

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

Local Area Risk Assessment

Trading Name:	Merkur Slots
Premise	67 High Street, Harlesden, NW10 4NS
Local Authority:	Brent Council
Premise Licence No:	New application
Operator Licence No:	000-003266-N-103444-030 (Merkur Slots UK Limited)
Company Details:	Merkur Slots UK, Second Floor Matrix House, North Fourth Street, Milton Keynes, MK9 1NJ
Name and Title of Assessor:	Ewelina Lesner – Internal Compliance Auditor and Amanda Kiernan – Head of Compliance
Date of Assessment:	07/04/2024
Review Date:	On opening in conjunction with local staff

Local Area Profile Risk Factors

Local Risk Profile:	67 High Street, a former Shoezone is located at a road junction on the busy High Street in Harlesden. Other businesses on the road include retail shops, supermarkets, convenience stores, coffee shops, restaurants, takeaways, banks, supermarkets, hair and beauty salons, betting shops, pawnbrokers, pharmacies, property agencies, etc.
Establishments of note:	Iceland Supermarket is located two units away, Tesco Supermarket 2 minutes' walk away. Ladbrokes is located opposite.
Adjoining premises:	Merkur Slots will be located between 'Holland & Barrett' and across the road 'Surprise Surprise'.
Crime statistics:	In the year ending December 2023 the crime rate in NW10 4NS was higher than the average crime rate across similar areas, with the highest reported crimes relating to Anti-social Behaviour (28.5%) and Violence and Sexual Offence (25.5%) (<i>police.uk</i>). In February 2024, 268 crimes were recorded within a half mile of the venue. The most commonly recorded crimes were 78 Violence & Sexual Offences, 70 Anti-social behaviour, 25 Criminal damage and arson, 21 Public Order, 17 Other Theft, 14 Theft from a person, 9 Burglary and 8 Robbery. (<i>streetcheck.uk</i>) During due diligence checks the Licensing Team have highlighted this area as a high crime spot.
Population:	Across the UK as a whole, the gender split is roughly equal at 49% male, 51% female. This address in Brent Central constituency is broadly in line with those figures, with 44% male. The majority of the population are in the age bracket 30-34 yrs, 11.7% are within the vulnerable age group below 25 years of age. The average figures are approximately as follows for relationship statuses: 33% married, 54% single, 7% divorced, 3% widowed, and 3% separated. (<i>Brent Borough Council Profile and streetcheck.co.uk</i>)
Culture:	Harlesden High Street, Brent, London can be considered more ethnically diverse than the UK average. As whole, the UK population claims itself as approximately 82.2% white, with residents of this area being 32% so. Other sizable ethnic groups are: Black African 19%, Other Asian 16%, Other 8%, Arab 7%, Black Caribbean 5%. (<i>streetcheck.co.uk</i>)
Unemployment:	Economically active in employment (including full-time students) stands at 55.4%, unemployed (including full time students) 5.9%. Unemployed is 3.4% and Economically inactive is at 39.4% (<i>Brent Borough Council Profile and ONS Census 2021</i>)
Deprivation:	In the latest Index of Multiple Deprivation (IMD) this area was ranked 2,026 out of 32,844 (6%) in England, where 1 was the most deprived and 32,844 the least. 89.8% of English postcodes are less deprived than NW10 4NS. This is broken down further by income 4%; employment 10%; health 41%; education 25%; barriers to services 2%; living environment 7%; and crime 5%. (<i>UK Local Area.com</i>)
Local Police:	Metropolitan Police Service – Harlesden and Kensal Green division. Acton Police Station (Metropolitan Police), 250 High Street, W3 9B. Current Policing Priorities include: To reduce violence and drug dealing in the area of Harlesden High Street – Harrow Road NW10 and in the area of Park Parade, Leghorn Road, Harlesden Gardens NW10; To work closely with Brent Council, Businesses and resident of Station Road in order to reduce drugs and Street Drinking problem in Station Road and Surrounding area and Robbery – High Visibility Patrols To reduce and prevent Street Robberies in the Town Centre Area. (<i>Police.uk</i>)
Independent Security Reviews	MERKUR Slots UK appointed Leveche Associates Ltd to conduct independent covert visits on numerous AGC/Bingo venues that operate throughout the UK 24-hrs, 7 days a week including six venues in and around the London area. Key comments from the reports include: 'Visits to these premises established that they are well run and that there are clearly defined systems in place to ensure the premises operate in support of the gambling objectives and do not attract or take advantage of juveniles or other vulnerable persons. The visits also established that MERKUR Slots customer do not cause crime or anti-social behaviour.' 'MERKUR Slots UK and their premises operate in support of the principles of Secured by Design, the company recommended by the Chief Officers of UK Police Forces for Crime Prevention standards'. 'The presence of MERKUR Slots does not lead to or result in people, who have been on a night out, staying in the area any longer than they had planned to'.

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

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

Localised Risks to the Licensing Objectives

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

Environmental Factors

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

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

<p>Kenmont Primary School, Valliere Rd, NW10 6AL Little Angels Nursery, 25 High St, NW10 4NE Nicoll Road Nursery, 40 Nicoll Rd, NW10 9AB Iqra Islamic Academy, 109 High St, NW10 4TS Newfield Primary School, Longstone Ave, NW10 3UD Our Lady of Lourdes Catholic Primary School Brent, Wesley Rd, Hillside, NW10 8PP St Mary's C E Primary School, Garnet Rd, NW10 9JA Wetherby House Montessori Kensal Rise, 29-31 Purves Road, NW10 5SX Excelsior Nursery Ltd, St Albans Rd, NW10 8UG</p> <p>Community Centres and Youth Centres Brent Hub Community Enterprise Centre, 6 Hillside, NW10 8BN Harlesden Ummah Community & Wellbeing Centre, 21 Craven Park Road, NW10 8SE Church End and Roundwood Unity Centre, 103 Church Road, NW10 9EG Faynuus Hope Community, 49 Craven Park Rd, London NW10 8SE Hazel Road Community Centre, Community Centre, Hazel Rd, 5PP Tavistock Hall, 25 High St, London NW10 4ND Brent Cultural Centre, 107 High St, NW10 4TS Roundwood School and Community Centre, 49 Longstone Ave, NW10 3UN COMMUNITY CHURCH HARLESDEN, 32 Manor Park Rd, NW10 4JJ Diverse Youth Club LTD, 25 High St, NW10 4NE</p> <p>Parks, play grounds and sports/leisure facilities Roundwood Park, Harlesden Rd, London NW10 3SH Bramshill Road Open Space, Bramshill Rd, London NW10 8BD Wesley Playing Fields, London NW10 6PH King Edward VII Park Children's Playground, London NW10 3QX Willesden Sports Centre, Donnington Rd, London NW10 3QX Stonebridge Recreation Ground, London NW10 8LW</p> <p>Vulnerable and addiction support services EACH Brent, Design works, Park Parade, London NW10 4HT</p> <p>Homeless shelters and food banks Crisis Skylight Brent, 1-2, Bank Buildings, High St, NW10 4LT The Salvation Army (Harlesden), Salvation Army Upper Hall, 32 Manor Park Rd, London NW10 4JJ</p> <p>Medical Centres, Care Homes and Mental Health facilities Freuchen Medical Centre, 190 High St, London NW10 4ST Murakami Medical Centre - Private GP Clinic, 7 Craven Park Rd, London NW10 8SE Roundwood Park Medical Centre, Willesden Centre for Health & Care, Robson Ave, London NW10 3RY Willesden Centre for Health & Care, Robson Ave, NW10 3RY Greenhill Park Medical Centre, Greenhill Park, London NW10 9AR</p>	<p>Test purchase fails are reviewed within 48 hours by the Area Manager, this involves reviewing CCTV footage of the incident and implementing appropriate training or where necessary disciplinary action.</p> <p>All age verification checks are recorded on the IHL SMART Tablet AV App, this data is collated centrally and regularly reviewed by an independent team of compliance auditors.</p> <p>Results of age verification checks and third-party results are shared with the Gambling Commission.</p> <p>Proof of Age scheme in place with application forms available in the venue.</p> <p>The children and young persons gambling participation survey shows that the number of 11-16 years olds that say they have gambled on fruit machines of whatever kind in an arcade, pub or club is around 2%. Of those around a half to two-thirds do so legally on Category D fruit machines which are located in FECs or holiday parks, where any play will be of short duration (as families will be on a day trip or holiday), in venues which they can only access with their parents, and in premises licensed to offer Category Ds which are as a result tightly-regulated.</p> <p>We also know from a study by Professor David Forrest and Dr Ian McHale that whilst adolescents at the coast are more likely to participate in gambling activities than those that do not, they are no more likely to be problem gamblers than those that do not live at the coast. This is an important finding. Many people cite early exposure to gambling as a cause of later gambling problems. There is no evidence of a causal link. As David Forrest stated at conference in Toronto in 2012 'marginal gamblers induced to participation by ease of access do not appear prone to problem gambling and more children gambling does not carry through to more children being problem gamblers. Panic about arcades does not appear justified' https://www.gamblingcommission.gov.uk/PDF/Young-People-Gambling-Report-2019</p> <p>Vulnerability Training and guidance are given to Merkur Slots staff on vulnerability (the inability or limited ability of people to control their actions). This includes addictive gambling, mental health, alcohol or drugs issues.</p> <p>Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</p> <p>All staff complete on boarding and 6 monthly refresher training which includes Safeguarding Children and Vulnerable People and Customer Interaction.</p> <p>Staff are trained how to deal with vulnerable customers and how to make effective interactions, any difficult cases are referred to our compliance team for review and resolution.</p>
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	<p>Hilltop Medical Practice, 150 Hilltop Ave, London NW10 8RY St Andrews Medical Centre, At Greenhill Park Medical Centre, London, NW10 9AR The Stonebridge Practice, Hillside Primary Care Centre, 150 Hilltop Ave, London NW10 8RY The Law Medical Group Practice, 9-11 Wrotesley Rd, NW10 5UY Dr K S Mathew, Buckingham Rd, London NW10 4RR Aksyr Medical Practice, 150 Hilltop Ave, London NW10 8RY Harlesden Healthcare Centre, 150 Hilltop Ave, London NW10 8RY Craven Park, 1 Craven Rd, London NW10 8RR Franklin Lodge, 58 Kings Rd, London NW10 2BN London Care Ltd - Rosemary House, Rosemary House, Uffington Rd, London NW10 3TD Wells House Care Ltd, 2 Wells House Rd, London NW10 6EE MMR Homecare Ltd, 115 High St, London NW10 4TR Tower House, 11-12 Tower Rd, London NW10 2HP ANA Nursing, Willesden Centre for Health & Care, Robson Ave, London NW10 3RY Lifelong Home Care Services, 78 Craven Park Rd, NW10 4AE Brent Cove Drop-in Service, Brent Hub Community Enterprise Center 6, Hillside, London NW10 8BN EACH Brent, Design works, Park Parade, London NW10 4HT Trybs Health, Old Oak Ln, London NW10 6DG</p> <p>Pawnbrokers and Loan Shops H&T Pawnbrokers, 72 High St, London NW10 4SJ Cash Converters, 36 High Street Harlesden, London NW10 4LS TGS Pawnbrokers, 89 High Street Harlesden, London NW10 4NT</p> <p>Gambling premises William Hill, 6/8 High Street, London NW10 4LT Silvertime, Harlesden, 10 High St, London NW10 4LT Silvertime, 53 High St, London NW10 4NJ Ladbrokes, 74 High St, London NW10 4SJ Ladbrokes, 59 Craven Park Rd, London NW10 8SH Paddy Power, 120 High St, London NW10 4SP</p> <p>Public Houses and Alcohol Licensed Premise Royal Oak, 95 High St, London NW10 4TS Triangle Bar & Night club, 252 High St, London NW10 4TD Segen Bar and Restaurant, 129 High St, London NW10 4TR The Mason's Arms, 665 Harrow Rd, London NW10 5NU The Fishermans Arms, 50 Old Oak Ln, London NW10 6UB Rising Sun, 25 Harlesden Rd, London NW10 2BY Grand Junction Arms, Acton Ln, London NW10 7AD Sportsman's, 58 Station Rd, London NW10 4UA Angies, 129 High St, London NW10 4TR The Shawl, 25 High Street Harlesden, London NW10 4NE The Green Man, 109 High St, London NW10 4TS</p>	<p>Merkur Slots take 'know your customer' seriously including affordability checks, engaging with customer on products to enabled an informed choice and take a risk-based approach to harm minimization.</p> <p>Customer Interaction Merkur Slots provide comprehensive customer interaction training, instruction and supporting policies to all staff in this area (via training platforms, training centres and Compliance Manual).</p> <p>Staff are provided with the training to enable them to provide guidance on safer and responsible gambling.</p> <p>Staff are trained on conducting effective customer interactions, identifying behavioural changes and how to identify and interact with players who exhibit signs of developing problems with their gambling.</p> <p>Staff are trained to monitor and record customer behaviour, spend and time spent gambling and customer interactions are used to assess customer source of funds/income where relevant.</p> <p>Customer interactions may result in the customer being guided to gambling support services such as Gamcare encouraged to use a self-help tool to assist them with managing their gambling behaviour, such as Self-Exclusion.</p> <p>All customer interactions are recorded on the IHL SMART Tablet Interaction App, this data is collated centrally and regularly reviewed by an independent team of compliance auditors.</p> <p>Player Protection <i>To identify signs associated with problem gambling and people who may be at risk of gambling related harm</i> <i>Failure to provide information to customers on responsible gambling</i> <i>Failure to maintain and administer the self-exclusion process, including breaches and reinstatement reviews</i></p> <p>Staff are aware of the importance of social responsibility and are trained to advise customers on gambling responsibly and the identification of potential gambling harm.</p> <p>'Stay in Control' Posters and Leaflets containing the Gamcare helpline number are in prominent locations within the premise and in private areas, such as customer toilets.</p> <p>Merkur Slots will actively seek to support and be involved in any local initiatives targeted at reducing harm caused by gambling.</p> <p>Socially Responsible messaging is implemented on all digital B3 and Cat C machines. All machines display Gamble Responsibly stickers with helpline contact details.</p>
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<p>Preventing gambling being a source of crime or disorder, being associated with crime and disorder or being used to support crime</p>	<p>Crime statistics: In the year ending December 2023 the crime rate in NW10 4NS was higher than the average crime rate across similar areas, with the highest reported crimes relating to Anti-social Behaviour (28.5%) and Violence and Sexual Offence (25.5%) (police.uk). In February 2024, 268 crimes were recorded within a half mile of the venue. The most commonly recorded crimes were 78 Violence & Sexual Offences, 70 Anti-social behaviour, 25 Criminal damage and arson, 21 Public Order, 17 Other Theft, 14 Theft from a person, 9 Burglary and 8 Robbery. (streetcheck.uk) During due diligence checks the Licensing Team have highlighted this area as a high crime spot</p> <p>Local Police: Metropolitan Police Service – Harlesden and Kensal Green division. Acton Police Station (Metropolitan Police), 250 High Street, W3 9B. Current Policing Priorities include: To reduce violence and drug dealing in the area of Harlesden High Street – Harrow Road NW10 and in the area of Park Parade, Leghorn Road, Harlesden Gardens NW10; To work closely with Brent Council, Businesses and resident of Station Road in order to reduce drugs and Street Drinking problem in Station Road and Surrounding area and Robbery - High Visibility Patrols To reduce and prevent Street Robberies in the Town Centre (Police.uk)</p> <p>Public Houses and Alcohol Licensed Premise Royal Oak, 95 High St, London NW10 4TS Triangle Bar & Night club, 252 High St, London NW10 4TD Segen Bar and Restaurant, 129 High St, London NW10 4TR The Mason's Arms, 665 Harrow Rd, London NW10 5NU The Fishermans Arms, 50 Old Oak Ln, London NW10 6UB Rising Sun, 25 Harlesden Rd, London NW10 2BY Grand Junction Arms, Acton Ln, London NW10 7AD Sportsman's, 58 Station Rd, London NW10 4UA Angies, 129 High St, London NW10 4TR The Shawl, 25 High Street Harlesden, London NW10 4NE The Green Man, 109 High St, London NW10 4TS</p> <p>Pawnbrokers and Loan Shops H&T Pawnbrokers, 72 High St, London NW10 4SJ Cash Converters, 36 High Street Harlesden, London NW10 4LS TGS Pawnbrokers, 89 High Street Harlesden, London NW10 4NT</p> <p>Gambling premises William Hill, 6/8 High Street, London NW10 4LT SILVERTIME Harlesden, 10 High St, London NW10 4LT Silvertime, 53 High St, London NW10 4NJ Ladbrokes, 74 High St, London NW10 4SJ Ladbrokes, 59 Craven Park Rd, London NW10 8SH Paddy Power, 120 High St, London NW10 4SP</p>	<p>Premise Security and violence in the workplace <i>Poor security control measures which may increase vulnerability to crime</i> <i>Failure to protect employee and customers from harm during the hours of late-night opening</i></p> <p>Merkur Slots Harlesden is subject to a separate security risk assessment, local factors are considered, and proportionate control measures/physical security measures are installed.</p> <p>Merkur Slots Harlesden will be fitted with a HD CCTV system with coverage of all public areas including all entry and exits points, CCTV will be clearly advertised to customers with screens visible by staff when working in the service area. Ability to review CCTV remotely and provide footage to relevant parties when required.</p> <p>Floor layout will be designed to avoid blind spots to enable the active management and observation of customers entering and leaving the premises, from the central service area the entrances, machines and toilets can be observed and staff will regularly patrol the gaming floor to supervise and interact with customers to identify underage or vulnerable persons.</p> <p>General Crime and Disorder <i>To identify aggressive customers to prevent crime and disorder</i> <i>Awareness of local crime issues in the local area</i></p> <p>We have reviewed the Police.UK hot-spot mapping for the local policing neighbourhood and are aware of the areas of Recorded Crime, Vulnerable People and Vulnerable Places and are very mindful of the potential damage associated with problem gambling. We will make every effort to liaise with local Police over reducing our involvement in any incident.</p> <p>Staff are trained to identify suspicious activity and have the ability to interrogate real-time machine data to identify criminal activity and fraudulent incidents which are logged and escalated where appropriate.</p> <p>All incidents are recorded on the IHL SMART Tablet Incident App inc. crime reference number where applicable.</p> <p>Staff are trained on how to deal with aggressive customers and situations which may also require police assistance.</p> <p>The company operate an internal security alert system and are registered with trade associations for crime bulletins (BACTA and Association).</p> <p>Machine data is captured in real-time and full secure cash reconciliation is completed on a weekly basis, the machine exceptions are monitored by a centrally based income protection team and all exceptional cash losses are investigated by the internal audit compliance team.</p> <p>Merkur Slots Harlesden will participate with any local/town centre scheme and actively seek to support and be involved with any local initiatives</p>
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targeted at reducing crime and/or disorder and will engage in the sharing of information with other businesses to support the local community.

Anti-social behaviour outside the premise

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

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

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

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

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

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

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

Money Laundering

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Alcohol and Drugs

Anti-social behaviour caused by alcohol is not tolerated within our premises and there are comprehensive security and reporting processes to escalate, report and deal with any issues as they arise.

'No Alcohol Allowed' signage on the door.

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

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

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

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

Money Lending

Money lending is not tolerated within our premises.

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

Late Night Operation

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

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

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

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

Ensuring that gambling is conducted in a fair and open way

Gaming Machine and Supervision

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

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

Customer Complaints

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

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

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

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

Marketing

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

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

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

<p>Other</p>	<p>Places of worship and Religious Buildings Harlesden Methodist Church, 25 High St, London NW10 4NE All Souls Parish Church, Station Rd, London NW10 4UJ Harlesden Church of God 7th Day, 9 Station Rd, London NW10 4UJ St Margaret's & St Georges Church, 67 Nicoll Rd, Craven Park Rd, London NW10 9AX Harlesden Baptist Church, 23A Acton Ln, London NW10 8UX Christ Church, St Albans Rd, London NW10 8UG Pentecostal Church, 4NE, 25 High St, London COMMUNITY CHURCH HARLESDEN, 32 Manor Park Rd, London NW10 4JJ Kidane Mihiret Church of Eritrean Orthodox, Willesden, 224 High St, London NW10 4TD St Matthew's, St Mary's Rd, London NW10 4AU St Margaret's & St Georges Church, 67 Nicoll Rd, Craven Park Rd, London NW10 9AX Harlesden Baptist Church, 23A Acton Ln, London NW10 8UX Pentecostal Church, 4NE, 25 High St, London Living Stone Church, 25 High Street Harlesden, London NW10 4NE Our Lady Of Willesden Rc Church, 1 Nicoll Rd, London NW10 9AX Beulah Apostolic Church, 130 Church Rd, London NW10 9NH Rhema Winners Citadel, Craven Park Rd, London NW10 4AG The Salvation Army (Harlesden), Salvation Army Upper Hall, 32 Manor Park Rd, London NW10 4JJ Rebirth Tabernacle, 33 Leghorn Rd, London NW10 4PN The Five Precious Wounds Catholic Church, The Presbytery Stonebridge Park, Brentfield Rd., London NW10 8ER Parish of Saint Michael and All Angels Stonebridge, 17 Hillside, London NW10 8LB River of Life Elim Pentecostal Church. Willesden, 1 Gifford Rd, London NW10 9ED Fountain of Life Christian Church, 6 Chase Rd, London NW10 6HZ Roundwood Gospel Assembly, Roundwood gospel assembly, Longstone Avenue, London NW10 3UE Dominion Christ Church, 57 Craven Park Rd, Greater, London NW10 8SH Restoration Revival Fellowship Apostolic Church, 50 Church Rd, London NW10 9PY MFM Willesden, Challenge Cl, London NW10 4BF Assembleia de Deus de Londres / ADLondres, 155 Acton Ln, London NW10 7NJ French Christian Community Bethel, Unit 38 Design Works Park Parade, London NW10 4HT Maranatha Christian Church, 1054 Harrow Rd, London NW10 5NL International Plenitude Ministries, Cumberland House, 80 Scrubs Ln, London NW10 6RF St Mark's Kensal Rise, Bathurst Gardens, Kensal Rise NW10 5HX</p>	<p>Ethnicity and Local Area Demographic Merkur Slots does not discriminate on the ground of ethnic or social demographic.</p> <p>Local area profiles which detail deprivation, social, ethnic or population may be used as part of the risk assessment in relation to gambling related harm in conjunction with the company standard controls.</p> <p>Merkur Slots takes a holistic approach to customers and is aware that the Equality Act precludes the exclusion of any group for generalised reasons.</p> <p>Merkur Slots will participate with any local/town centre scheme and actively seek to support and be involved with any local initiatives targeted at reducing deprivation (crime/employment/health) and engage in the sharing of information.</p> <p>Training & Social Responsibility Merkur Slots take responsible gambling and social responsibility seriously, ensuring all staff are fully trained to carry out their roles in a responsible manner.</p> <p>Merkur Slots have attained Responsible Gambling Accreditation from the G4 Global Gambling Guidance Group.</p> <p>Merkur Slots work with YGAM (Young Gamers and Gamblers Education Trust) to deliver City and Guilds accredited training on vulnerable and gambling harm to all levels of management.</p> <p>There are two National Training Centres and a dedicated Learning and Development Team.</p> <p>Gamcare Accredited training completed by members of management.</p> <p>All staff complete on boarding and 6 monthly refresher training: The Essentials of Compliance, Safeguarding Children and Vulnerable People Age Verification and Customer Interaction.</p> <p>Staff are aware of the importance of social responsibility, trained to advise customers of gambling responsibly and identifying potential problem gamblers.</p> <p>Compliance and Social Responsibility Folder and Player Protection Framework containing policies and procedures is available to all staff. Venue Mangers review compliance logs monthly, Area Managers Bi monthly and Compliance Auditors annually.</p>
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Merkur Slots 67 High Street, Harlesden, NW10 4NS - Premise Layout

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

Additional Comments

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

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

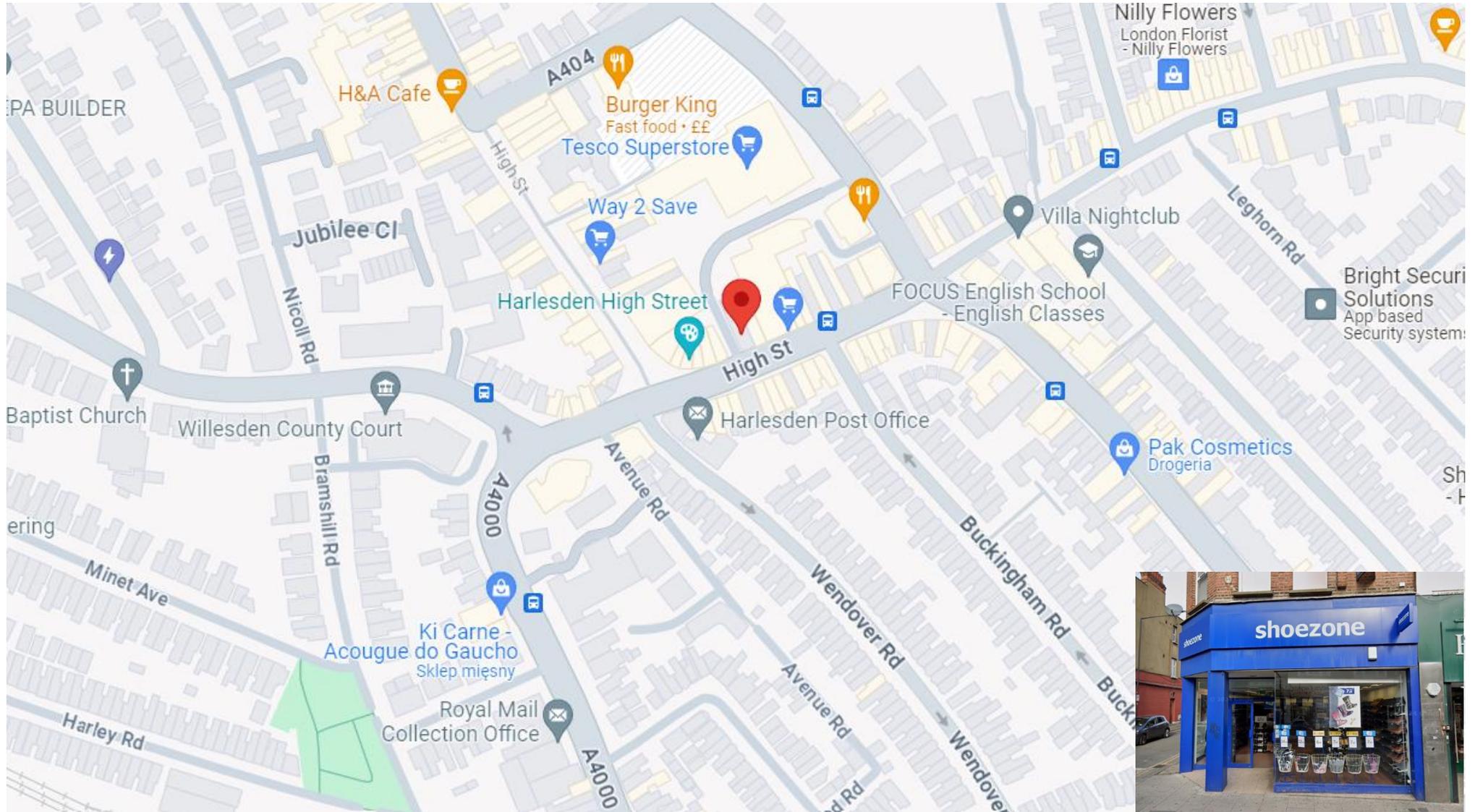
None of our operational venues have been subject to review proceedings.

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

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

Assessors Name:	Ewelina Lesner and Amanda Kernan
Signature:	
Date:	07/04/2024

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



Merkur Slots – Shop frontage example

