular için eğlenceli olmaktan çıkar.

Kumar hayatlarını tamamen ele geçirebilir

KUMAR BAĞIMLILIĞI

Kumar bağımlıları, kazansalar da kaybetseler de oynamaya devam ederler.

Oynamaya devam edebilmek için kendi paralarını ve başkalarının parasını kullanırlar. Kumar hayatlarını ele geçirdikçe aile hayatı, iş hayatı ve diğer ilgi alanları gibi birçok unsur da zarar görür

Kumar, şu durumlarda sorun haline gelir:

- Tüm paranız bitene kadar kumar oynamak.
- Kumar oynamaya devam etmek için borç almak veya para çalmak.
- Kayıpları geri kazanmak için kumar oynamak.
- Kumar oynamak için diğer ilgi alanlarını, aile ve arkadaşları ihmal etmek.

DEĞERLENDIRME YAPIN

Kumar sorunu yaşıyor olabileceğini düşünen biri, kendine şunları yapıp yapmadığını sormalıdır:

- Kumar yüzünden okula veya işe daha az zaman ayırmak.
- Borç ödemek veya maddi zorlukların üstesinden gelmek üzere para kazanmak için kumar oynamak.
- Kaybettikten sonra, kayıpları geri kazanmak için mümkün olan en kısa sürede yeniden oynamak zorunda hissetmek.
- Son parası bitene kadar kumar oynamak.
- Kumar giderlerini finanse etmek için borç almak.
- "Kumar parasını" normal harcamalar için kullanmaktan çekinmek.
- Kumar alışkanlığını finanse etmek için yasa dışı bir eylemde bulunmak veya bulunmayı düşünmek
- Kumar oynamanın bir sonucu olarak aklından kendine zarar verecek davranışlarda bulunmayı geçirmek.

KIM YARDIM EDEBILIR?

Kumar alışkanlığınızla ilgili zorluk yaşıyorsanız veya bu durumda olup yardım isteyen başka birini tanıyorsanız, GamCare yardım hattını arayın:

GamCare: 0808 8020 133

GamCare, kumarın sosyal etkileriyle ilgili bilgi, tavsiye ve pratik yardım sunan ulusal bir merkezdir.

Ulusal yardım hattı, eğitimli personel tarafından yanıtlanır. Kumar bağımlılarına, kumar oynayanların aile ve arkadaşlarına danışmanlık, bilgi ve tavsiye sunabilir. Kumar bağımlılarına yönelik danışmanlıkla ilgili bilgiler talep üzerine sunulur.

KONTROLÜ ELINIZDE TUTUN

Makinelerde oyun oynadığınızda şunları unutmamak önemlidir:

- Paranızla yatırım yapmış değil, eğlence satın almış olursunuz.
- Sadece kaybetmeyi göze alabileceğiniz parayı harcamalısınız.
- Oynamadan önce, ne kadar harcama yapacağınızla ilgili net sınırlar belirlemelisiniz.
- Makinelerde oyun oynamanın hayatınızın en önemli parçası haline gelmesi, sorunların ortaya çıkmasına neden olur.
- Zamanınızın ve ilginizin yalnızca küçük bir kısmını oyun oynamaya ayırmalısınız.
- İmkânlarınız dahilinde oynamak eğlenceli ve heyecan verici olabilir.
- İmkânlarınızın ötesinde harcama yapmak hem siz hem de başkaları için sorunlar yaratabilir.
- Endişelerden veya baskılardan uzaklaşmak için oynamamalısınız.

MESURER LES RISQUES

Les jeux d'argent sont une forme de divertissement amusante et passionnante pour profiter d'une expérience agréable.

Jouer aux machines à sous est une manière attrayante de prendre des risques tant que cette prise de risque est maîtrisée.

La plupart des gens qui jouent à des jeux d'argent ou aux machines à sous profitent de cette expérience sans aucun problème, mais une minorité de personnes perdent le contrôle de ce qu'ils font.

Pour ces joueurs, l'expérience n'est plus agréable.

Leur vie entière peut tourner autour des jeux d'argent.

DÉPENDANCE AU JEU

Les personnes dépendantes au jeu continueront de jouer qu'elles gagnent ou qu'elles perdent de l'argent.

Elles dépenseront leur argent et celui des autres pour pouvoir continuer à jouer. Le jeu domine leur vie et d'autres aspects peuvent en pâtir : vie familiale, vie professionnelle et autres intérêts.

Le jeu devient un problème lorsque :

- Vous jouez jusqu'à ne plus avoir un sou.
- Vous empruntez ou volez de l'argent pour continuer à jouer.
- Vous jouez pour regagnez vos pertes.
- Vous mettez de côté vos autres intérêts, votre famille et vos amis pour jouer.

VÉRIFIONS

Une personne qui pense être dépendante au jeu doit se demander si :

- Elle consacre du temps au jeu au détriment de ses études ou de son travail.
- Elle joue pour gagner de l'argent afin de rembourser des dettes ou de résoudre des problèmes financiers.
- Après avoir perdu, elle ressent le besoin de revenir dès que possible pour regagner le montant perdu.
- Elle joue jusqu'à ne plus avoir un sous en poche.
- Elle emprunte de l'argent pour jouer.
- Elle se montre réticente à dépenser « son argent pour le jeu » pour des dépenses normales.
- Elle a commis ou a déjà pensé à commettre un acte illégal pour financer son jeu.
- Elle a déjà eu ou pensé à des comportements autodestructeurs en raison de sa dépendance au jeu.

À QUI DEMANDER DE L'AIDE ?

Si vous êtes dépendant aux jeux d'argent ou si vous connaissez quelqu'un qui a besoin d'aide, appelez la ligne d'assistance GamCare.

GamCare: 0808 8020 133

GamCare est le centre national qui offre des informations, des conseils et de l'aide concernant l'impact social des jeux d'argent.

Du personnel qualifié répond aux appels sur la ligne d'assistance nationale. Ils fournissent des conseils, des informations et de l'aide aux personnes dépendantes aux jeux d'argent, ainsi qu'à leur famille et leurs amis. Des informations sur l'aide disponible aux personnes dépendantes au jeu sont peuvent être fournies sur demande.

GARDER LE CONTRÔLE

À chaque fois que vous jouez sur des machines à sous, souvenez-vous que :

- Vous achetez un divertissement, vous n'investissez pas de l'argent.
- Vous devriez miser uniquement des sommes que vous pouvez vous permettre de perdre.
- Avant de jouer, vous devez fixer des limites strictes concernant les sommes que vous dépenserez.
- Vous aurez des problèmes si les machines à sous dominent votre vie.
- Jouer ne devrait occuper qu'une petite partie de votre temps et de votre esprit.
- Jouer dans la limite de vos moyens peut être amusant et passionnant.
- Dépenser au-delà de vos moyens peut créer des PROBLÈMES pour vous et les autres.
- Vous ne devriez pas jouer pour échapper à vos inquiétudes et au stress.

CALCULAR EL RIESGO

El juego es una forma de entretenimiento divertida y emocionante que aporta una agradable experiencia.

Jugar con las máquinas tragaperras es una forma interesante para arriesgarse siempre que el riesgo se mantenga bajo control.

La gran mayoría de las personas que juegan con máquinas tragaperras o de otras formas disfruta de la experiencia sin problema, pero un número muy reducido pierde el control de lo que hace.

Para estos jugadores deja de ser divertido.

El juego puede dominar sus vidas.

PROBLEMAS CON EL JUEGO

Los jugadores con problemas seguirán jugando, ganen o pierdan.

Usarán su propio dinero y el de los demás para seguir jugando. A medida que el juego se apodera de sus vidas, pueden sufrir muchas otras cosas, como la vida familiar, el trabajo y otros intereses.

El juego se convierte en un problema cuando:

- juegas hasta perder todo el dinero;
- pides o robas dinero para seguir jugando;
- juegas para intentar recuperar las pérdidas;
- descuidas otros intereses, a la familia y a los amigos por jugar.

DARSE CUENTA

Alguien que piensa que puede tener un problema con el juego debe preguntarse a sí mismo si:

- pierde tiempo en los estudios o en el trabajo por jugar;
- juega con la intención de ganar dinero para pagar deudas o resolver problemas financieros;
- después de perder cree que tiene que volver lo antes posible para recuperar las pérdidas;
- juega hasta perderlo todo;
- pide dinero prestado para financiar el juego;
- se niega a usar el «dinero del juego» para gastos habituales;
- ha cometido o ha considerado cometer un acto ilegal para financiar el juego;
- ha considerado el comportamiento autodestructivo como resultado del juego.

¿QUIÉN PUEDE AYUDAR?

Si tienes problemas con el juego o conoces a alguien que los tenga y quieres ayudar, llama al teléfono de asistencia GamCare:

GamCare: 0808 8020 133

GamCare es el centro nacional de información, asesoramiento y ayuda práctica en relación al impacto social del juego.

El teléfono de asistencia nacional es atendido por personal cualificado. Pueden ofrecer orientación, información y asesoramiento para los problemas del juego, a la familia y a los amigos de un jugador. La información sobre el asesoramiento para jugadores con problemas está disponible previa solicitud.

MANTENER EL CONTROL

Cuando juegues a las máquinas es conveniente que recuerdes lo siguiente:

- compras entretenimiento. Apostar no es invertir dinero;
- solo debes gastar el dinero que puedas permitirte perder;
- antes de jugar, debes establecer límites estrictos sobre la cantidad que gastarás;
- surgirán problemas si las máquinas se convierten en la parte más importante de tu vida;
- jugar solo debe ocupar una cantidad relativamente pequeña de tu tiempo e interés;
- jugar dentro de tus posibilidades puede ser divertido y emocionante;
- gastar por encima de tus posibilidades puede ocasionar problemas para ti y para los demás;
- no debes jugar para huir de preocupaciones o presiones.

DAS RISIKO KALKULIEREN

Glücksspiel ist eine spannende und kurzweilige Form der Unterhaltung.

Der Einsatz an Spielautomaten ist eine attraktive Möglichkeit, ein Risiko einzugehen, solange dieses kontrolliert wird..

Die meisten Menschen, die Spielautomaten oder andere Glücksspielformen nutzen, haben dabei keine Probleme. Es gibt jedoch eine sehr geringe Anzahl von Spielern, die die Kontrolle darüber verlieren, was sie tun.

Für diese Spieler hört der Spaß auf.

Ihr Leben kann vom Spielen bestimmt werden.

SPIELSUCHT

Personen mit Spielsucht spielen immer weiter, unabhängig davon, ob sie gewinnen oder verlieren.

Sie verwenden ihr eigenes Geld und das anderer Personen, um weiter spielen zu können. Wenn das Spielen einen immer größeren Stellenwert in ihrem Leben einnimmt, können viele andere Dinge darunter leiden: Familienleben, Arbeit und andere Interessen

Glücksspiel wird zum Problem, wenn Sie:

- spielen, bis Sie Ihr gesamtes Geld verspielt haben.
- Geld leihen oder stehlen, um weiter spielen zu können.
- spielen, um Ihre Verluste wieder reinzuholen.
- Ihre anderen Interessen, Ihre Familie und Freunde vernachlässigen, um zu spielen.

SELBSTTEST

Menschen, die denken, dass sie ein Glücksspielproblem haben, sollten sich folgende Fragen stellen:

- Fehlt mir wegen des Glücksspiels Zeit für Bildung oder Arbeit?
- Spiele ich, um Geld zu bekommen, mit dem ich Schulden zahlen oder finanzielle Probleme lösen kann?
- Muss ich nach dem Verlieren so schnell wie möglich wieder zurück, um den Verlust reinzuholen?
- Spiele ich, bis mein letzter Euro weg ist?
- Leihe ich mir Geld, um das Glücksspiel zu finanzieren?
- Widerstrebt es mir, „Spielgeld“ für normale Ausgaben zu verwenden?
- Habe ich jemals etwas Illegales gemacht, um mein Glücksspiel zu finanzieren, oder habe ich dies vor?
- ich als Folge meines Glücksspielverhaltens jemals selbstzerstörerisches Verhalten erwägt?

WER KANN HELFEN?

Wenn Sie denken, dass Sie Probleme mit dem Spielen haben oder jemanden kennen, der Hilfe wünscht, rufen Sie die telefonische Anlaufstelle von GamCare an::

GamCare: 0808 8020 133

GamCare ist das nationale Zentrum in Großbritannien, das Informationen, Ratschläge und praktische Hilfe zu den sozialen Folgen von Glücksspiel bietet.

Die nationale telefonische Anlaufstelle ist mit geschulten Mitarbeitern besetzt. Sie bieten Beratung, Informationen und Ratschläge für Personen mit Spielsucht, deren Angehörigen und Freunde. Informationen zur Beratung von Personen mit Spielsucht sind auf Anfrage verfügbar.

DIE KONTROLLE BEHALTEN

Wenn Sie Spielautomaten benutzen, ist es sinnvoll, daran zu denken, dass:

- Sie für Unterhaltung zahlen, nicht Ihr Geld investieren.
- Sie nur mit Geld spielen sollten, das Sie auch verlieren DÜRFEN.
- Sie sich vor dem Spielen feste Grenzen stecken, wie viel Sie ausgeben möchten.
- Sie Probleme bekommen, wenn Spielautomaten zur wichtigsten Sache in Ihrem Leben werden.
- Sie Glücksspiel nur einen verhältnismäßig kleinen Teil Ihrer Zeit und Aufmerksamkeit widmen sollten.
- das Spielen innerhalb Ihres finanziellen Rahmens SPASS machen und spannend sein kann.
- Spielen außerhalb Ihres finanziellen Rahmens Ihnen und anderen Personen Probleme verursachen kann.
- Sie nicht spielen sollten, um Ihren Sorgen und Problemen zu entkommen.

VYPOČÍTÁNÍ RIZIKA

Sázení je zábava a vzrušující forma pobavení, která přináší příjemné zážitky.

Hraní na hracích automatech je přitažlivý způsob podstoupení rizika, dokud máte toto podstoupené riziko pod kontrolou.

Převážná většina lidí, kteří hrají na hracích automatech nebo sází jiným způsobem, si tyto zážitky užívá bez jakýchkoli problémů, ale velmi malý počet hráčů ztratí kontrolu nad tím, co dělají.

Pro tyto hráče to přestává být zábava.

Jejich životu může dominovat gamblerství

PROBLEMATICKÉ GAMBLERSTVÍ

Problematičtí gambleři budou pokračovat v hraní, ať vyhrávají nebo prohrávají.

Budou používat své peníze i peníze jiných lidí, aby mohli pokračovat v hraní. Jejich život řídí hraní a mnoho ostatních věcí může trpět: rodinný život, jejich práce a další zájmy

Hraní se stává problémem, pokud:

- Hrajete, dokud nepřijdete o všechny peníze.
- Půjčujete si nebo kradete, abyste mohli v hraní pokračovat.
- Hrajete, abyste dohnali ztráty.
- Zanedbáváte ostatní zájmy, rodinu a přátele kvůli hraní.

KONTROLA

Lidé, kteří se domnívají, že by mohli mít problém s gamblerstvím, by se měli sami sebe zeptat, jestli:

- Zanedbávají práci nebo vzdělání kvůli hraní.
- Hrají, aby získali peníze na zaplacení dluhů nebo vyřešení finančních těžkostí.
- Když prohrají, mají pocit, že se musí co nejdříve vrátit a vyhrát prohrané peníze zpět.
- Hrají, dokud nepřijdou o poslední peníze.
- Půjčují si, aby mohli financovat své sázení.
- Zdráhají se používat „peníze na hraní“ na běžné výdaje.
- Dopustili se nebo uvažovali, že by se dopustili, protiprávního jednání, aby získali peníze na sázení.
- Už někdy uvažovali o sebedestrukčním chování jako důsledku sázení.

KDO MŮŽE POMOCI?

Pokud máte problémy se sázením, nebo znáte někoho, kdo je má, a chcete pomoc, obraťte se na linku pomoci GamCare:

GamCare: 0808 8020 133

GamCare je státní centrum pro informace, poradenství a praktickou pomoc týkající se společenských dopadů gamblerství.

Na státní lince pomoci pracují vyškolení pracovníci. Mohou poskytovat poradenství a rady problémovým hráčům, rodinným příslušníkům a přátelům gamblerů. Informace ohledně poradenství pro problémové gamblery jsou k dispozici na vyžádání.

MĚJTE TO POD KONTROLOU

Vždy, když hrajete na automatech, měli byste mít na paměti, že:

- Kupujete si zábavu, neinvestujete peníze.
- Měli byste utratit pouze peníze, o které si můžete dovolit přijít.
- Před zahájením hraní byste si měli určit přesné limity, kolik peněz chcete utratit.
- Problém nastane, pokud se hrací automaty stanou nejdůležitější částí vašeho života.
- Hraní by mělo zabírat relativně malé množství vašeho času a zájmu.
- Hraní v rámci vašich možností by mělo být zábavné a vzrušující.
- Utrácení nad vaše možnosti pravděpodobně způsobí problémy vám i ostatním.
- Hraní by pro vás nemělo být únikem před starostmi či tlaky.

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