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BRENT COUNCIL LICENSING SUB-COMMITTEE
APPLICATION FOR BINGO PREMISES LICENCE
67 HIGH STREET, HARLESDEN, LONDON NW10 4NS

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. The applicant is the largest operator of such premises in the UK, with over 230 licensed gambling premises, principally in town and city centres. It is a highly competent and conscientious operator that has satisfied authorities across the UK that it can be trusted to operate premises in such a way as to promote the licensing objectives.
3. One mark of its competence is that it has been granted licences in every premises for which it has made an application. Furthermore, none of its licenses has ever been reviewed. While sometimes representations are made, its record demonstrates that after licences are granted it operates in full conformity with the licence objectives, and the concerns expressed by those making representations do not materialise. The applicant has no reason to believe that, if this licence is granted, its premises at 67 High Street will be any different.
4. Representations against the application have been made by ward councillors and a number of local residents. 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 25 conditions to promote the licensing objectives.
5. The applicant takes representations 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 28-36)
 - Steve Ambrose, Operations Director (page 37-39)
 - Nigel Davies, Head of Gaming (page 40-41)
 - Observation reports re Merkur Premises by Leveche Associates (page 58-333)
 - Legal obligations to promote licensing objectives:
 - Gambling Commission's Licence Conditions and Codes of Practice applicable to non-remote bingo licences (page 642-697)
 - Mandatory and default conditions attaching to bingo premises licences (page 710-711)
 - The individual conditions proposed (page 26-27)
 - Operational standards (pages 334-335)

Background

7. The applicant is part of the Gauselmann 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.
8. 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.
9. 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 25 further conditions.

The nature of high street bingo premises

10. 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 650¹). 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.
11. 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.
12. It is therefore important to give a careful explanation of why the applicant's premises trade without regulatory concern.

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.
- There are no general seating areas for people to gather inside. The premises are not fitted out for groups.
- Alcohol is not only 'not sold' but is strictly prohibited.
- Those under the influence of drugs or alcohol are not admitted.

¹ Gambling Commission industry statistics.

- Good quality CCTV systems are fitted to the exterior of the premises and are monitored. Those outside know they are under surveillance. In 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.

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 bingo 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

- a) Alcohol is not permitted in the applicant's bingo premises.
- b) Those who are intoxicated through alcohol or drugs are not permitted on the premises.
- c) 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.
- d) Customers may set deposit and time limits on machines to assist them with managing their gambling behaviour.
- e) "Stay in Control" posters and leaflets with the GamCare helpline number are located prominently in the premises, including the WC.
- f) All machines display responsible gambling messages with helpline contact details.

Protection of children from being harmed or exploited by gambling

- g) Although children are entitled to enter bingo premises as a matter of law, Merkur does not allow children to enter their premises.
- h) The exterior contains no advertising or marketing which might be attractive to children.
- i) Gambling cannot be seen from the outside - as it frequently can in betting offices and sometimes pubs.
- j) The exterior and interior display prominent messaging stating that Think 25 is applied.
- k) Those entering are greeted by staff members, so that their appearance is checked immediately.
- l) 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.
- m) 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:
 - a) Staffing levels are set following a security risk assessment. There is no pre-planned single staffing after 8 p.m.
 - b) 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.
 - c) The layout of the premises facilitates effective supervision. There is no space for groups to gather.
 - d) Staff members are on the trading floor, not behind a counter.
 - e) Good quality CCTV is used throughout (inside and out) and customers are aware they are monitored.
 - f) The use of '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. 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.
 - g) Staff members do not carry floats.
 - h) Safes are time-delayed.
 - i) Anti-money laundering systems are used on the machines.
 - j) The locational and social context of licensed premises is part of induction training for all staff.
 - k) 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).
 - l) Any incidents are logged electronically and reviewed at national level.

- m) Premises are fitted with maglocks, enabling entry to be controlled when necessary.
- n) Panic alarms are installed giving direct contact with the Police.
- o) Venues are subject to ongoing security risk assessments, so that any further measures needed are periodically assessed and undertaken.
- p) The applicant maintains good liaison with local Police.

The regulatory record of the applicant

16. The previous section summarised the standard controls used by the applicant to provide a safe, welcoming, and pleasant environment for customers, while also promoting the licensing objectives. That it does all of this to a standard of excellence is demonstrable:
- It has over 230 licences. It has been granted licences in every premises for which application has been made.²
 - None of its trading licences has ever been reviewed.³
17. This is despite the range of areas in which the applicant operates, including those with high social deprivation. Its systems, staff training, compliance monitoring and audit have proved effective in ensuring that the licensing objectives are promoted, including in its 24-hour premises.
18. It is a record of which the applicant is proud and guards with care. In the very rare event of any kind of issue, it will always liaise with relevant authorities to ensure that it is resolved promptly and effectively.

The Law

19. 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*

² For completeness, there was one refusal in Blackpool but this was granted on re-application three months later following submission of further information.

³ In 2021, *applications* for review were commenced in Enfield but were rejected without a hearing by the licensing authority under section 198 Gambling Act 2005, since they were in substance objections to gambling in general rather than to the operator or the premises.

*(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)).*

20. 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.

21. 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. The Commission's 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.

22. As the paragraph makes clear, 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.

23. 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 in its Guidance 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. 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.” [underlining added]

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 necessary 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 irrelevant 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). Objections which state that there are enough (or too many) gambling establishments in a locality may be relevant to planning, but they are irrelevant to licensing.
 - vi. Planning issues generally.

24. It is therefore necessary to consider:

- a) whether there is evidence which *demonstrates* that the licensing objectives would not be met by granting the application;
- b) 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?
- c) 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 23(c) above.

The Representations

25. In the course of pre-hearing consultations with the responsible authorities, the applicant was asked by the Police to agree eleven licence conditions. These are now conditions 1, 9, 10, 11, 12, 13, 18, 19, 20, 24 & 25 on the “consolidated schedule of proposed conditions” and are agreed. The police have withdrawn their initial representation.
26. In the same consultation period, the Licensing Authority requested that the applicant amend the wording of conditions 1, 2, 3, 4 7 5 (the CCTV conditions), which amendment was accordingly made. The Licensing Authority also asked the applicant to agree ten new conditions, which are accepted and are conditions 6, 7, 8, 14, 15, 16, 17, 21, 22 & 23 on the consolidate schedule. The Licensing Authority has likewise withdrawn its initial representation.
27. There are outstanding representations from some ward councillors and local residents.
28. Putting to one side planning issues such as whether a Merkur Bingo premises ‘*will contribute positively to the area’s development*’, and whether ‘*there is no need for further gambling premises*’, the material representations may be summarised:
 - A concern that additional gambling premises may cause an increase crime and disorder.
 - A concern that additional premises may lead to increased anti-social behaviour, including loitering, public drinking and drug-related activity.
 - The area has high levels of poverty and deprivation, putting vulnerable people at risk of gambling-related harm.
 - The area is frequented by young people. There is a school nearby. The exposure to gambling may increase an interest in gambling among young people.
29. The applicant is very familiar with concerns such as the above. They are frequently expressed by local people when a new Merkur Bingo licence is applied for. Its experience, however, is that when premises have been licensed and are up-and-running, it is invariably the case that what was *feared* would happen hasn’t in fact transpired.

The applicant is respectful of the local concerns, however, and takes this opportunity to respond to them.

The applicant's submissions on the principal areas of concern

Crime and disorder

30. As stated above and evidenced by independent covert observations (paragraphs 42-45 below) 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.
31. 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. The applicant's *ongoing* security risk assessment will ensure adequate mitigation of any emerging risks arising due to behaviours of those in the immediate vicinity.
32. 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 1-5);
 - b) staff training, including in issues related to the local area, problem gambling, self-exclusion and interactions (conditions 22 & 22);
 - c) there shall be no pre-planned single staffing after 8 p.m. (condition 11);
 - d) reasonable steps must be taken to prevent nuisance and/or drinking outside the premises (condition 23), supplemented by banning notices (condition 24);
 - e) a 'maglock' to be installed and maintained, which must be available for use at all times (condition 10);
 - f) installation of intruder alarm and panic button (conditions 16,17)
 - g) 'Staff Guard' or similar to be installed/maintained, allowing direct contact with a central monitoring station by audio and CCTV communication (condition 12).

Community Impact - noise, nuisance, and anti-social behaviour

33. As was mentioned in paragraph 23(f)(i), 'nuisance' is not a relevant consideration in the determination of a bingo premises licence application. The prevention of 'crime and disorder' arising from *gambling* is of course a licensing objective: but that is a different matter from nuisance associated with *premises*. In rejecting a proposed amendment to the Gambling Bill, which was to add the prevention of nuisance as a licensing objective, The Minister for Sport and Tourism (Richard Caborn MP) said –

“The relevant risks associated with licensing of pubs, bars and other premises on which alcohol is sold include noise and anti-social conduct, particularly at night... there is no intention of allowing [premises other than casinos and bingo clubs] such as ... 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.”

34. Merkur has nonetheless offered conditions requiring the installation of comprehensive external CCTV to mitigate the risks of nuisance outside its premises.

High levels of poverty and deprivation; vulnerable people at risk

35. The applicant is fully aware of the level of deprivation in this area and has taken it into account both its risk assessment and proposed licence conditions, which in turn will inform its staff training. Merkur has proposed a series of measures for the protection of vulnerable people which go beyond its already thorough national measures. We respectfully suggest this is precisely what the process of local risk assessment is designed to achieve.
36. The Gambling Commission’s Guidance does not suggest that the mere presence of a higher than average ratio of vulnerable people should result in a refusal. That is because the statutory obligation is to aim to permit and to frame conditions to respond to identified local risks. In its guidance the Commission refers to matters such as physical layout, supervision of premises, use of floor-walkers etc., to mitigate the risks of harm to vulnerable people. The applicant has taken account of the Guidance in its proposals and designed them accordingly
37. A recurring concern raised in the representations 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. The applicant has not previously been criticised by the Gambling Commission or any licensing authority, for any inadequacy in its policies and procedures for the protection of vulnerable people.
38. 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. The evidence before the Sub-Committee, in particular the independent reports from Leveche Associates (42-45 below), suggests that the applicant operates robust systems which we submit are more than ‘reasonably consistent’ with the licensing objective for the protection of vulnerable persons.

39. As is always the position, Merkur welcomes participation in its staff training by the licensing authority and relevant local care providers if they so wish, which underpins its local liaison.

Protection of children

40. The Act does not seek to prevent children from seeing gambling at all: for example children in Harlesden walk past and can see into betting offices, they can go into pubs and see gaming machines, they can see lottery terminals and scratch cards in convenience stores, newsagents etc. Rather, the Act is structured around preventing children gambling (other than in limited ways, e.g. family entertainment centres) and preventing advertising being attractive to them

41. The licensing objective is preventing children being harmed or exploited by gambling. Despite the right to admit children to bingo premises the applicant does not admit children to its high street bingo premises at all. Children do not come in, let alone gamble in, the applicant's premises. Nor can they see in, nor are they exposed to advertising or imagery attractive to them. This not only promotes the licensing objective but is also compliant with the interpretation/treatment of the objective by the Gambling Commission in its guidance and Licence Conditions and Codes of Practice.

42. The applicant's experience is that under 18-year-olds do 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.

43. 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 230 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.

The Evidence

44. 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.

45. 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 from GamCare and other organisations.

Sufficiency of staffing:

- All venues were sufficiently staffed with attentive, trained personnel carrying out key roles:
 - Door supervisors controlling entry, vetting customers, and patrolling outside.
 - Reception 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.
46. 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.
47. The full reports (with photographs) comprise 276 pages and are pages 58-333. A premises-by-premises summary of the reports is at Appendix 1 of this skeleton.

Staffing and management

48. There will be a minimum of 1 member of staff on duty at all times; and between 20:00 and closing there will be no single-staffing unless due to circumstances beyond the applicant's control.
49. The applicant staffs its premises according to the need to exercise appropriate supervision and to service customers. These are dynamic assessments according to customer usage at particular times of day and days of the week.
50. It is right to say that bingo premises do not experience the kind of peaks as are experienced by betting offices, for example at racing times. The pattern tends to be low numbers which remain steady throughout all trading hours. Nevertheless, the applicant has offered a double-staffing condition after 8 p.m. and of course its staffing levels at other times will be appropriate to the need.
51. The applicant provides sufficient staff to perform all requisite tasks, including greeting, checking customers, supervising and other duties. It analyses customer patterns during the week and staffs accordingly. For example, there will be parts of the day when there is normally no more than a very small handful of customers in the premises. Ten customers would be regarded as very busy. Authorities in general tend not to micro-manage staffing levels but leave it to the applicant's experience to provide sufficient staff to maintain security, provide a customer service and meet regulatory obligations.

Conclusions

52. In conclusion:

- a) 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.
- b) It is part of a group which operates 230 licensed gambling premises in a wide variety of locations of higher and lower crime, deprivation and population density.
- c) Despite that, it has never been subject to a review of a trading venue, or prosecution.
- d) 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.
- e) 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.
- f) In addition, the applicant has offered licence conditions specifically drafted to meet local concerns.
- g) 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.
- h) 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.

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

54. Conversely, taking into account the calibre of the applicant, its experience, systems, training, supervision, audit, and regulatory record (nationally and locally); its legal obligations under the Act, Regulations and codes; and the conditions it is offering; the Sub-Committee is invited to conclude that it has not been demonstrated by any evidence that the premises would undermine the licensing objectives.

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

Gerald Gouriet KC

**Francis Taylor Building
Inner Temple**

Wednesday 14 August 2024

Appendix 1

Edgware Road Report – pages 58-92

Preventing crime and disorder:

1. No evidence of crime and disorder, anti-social behaviour, street drinking, drug dealing or youth groups hanging around the premises or area (para 70)
2. Area felt safe with the public going about normal business (para 14)
3. Premises were well-run with no issues on each observation (para 2)

Protecting children and vulnerable persons:

1. Signage on door stating no under 18s and CCTV in operation (para 37)
2. Think 25 policy in place requiring ID checks (para 73ii)
3. Staff monitor customers to ensure no underage or vulnerable persons (para 45; para 63)
4. People entering vetted to prevent access by drunken or vulnerable people (para 71)
5. Demographic is older, not attracting young people or children (para 75)

Staffing and management:

1. Two staff on duty dressed in smart uniforms, one with an SIA badge (para 40-41; para 56)
2. Staff welcomed customers, offered assistance, and provided free soft drinks (para 57, 60-61)
3. Staff regularly patrolled, checking on customers and cleaning (para 45; para 63)

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

1. Customers arriving went straight in, customers leaving left the area immediately (para 46; para 65)
2. No groups hanging around outside the premises (para 46; para 65)
3. No anti-social behaviour seen in vicinity of premises (para 66)

In summary, the observations provide evidence that Merkur Slots is a responsibly operated business that upholds the licensing objectives without negatively impacting the local area. The full report contains further relevant details.

Edmonton Green Report – pages 93-117

Prevention of crime and disorder

1. No evidence of anti-social behaviour or criminality linked to the Merkur Slots premises during the observation period (para 55)
2. People entering are supervised to prevent access by heavily intoxicated individuals (para 59)
3. Operates in support of 'Secured by Design' crime prevention standards (para 63)

Protection of children and vulnerable persons

1. Strict Over-18 policy and "Think 25" age verification using photographic ID (para 62)
2. Staff are trained to protect players, including a City & Guilds accredited program (para 62)
3. Premises entry is supervised to prevent access by juveniles or vulnerable people (para 59-60)
4. Responsible gambling messaging and information is provided to customers (para 62)

Staffing and management

1. Employs sufficient staff to effectively manage age restrictions and fair gambling
2. Security staff control entry and the premises had multiple staff members on duty (para 43 & para 48)
3. Company implements a "Merkur 360" player protection and responsible gambling program (para 62)

Community Impact - Noise, nuisance, or anti-social behaviour

1. Does not contribute to noise or other nuisance and anti-social behaviour. No evidence of the premises causing noise issues or anti-social behaviour (para 55, & para 64)
2. Evidence of some anti-social behaviour in the area was not linked to Merkur Slots (para 56-57)
3. As a "low-key carpeted style lounge" the premises do not attract young people or cause disturbances like a "loud busy arcade" (para 61)

In summary, the evidence throughout of the observation report indicates that this Merkur Slots operates to a high standard in preventing crime, protecting the vulnerable, ensuring sufficient staffing, and avoiding public nuisance issues. The observer concludes these premises are well-run and do not negatively impact the local area (para 64).

Hatfield Report – pages 118-146

Prevention of Crime and Disorder:

1. Area felt safe with no signs of criminality, begging, anti-social behaviour (para. 11)
2. No issues seen at premises during covert visit, well run (para. 30)
3. No one hanging around outside premises, customers arrived and left promptly (para. 45)
4. Premises has smart, professional frontage (para. 50)
5. No evidence of crime, disorder, anti-social behaviour, street drinking, drug dealing, groups of youths hanging around (para. 50)

Protection of Children and Vulnerable Persons:

1. The demographic is much older and doesn't attract young people or children (para 55)
2. Signage on door stating no under 18s (para. 32)
3. Think 25 policy in place requiring ID checks (para. 53)
4. Staff complete low-profile patrols to check customers aren't underage or vulnerable (para. 3)
5. People entering vetted to ensure drunken or vulnerable persons don't gain access (para. 42)
6. Responsible gambling information provided via leaflets and posters (para. 53)

Staffing and management:

1. Male staff member at reception to greet customers (para. 35)
2. Female staff member at reception desk (para. 37)
3. Staff seen cleaning, patrolling, meeting customer needs during visit (para. 43)
4. Professional, attentive staff managing the premises (para. 54)

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

1. Music playing at background level, relaxed welcoming atmosphere (para. 50)
2. Low-key environment, only a handful of mature customers at any time (para. 55)
3. No excessive noise, street drinking or anti-social behaviour seen (para. 50)
4. Premises don't impact the local environment, infrastructure, or community (para. 58)

Holloway Road Report – pages 147-176

Prevention of crime and disorder

1. Well-run premises with no signs of crime, disorder, antisocial behaviour, street drinking or drug dealing in or around the venue (para 57, 59)
2. Proactive patrols by door supervisor to deter criminal behaviour (para 57)
3. Operates in support of 'Secured by Design' principles recommended by UK Police for crime prevention (para 63)

Protection of children and vulnerable persons

1. Strict Think 25 policy requiring ID to prevent underage gambling (para 60ii)
2. Customers vetted on entry to ensure no drunken or vulnerable persons gain access (para 58)
3. Responsible gambling information provided via leaflets and posters (para 60iii)
4. Attracts an older demographic, not young people or children (para 62)

Staffing and management

1. Door supervisor controlling entry and conducting external patrols (para 40, para 55)
2. Two staff members on duty serving customers and monitoring the premises (para 42, &, paras 45, 46)

Community Impact - Noise, nuisance, or anti-social behaviour

1. Customers do not loiter outside premises or stay in the area longer than planned (para 59)
2. No noise or antisocial behaviour issues from the venue or customers (para 57)
3. Low-key atmosphere with only a handful of customers at a time (para 62)

In summary, the evidence indicates that Merkur Slots operates responsibly to uphold the gambling objectives without negatively impacting the surrounding area. The full observation report provides more detail to support these key points.

Hounslow Report – pages 177-207

Prevention of crime and disorder:

1. No observed signs of crime and disorder, anti-social behaviour, street drinking, drug dealing, or groups of youths in or around the premises. (para. 53)
2. Entry controlled with time-delay lock and security system. (para. 2)
3. SIA licensed door supervisor vets customers before entry. (para. 3)

Protection of children and vulnerable persons:

1. Signage states no under 18s. (para. 2)
2. Door supervisor ensures drunken or vulnerable people don't gain access. (para. 38)
3. Staff conduct regular patrols to check no underage or vulnerable persons are on the premises. (paras. 47, 54)
4. Gamcare leaflets and information on responsible gambling available. (para. 48)

Staffing and management:

1. Three staff members on duty, including door supervisor, to assist customers and monitor premises. (paras. 39, 42)
2. Staff trained on responsible gambling policies like 'Think 25' age verification. (para. 56)

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

1. Well-lit, professional, carpeted premises with relaxed atmosphere and small number of customers. (para. 53)
2. Customers arrived and departed without loitering or causing disturbances. (para. 49)
3. No noise or anti-social behaviour issues observed from 24-hour operation. (para. 51)

Streatham Report – 208-241

Prevention of crime and disorder:

- Observations showed the premises are well run with no issues. (para. 2)
- From observations, Merkur Slots operating 24-hours does not create anti-social behaviour, noise or any other crime and disorder. (para. 3)
- During observations, no illegal activity or anti-social behaviour was seen taking place. (para. 35)
- No begging, street drinking, or drug dealing was observed around the premises. (para. 36)
- Customers arriving went straight into the premises and customers leaving left the area straight away. (para. 59)

Protection of children and vulnerable persons:

- People entering were vetted before being allowed admission to ensure vulnerable people didn't gain access. (para. 82)
- Strict Over 18 Policy in place, with photographic ID required to gain entry under Think 25 policy. (para. 84ii)
- The demographic is much older and doesn't attract young people or children. (para. 86)
- Staff complete patrols to check customers aren't underage or vulnerable. (para. 57, para 75)

Sufficiency of staff:

- Two staff members were on duty managing the premises during covert visits. (paras. 69, 74)
- Staff welcomed customers, offered refreshments, provided information on machines. (para. 52)
- Staff seen cleaning, patrolling, checking on customers' needs. (para 57)

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

- Merkur Slots operating 24-hours does not negatively impact nearby residents, environment, local infrastructure, or wider community. (para. 3)
- No groups of youths hanging around the premises or nearby streets. (para. 41)
- Customers arriving went straight in and leaving left the area straight away. (para. 59)
- No evidence of anti-social behaviour, excessive noise, or littering in vicinity of premises. (para. 81)

Tottenham Court Road Report – 242-276**Prevention of crime and disorder:**

- No evidence of crime, disorder, anti-social behaviour, excessive noise, littering, street drinking, drug dealing, begging or groups of youths hanging around in the vicinity of the premises (para 64).
- People entering the premises are vetted before or immediately upon entry to ensure drunken or vulnerable people don't gain access (para 65).
- Merkur Slots takes safer gambling seriously as evidenced by their responsible gambling programs and policies: (para 67).

Protection of children and vulnerable persons:

- Merkur 360 Program to achieve higher player protection standards (para 67i)
- Strict "Think 25" policy requiring photo ID for entry (para 67ii)
- Responsible gambling messaging and info from GamCare available inside venue (para 67iii; images A33-34)
- Detailed staff training on responsible gambling, accredited by City & Guilds (para 67iv)

Sufficiency of staff:

- Professional and attentive staff manage the premises; venues are well-run with systems to operate in support of the gambling objectives and avoid taking advantage of juveniles or vulnerable persons (para 68-69).

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

- During covert visits, staff were observed cleaning, completing low-profile patrols to check on customers' needs and ensure no underage or vulnerable customers (para 46; para 61).
- The atmosphere inside the venue was relaxed, welcoming, low-key - very different from a loud busy arcade. Only a handful of mature customers inside at a time, not attracting young people or children (para 69).

In summary, the observations provide substantial evidence that Merkur Slots Cashino on Tottenham Court Road is a responsibly operated venue that has policies and practices in place to prevent crime and disorder, protect vulnerable people, ensure sufficient staffing, restrict underage access, and avoid being a noise or anti-social behaviour nuisance to the surrounding area. The overall finding was that the premises does not negatively impact the local environment or community (para 72).

Upton Park Report – 277-306

Prevention of crime and disorder:

- Observations in the area around Merkur Slots from 21:00 to 06:10 hours showed no evidence of crime, disorder, anti-social behaviour, street drinking, drug dealing, or youths loitering (p. 55 & 59)
- The premises has good security lighting and external CCTV cameras (p. 54)
- Customers entering and leaving did not hang around outside causing problems (p. 57)
- Merkur Slots operates in support of Secured by Design crime prevention standards (p. 61)

Protection of children and vulnerable persons:

- Photographic ID is required to gain entry under Merkur's "Think 25" age verification policy (p. 58ii)
- Staff monitor customers to ensure underage or vulnerable persons do not gain access (p. 47)
- The customer demographic is older and the environment is low-key, not attracting children or youths (p.60)
- Literature on responsible gambling is available, like GamCare leaflets (image A36)

Sufficiency of staff:

- Two staff members were on duty and welcoming at reception during the 02:31 visit, with one explaining the lack of alcohol and offering free refreshments (p. 39-42)
- Staff proactively monitor customers regarding age and vulnerability while on patrol (p. 47)

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

- Observations over the course of the night showed Merkur Slots does not lead to customers staying in the area longer or hanging around outside causing issues (p. 57)
- No anti-social behaviour, noise or other nuisance was witnessed in the vicinity of the premises (p. 55)

In summary, the evidence indicates that Merkur Slots has policies and procedures in place to uphold the licensing objectives regarding crime, underage gambling, responsible gambling, public nuisance and anti-social behaviour. The observational findings suggest the venue does not negatively impact the local area in relation to these factors.

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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.
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 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.
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.

LICENSING SUB - COMMITTEE HEARING – 27 AUGUST 2024

SUPPLEMENTAL STATEMENT – AMANDA KIERNAN

1. 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. 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.
2. MERKUR operates a national estate of over 230 licensed bingo, adult gaming centre and family entertainment centre premises. Over 140 of MERKUR's premises operate with a 24-hour premises licence.
3. MERKUR is a leading national operator of bingo premises with clear policies to promote the Gambling Licensing Objectives. We always endeavour to liaise with Responsible Authorities concerning the operation of our premises and pre-consult with the police prior to making new applications.
4. 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").
5. MERKUR Slots UK Limited, has never had a review of a trading premises licence, which evidences the high standard of operation applied across the Company's licensed estate.¹
6. MERKUR holds key positions within the Bingo Association and BACTA (the trade association for the amusement and gaming machine industry in the UK) Executive and Social Responsibility Committees, working closely with these groups to innovate and promote Compliance and Social Responsibility within the industry.
7. MERKUR has over 50 Personal Management Licence Holders throughout its operational structure, all of whom are aware of their roles and responsibilities in regard to the LCCP. Legal obligations are placed upon personal licence holders to promote the Licensing Objectives whilst undertaking their respective duties.
8. 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. The Company conducts a compliance audit in each venue annually. Audits include Regulatory Compliance, Customer Interaction, Incidents, Self-exclusion breaches and Age Verification records. During the audits, premises staff are tested 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

¹ Two non-trading premises licences were subject to review applications in Enfield in 2021, but both applications were rejected by the Authority without a hearing, as the substance of both applications was based on objections to gambling in principle rather than identifying any concerns with the proposed operation at the premises.

checks are collated on a central hub, which is regularly reviewed and monthly reports are provided to Operations Teams.

9. 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.
10. Venue window displays are designed in consideration of premises' location, particularly in busy high street areas where children and young persons may pass by, and maintain the Company's focus that all gambling should be carried out in a socially responsible manner. 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.

Relationship with the Responsible Authorities and Interested Parties

11. MERKUR takes its duty to operate safe and Gambling Act 2005 compliant premises seriously. To this end, the Company has always sought to maintain good relations with local police and licensing authority teams.
12. For the purposes of this application for a new bingo premises licence, the local Licensing Authority and Police were initially contacted on 12 February 2024.
13. An initial response was received on the from both the Police and Licensing and a teams call was organised with our instructed solicitor to discuss the application in depth.
14. Two teams calls were held the with our solicitor, one with the Police and one with Licensing to discuss the application. Vital invaluable local information was provided to our solicitor which was relayed to myself and used to inform and update the local area risk assessment, which was submitted with the application.
15. Following the teams meeting, eleven conditions were included within the application. representations were then received from the Licensing Authority and Police, requesting some slight amendments to the conditions, which were agreed. Both the Licensing Authority and the Police withdrew their representation and confirmed they were happy that the proposal upheld the licensing objectives.
16. No concerns were raised by the Child Protection Team and the Gambling Commission regarding MERKUR's bingo premises licence proposals and did not object to the application.
17. MERKUR's detailed policies and procedures are designed to ensure that all gambling in Company premises remains responsible, controlled and that the Licensing Objectives are continually promoted.
18. 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.
19. An updated informed local area risk assessment has been submitted to support the application.
20. We understand that the local area suffers with general crime and disorder and nuisance, albeit not always specifically associated with gambling premises. We do not generally experience the kind of difficulties sometimes experienced by betting offices in terms of crime and disorder and nuisance, due to our different clientele, customer numbers, product,

layout and management. 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.

21. We have identified local providers of vulnerability support services within the local area risk assessment and we will endeavour to contact any relevant organisations and invite feedback on any local concerns that can be incorporated into premises training and evaluation. The Company is also committed to working with all Responsible Authorities to ensure that any emerging risks are identified, incorporated into the premises risk assessment and effectively addressed.

MERKUR Compliance – Protection of Children and Vulnerable

22. 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.
23. 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'*.
24. In February 2022, MERKUR were subject to the G4 follow up audit where 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.
25. 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."* The year one donation was used to support academic research into safer gambling and gaming and focused on what would be appropriate customer protection considerations in an immersive environment. The academic research was carried out by Bournemouth University.
26. MERKUR operates training upon recruitment and then 6-monthly refresher training programmes for all employees. Training modules include 'The Essentials of Compliance and Social Responsibility' which covers the Gambling Act 2005, LCCP, the Licensing Objectives under the Gambling Act 2005 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. Initial six-week, classroom based, induction training is completed for all new venue teams and includes customer interaction role play and exposure to operation and customers in live venues. Following site opening, new teams are provided regular follow up and support. The Company also incorporates accredited Social Responsibility and Interaction training for its premises management teams. Excerpts from the Company's training platform are provided in the supporting documents.

27. MERKUR have a National Training Centre where venue teams receive face to face training which includes identifying signs of potential problem gambling and other vulnerabilities such as homelessness. Staff are trained to take appropriate action, such as offering support such as managing time spent playing (time outs) and 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.
28. 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.
29. 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.
30. 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.
31. Examples of some of MERKUR's responsible gambling information have been provided in the supporting documents.
32. 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.
33. 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.
34. 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.

35. A copy of MERKUR Slots Social Responsibility, Operational Compliance and Training Documents have been included within our hearing documentation, which highlight the priority given to responsible gambling and the provision of responsible gambling information to our customers and staff members.

Site location

36. A detailed local area risk assessment has been supplied in the supporting documentation, designed to take account of the council's Gambling Statement of Licensing Principles, local crime statistics, local demographics and establishments that may impact on potential customer vulnerability and local crime and disorder. The local area risk assessment has been prepared and updated with specific consideration to the site's location.
37. Local analysis is an invaluable tool to direct local resources and assists with the identification of potential risks and the development of local training and partnership to ensure that potential risks are mitigated and that gaming in MERKUR Slots premises remains responsible.
38. MERKUR is an experienced operator with premises in many large cities and towns across the country, each with their own local profiles and risk. MERKUR effectively and responsibly operates in these areas, some of which are subject to greater and lower levels of general crime and disorder and deprivation. The Company's responsible gambling safeguards, security measures and strictly controlled marketing practices are proven to be effective and management will always adapt to local circumstances.
39. As a result of the Company's commitment to responsible operation and the resources directed to responsible play, none of MERKUR's operational premises licences have been subject to review proceedings or revocation.

Underage Gambling

40. MERKUR's detailed policies and procedures are designed to ensure that all gambling in Company premises remains responsible, controlled and that the Licensing Objectives are continually promoted.
41. By law, licensed bingo premises can permit under 18s on the premises and can also apply for a premises licence under the Licensing Act 2003. However, MERKUR's premises are strictly adult only, operate Think 25 and will not obtain a licence under the Licensing Act 2003.
42. Unlike many other licensed operators, such as some licensed betting premises and adult gaming centres, the MERKUR Slots venue will apply our strict marketing and advertising policy, ensuring that advertising is not appealing to underage individuals and that line of site into the venue is restricted. This will ensure that children and young person's cannot see into the premises, preventing exposure to ambient gambling with all gaming activities hidden from view.
43. MERKUR Slots customer demographics are up to 50% female with an average age over 30.
44. Staff training and company policy is designed to mitigate the potential risk of underage gambling and exposure to ambient gambling.
45. To ensure the effectiveness of the Company's Think 25 policy, venues regularly undergo random test purchasing and details can be provided to local authorities upon request.

In our experience, our venues are not attractive to underage individuals due to the ambience of our venues, the nature of our gaming services and customer demographics. This is consistently seen across our licensed estate. Our products are not designed for children, and do not appeal to them.

46. The Company's partnership approach and high standard of staff training, customer monitoring and interaction has continued to ensure that all potential risks are mitigated and the occurrence of incidents remains minimal.

Crime and Vulnerability

47. It is rare for our premises to be associated with serious anti-social behaviour or crime and disorder but our staff training procedures and security measures, including external CCTV, are designed to monitor customer behaviour and external areas for anti-social behaviour. Company policy ensures that appropriate steps are taken to minimise any risks and we record and report any incidents or concerns to Company management, for internal review and assessment, and local authorities.
48. MERKUR is an experienced operator with a proven history of operating premises in some challenging areas and serious incidents relating to crime and disorder are rare.
49. In addition, all staff training is developed to consider local area characteristics and MERKUR Slots operates on the basis that its controls and best practice are adopted at all times.
50. Local premises management will always work with local authorities under the Act, other authorities, trade groups and vulnerability support services to reinforce any local concerns and identify any emerging local risks within premises' training and operation.
51. The kind of people who come to our premises (including their age and general behaviour) is not such as to threaten the peace of the neighbourhood.
52. Furthermore, unlike pubs and clubs, one does not find groups of people loitering outside our premises smoking or creating a disturbance. Our customers arrive, play the machines and leave. That is one reason why none of our premises have faced a review hearing.
53. Unlike betting offices, there is no ongoing entertainment such as a sporting event and no communal places for crowds to gather. Similarly, unlike betting offices, our premises do not experience significant peaks and troughs of customers. Our customer numbers are almost always in single figures. This is a further reason why we do not experience conflicts with our residential neighbours.
54. In general, it is rare for our venues that operate late at night 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.
55. MERKUR operate a business-wide Anti-Money Laundering (AML) policy, which is reviewed annually, and ensures that the risks of money laundering in these premises are low. The premise layout is designed to allow customer supervision at all times. All machines within the premises are linked to a central machine data capture system, which identifies and sends alerts of suspicious activity and allows the venues to individually analyse live transactional activity for money laundering. All AML incidents, rare as they are, are reported by the venue staff via a tablet which also provides an automated email alert to myself, as the dedicated AML manager.

56. 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 policies. In our experience, 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.
57. 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 Concerns

58. The representations received from the and local residents and Councillor identify the potential for increased anti-social behaviour and the increased risk to vulnerable people and children in the area should the Licensing Sub-Committee be minded to grant the current premises licence application. I have already touched on some of the concerns expressed.
59. All comments made within the representations were reviewed. We are confident that the proposed conditions are more than sufficient to alleviate these concerns.
60. MERKUR has provided a detailed local area risk assessment, reviewed local area statistics and demographics and reviewed the Council's detailed policies in order to effectively identify any potential risks to the proposed operation.
61. MERKUR will implement robust security policies and procedures to monitor customer behaviour both within the premises and immediately outside the venue, refuse service to individuals who may be under the influence of alcohol or drugs and work in partnership with the local police in the event that any incidents of crime or disorder occur.
62. MERKUR Slots premises, from experience, are not attractive to young persons and sites rarely have issues with young person's attempting to gain access. All our premises are over 18s and operate a Challenge 25 policy.
63. MERKUR Slots premises usually only have low numbers of customers within the premise at any one time, with members of staff continually walking around. This means that in the rare event that a young person attempts to enter the premises, they would be intercepted and challenged for their ID at the earliest opportunity.
64. The Company's detailed training procedures and evaluation tools have been designed to mitigate any local risk to the Licensing Objectives, with a particular focus on the protection of children and the vulnerable from harms associated with gambling. As part of MERKUR's Socially Responsible Gambling Policy, customers are continually monitored and interactions completed where concerns are identified. As part of the interaction process, customer play is assessed to trigger customer affordability and source of funds enquiries to ensure that all gaming remains controlled. I have described the Company's approach above, and it will of course be implemented in these premises.
65. Should the Committee members be minded to grant the application applied for, we believe all potential operational risks will be effectively mitigated.
66. MERKUR understands that local risk assessment and staff training is a live matter, which is regularly assessed and adapts to any emerging or changing risks in the locations in which it operates. This premises will be no exception.

67. Due to the nature of the gaming that is provided at MERKUR venues, it is rare for customers to congregate outside, unlike betting premises, as there is no ongoing entertainment such as a sporting event. It is also rare for our venues to have significant customer numbers at any one time with total customer numbers almost always in single figures. Customers leaving our premises rarely cause concern to our local neighbours.
68. MERKUR is committed to partnership working and will always engage with local Betwatch, Pubwatch, or other similar schemes to share best practice and local knowledge of venue operation or identified risks, whether or not they strictly relate to gambling premises.
69. Our staff are under instructions to record every incident, however minor. Our staff are trained in conflict management, and in the overwhelming majority of cases handle matters themselves. They are equipped not only with panic alarms, but also with a "Staff Guard" fob, which enables them to call up assistance from a central hub staffed with SIA-personnel who can view the CCTV, speak and be heard in the premises. When Staff Guard staff become involved, it usually resolves the incident rapidly. In a small number of cases, the Police are summoned, and the action of summoning them usually brings the incident to a halt.
70. I have no reason to believe, based on our record elsewhere, that this premises will cause a significant uptick in crime and disorder at the venue or place a significant additional burden on the Police.

Premises Operation

71. The premises will be managed by an experienced shop 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. Training focuses on the promotion of the Licensing Objectives and a copy of our Policies and Procedures has been provided as part of our hearing bundle.
72. 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.
73. 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.
74. All MERKUR's staff members actively monitor and manage the area immediately outside their premises and record all incidents should they occur. Reporting lines are set up with local police teams to ensure that any potential local issues are identified and addressed.
75. 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.
76. Staff numbers and premises operation are regularly risk assessed, incorporating monitoring of premises operation, internal compliance audit completed by our field-based compliance team, evaluation of customer numbers and feedback from Responsible Authorities and Interested Parties. These effective measures ensure that premises are able to quickly adapt to any emerging risk or local concern. Staff numbers and rotas are

continuously reviewed to adapt to customer numbers and cognisance is taken of police advice.

77. 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.

Conclusion

78. 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.
79. 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.
80. In my experience a good manager and their team will know regular customers well and new customers will always attract raised awareness.
81. Although nuisance is not a licensing objective under the Gambling Act, our premises do not cause nuisance to neighbours.
82. MERKUR continues to take very seriously any issue which its presence creates, both out of respect for the local community and because its licence and commercial reputation depends upon it.

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

Date: 16/08/2024

LICENSING SUB - COMMITTEE HEARING – 27 AUGUST 2024

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 between 5 and 10 at any one time, would be considered an exceptionally 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. The use of maglock must be constant if the premises operates past midnight.
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. 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.
22. Within the application, 11 safeguarding conditions have been offered to be attached to the premises licence. These include extensive safeguards surrounding CCTV, the use of StaffGuard, staff numbers, a Challenge 25 scheme and operating a Maglock on the premises entrance door.

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: 16/08/2024

LICENSING SUB-COMMITTEE HEARING – 27 AUGUST 2024

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 National Council, Divisions 1 & 3, and various Committees. I'm also the Chairman of the Gambling Business Group's Machines Sub-Group, and take a very active role with 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 230 'High Street Bingo' premises, bingo clubs, Family Entertainment Centres 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 terminal, choosing to play while standing or in seating provided around the premises.
7. 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.
8. High Street Bingo premises operate a combination of category B3 and C gaming terminals with stakes ranging from 10p through to £2.
9. Across Merkur Slots UK Limited's venues the average stake placed is between 30p and 40p. Only 20% of the gaming machines provided may be category B3s. The remainder, being the category C gaming machines, have the same stake and prize levels as those offered in pubs.
10. Details of the gaming content provided in the bingo tablets has been provided in the supporting documentation.
11. 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.
12. 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.

13. 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.
14. 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 awful and giving 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 Product, Merkur Slots UK Limited

Date: 16/08/2024

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-103444-031 (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:	15/08/2024 and upon 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%). During the last 12 months the most commonly recorded crimes were Anti-social behaviour (28.9%), Violence & Sexual Offences (25.8%), Vehicle crime (7.8%), Public Order (6.5%), Other Theft (6.3%) and 9 Burglary (5%). (<i>police.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 Increase patrols to reduce the number of robberies taking place in the Harlesden Town Centre, specifically Tavistock Square and the Jubilee Clock locality; to Reduce VAWG and ASB incidents in the Harlesden Town Centre Locality and to increase the number of joint operations between council and police to reduce the Street drinking and open drug dealing in the Craven Park Road and Craven Park locality. (<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 9</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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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

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

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

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

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.

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.

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 will 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.

	<p>Residential Areas The area containing High Street, Brent, London consists predominantly of flats. There is a higher-than-average level of rented housing (excluding social housing) - 77% of household spaces.</p> <p>Bus stops and other Transport links Buckingham Road Harlesden (Stop B), London NW10 4NT Harlesden Jubilee Clock (Stop X), London NW10 4LS Tavistock Road, London NW10 4JJ Willesden County Court (Stop T), London NW10 8TS Park Parade (Stop F), London NW10 4SP Harlesden Jubilee Clock (Stop W), London NW10 4UJ Willesden County Court, London NW10 8SB Park Parade (Stop C), London NW10 4JH Acton Lane Harlesden (Stop R), London NW10 4UB Park Parade (Stop D), London NW10 4JB</p> <p>Locally Identified Premises Aspect Property, 41 Park Parade, London NW10 4JE Jai Electronics, 155 High St, London NW10 4TR Cash Converters, 36 High Street Harlesden, London NW10 4LS High Crown Bakery & Take-Away, 2 Craven Park Rd, London NW10 4AB Taste of Lahore, 1 Manor Park Rd, London NW10 4JW One Stop Caribbean, 17-19 High Street Harlesden, London NW10 4NE Sparks, Bank Buildings, 5 High St, London NW10 4LT Local Food Express, 16 Park Parade, London NW10 4JH Harlesden High Street, 57 High St, London NW10 4NJ Harlesden Fresh Fish, 90 High St, London NW10 4SL Halal Butchers, 92 High St, London NW10 4NT Iceland Supermarket Harlesden, 71-75 High St, London NW10 4NS</p>	<p>Senior Management are members of the BACTA Divisional and Socially Responsible Committees and Bingo Association Executive and Socially Responsible Committees. They take the opportunity to actively participate with these trade bodies, collaborating with other operators to promote responsible gambling initiatives including the development of an Accredited Gamcare training programme and the Machine Messaging trial and evaluation.</p> <p>The Gamcare Helpline Annual Statistics 2020 reported that calls received from people experiencing problems with their gambling were low in High Street Arcade Gaming Machines at 3% compared to Betting Shop Gaming Machines at 15%. The vast majority of calls were received from people within the on-line sector.</p> <p>Deprivation Whilst the premise may be near or in an area of relative deprivation, Merkur Slots takes the view that individual customers must be treated holistically, and the information provided in this document are designed to identify individuals that could potentially be at risk of gambling related harm</p> <p>Merkur Slots operates on the basis that its controls and best practice is always adopted therefore, it is not a question of degrees of vigilance being implemented in different areas.</p> <p>Homelessness Some premises are used by the homeless for warmth and company. Merkur Slots treats all customers with dignity and has a clear policy on begging.</p> <p>Staff are trained to deal with vulnerable people in a sympathetic manner, any difficult cases are referred to our compliance team for review and resolution.</p> <p>Staff are trained how to manage situations with homeless people seeking refuge.</p> <p>A line of contact will be created with local high-risk premises, homeless shelters, foodbanks to provide social responsibility information.</p> <p>MERKUR staff are aware of where rough sleepers sleep and beggars loiter in the local area and actively prevent them from entering the premise, including close monitoring of individuals spending coins/low level amounts on a frequent basis.</p> <p>Should loitering increase due to extended hours additional notices will be added about loitering without play not being tolerated.</p>
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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%). During the last 12 months the most commonly recorded crimes were Anti-social behaviour (28.9%), Violence & Sexual Offences (25.8%), Vehicle crime (7.8%), Public Order (6.5%), Other Theft (6.3%) and 9 Burglary (5%). <i>(police.uk)</i> 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 Increase patrols to reduce the number of robberies taking place in the Harlesden Town Centre, specifically Tavistock Square and the Jubilee Clock locality; to Reduce VAWG and ASB incidents in the Harlesden Town Centre Locality and to increase the number of joint operations between council and police to reduce the Street drinking and open drug dealing in the Craven Park Road and Craven Park locality. <i>(police.uk)</i></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.

		<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Maglock systems will be deployed during times of public houses closing.</p> <p>Money Lending Money lending is not tolerated within our premises.</p> <p>Suspensions of organised money lending by illegal money lenders are escalated to the audit compliance team and onwards to local authority money lending teams.</p> <p>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.</p> <p>Dedicated Regional Night Managers are employed to support venues with security incidents.</p> <p>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.</p> <p>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.</p>
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<p>Ensuring that gambling is conducted in a fair and open way</p>		<p>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).</p> <p>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.</p> <p>Customer Complaints <i>Failure to prevent customers complaints and disputes regarding gambling within our premises. Failure to resolve customer's complaints and disputes regarding our gambling premises.</i></p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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).</p> <p>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.</p> <p>All marketing campaigns are reviewed for appropriateness before being launched. No advertising is used that depicts images that may appeal to children.</p>
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<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>Merkur Casino has a dedicated Learning and Development Team and a Safer Gambling team that deliver face to face social responsibility training. The Safer Gambling Team review and evaluate the effectiveness of training.</p> <p>Gamcare Accredited training completed by members of management.</p> <p>All staff complete on boarding and 6 monthly refresher training: The Essentials of Compliance, Safeguarding Children and Vulnerable People Age Verification and Customer Interaction.</p> <p>Staff are aware of the importance of social responsibility, trained to advise customers of gambling responsibly and identifying potential problem gamblers.</p> <p>Compliance and Social Responsibility Folder and Player Protection Framework containing policies and procedures is available to all staff. Venue Mangers review compliance logs monthly, Area Managers Bi monthly and Compliance Auditors annually.</p>
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Merkur Slots 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.

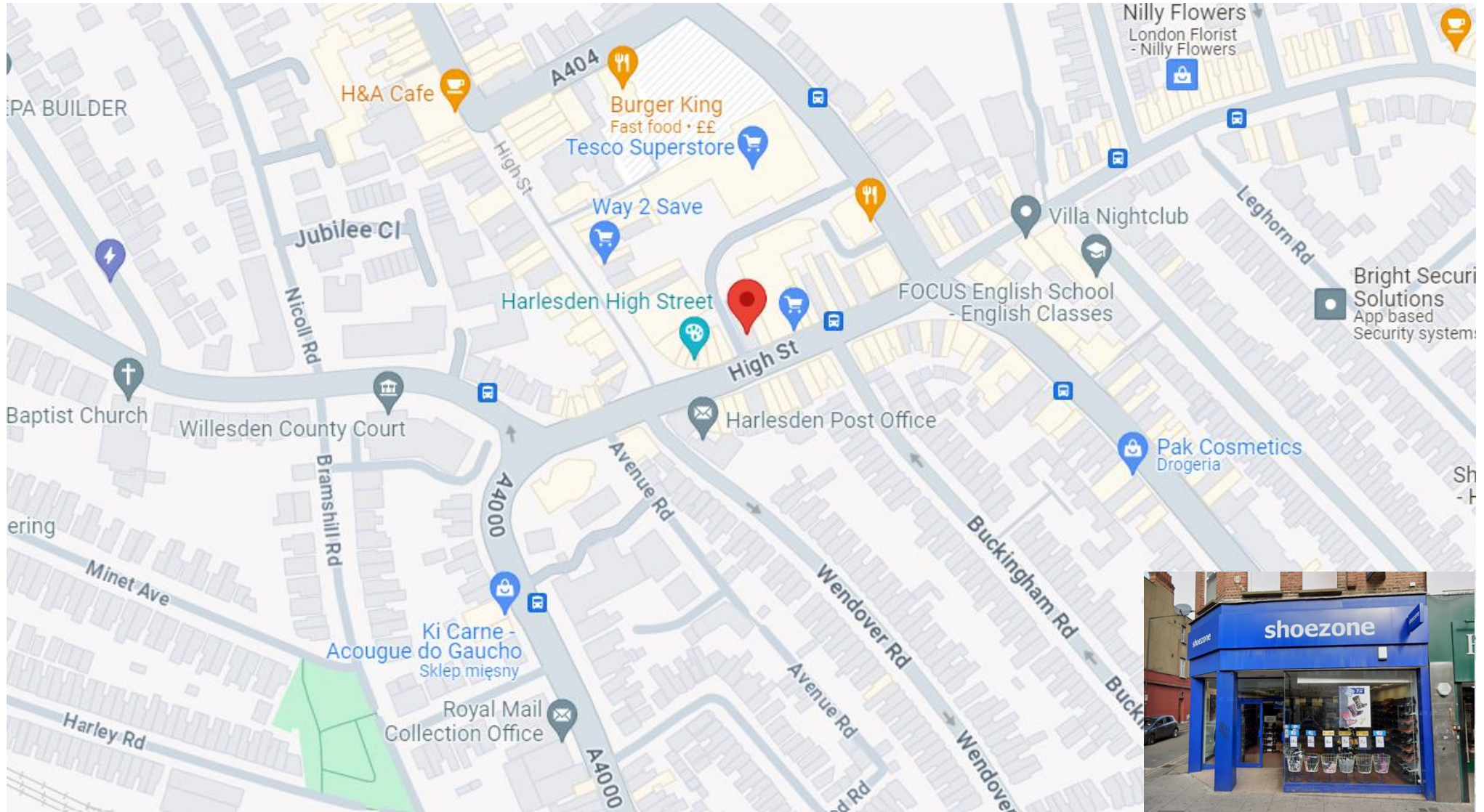
None of our operational venues have been subject to review proceedings.

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:	15/08/2024

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



Merkur Slots – Shop frontage example

