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Felix Faulkner
Poppleston Allen
The Stanley Building
7 Pancras Square
Kings Cross
London
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14 June 2024

Our Ref: 31723

Dear Felix Faulkner,

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

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

Officer: Esther Chan – Licensing Inspector

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

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

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

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

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

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

CCTV

1. A comprehensive CCTV system shall be installed and maintained on the premises as required by the Metropolitan Police Licensing Team. CCTV should cover the following:
 - a) All entry and exit points to and from the premises enabling frontal identification of every person entering under any light conditions
 - b) The areas of the premises to which the public have access (excluding toilets)
 - c) Gaming machines and the counter area
2. The CCTV shall continue to record activities 24 hour a day for 31 days.
3. CCTV shall be made available for the police viewing at any time with minimum delays when requested.
4. The premises shall display notices near the entrance of the venue stating that CCTV is in operation.
5. A monitor shall be placed inside the premises above the front door showing CCTV images of customers entering/exiting the premises.

Children and Young People

6. The Licensee shall maintain a bound and paginated 'Challenge 25 Refusals' register at the premises. The register shall be produced to the police or licensing authority forthwith on request.
7. Prominent signage and notices advertising the Challenge 25 will be displayed showing the operation of such policy.
8. Third party testing on age restricted sales systems purchasing shall take at least twice a year and the results shall be provided to the Licensing Authority upon request.
9. A Challenge 25 proof of age scheme shall be operated at the premises where the only acceptable forms of identification are recognised photographic identification cards, such as a driving licence, passport or proof of age card with the PASS Hologram.

Entrances and Doors

10. A magnetic locking device, commonly referred to as a Maglock, will be installed and maintained on the main entrance/exit to the premises and will be available for use at all times.

Staffing levels

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

12. The licensee's Staff Guard system shall be installed and maintained at the premises, which allows direct communication with a central monitoring station permitting audio and CCTV communication.

Identification of Offenders or Problem Persons

13. The Licensee shall implement a policy of banning any customers who engage in crime or disorder within or outside the premises.
14. The licensee will refuse entry to customers who appear to be under the influence of alcohol or drugs.

Seating

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

Alarms

16. The licensee shall install and maintain an intruder alarm on the premises.
17. The premises shall install and maintain a panic button behind the service counter.

Toilets

18. The licensee will ensure that customer toilets are checked every hour for evidence of drug taking. Toilet checks are to be documents stating the time and member of staff who made the checks.
19. Toilet doors remain locked and access is permitted by staff members.

Signage, Promotional Material and Notices

20. Signs to be displayed alerting customers to the following;
 - a) No alcohol
 - b) No smoking
 - c) No persons under 18 Years
 - d) Persons will be prosecuted for causing criminal damage
 - e) Prominent GamCare documentation will be displayed at the premises.

Staff Training

21. The licensee shall:
 - a) provide training on the specific local risks to the licensing objectives that have been identified for these premises as part of the staff induction training programme.
 - b) periodically provide refresher training to all of its staff working at these premises on the specific local risks to the licensing objectives.
 - c) Participation in this training shall be formally recorded on each member of staffs training records which, if requested will be presented to the Licensing Authority as soon as practicable.

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

Homeless and Street Drinking

23. The Licensee shall take all reasonable steps to prevent street drinking of alcohol directly outside the premises and to ban from the premises those who do so.

24. The Licensee shall place a notice visible from the exterior of the premises stating that customers drinking alcohol outside the premises is not permitted and those who do so will be banned from the premises.

Recording of Incidents and Visits

25. An incident log shall be kept for the premises and made available on request to an authorised officer of the Council or the Police which will record the following;

- a) All crimes reported to the venue;
- b) Any complaints received regarding crime and disorder;
- c) Any incidents of disorder;
- d) Any faults in the CCTV system; and
- e) Any visit by a relevant authority or emergency service.
- f) Details of any person(s) banned from the premises.

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

Yours sincerely,



Esther Chan
Licensing Inspector
Regulatory Services