



## **Full Observation Report**

**Stuart Jenkins – Licensing Consultant**

**Leveche Associates Limited**

### **Merkur Slots**

**182-184 Edgware Road London W2 2DS**

#### **Executive Summary**

1. Observations were conducted on Merkur Slots premises at 182-184 Edgware Road London W2 2DS and the surrounding area between 21:00 hours on Thursday 1<sup>st</sup> September 2022 and 06:15 hours on Friday 2<sup>nd</sup> September 2022, then again between 22:50 hours and 23:35 hours on Thursday 15<sup>th</sup> September 2022.
2. Two covert visit were made to the site and the surrounding area. The observations showed the premises are situated on a busy high street within a parade of shops on the A5 Edgware Road. The visits showed the premises to be well run with no issues on each occasion.
3. There are two other operators in the area with a similar business model to Merkur Slots which are Little Vic Casino 156 – 158 Edgware Road W2 2DS and Reel Time 212 Edgware Road W2 1DH which are advertised as being open 24-hours a day. From the observations and my visits to the area, it is clear that Merkur Slots operating 24-hours a day would not create anti-social behaviour, noise or any other crime and disorder and does not have a negative impact on nearby residents, the environment, local infrastructure, or wider local community.

#### **Introduction**

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

5. These premises are licenced under the Gaming Act 2005 and are open Sunday to Thursday 07:00 to 01:00 hours and Friday and Saturday 07:00 hours to 02:00 hours.
6. The premises come under the jurisdiction of Westminster City Council.

### **Personal – Stuart Jenkins**

7. I am a former Police Officer having retired from the Metropolitan Police after completion of over 30 years exemplary service.
8. Throughout my police career the majority of my service was spent on specialist units engaged on proactive operations :- 1993–1997 Central Territorial Support Group (TSG) - Level 1 Public Order, firearms officer and dedicated surveillance officer; 1997–1998 CO14 Clubs & Vice Unit – test purchase officer and street offences investigations; 1998-2000 Charing Cross Division on promotion – overt and covert licensing operations; 2000-2008 CO14 Clubs & Vice Unit – lead officer for the investigation of serious criminal offences within licensed premises across London, test purchase officer, Pan-London licensing tactical advisor, Licensing Policy Development and Implementation for the Metropolitan Police Service (MPS) and intelligence unit supervisor; 2008-2018 Marine Policing Unit (MPU) – licensing lead for the MPU; licensing tactical advisor Notting Hill Carnival, covert licensing operations and intelligence unit supervisor. Marine intelligence and accreditation lead for the Queens Diamond Jubilee River Pageant and intelligence lead for the London Olympics 2012.
9. I have worked as an Independent Consultant in the Licensing and Security Industry for the last 5 years.
10. I was a Home Office qualified Crime Prevention Design Advisor.
11. I am the holder of the BTEC Level 3 Certificate (Security Industry Authority) – Close Protection Operative in the Private Security Industry.
12. I am the holder of a Personal Licence under the Licensing Act 2003.

### **Observations**

13. I carried out my observations of Merkur Slots premises at 182-184 Edgware Road and the surrounding area between 21:00 hours on Thursday 1<sup>st</sup> September 2022 and 06:15 hours on Friday 2<sup>nd</sup> September 2022, and again between 22:50 hours and 23:35 hours on Thursday 15<sup>th</sup> September 2022.
14. The area felt safe with members of the public going about their business, working, shopping, and socialising.
15. The area is well lit and illuminated from street lighting and shop front lights. I had clear and unobstructed views throughout the observations.

16. During observations I concentrated on the pedestrian footfall, signs of criminality, begging, anti-social behaviour including any additional noise, vulnerable persons, other persons at risk and the general environment.
17. The area of observations is densely populated with many retail premises, licensed bars, and restaurants. Edgware Road is well served by public transport with regular bus routes, taxis, and trains. There was ample car parking available in a nearby pay and display car park and restricted parking in the side roads. There are London Underground Stations located at Edgware Road to the north of the premises and Marble Arch to the south. These transport mediums allow the public to arrive and leave the area safely and quickly.
18. The area has a diverse community living together in a mixture of privately owned and rental accommodation. The area also has several hotels and bed and breakfast establishments.
19. The premises is situated on the A5 a busy road running North to South. The southern end finishes at one of London's iconic tourist venues, Marble Arch and Hyde Park with the exclusive premises of Park Lane close by. To the north is the Marylebone Flyover which connects to the A40 a main arterial route into London. The road has two-way vehicular traffic passing the venue.
20. Running off Edgware Road, east to west are numerous residential hotel and commercial premises. On either side of Edgware Road there are many retail outlets including independent shop premises, licensed premises, gaming premises, betting shops, restaurants, estate agents, supermarkets, mini-supermarkets, hairdressers, barber shops, chemists and fast-food premises.
21. Immediately north of the premises is an empty shop then the junction with Crawford Place. Immediately south of the premises is a McDonalds Restaurant and then a large Waitrose Supermarket. Opposite there are a number of small independent shops including a mobile phone sales and service premises (Mr Tech and Linku), a Salon (Baghdad Salon) and a Pharmacy.
22. Pedestrian and vehicular traffic varied during the times of the observations. There was zoned parking in local side roads and additional underground parking for some of the residential apartment premises.
23. The area of observations was from Chapel Street in the north and George Street in the south.
24. There are seven other gambling premises in the Edgware Road W2 area of observations. The four bookmaker premises were all closed by 22:00 hours, the other gaming premises were open 24-hours:
  - i. Coral Bookmakers 214 Edgware Road W2 1DH – Image A16
  - ii. Ladbrokes Bookmakers 113-115 Edgware Road W2 2HX – Image A18
  - iii. Paddy Power Bookmakers 242 Edgware Road W2 1DS – Image A15
  - iv. William Hill Bookmakers 95 Edgware Road W2 2HX – Image A19
  - v. Little Vic Casino 156 – 158 Edgware Road W2 2DS – Image A10

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

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

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

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

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

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

## **Covert Observations**

### **Deployment One**

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

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

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

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

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

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

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

35. Between 00:11 hours and – 00:21 hours I conducted a covert visit to the Merkur Slots Edgware Road – Images A25, A26.
36. The front display of the premises was clean, well maintained and looked professional. The signage was clear and bright.
37. At 00:11 hours I went to the entrance door which was closed. I saw that entry was controlled by using a bell security entry system. On the glass of the door, I saw signage stating no under 18's, CCTV in operation, no alcohol and that a time delay lock was in use.
38. I pushed the door and entered. On entry I saw to the right was a display board with the rules, policies and licences on show for customers and the authorities.
39. On entering this main area, the room opened into a large deep room. I saw it was on one level which was carpeted and there were gaming machines of various types throughout the premises.
40. About half way down on the left I saw a reception area where refreshments were also prepared. At the reception desk I saw two male members of staff dressed in smart corporate clothing.
41. One of the males approached and informed me that the premises was due to close in about 10 minutes. I stated I thought it closed at 1am and he stated it did, but they were closing early to allow staff to thoroughly clean the gaming machines and room. I saw that he had an SIA door supervisor badge clearly displayed. The other member of staff then spoke to me confirming I only had 10 minutes to use the machines until the premises closed, I replied that would be fine.
42. I saw there was one other customer in the premises. He was male about 27 years of age and casually dressed. No other customers came into the venue during my visit.
43. I found a gaming machine to play and sat down. I asked the second male if there were drinks available. He stated there were only soft drinks available as they were about to close. I declined the offer and carried on playing the machine.
44. There was a facility to prepare hot and soft drinks at the reception desk area which was clean and tidy.
45. Whilst I was in the venue, I saw the staff cleaning, wiping down surfaces and completing a low-profile patrol checking on customers' needs and making sure they weren't underage or vulnerable. I felt safe, I was not pressurised to use the machines or to spend money. The staff were friendly, polite, informative and I found the premises clean and tidy.

46. After 10 minutes in the premises, I was informed by staff that they were now closed, and I needed to leave. At no time during my observations did I see anyone hanging around the premises. Customers arriving went straight into the premises and customers leaving left the area straight away. I left the premises at 00:21 hours – Image A26.
47. At 01:00 hours Merkur Slots Edgware Road formally closed without any issues or incidents.
48. Throughout my continuing observations I recorded further photographic images that demonstrate there was no anti-social behaviour in the vicinity of the Merkur Slots premises – Images A27, A28, A29, A30, A31, A32, A33, A34, A35, A36, A37, A38, A39, A40, A41.
49. I remained in the area until 06:15 hours when I concluded my observations.

## **Deployment Two**

50. I conducted my covert observations from between 22:50 hours to 23:35 hours on Thursday 15<sup>th</sup> September 2022.
51. At 22:50 hours I arrived in the area of the Merkur Slots 182-184 Edgware Road W2 2DS and started my observations by monitoring the venue and the immediate area around it – Image B1.
52. Pedestrian and vehicular traffic passing the premises was constant but varied as is typical with Edgware Road 24-hours 7-days a week.
53. Between 22:56 hours and 23:28 hours I conducted a covert visit to the Merkur Slots 182-184 Edgware Road W2 2DS – Image B2.
54. At 22:56 hours I went to the entrance door which was closed. The front of the premises was as I have described previously.
55. I pushed the door and entered the premises. In front of me was the board with the premises policies, rules and licences on display. I passed the policies board and entered the main area which was the same as when I visited previously.
56. I saw there were two male staff on duty who were dressed in smart corporate clothing. One of the males was also wearing an SIA door supervisor badge.
57. The member of staff without the SIA badge approached me, welcomed me to the venue and asked if I needed any help with choosing a gaming machine to play. I stated I was fine and looked around the premises.
58. I saw there were five other customers in the venue at the time of my visit. All five were male aged between 28 years and 55 years and casually dressed.

59. I found a gaming machine beyond the reception desk. The staff left me to enjoy playing the machines. I was not pressurised or encouraged to spend money.
60. Whilst I was playing the machine the male member of staff who spoke to me originally asked if I would like a soft drink, water, coffee, tea or a snack. I asked if I could get an alcoholic drink and he explained the premises weren't licensed for alcohol but the non-alcoholic drinks they provided were free for customers. I accepted his offer of a coffee.
61. After a couple of minutes, the staff member brought over my coffee and stated if I needed any help to ask him or his colleague.
62. The hot and soft drinks were prepared at the reception desk area which was clean and tidy.
63. As before whilst I was in the venue, I saw the staff cleaning, wiping down surfaces and completing a low-profile patrol checking on customers' needs and making sure they weren't underage or vulnerable. I felt safe, I was not pressurised to use the machines or to spend money. The staff were friendly, polite, informative and I found the premises clean and tidy.
64. Before leaving I used the toilets which were clean and tidy. The toilets were regularly checked as shown by the toilet check sheet and there were Gamcare leaflets available for customers to take away – Image B3, B4.
65. At no time during my observations did I see anyone hanging around the premises. Customers arriving went straight into the premises and customers leaving left the area straight away. Prior to me leaving two male customers left and did not return. I left the premises at 23:28 hours – Image B5.
66. Throughout my continuing observations I recorded a further photographic image that demonstrated there was no anti-social behaviour in the vicinity of the Merkur Slots premises – Image B6.
67. I remained in the area until 23:35 hours when I concluded my observations.

## **Summary**

68. I found Merkur Slots in Edgware Road to have a smart, well-lit, and professional looking frontage. The premises were carpeted, with music playing in the background and the atmosphere was relaxed and welcoming.
69. At the time of my visits to the location, I saw mature females engaged in begging and homeless people sleeping in doorways on Edgware Road. However, this activity took place well away from Merkur Slots and was not linked to the premises in any way.
70. I saw no evidence of crime and disorder, anti-social behaviour, excessive noise, littering, street drinking, drug dealing or groups of youths hanging around.

71. People entering these premises were vetted before entering or immediately upon entry to ensure drunken or other vulnerable people didn't gain access to the premises.
72. It is clear the presence of Merkur Slots in Edgware Road does not lead to or result in people, who have been on a night out, staying in the area any longer than they had planned to.
73. Merkur Slots UK takes safer gambling seriously. This can be evidenced with the use of safeguarding programs such as:
- i. Merkur 360 Program - To achieve higher standards of player protection Merkur have worked with G4 Global Gambling Guidance Group, which focuses on the provision of responsible gambling and has also implemented its own 360 responsible gambling program.
  - ii. Think 25 Policy – Strict Over 18 Policy. All venues operate a Think 25 Policy whereby photographic ID is required to gain entry.
  - iii. In View Tools – Staying in control is a key part of messaging in the Merkur venues. Leafleting and posters such as BeGambleAware and GamCam, can be found in the venues main area and in private places such as toilets.
  - iv. Staff Training – Merkur Slots has developed a detailed training programme for all staff members including its own City and Guilds accredited training developed in partnership with YGAM and Betknowmore.
74. From my visits to many Merkur Slots Premises, I have found professional and attentive staff managing them. The premises are well run and there are clearly defined systems in place to ensure the premises operate in support of the gambling objectives and don't attract or take advantage of juveniles or other vulnerable persons.
75. The demographic is much older and doesn't attract young people or children. The environment is very different to a loud busy arcade, it is a low-key carpeted style lounge with no more than a handful of mature customers in at any one time.
76. Merkur Slots UK and their premises operate in support of the principles of Secured by Design, the company recommended by the Chief Officers of UK Police Forces for Crime Prevention standards.
77. In conclusion, from my visits it is my opinion Merkur Slots UK Limited are well run, and their operation significantly reduces the risk of crime and disorder and vulnerable people being taken advantage of. It is clear that the Merkur Slots premises do not impact on the environment, infrastructure, or local community.



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

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



## **Appendix A**

Observation Images

1st - 2nd September 2022

### **Merkur Slots**

182-184 Edgware Road

London

W2 2DS

### **Leveche Associates Ltd**

Nightingale House

46-48 East Street

Epsom

Surrey KT17 1HQ

**Merkur Slots**  
Merkur Slots 182-184 Edgware Road London W2 2DS  
1st - 2nd September 2022



**Image A1**

21:21hrs

Merkur Slots 182-184 Edgware Road London W2 2DS



**Image A2**

21:21hrs

Edgware Road looking south

**Mercur Slots**  
Mercur Slots 182-184 Edgware Road London W2 2DS  
1st - 2nd September 2022



**Image A3**  
21:21hrs  
Edgware Road looking north



**Image A4**  
21:26hrs  
McDonalds 178 - 180 Edgware Road W2 2DS

**Merkur Slots**  
Merkur Slots 182-184 Edgware Road London W2 2DS  
1st - 2nd September 2022



**Image A5**

21:26hrs

Waitrose Supermarket  
168 - 176 Edgware Road W2 2DX



**Image A6**

21:27hrs

Edgware Road looking north

**Merkur Slots**  
Merkur Slots 182-184 Edgware Road London W2 2DS  
1st - 2nd September 2022



**Image A7**

21:27hrs

Pharmacentre 149 Edgware Road  
(opposite Merkur Slots)



**Image A8**

21:28hrs

Female engaged in begging Edgware Road  
looking north

**Merkur Slots**  
Merkur Slots 182-184 Edgware Road London W2 2DS  
1st - 2nd September 2022



**Image A9**

21:30hrs

Rough Sleeper Edgware Road looking north



**Image A10**

21:30hrs

The Little Vic Casino 156 Edgware Road W2 2DS

**Merkur Slots**  
Merkur Slots 182-184 Edgware Road London W2 2DS  
1st - 2nd September 2022



**Image A11**

21:31hrs

Victoria Casino 150 -162 Edgware Road W2 2DT



**Image A12**

21:32hrs

Female engaged in begging Edgware Road



**Mercur Slots**  
Mercur Slots 182-184 Edgware Road London W2 2DS  
1st - 2nd September 2022



**Image A13**

21:32hrs

Congestion Charge Restrictions Signage Edgware Road



**Image A14**

21:40hrs

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

**Merkur Slots**  
Merkur Slots 182-184 Edgware Road London W2 2DS  
1st - 2nd September 2022



**Image A15**

21:40hrs

Paddy Power 242 Edgware Road W2 1DS



**Image A16**

21:42hrs

Coral Bookmakers 214 Edgware Road W2 1DH

**Merkur Slots**  
Merkur Slots 182-184 Edgware Road London W2 2DS  
1st - 2nd September 2022



**Image A17**

21:43hrs

Reel Time 212 Edgware Road W2 1DH



**Image A18**

21:47hrs

Ladbrokes Bookmakers  
113 - 115 Edgware Road W2 2HX

# Merkur Slots

Merkur Slots 182-184 Edgware Road London W2 2DS

1st - 2nd September 2022



**Image A19**

21:49hrs

William Hill Bookmakers 95 Edgware Road W2 2HX



**Image A20**

21:50hrs

Edgware Road looking north

**Merkur Slots**  
Merkur Slots 182-184 Edgware Road London W2 2DS  
1st - 2nd September 2022



**Image A21**

23:53hrs

Merkur Slots 182 - 184 Edgware Road W2



**Image A22**

23:55hrs

Edgware Road j/w Sussex Gardens looking north

**Merkur Slots**  
Merkur Slots 182-184 Edgware Road London W2 2DS  
1st - 2nd September 2022



**Image A23**

23:55hrs

Edgware Road looking south



**Image A24**

23:58hrs

Edgware Road looking north

**Merkur Slots**  
Merkur Slots 182-184 Edgware Road London W2 2DS  
1st - 2nd September 2022



**Image A25**

00:10hrs

Merkur Slots 182 - 184 Edgware Road



**Image A26**

00:22hrs

Merkur Slots 182 - 184 Edgware Road

**Merkur Slots**  
Merkur Slots 182-184 Edgware Road London W2 2DS  
1st - 2nd September 2022



**Image A27**

02:40hrs

Merkur Slots 182 - 184 Edgware Road



**Image A28**

02:40hrs

Edgware Road looking south



**Merkur Slots**  
Merkur Slots 182-184 Edgware Road London W2 2DS  
1st - 2nd September 2022

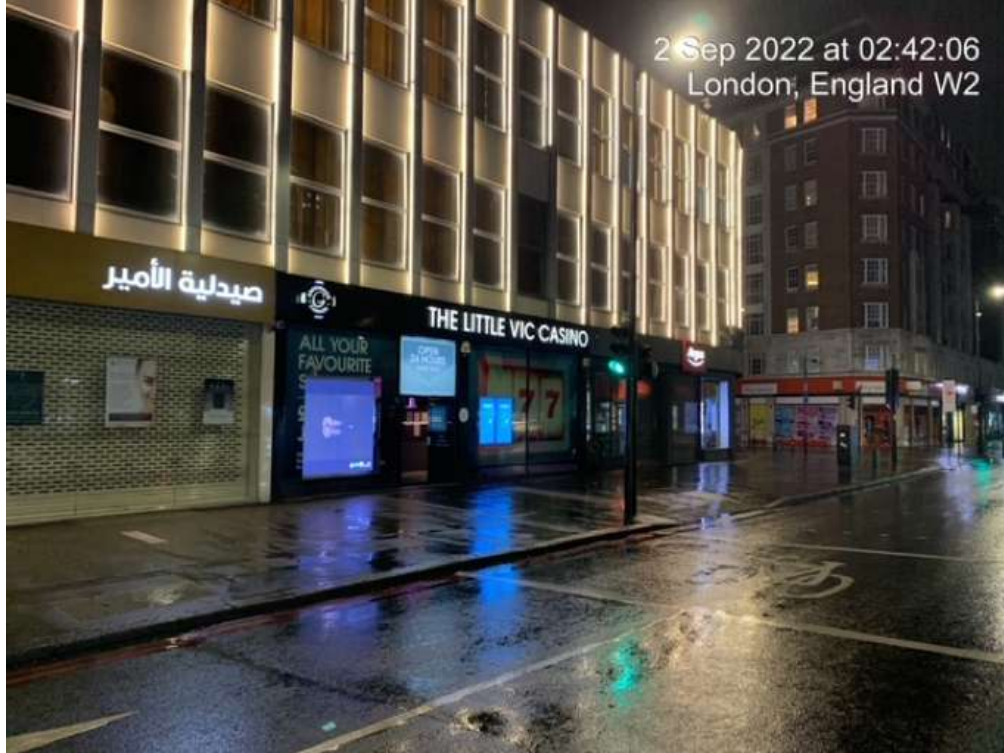


**Image A29**  
02:40hrs  
Edgware Road looking north



**Image A30**  
02:41hrs  
Al Mustafa Express 135 Edgware Road W2 2HR

**Merkur Slots**  
Merkur Slots 182-184 Edgware Road London W2 2DS  
1st - 2nd September 2022



**Image A31**

02:42hrs

Little Vic Casino Edgware Road



**Image A32**

02:42hrs

Edgware Road looking south

**Merkur Slots**  
Merkur Slots 182-184 Edgware Road London W2 2DS  
1st - 2nd September 2022



**Image A33**

04:37hrs

Merkur Slots 182 - 184 Edgware Road



**Image A34**

04:37hrs

Edgware Road looking north

**Merkur Slots**  
Merkur Slots 182-184 Edgware Road London W2 2DS  
1st - 2nd September 2022



**Image A35**

04:37hrs

Edgware Road looking south



**Image A36**

04:38hrs

Rough Sleepers Edgware Road looking north

**Merkur Slots**  
Merkur Slots 182-184 Edgware Road London W2 2DS  
1st - 2nd September 2022



**Image A37**

04:39hrs

The Little Vic Casino Edgware Road



**Image A38**

06:04hrs

Merlur Slots 182 - 184 Edgware Road

**Merkur Slots**  
Merkur Slots 182-184 Edgware Road London W2 2DS  
1st - 2nd September 2022



**Image A39**

06:04hrs

McDonalds Edgware Road



**Image A40**

06:05hrs

Edgware Road looking north

## Merkur Slots

Merkur Slots 182-184 Edgware Road London W2 2DS

1st - 2nd September 2022



**Image A41**

06:05hrs

Edgware Road looking south

## **Appendix B**

Observation Images  
15th September 2022

### **Merkur Slots**

182 -184 Edgware Road  
London  
W2 2DS

### **Leveche Associates Ltd**

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





**Merkur Slots**  
182-184 Edgware Road London W2 2DS

15th September 2022



**Image B1**

22:54hrs

Edgware Road looking north



**Image B2**

22:55hrs

Merkur Slots 182 -184 Edgware Road W2 2DS

**Merkur Slots**  
182-184 Edgware Road London W2 2DS

15th September 2022



**Image B3**

23:22hrs

Toilet Check Sheet  
Merkur Slots 182 - 184 Edgware Road



**Image B4**

23:22hrs

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

**Merkur Slots**  
182-184 Edgware Road London W2 2DS

15th September 2022



**Image B5**

23:28hrs

Merkur Slots 182 - 184 Edgware Road

**Image B6**

23:28hrs

Edgware Road looking south



## **Full Observation Report**

**Mr Nicholas Mason – Consultant**

**Leveche Associates Limited**

**Merkur Slots**

**19 The Concourse**

**Edmonton Green N9 0TQ**

### **Executive Summary**

1. Observations were conducted on Merkur Slots premises at 19 The Concourse Edmonton Green N9 0TQ and the surrounding area between 20:45hrs on Thursday 22nd September 2022 and 05:45hrs on Friday 23<sup>rd</sup> September 2022. The premises are situated in a pedestrianised area of Edmonton Green.
2. One covert visit was made to the Merkur premises and the surrounding area. Observations showed the premises to be well run and operating correctly with no issues.
3. There are no other gaming premises with a similar business model to Merkur Slots in the immediate area. From the observations, it is clear that Merkur Slots operating 24-hours a day does not create anti-social behaviour, noise or any other crime and disorder and does not have a negative impact on nearby residents, the environment, local infrastructure, or wider local community.

## **Introduction**

4. We are instructed to conduct independent observations at Merkur Slots premises at 19 The Concourse Edmonton Green Shopping Centre N9 0TQ and the surrounding area.
5. The premises has a 24-hour licence under the Gaming Act 2005 and is open 24-hours a day 7-days a week.
6. The premises come under the jurisdiction of the London Borough of Enfield Council and the Edmonton Green Ward for the Metropolitan Police.

## **Personal Summary – Nicholas Mason**

7. I am a Director of Leveche Associates Limited, an independent company dealing with Licensing and Security in the private sector. I am a former Police Officer having retired from the MPS upon completion of over 30 years exemplary service.
8. Throughout my police career the majority of my service was as a Detective at different ranks. I attained the rank of Detective Chief Inspector with responsibility for the risk assessment and management of intelligence led operations by covert means, including the disruption of organised crime groups infiltrating the licensing industry.
9. For a number of years, I performed the role of 'On Call Senior Investigating Officer' for the MPS Serious Crime Directorate with responsibility for advising 'fast time' best practice and investigation strategy in the most serious of incidents.
10. As a senior Detective of the MPS Crime Reporting & Investigation Bureau I had responsibility for the strategic overview of all recorded crime for London and the Management of Investigations transferred into MPS through other UK crime authorities / Police forces.
11. I have worked as an Independent Consultant in the Licensing and Security Industry for the last 5 years.
12. I am the holder of the Chartered Management Institute level 5 Certificate in Police Management.
13. I am a Registered Close Protection Operative - Level 3 Certificate (Security Industry Authority - SIA).
14. I hold the UK Award for Personal Licence Holders (APLH) under the Licensing Act 2003.

## **Observations**

15. Observations were carried out at Merkur Slots premises at 19 The Concourse Edmonton Green Shopping Centre N9 0TQ and the surrounding area on Thursday 22nd September 2022 into the early hours of Friday 23<sup>rd</sup> September 2022.

16. The premises are situated in a pedestrianised area of Edmonton Green. The footway in front of the Merkur Slots premises runs generally east to west. Immediately next door and to the east is the Betfred Bookmakers and to the west is a large Lidl Supermarket – Image A1 .
17. Betfred is the only bookmaker premises in the vicinity of Merkur Slots. The Betfred premises trades Monday to Sunday 07:30hrs to 22:00hrs. There are other Bookmakers within Edmonton Shopping Centre but they are some distance away and unlikely to impact on the operation of the Merkur Slots premises.
18. There are no other Adult Gaming Centres at this location and no other premises that operate a similar business model to Merkur Slots premises.
19. There are only a small number of other shops in the vicinity of the Merkur Slots premises which include a Pharmacy, Café , Barbers, Chinese Medical Centre, Opticians, a Clothing Shop and a Western Union Money transfer premises. All of these premises were closed for the period of observations.
20. Opposite the Merkur Slots premises are fast food shops, The Lime Tree Café, Hi Wok take away and the Baraja Bakery. The Hi Wok was open when observations commenced but had closed by 21:30hrs, as had all the other premises.
21. At the eastern end of the pedestrian area is Edmonton Green Market which has numerous market stall premises and leads into Edmonton Green Shopping Centre though all of this area was closed at the time of observations – Image A2, A3, A4.
22. Parking in the surrounding streets is restricted by double yellow lines and residents parking permits. There is a large car park available that serves Edmonton Shopping Centre.
23. The location is well served for public transport with the main bus station only 100 metres from the Merkur premises at Edmonton Green providing transport away from the town centre. Edmonton Rail Station is within 150 metres of the Merkur premises and provides another transport option both locally and with a connection to Central London. During the course of observations numerous licensed taxis / Ubers were seen serving the locality – Image A5, A8.
24. Opposite the Bus Station there is an additional transport option with a 24hr Mini cab office – Image A10, there are also a number of fast food take away / restaurant premises and a mini-supermarket – Image A11.
25. On the roundabout opposite the war memorial at 29 The Concourse is BIMs Burger Shop. This was a focal point for Deliveroo delivery riders to congregate with their motorcycles, though the pavement is wide enough at this point for them not to impact on passing pedestrians – Image A6, A7.
26. Away from the pedestrianised area the location has multiple side streets with privately owned and rented residential accommodation including some tower blocks that overlook the pedestrian area – Image A12.

27. In front of the Lidl Supermarket and near the Merkur Slots premises the paved area extends and a number of benches are located.
28. There are no public houses or bars in the immediate vicinity of the Merkur Slots premises.
29. There are no religious premises or schools in the immediate vicinity of the Merkur Slots premises and no children were seen in the area at the time of these overnight observations.
30. The area is well lit and illuminated from street lighting, lighting from the Bus Station and shop front lights. I had clear and unobstructed views throughout the observations.
31. Photographic images of what was seen were obtained to support my findings. These images are documented in Appendix A.

### **Covert Observations**

32. On Thursday 22<sup>nd</sup> September at 20:45hrs observations commenced and went through the night until 05:45 hours on Friday 23<sup>rd</sup> September 2022.
33. The Merkur Slots premises were open as were the adjacent premises, the Betfred Bookmakers and Lidl supermarket. The Merkur premises had a smart corporate and professional looking frontage that was well maintained and clean. There was no evidence of anti-social behaviour – Image A1.
34. From around 21:50hrs I positioned myself in the vicinity of the Betfred Bookmakers as it was closing for the evening. There was no evidence of criminality, additional noise or anti-social behaviour as the premises closed – Image A13.
35. At 22:01hrs 5 customers, 4 men and 1 woman left Merkur Slots premise. They walked past where I was standing and I could hear them talking. There was no disturbance or anti-social behaviour – Image A14.
36. At 22:06hrs the staff from Betfred Bookmakers left the premises, locked the front door and walked away in the direction of the bus station. Again, there was no disturbance or anti-social behaviour – Image A15 .
37. At 22:11hrs a group of young men were seated or standing by the benches outside Lidl Supermarket, some were drinking from what I believed to be beer cans and were occasionally shouting. None of these men were linked to the Betfred Bookmakers or the Merkur Slots premises – Image A16.
38. At 23:24hrs I was in the vicinity of the Merkur Slots premises and surrounding area, there was no evidence of additional noise or anti-social behaviour – Image A17, A18, A19.

39. At 23:25hrs I saw a white male in a blue casual track-suit approach the front door of the Merkur premises. I heard the buzz of the security bell and the man then walked into the premises and out of sight – Image A19.
40. At 00:47hrs I was in the vicinity of the Merkur Slots premises and surrounding area, there was no evidence of additional noise or anti-social behaviour – Image A20, A21, A22.
41. Between 01:00hrs and 01:40hrs I conducted a covert visit to the Merkur Slots premises at 19, The Concourse. As I approached I could see signage on the front door that stated no smoking on the premises, over 18' only, no alcohol and that CCTV was in use.
42. The design of the frontage meant I was unable to see into the premises from the street. The premises were advertised as being open for 24-hrs per day.
43. The front door was locked, there was a CCTV camera to my left with a push button that I pressed. The door was unlocked and opened by a member of security staff who was wearing a blue blazer saying security and had a lanyard around his neck that held an SIA badge. He greeted me and I walked in.
44. Once inside the entrance I saw there was an information board on my right. On this board were Merkur Slots information documents, premises rules, policies and licenses. The documents displayed included:
- i. The premises licence.
  - ii. The company codes of practice.
  - iii. It was a no smoking venue.
  - iv. Think 25 poster.
  - v. GamCare poster.
45. I walked through the premises and could see there was a series of gaming machines going from the front to the back of the premises along both walls. The floor was carpeted providing a lounge style effect and at the rear of the premises was a reception area. Behind a Perspex shield was an area for preparing drinks, this area appeared clean and tidy. Two other members of staff, wearing Merkur liveried black shirts with black trousers were standing there.
46. I walked around the premises looking for a machine to play. There were 3 other customers playing machines, each was about 35 years old, they were all male casually addressed and each appeared to be on their own. I selected a machine along the left-hand wall near the front of the premises and sat down.
47. I began to play a machine when I was approached by a member of staff who I had seen at the rear of the premises. He asked if I would like a drink and I asked what



was available. He explained that there were soft drinks or coffee and I asked for a black coffee. He walked off returning with the coffee a few minutes later.

48. I continued to play the machine and noted that both staff I had seen at the rear of the premises were cleaning, one with spray, wiping down the machines while the staff member I had spoken to had a hand-held vacuum and was cleaning the carpet in different areas.
49. I paused playing my machine and spoke to the member of staff who had brought my coffee and asked if the toilet was at the rear of the premises. He confirmed that it was but then explained that it was out of order, there had been a leak, a plumber had been to look at it and would be returning in the morning.
50. I returned to playing the machine, neither I or any of the other 3 customers were pressurised or encouraged to spend money and I did not see anyone who was vulnerable or drunk. The staff were friendly and polite and the premises clean and tidy.
51. During the course of my visit no other persons entered the premises. I stood up to leave and as I did so the security guard walked to the front door and unlocked it. I thanked him and walked out of the premises at 01:19hrs. As I went out through the door there was no one loitering outside or looking to gain entry. There was no anti-social behaviour inside or outside in the vicinity of the premises – Image A23.
52. At 01:41hrs I saw an elderly male and female couple standing at the paved area in front of the Lidl Supermarket. The female was shouting at the male who was clearly very drunk. They were joined by another elderly couple and stood by the scaffolding close to Domino's Pizza delivery shop opposite the bus station. None of these people were linked to the Merkur Slots premises and after a short while walked away towards the bus station and out of my sight – Image A24.
53. As the night progressed there was some footfall and local traffic but nothing out of the ordinary. I obtained images from the vicinity of the Merkur Slots premises which demonstrate there was no evidence of any anti-social behaviour or criminality – Image A25, A26, A27, A28, A29, A30, A31.
54. At 05:45hrs I concluded my observations – Image A32.

## **Summary**

55. During the observation periods I found no evidence of anti-social behaviour or criminality at the Merkur Slots premises or linked to it.
56. Early on during my observations at 22:11hrs I witnessed a group of young men at the benches outside Lidl Supermarket, some were drinking from what I believed to be beer cans and were occasionally shouting. None of these men were linked to the Betfred Bookmakers or the Merkur Slots premises.
57. At 01:41hrs I saw the elderly drunk male with his wife and another couple. None of these people were linked to the Merkur Slots premises.

58. During the course of my observations I saw no other evidence of anti-social behaviour, begging, crime and disorder, drug dealing or other groups of youths loitering in the area.
59. People entering the Merkur Slots premises were supervised on entry and whilst on the premises to ensure that anyone heavily intoxicated, juveniles or other vulnerable people didn't gain access.
60. The visit 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 don't attract or take advantage of juveniles or other vulnerable persons.
61. At Merkur Slots premises the demographic is much older and doesn't attract young people or children. The environment is very different to a loud busy arcade, it is a low-key carpeted style lounge with no more than a handful of mature customers in at any one time.
62. Merkur Slots UK takes safer gambling seriously. This can be evidenced with the use of safeguarding programs such as:
- Merkur 360 Program - To achieve higher standards of player protection Merkur have worked with G4 Global Gambling Guidance Group, which focuses on the provision of responsible gambling and has also implemented its own 360 responsible gambling program.
  - Think 25 Policy – Strict Over 18 Policy. All venues operate a Think 25 Policy whereby photographic ID is required to gain entry.
  - In View Tools – Staying in control is a key part of messaging in the Merkur venues. Leafleting and posters such as BeGambleAware and GamCam, can be found in the venues main area and in private places such as toilets.
  - Staff Training – Merkur Slots has developed a detailed training programme for all staff members including its own City and Guilds accredited training developed in partnership with YGAM and Betknowmore.
63. 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.
64. In conclusion, from this visit and my visits to other Merkur premises it is my opinion these types of 24-hour gaming premises are well run and do not increase anti-social behaviour, noise or any other crime and disorder that would have a negative impact on nearby residents, the environment, local infrastructure or wider local community.

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

**Nick Mason - Consultant**  
**Leveche Associates Limited**  
**23rd September 2022**

## **Appendix A**

Observation Images

22nd - 23rd September 2022

### **Merkur Slots**

19 The Concourse  
Edmonton Green  
N9 0TQ

### **Leveche Associates Ltd**

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



**Merkur Slots**  
19 The Concourse Edmonton Green N9 0TQ  
22nd -23rd September 2022



**Image A1**

20:55hrs

Merkur Slots 19 The Concourse Edmonton Green



**Image A2**

20:57hrs

Edmonton Green Market

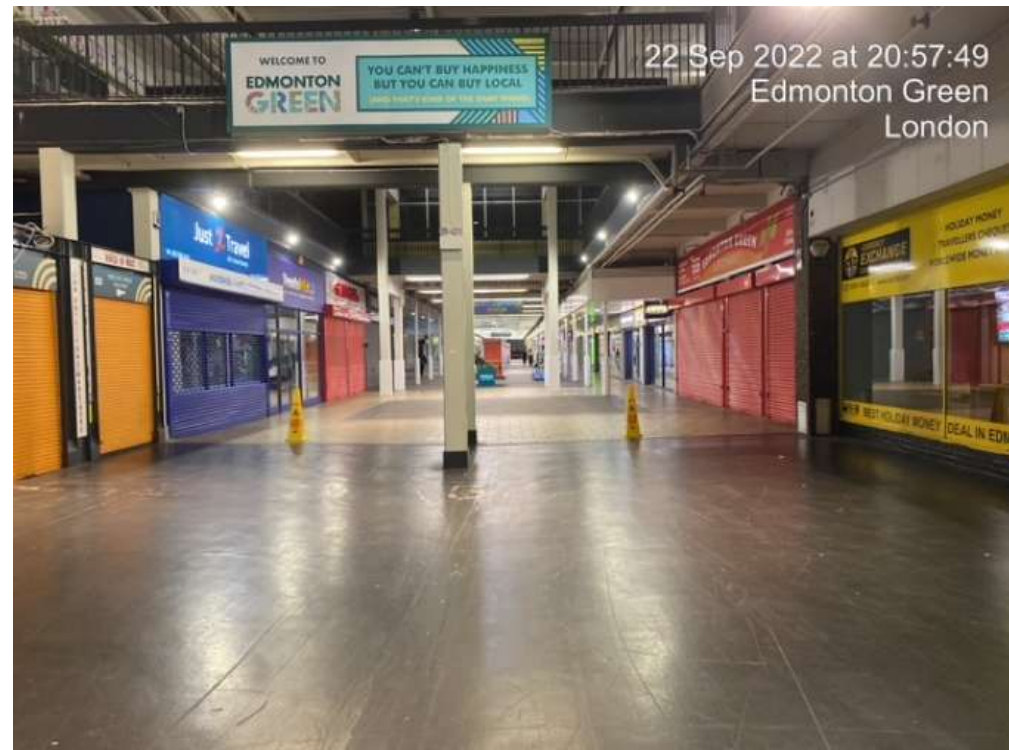
**Merkur Slots**  
19 The Concourse Edmonton Green N9 0TQ  
22nd -23rd September 2022



**Image A3**

20:57hrs

Edmonton Green Market looking towards Merkur Slots



**Image A4**

20:57hrs

Edmonton Green Market looking towards Shopping Centre

**Mercur Slots**  
19 The Concourse Edmonton Green N9 0TQ  
22nd -23rd September 2022

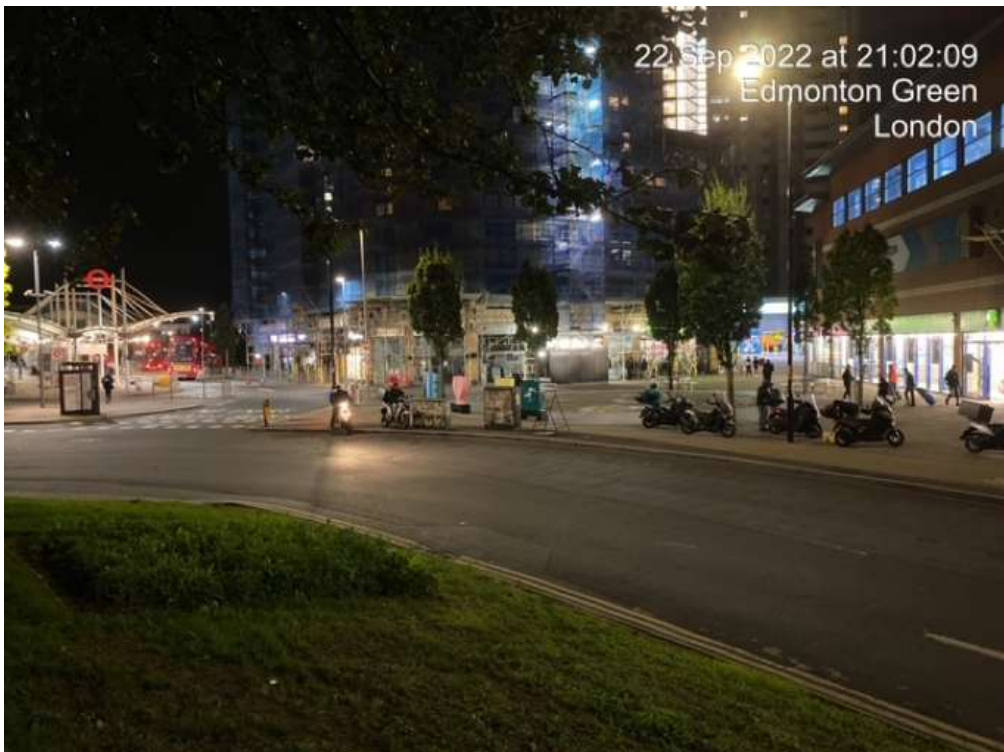


**Image A5**  
21:00hrs  
Edmonton Bus Station



**Image A6**  
21:02hrs  
Deliveroo riders outside BIMS Burger shop

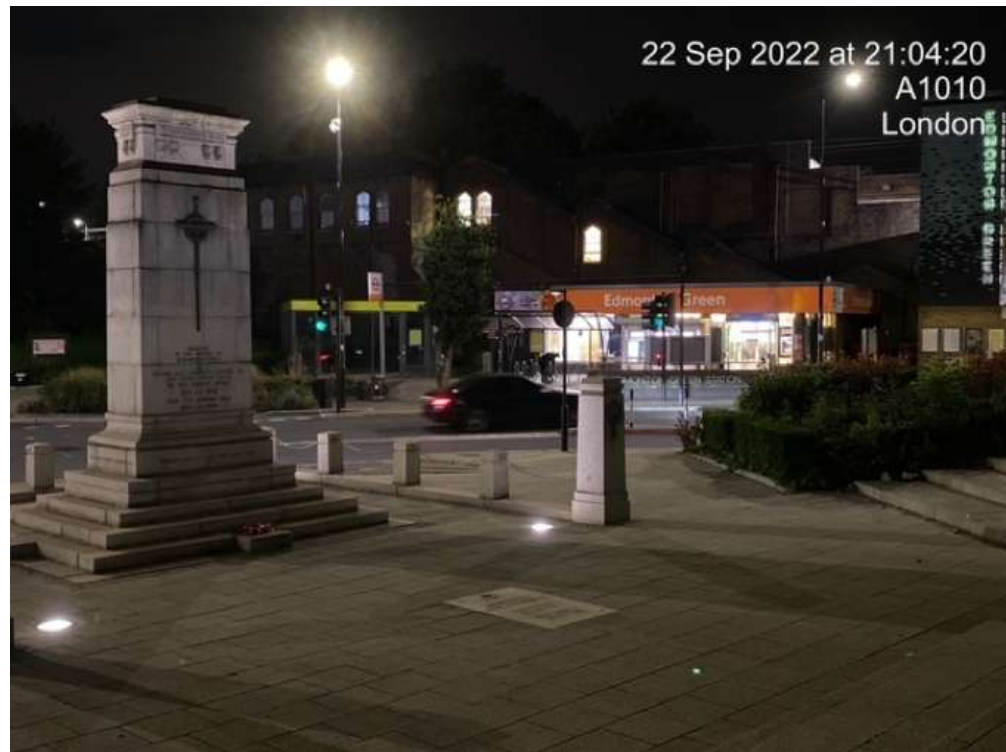
**Merkur Slots**  
19 The Concourse Edmonton Green N9 0TQ  
22nd -23rd September 2022



**Image A7**

21:02hrs

Deliveroo riders outside BIMS Burger shop



**Image A8**

21:04hrs

Edmonton Green Rail Station



**Merkur Slots**  
19 The Concourse Edmonton Green N9 0TQ

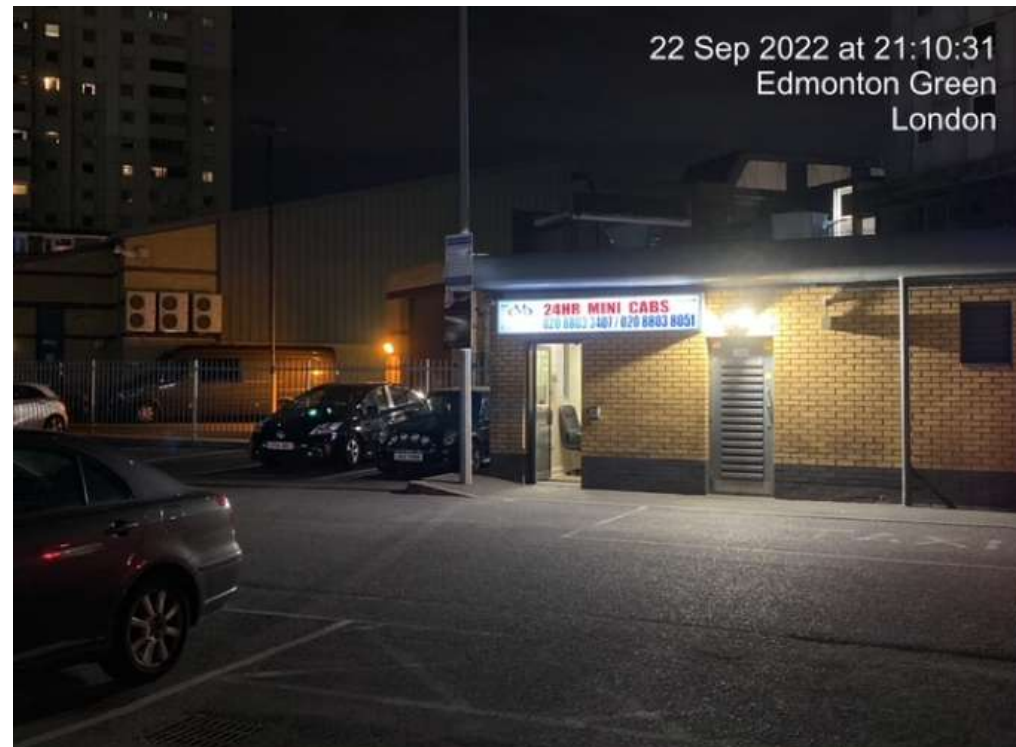
22nd -23rd September 2022



**Image A9**

21:08hrs

Merkur Slots 19 The Concourse Edmonton Green

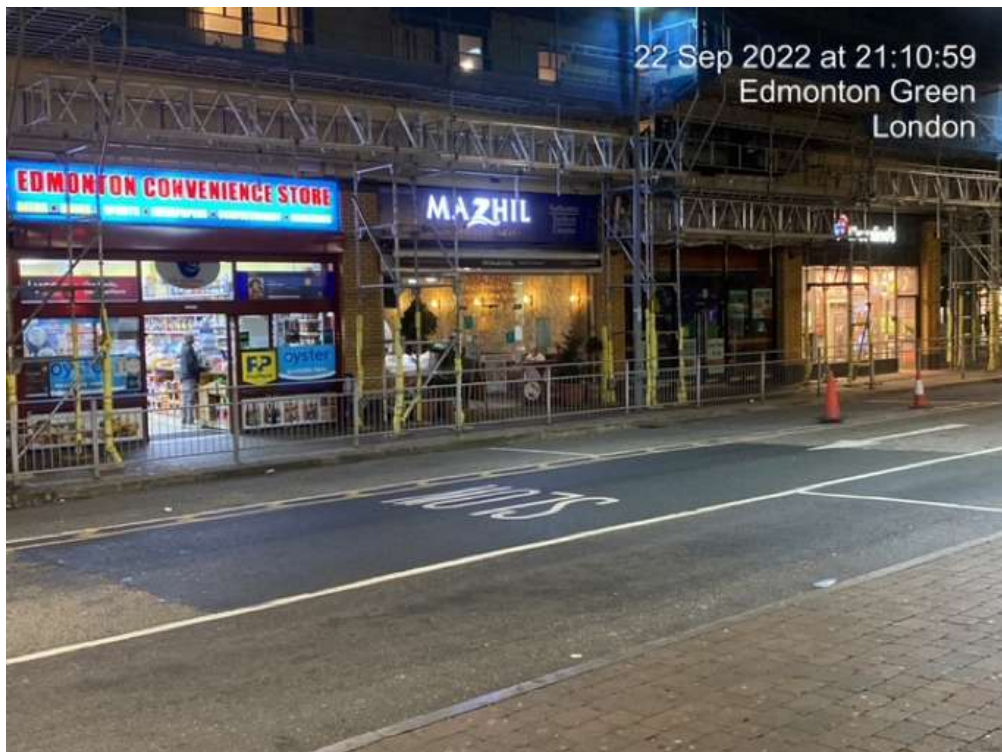


**Image A10**

21:10hrs

24hr Mini Cabs opposite Bus Station

**Merkur Slots**  
19 The Concourse Edmonton Green N9 0TQ  
22nd -23rd September 2022



**Image A11**

21:10hrs

Food premises / Mini Supermarket opposite Bus Station



**Image A12**

21:53hrs

Residential Tower Blocks Edmonton Green

**Mercur Slots**  
19 The Concourse Edmonton Green N9 0TQ  
22nd -23rd September 2022



**Image A13**

21:56hrs

Betfred Bookmakers

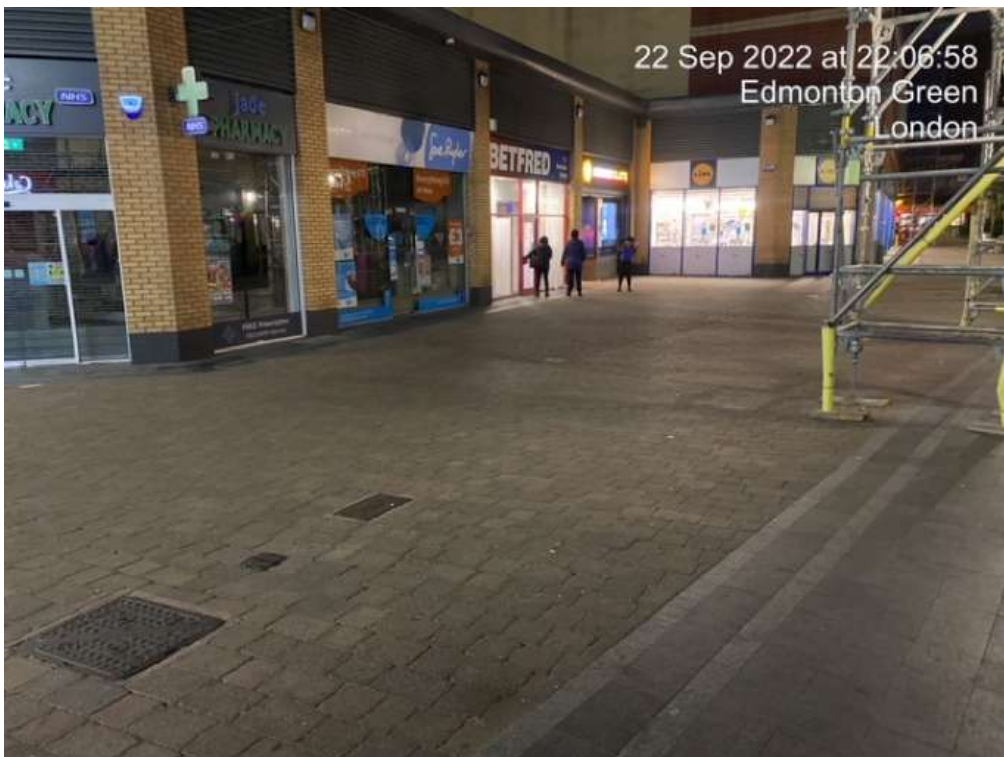


**Image A14**

22:01hrs

Customers leave Mercur Slots Edmonton Green

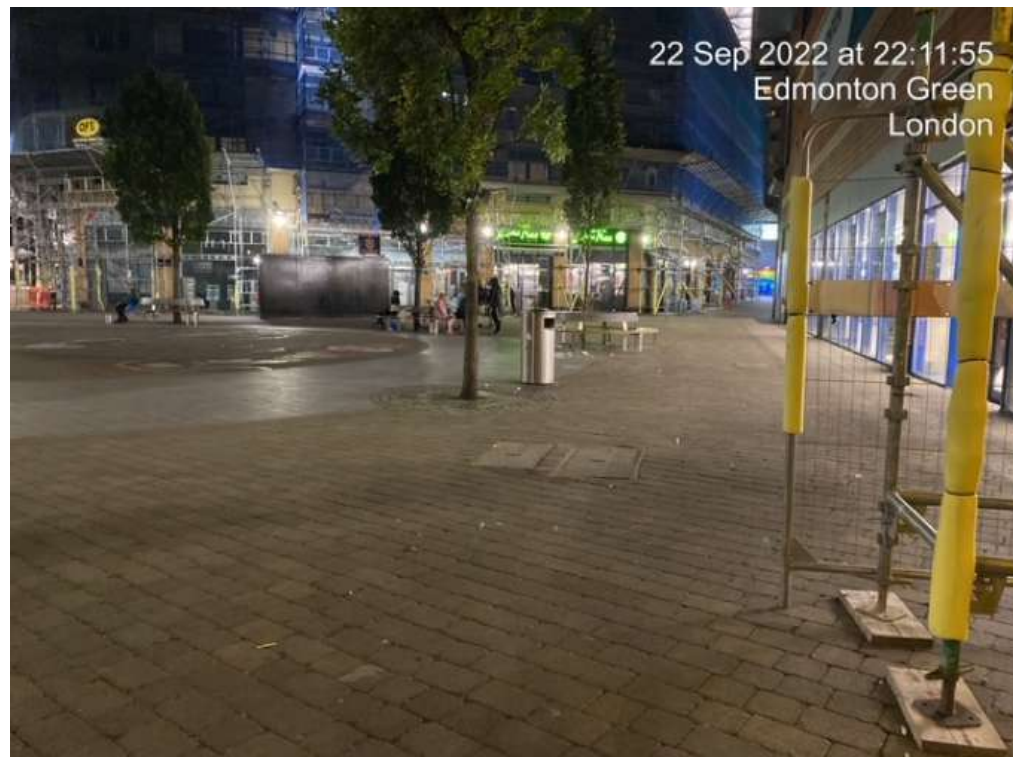
**Merkur Slots**  
19 The Concourse Edmonton Green N9 0TQ  
22nd -23rd September 2022



**Image A15**

22:06hrs

Betfred Bookmakers closing time

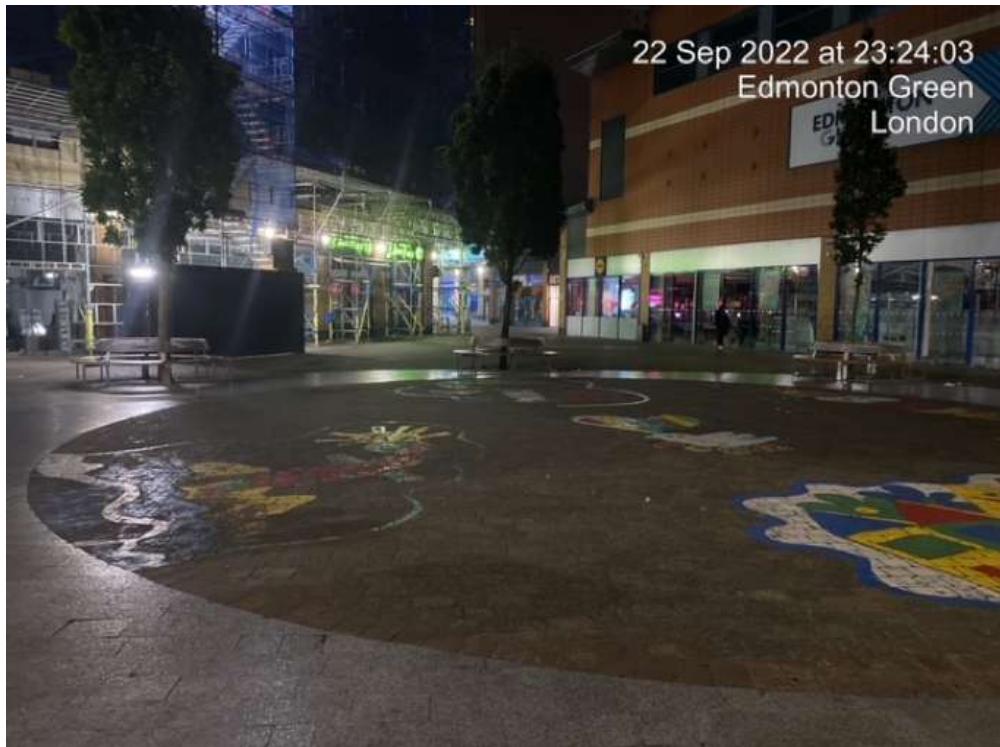


**Image A16**

22:11hrs

Paved area outside Lidl Supermarket

**Mercur Slots**  
19 The Concourse Edmonton Green N9 0TQ  
22nd -23rd September 2022



**Image A17**

23:24hrs

Paved area outside Lidl Supermarket



**Image A18**

23:24hrs

Edmonton Bus Station

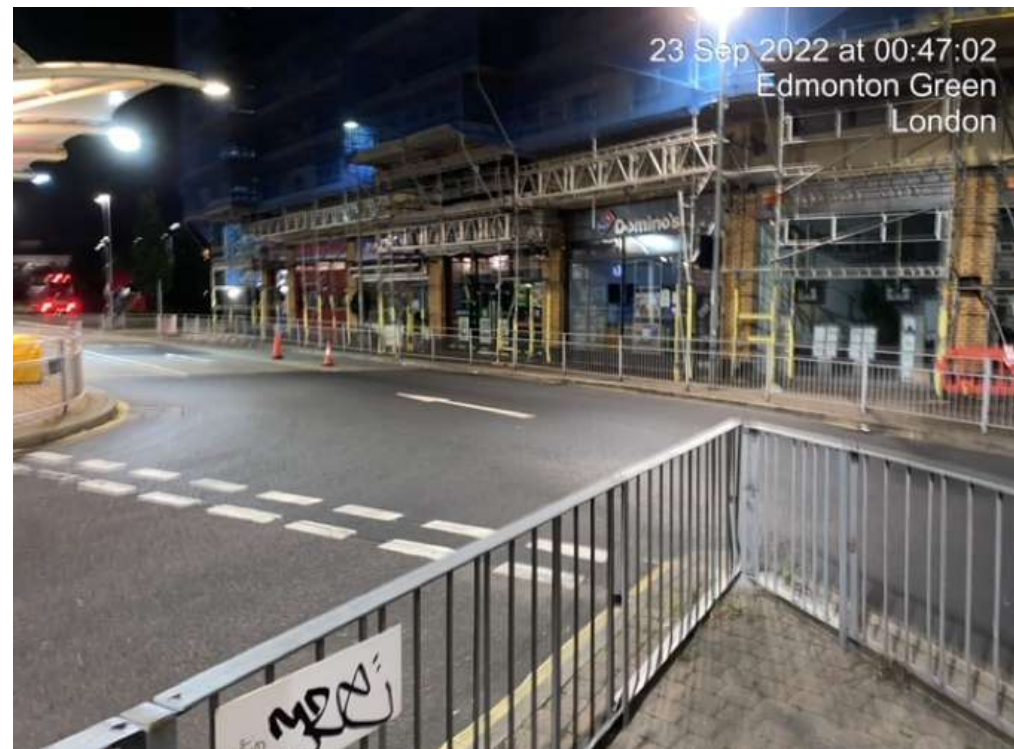
**Merkur Slots**  
19 The Concourse Edmonton Green N9 0TQ  
22nd -23rd September 2022



**Image A19**

23:25hrs

Merkur Slots 19 The Concourse Edmonton Green

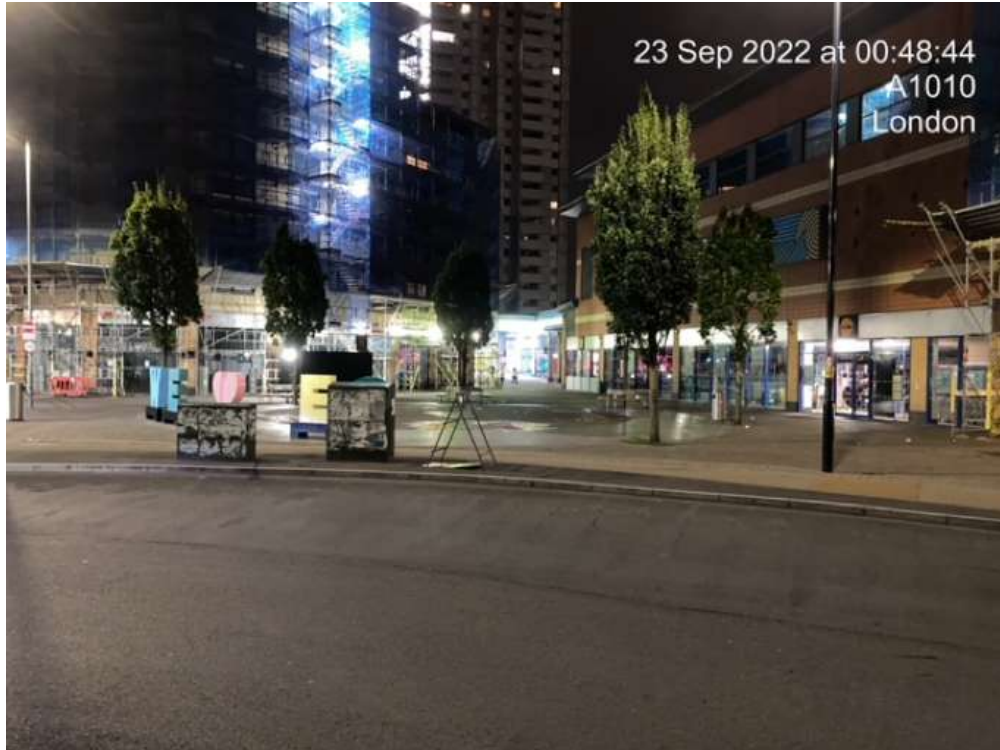


**Image A20**

00:47hrs

Food premises / Mini Supermarket opposite Bus Station

**Merkur Slots**  
19 The Concourse Edmonton Green N9 0TQ  
22nd -23rd September 2022



**Image A21**

00:48hrs

Paved area outside Lidl Supermarket



**Image A22**

00:52hrs

Merkur Slots 19 The Concourse Edmonton Green

**Merkur Slots**  
19 The Concourse Edmonton Green N9 0TQ

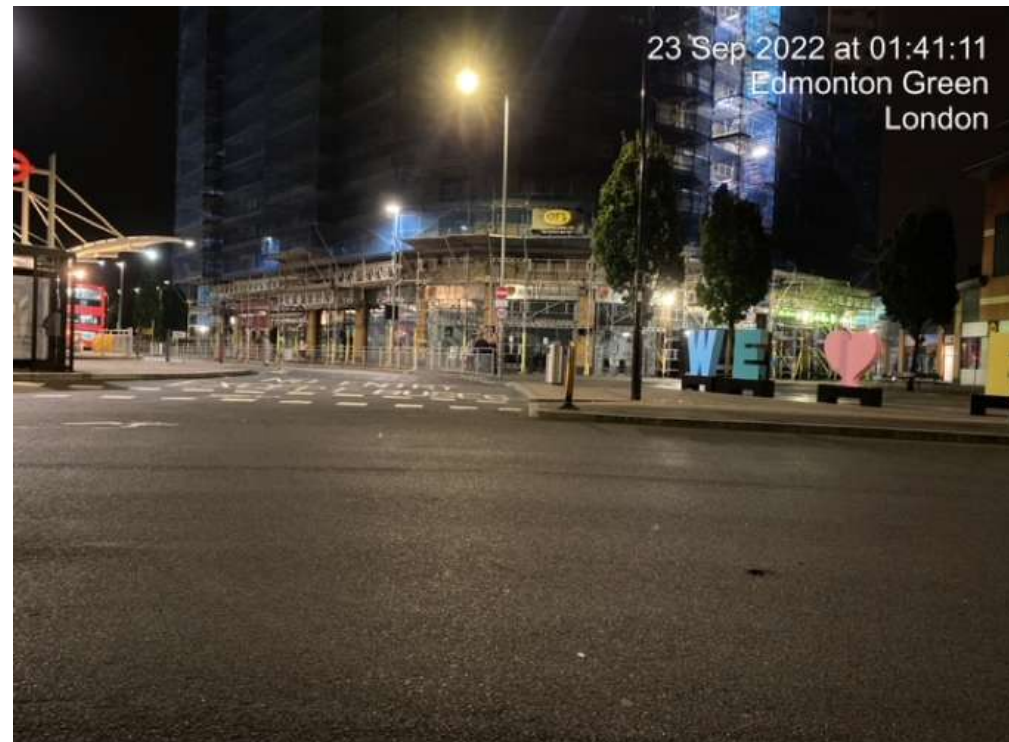
22nd -23rd September 2022



**Image A23**

01:19hrs

Merkur Slots 19 The Concourse Edmonton Green



**Image A24**

01:41hrs

Paved area outside Lidl Supermarket



**Merkur Slots**  
19 The Concourse Edmonton Green N9 0TQ  
22nd -23rd September 2022



**Image A25**

02:11hrs

Paved area outside Lidl Supermarket



**Image A26**

02:11hrs

Merkur Slots 19 The Concourse Edmonton Green

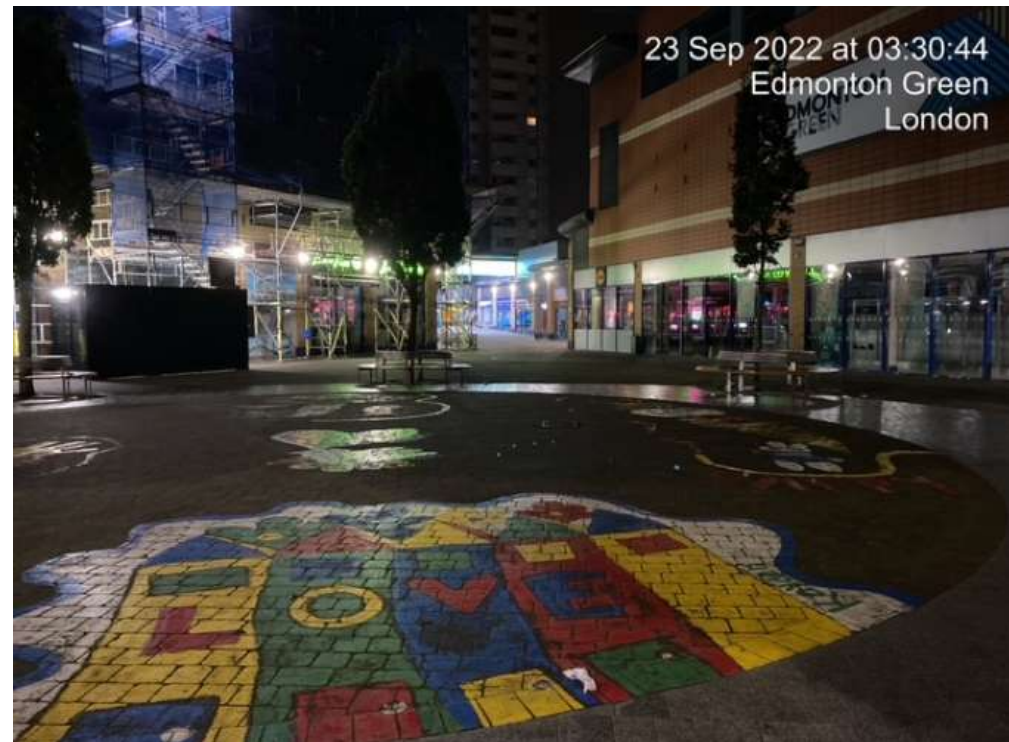
**Merkur Slots**  
19 The Concourse Edmonton Green N9 0TQ  
22nd -23rd September 2022



**Image A27**

03:30hrs

Merkur Slots Edmonton Green



**Image A28**

03:30hrs

Paved area outside Lidl Supermarket

**Merkur Slots**  
19 The Concourse Edmonton Green N9 0TQ  
22nd -23rd September 2022



**Image A29**

04:42hrs

Paved area outside Lidl Supermarket



**Image A30**

04:42hrs

Merkur Slots Edmonton Green

**Merkur Slots**  
19 The Concourse Edmonton Green N9 0TQ  
22nd -23rd September 2022



**Image A31**

05:44hrs

Merkur Slots Edmonton Green



**Image A32**

05:44hrs

Paved area outside Lidl Supermarket



## **Full Observation Report**

**Stuart Jenkins – Licensing Consultant  
Leveche Associates Limited**

### **Merkur Slots**

### **33 Town Centre Hatfield AL10 0JX**

#### **Executive Summary**

1. Observations were conducted on Merkur Slots 33 Town Centre Hatfield AL10 0JX and the surrounding area between 20:00 hours on Wednesday 10<sup>th</sup> August 2022 and 06:45 hours on Thursday 11<sup>th</sup> August 2022. One covert visit was made to the site and the surrounding area. The observations showed the premises are in a quiet pedestrianised shopping area in the Town Centre of Hatfield with some residential accommodation above the shops. The covert visit showed the premises to be well run with no issues. There are no other gaming premises with a similar operation to Merkur Slots in the area. From the observations, it is clear that Merkur Slots operating 24-hours a day does not create anti-social behaviour, noise or any other crime and disorder that would have a negative impact on nearby residents, the environment, local infrastructure, or wider local community.

## **Introduction**

2. I have been instructed to conduct independent observations on the Merkur Slots premises at 33 Town Centre Hatfield AL10 0JX and the surrounding area.
3. Merkur Slots UK operate the venue which has a 24-hour licence under the Gambling Act 2005.
4. The premises come under the jurisdiction of the Hatfield Central Ward of Welwyn Hatfield Borough Council.

## **Personal – Stuart Jenkins**

5. I am a former Police Officer having retired from the Metropolitan Police after completion of over 30 years exemplary service.
6. Throughout my police career the majority of my service was spent on specialist units engaged on proactive operations :- 1993–1997 Central Territorial Support Group (TSG) - Level 1 Public Order, firearms officer and dedicated surveillance officer; 1997–1998 CO14 Clubs & Vice Unit – test purchase officer and street offences investigations; 1998-2000 Charing Cross Division on promotion – overt and covert licensing operations; 2000-2008 CO14 Clubs & Vice Unit – lead officer for the investigation of serious criminal offences within licensed premises across London, test purchase officer, Pan-London licensing tactical advisor, Licensing Policy Development and Implementation for the Metropolitan Police Service (MPS) and intelligence unit supervisor; 2008-2018 Marine Policing Unit (MPU) – licensing lead for the MPU; licensing tactical advisor Notting Hill Carnival, covert licensing operations and intelligence unit supervisor. Marine intelligence and accreditation lead for the Queens Diamond Jubilee River Pageant and intelligence lead for the London Olympics 2012.
7. I was a Home Office qualified Crime Prevention Design Advisor.
8. I am the holder of the BTEC Level 3 Certificate (Security Industry Authority) – Close Protection Operative in the Private Security Industry.
9. I am the holder of a Personal Licence under the Licensing Act 2003.

## **Observations**

10. I carried out my observations of 33 Town Centre, Hatfield AL10 0JX and the surrounding area between 20:00 hours on Wednesday 10<sup>th</sup> August 2022 and 06:45 hours on Thursday 11<sup>th</sup> August 2022.
11. The area felt safe with members of the public going about their business, working, shopping, and socialising.
12. The area is well lit and illuminated from street lighting and shop front lights. I had clear and unobstructed views throughout the observations.

13. During observations I concentrated on the pedestrian footfall, signs of criminality, begging, anti-social behaviour including any additional noise, vulnerable persons, other persons at risk and the general environment.
14. The Merkur Slots premises is situated in the main pedestrianised Town Centre in Hatfield which encompasses pedestrianised shopping streets and a large square. Many of these shops have residential properties above them too. The section of the Town Centre that Merkur Slots is in, runs generally east to west. No vehicular traffic pass the venue but pedestrians can pass the premises in either direction – Image A1.
15. Mainstream shops line the pedestrian Town Centre, Town Square and Market Place.
16. During the observations pedestrian traffic passing the Town Centre and Market Place was varied. Vehicular traffic varied and passed Hatfield Town Centre via the B6426 Bypass, Wellfield Road, The Common and Lemsford Road - Image A2 and A3.
17. East of and next to the premises is Jade Pharmacy 31 Town Centre AL10 0JT. To the west of and next to the premises is an empty shop. Other shops line the Town Centre, Town Centre Square and Market Place.
18. Hatfield Mainline Train Station is a 15-minute walk from the Town Centre.
19. The area of observations is densely populated with many retail premises, that include supermarkets, mini supermarkets, department stores, pubs, nightclubs, cafes, hairdressers, estate agents, charity shops, bookmakers, restaurants, fast-food shops, and pawn brokers which service the transient and residential population alike.
20. The area has a diverse community living together in a mixture of privately owned and rental accommodation.
21. The Town Centre is well served by public transport with a variety of bus routes, mainline rail and taxis. There was ample car parking available in a nearby pay and display car park and restricted parking in the side roads. These transport mediums allow the public to arrive and leave the area safely and quickly.
22. There are three other gambling premises in the Town Centre area, all of which close by 22:00 hours. Namely:
  - i. Betfred 19 Town Centre Hatfield AL10 0JT
  - ii. Bet Zone 88 Town Centre Hatfield AL10 0JT
  - iii. Ladbrokes The Common Hatfield AL10 0LU
23. These premises can be divided into two main types:
  - i. Betting premises not licensed to serve alcohol.

- ii. Gaming premises – Adult Gaming Centres (AGC) and Bingo Premises not licensed to serve alcohol.
24. There are no other gaming venues in Hatfield Town Centre with a similar business model to Merkur Slots UK.
  25. There is one public house in the Town Centre called The White Hart, which is advertised as operating Monday, Tuesday and Wednesday 11:00 hours – 23:00 hours, Thursday 11:00 hours – 00:00 hours, Friday and Saturday 11:00 hours – 02:00 hours and Sunday 12:00 hours – 22:00 hours. At the time of my visit, it appeared to be well run and closed on time.
  26. Throughout my observations in the Town Centre, Market Place and The Common I saw no begging taking place in the street, no street drinkers, vagrants, or drug dealing around the premises or the area.
  27. Photographic images of what was seen during the observations were taken to support my findings and are documented in Appendix A.

## **Covert Observations**

### **Deployment**

28. I conducted my covert observations from 20:00 hours on Wednesday 10<sup>th</sup> August 2022 to 06:45 hours on Thursday 11<sup>th</sup> August 2022.
29. At 20:00 hours I arrived in the area of the Merkur Slots premises 33 Town Centre Hatfield and started my observations by monitoring the venue, the immediate area around it and the pedestrian footfall.
30. There was little pedestrian traffic in and around the Town Centre and Market Place. There were only a couple of shops open at the time of my arrival which included a hairdresser shop, large Asda Supermarket and takeaway / eat in premises. All of these remaining closed at various times between 21:00 hours and 00:00 hours. They were well run and had no issues.
31. Between 20:00 hours and 00:00 hours small groups of residents and visitors to the area sat in the Town Centre Square socialising with some using the public table tennis tables in the square. By 01:00 hours pedestrian activity was reduced to single people cycling or walking past Merkur Slots and through the Town Centre Square.
32. Between 00:10 hours and 00:25 hours I counted the pedestrian footfall that passed the Merkur Slots premises in a 15-minute period. On this occasion a total of 4 pedestrians passed the venue.



33. Between 02:16 hours and 02:41 hours I conducted a covert visit to the Merkur Slots 33 Town Centre Hatfield.
34. At 02:16 hours I went to the entrance door. Entry was controlled by using a bell security entry system. On the glass of the door, I saw signage stating no under 18's, CCTV in operation, no alcohol and that a time delay lock was in operation.
35. After a short time, the door was opened and I was greeted by a male member of staff who invited me into the premises. This male was wearing a smart corporate clothing – Image A28.
36. He escorted me into the premises. I saw it was on one level which was carpeted and there were gaming machines of various types throughout the premises.
37. There was a reception desk to one side with a female member of staff behind it. She was smartly dressed in corporate clothing.
38. The male staff member asked me if I needed any help with the gaming machines or choosing one to play. I stated I was fine and chose a machine to play, towards the back of the premises.
39. He then asked if I would like a soft drink, water, coffee, or tea. I asked if I could get an alcoholic drink and he explained the premises weren't licensed for alcohol but the non-alcoholic drinks they provided were free for customers. I accepted his offer of a coffee.
40. After a couple of minutes, the male staff member brought over my coffee and stated if I needed any help to ask him or his colleague.
41. The staff member then left me to enjoy playing the machines. I was not pressurised or encouraged to spend money.
42. The hot and soft drinks were prepared at a reception desk area which was clean and tidy. During my visit no other customers came into the venue.
43. Whilst I was in the venue, I saw the staff cleaning, wiping down surfaces and completing a low-profile patrol checking on customers' needs and making sure they weren't underage or vulnerable. I felt safe, I was not pressurised to use the machines or to spend vast sums of money. The staff were friendly, polite, informative and I found the premises clean and tidy.
44. Before leaving I used the toilets which were clean and tidy. The toilets were regularly checked as shown by the toilet check sheet and there were Gamcare leaflets available for customers to take away.
45. At no time during my observations did I see anyone hanging around the premises. Customers arriving went straight into the premises and customers leaving left the area straight away. I left the premises at 02:41 hours – Image A29.

46. Between 02:45 hours and 03:00 hours I counted the pedestrian footfall that passed the Merkur Slots premises in a 15-minute period. On this occasion a total of 0 pedestrians passed the venue.
47. Between 04:08 hours and 04:23 hours I counted the pedestrian footfall that passed the Merkur Slots premises in a 15-minute period. On this occasion a total of 0 pedestrians passed the venue – Images A40, A41 and A42.
48. At around 06:00 hours shop traders started to arrive to prepare and open their premises ready for the day ahead – Images A33, A34, A35, A36 and A37.
49. I remained in the area until I completed my observations at 06:45 hours when I left.

## Summary

50. I found Merkur Slots Hatfield to have a smart, well-lit, and professional looking frontage. The premises were carpeted, with music playing in the background and the atmosphere was relaxed and welcoming. At the time of my visits to the location, I saw no evidence of crime and disorder, anti-social behaviour, excessive noise, littering, street drinking, drug dealing, begging or groups of youths hanging around.
51. People entering these premises were vetted before being allowed entry to ensure drunken or other vulnerable people didn't gain access to the premises.
52. It is clear the presence of Merkur Slots in the Town Centre does not lead to or result in people, who have been on a night out, staying in the city centre any longer than they had planned to.
53. Merkur Slots UK takes safer gambling seriously. This can be evidenced with the use of safeguarding programs such as:
  - Merkur 360 Program - To achieve higher standards of player protection Merkur have worked with G4 Global Gambling Guidance Group, which focuses on the provision of responsible gambling and has also implemented its own 360 responsible gambling program.
  - Think 25 Policy – Strict Over 18 Policy. All venues operate a Think 25 Policy whereby photographic ID is required to gain entry.
  - In View Tools – Staying in control is a key part of messaging in the Merkur venues. Leafleting and posters such as BeGambleAware and GamCam, can be found in the venues main area and in private places such as toilets.
  - Staff Training – Merkur Slots has developed a detailed training programme for all staff members including its own City and Guilds accredited training developed in partnership with YGAM and Betknowmore.

54. From my visits to many Merkur Slots Premises, I have found professional and attentive staff managing them. The premises are well run and there are clearly defined systems in place to ensure the premises operate in support of the gambling objectives and don't attract or take advantage of juveniles or other vulnerable persons.
55. The demographic is much older and doesn't attract young people or children. The environment is very different to a loud busy arcade, it is a low-key carpeted style lounge with no more than a handful of mature customers in at any one time.
56. 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.
57. In conclusion, from my visits it is my opinion Merkur Slots UK Limited are well run, and their operation significantly reduces the risk of crime and disorder and vulnerable people being taken advantage of.
58. From my observations it is clear that the Merkur Slots premises do not impact on the environment, infrastructure, or local community.
59. I believe the facts in my report are honest and true. The opinions I have expressed are made in good faith and in my best judgement. The fee for this report is not conditional on the outcome of any future case, application or finding.

**Stuart Jenkins**  
**Licensing Consultant**  
**Leveche Associates Limited**  
**20/08/2022**



## **Appendix A**

Observation Images  
10th August 2022

### **Mercur Slots**

33 Town Centre  
Hatfield  
AL10 0JX

### **Leveche Associates Ltd**

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

**Merkur Slots**  
33 Town Centre Hatfield AL10 0JX  
Wednesday 10th August 2022



**Image A1**

20:02hrs

33 Town Centre Hatfield AL10 0JX



**Image A2**

20:02hrs

Merkur Slots looking east along  
Town Centre Pedestrian Street

**Merkur Slots**  
33 Town Centre Hatfield AL10 0JX

Wednesday 10th August 2022



**Image A3**

20:03hrs

Merkur Slots looking east towards  
Town Centre Square



**Image A4**

20:03hrs

Betfred 19 Town Centre Hatfield AL10 0JT

Wednesday 10th August 2022



**Image A5**

20:05hrs

Hatfield Town Centre Pedestrian Square



**Image A6**

20:06hrs

Hatfield Town Centre Pedestrian Square  
looking north

**Merkur Slots**  
33 Town Centre Hatfield AL10 0JX

Wednesday 10th August 2022



**Image A7**

20:08hrs

Hatfield Town Centre Pedestrian Square looking west



**Image A8**

20:08hrs

Hatfield Town Centre looking west  
towards Merkur Slots



Wednesday 10th August 2022



**Image A9**

20:16hrs

Hatfield Town Centre looking east  
towards Merkur Slots



**Image A10**

20:17hrs

Asda Supermarket Hatfield Town Centre

**Merkur Slots**  
33 Town Centre Hatfield AL10 0JX

Wednesday 10th August 2022



**Image A11**

20:17hrs

Asda Supermarket Car Park Hatfield Town Centre



**Image A12**

21:31hrs

Ladbrokes 44 The Common Hatfield AL10 0LU

Wednesday 10th August 2022



10 Aug 2022 at 21:32:55  
Hatfield, England AL10 0LU

**Image A13**

21:32hrs

The Common looking towards Asda Supermarket



10 Aug 2022 at 21:33:43  
Hatfield, England AL10 0LU

**Image A14**

21:33hrs

The Common looking towards Asda Car Park

Wednesday 10th August 2022



10 Aug 2022 at 21:55:16  
Hatfield, England AL10 0LD

**Image A15**

21:55hrs

Hatfield Town Centre Square looking west  
towards Merkur Slots



10 Aug 2022 at 21:55:23  
Hatfield, England AL10 0LD

**Image A16**

21:55hrs

Hatfield Town Centre Square looking north

Wednesday 10th August 2022



**Image A17**

21:56hrs

Hatfield Town Centre Square looking south



**Image A18**

21:56hrs

Shops off Hatfield Town Centre Square southern end looking south

**Merkur Slots**  
33 Town Centre Hatfield AL10 0JX

Wednesday 10th August 2022



**Image A19**

21:57hrs

Merkur Slots Hatfield Town Centre



**Image A20**

21:59hrs

Hatfield Town Centre looking east



**Image A21**

23:55hrs

Merkur Slots Hatfield Town Centre



**Image A22**

23:55hrs

Town Centre Hatfield looking east

**Merkur Slots**  
33 Town Centre Hatfield AL10 0JX

Wednesday 10th August 2022



**Image A23**

23:55hrs

Town Centre Hatfield looking west



**Image A24**

00:08hrs

Rear of Merkur Slots Hatfield



Wednesday 10th August 2022



**Image A25**

00:11hrs

Hatfield Town Centre Square looking north



**Image A26**

00:20hrs

Hatfield Town Centre Square looking north

**Merkur Slots**  
33 Town Centre Hatfield AL10 0JX

Wednesday 10th August 2022



**Image A27**

02:14hrs

Hatfield Town Centre looking east



**Image A28**

02:15hrs

Merkur Slots Hatfield

**Merkur Slots**  
33 Town Centre Hatfield AL10 0JX

Wednesday 10th August 2022



**Image A29**

02:41hrs

Merkur Slots Hatfield



**Image A30**

02:42hrs

Hatfield Town Centre Square looking north

**Merkur Slots**  
33 Town Centre Hatfield AL10 0JX

Wednesday 10th August 2022



11 Aug 2022 at 02:42:41  
Hatfield, England AL10 0JZ

**Image A31**

02:42hrs

Hatfield Town Centre Square looking east



11 Aug 2022 at 04:06:49  
Hatfield, England AL10 0JT

**Image A32**

04:06hrs

Hatfield Town Centre looking east  
towards Merkur Slots

Wednesday 10th August 2022



**Image A33**

04:08hrs

Merkur Slots Hatfield



**Image A34**

04:09hrs

Hatfield Town Centre Square looking north

Wednesday 10th August 2022



**Image A35**

04:09hrs

Hatfield Town Centre Square looking west  
towards Merkur Slots



**Image A36**

04:09hrs

Shops off Hatfield Town Centre Square  
southern end looking south

Wednesday 10th August 2022



**Image A37**

04:11hrs

Shops in Market Place Hatfield



**Image A38**

04:12hrs

The White Hart Public House Queensway  
Hatfield AL10 0LW

**Merkur Slots**  
33 Town Centre Hatfield AL10 0JX

Wednesday 10th August 2022



**Image A39**

06:20hrs

Hatfield Town Centre looking east



**Image A40**

06:21hrs

Merkur Slots Hatfield



Wednesday 10th August 2022



**Image A41**

06:23hrs

Hatfield Town Centre Square looking west



**Image A42**

06:23hrs

Hatfield Town Centre Square looking north



## **Full Observation Report**

**Stuart Jenkins – Licensing Consultant  
Leveche Associates Limited**

### **Merkur Slots**

**456 Holloway Road London N7 6QA**

#### **Executive Summary**

1. Observations were conducted on Merkur Slots premises at 456 Holloway Road London N7 6QA and the surrounding area. The premises are situated on the crossroad junction of Holloway Road (A1) Seven Sisters Road (A503) and Parkhurst Road (A503) and are in a parade of shops on a busy crossroads. The premises operates 24-hours a day 7-days a week.
2. One covert visit was made to the site and the surrounding area. The covert visit showed the premises to be well run with no issues. There was one other gaming premises with a similar business model to Merkur Slots in the area, Admiral Casino 3 Seven Sisters Road N7 6AJ.
3. From the observations, it is clear that Merkur Slots, operating 24-hours a day does not create anti-social behaviour or any other crime and disorder that would have a negative impact on nearby residents, the environment, local infrastructure, or wider local community.
4. Photographic images support these observations and the conclusions reached.

#### **Introduction**

5. We are instructed to conduct independent observations at Merkur Slots premises 456 Holloway Road London N7 6QA and the surrounding area.

6. Merkur Slots UK operate the venue which has a 24-hour licence under the Gambling Act 2005.
7. The premises come under the jurisdiction of Islington Council.

### **Personal – Stuart Jenkins**

8. I am a Director of Leveche Associates Limited, an independent company dealing with Licensing and Security in the Private Sector. I am a former Police Officer having retired from the Metropolitan Police after completion of over 30 years exemplary service.
9. Throughout my police career the majority of my service was spent on specialist units engaged on proactive operations :- 1993–1997 Central Territorial Support Group (TSG) - Level 1 Public Order, firearms officer and dedicated surveillance officer; 1997–1998 CO14 Clubs & Vice Unit – test purchase officer and street offences investigations; 1998-2000 Charing Cross Division on promotion – overt and covert licensing operations; 2000-2008 CO14 Clubs & Vice Unit – lead officer for the investigation of serious criminal offences within licensed premises across London, test purchase officer, Pan-London licensing tactical advisor, Licensing Policy Development and Implementation for the Metropolitan Police Service (MPS) and intelligence unit supervisor; 2008-2018 Marine Policing Unit (MPU) – licensing lead for the MPU; licensing tactical advisor Notting Hill Carnival, covert licensing operations and intelligence unit supervisor. Marine intelligence and accreditation lead for the Queens Diamond Jubilee River Pageant and intelligence lead for the London Olympics 2012.
10. I have worked as an Independent Consultant in the Licensing and Security Industry for the last 5 years.
11. I was a Home Office qualified Crime Prevention Design Advisor.
12. I am the holder of the BTEC Level 3 Certificate (Security Industry Authority) – Close Protection Operative in the Private Security Industry.
13. I am the holder of a Personal Licence under the Licensing Act 2003.

### **Observations**

14. Observations were carried out at Merkur Slots premises 456 Holloway Road London N7 6QA and the surrounding area between 21:00 hours on Saturday 3<sup>rd</sup> September 2022 and 06:00 hours on Sunday 4<sup>th</sup> September 2022.
15. The area felt safe with members of the public going about their business, working, shopping, and socialising.

16. The area is well lit and illuminated from street lighting and shop front lights. I had clear and unobstructed views throughout the observations.
17. During observations I concentrated on signs of criminality, begging, anti-social behaviour, vulnerable persons, other persons at risk and the general environment.
18. Merkur Slots is situated on the crossroad junction of Holloway Road (A1) Seven Sisters Road (A503) and Parkhurst Road (A503). The premises are in a parade of shops on a busy crossroads and operates 24-hours a day 7-days a week. There are shops and commercial businesses on either side of Holloway Road. Many of these shops have residential properties above them – Image A1.
19. Holloway Road generally runs north to south and Seven Sisters Road east to west. The premises had two entrances in use, the main one on the Holloway Road junction with Seven Sisters Road and a second one in Seven Sisters Road. There was a third entrance on Holloway Road but this did not appear to be in use. Holloway Road is a main arterial 'A' road with two and sometimes three traffic lanes in each direction. Seven Sisters Road is a two-lane one-way road with the traffic travelling northbound.
20. Immediately outside the venue is a wide footpath then the roads themselves. During the observations vehicular and pedestrian traffic never stopped but was varied – Image A2.
21. East of and next to the premises is Vodaphone 454 Holloway Road N7 6QA. To the west of, next to the premises and the other side of the junction with Seven Sisters Road is Three (Phone Shop) 458 Holloway Road N7 6HT. To the north and next to the premises is Photo 7 Studio, 2 Seven Sisters Road N7 6AH. Other shops line the Holloway Road and Seven Sisters Road on both sides of the roads.
22. The area of observations was Holloway Road from Camden Road in the east and Hercules Road in the west and Seven Sisters Road to the junction with Salterton Road in the north.
23. This area is densely populated with many retail premises, that include supermarkets, mini supermarkets, small food shops, pub, cafes, hairdressers, barbers, estate agents, slots casinos, bookmakers, restaurants, fast-food shops and pawn brokers which service the transient and residential population alike.
24. The area has a diverse community living together in a mixture of privately owned, local authority and rental accommodation.
25. Holloway Road and the immediate area are well served by public transport with a variety of bus routes, taxis, underground and mainline trains. There was ample car parking available in a nearby pay and display car park and restricted

parking in the side roads. These transport mediums allow the public to arrive and leave the area safely and quickly.

26. Tufnell Park and Caledonian Road Underground Stations are nearby and Drayton Park Mainline Station 19 minutes' walk (0.9 miles).
27. There are five other gambling premises in the immediate area, all of which close by 22:00 hours except Admiral Casino:
  - i. Admiral Casino 3 Seven Sisters Road N7 6AJ– Image A3
  - ii. Betfred 10-12 Seven Sisters Road N7 6AH – Image A6
  - iii. Paddy Power 42-44 Seven Sisters Road N7 6AA - Image A8
  - iv. Ladbrokes 502 Holloway Road N7 6JA– Image A21
  - v. William Hill 37 Seven Sisters Road N7 6AX – Image A9
28. These premises can be divided into two main types:
  - i. Betting premises not licensed to serve alcohol.
  - ii. Gaming premises – Adult Gaming Centres (AGC) and Bingo Premises not licensed to serve alcohol.
29. Admiral Casino has a similar business model to Merkur Slots UK which operates 24-hours, 7-days a week.
30. There were three public houses in the vicinity of the gaming premises – The Enkel Arms 34 Seven Sisters Road N7 6AA, Big Red 385 Holloway Road N7 0RY and The Hercules Public House 505 Holloway Road N7 6JA. At the time of my visit, they all appeared to be well run and there were no issues – Images A7, A18, A22.
31. Throughout my observations in and around the area I saw no street drinkers, vagrants, or drug dealing around the premises. However, on two occasions I saw a female engaged in begging, approaching customers as they left McDonalds Restaurant 13-15 Seven Sisters Road N7 6AJ. There was no begging taking place anywhere near Merkur Slots premises.
32. Photographic images of what was seen during the observations were taken to support my findings and are documented in Appendix A.

## **Covert Observations**

### **Deployment**

33. I conducted covert observations from between 21:00 hours on Saturday 3<sup>rd</sup> September 2022 and 06:00 hours on Sunday 4<sup>th</sup> September 2022.
34. At 21:00 hours I arrived in the area of the Merkur Slots premises 456 Holloway Road N7 6QA and started observations by monitoring the venue and the immediate area around it.

35. Between 21:00 hours and 22:15 hours McDonalds in Seven Sisters Road was busy with customers. Delivery riders were parked on the road and footpaths outside McDonalds and other restaurants waiting to service fast food deliveries – Image A5.
36. There was a good volume of pedestrian traffic in and around shops that were open in Holloway Road and Seven Sisters Road. At this time most of the shops had closed. The bookmakers were still open but soon closed without any issues. After 22:00 hours the only premises open close to Merkur Slots were fast-food take aways, Admiral Casino, the pubs and some restaurants. They were well run and had no issues.
37. Between 22:15 hours and 01:00 hours a continuous flow of pedestrians walked past the venue transiting the area or visiting the 24-hour mini supermarkets and fast-food shops – Images A8, A9, A10, A11, A12, A13, A14, A15, A16, A17, A18, A19, A20, A21, A22, A23, A24, A27, A28, A29.
38. Between 01:00 hours and 02:46 hours pedestrian and traffic numbers reduced but there was still traffic in the area – Images A30, A31, A32, A33, A34.
39. Between 02:47 hours and 03.18 hours I conducted a covert visit to the Merkur Slots 456 Holloway Road– Image A35.
40. At 02:47 hours I went to the main central entrance door which was open, but I could see there was a male door supervisor just inside controlling the entrance. I saw that entry could be controlled by using a bell security entry system. On the glass of the door I saw signage stating no under 18's, CCTV in operation, no alcohol and that a time delay lock was in operation.
41. On entering I looked at the door supervisor and saw he was smartly dressed with his SIA badge clearly displayed. He acknowledged me and waved me through into the premises.
42. Once inside I found myself in a large carpeted room on one level and there were gaming machines of various types throughout the premises. In front of me was a reception desk area. This area was used for the preparation of refreshments with a facility to make hot drinks. Behind the desk was a female member of staff dressed smartly in corporate clothing who welcomed me to the premises.
43. As I walked through the premises and saw it went round to the right where there were further machines, past the toilets on the right and leading out into an open aired space at the back of the premises where customers could smoke.
44. I saw there were eight other customers in the venue. All were male aged between 28 years and 50 years. I found a machine and started to play it.

45. In front of and to the left of the reception desk was an office door. The door opened and another female member of staff came out into the main gaming area. She was smartly dressed in corporate clothing.
46. After a short period of time the second female staff member approached me and asked if I would like a soft drink, water, coffee, tea or a snack. I asked if I could get an alcoholic drink and she stated they didn't sell alcohol but the non-alcoholic drinks they provided were free for customers. I accepted her offer of a coffee and after a couple of minutes, she brought over my drink.
47. The staff then left me to enjoy playing the machines. I was not pressurised or encouraged to spend money.
48. During my visit I saw customers enter the venue and other customers leave. The numbers of customers never got above eight at any time. The hot and soft drinks were prepared at a reception desk area which was clean and tidy.
49. Whilst I was in the venue, I saw the staff cleaning, wiping down surfaces and completing a low-profile patrol checking on customers' needs and making sure they weren't underage or vulnerable. I felt safe, the staff were friendly, polite, informative and I found the premises clean and tidy.
50. Before leaving I used the toilets and found them to be clean and tidy. The toilets were regularly checked as shown by the toilet check sheet and there were Gamcare leaflets available for customers to take away – Image A36.
51. At no time during my observations did I see anyone hanging around the premises. Customers arriving went straight into the premises and customers leaving left the area straight away. I left the premises at 03:18 hours – Image A37.
52. Between 03:20 hours and 05:00 hours vehicular traffic and pedestrian traffic was varied.
53. Customers visited the 24-hour premises throughout the night in small numbers without any incidents of crime and disorder or anti-social behaviour. This position remained unchanged during the course of my observations until 06:00 hours when I departed.
54. Prior to my departure I obtained further images that show there was no problems, issues or anti-social behaviour in the area – Image A38, A39, A40, A41, A42.
55. On several occasions during my time in the area I saw the Merkur Slots door supervisor patrolling around the front of the premises in between the entrances to checking the front of the premises was clear and no one was loitering around.

## Summary

56. I found Merkur Slots 456 Holloway Road to have a smart, well-lit, and professional looking frontage. The premises were carpeted, with music playing in the background and the atmosphere was relaxed and welcoming.
57. At the time of my visit to the location, I saw no evidence of crime and disorder, anti-social behaviour, littering, street drinking, drug dealing or groups of youths hanging around. However, on two occasions I did see a female engaged in begging approaching customers as they left McDonalds in Seven Sisters Road. There was no begging around Merkur Slots premises and I saw proactive patrols being conducted by the door supervisor to deter and prevent this activity or any other criminal behaviour from taking place.
58. People entering these premises were vetted before being allowed stay to ensure drunken or other vulnerable people didn't gain access to the premises.
59. It is clear the presence of Merkur Slots in the Holloway Road does not lead to or result in people who have been on a night out, staying in the area any longer than they had planned to and that customers do not hang around outside the premises causing problems.
60. Merkur Slots UK takes safer gambling seriously. This can be evidenced with the use of safeguarding programs such as:
- i. Merkur 360 Program - To achieve higher standards of player protection Merkur have worked with G4 Global Gambling Guidance Group, which focuses on the provision of responsible gambling and has also implemented its own 360 responsible gambling program.
  - ii. Think 25 Policy – Strict Over 18 Policy. All venues operate a Think 25 Policy whereby photographic ID is required to gain entry.
  - iii. In View Tools – Staying in control is a key part of messaging in the Merkur venues. Leafleting and posters such as BeGambleAware and GamCam, can be found in the venues main area and in private places such as toilets.
  - iv. Staff Training – Merkur Slots has developed a detailed training programme for all staff members including its own City and Guilds accredited training developed in partnership with YGAM and Betknowmore.
61. Leveche Associates Ltd have carried out covert visits on numerous Adult Gaming Centres that operate throughout the UK 24-hrs a day, 7-days a week. 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 don't attract or take advantage of juveniles or other vulnerable persons. The visits also established that Merkur Slots customers do not cause crime or anti-social behaviour.



62. At Merkur Slots premises the demographic is much older and doesn't attract young people or children. The environment is very different to a loud busy arcade, it is a low-key carpeted style lounge with no more than a handful of mature customers in at any one time.
63. 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.
64. In conclusion, from my visits it is my opinion Merkur Slots UK Limited are well run, and their operation significantly reduces the risk of crime and disorder and vulnerable people being taken advantage of and it is clear that the Merkur Slots premises do not impact on the environment, infrastructure, or local community.
65. I believe the facts in my report are honest and true. The opinions I have expressed are made in good faith and in my best judgement. The fee for this report is not conditional on the outcome of any future case, application or finding.

**Stuart Jenkins**  
**Licensing Consultant**  
**Leveche Associates Limited**  
**28/09/2022**



## **Appendix A**

Observation Images

3rd - 4th September 2022

### **Mercur Slots**

456 Holloway Road  
N7 6QA

### **Leveche Associates Ltd**

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

**Merkur Slots**  
Merkur Slots 456 Holloway Road N7 6QA  
3rd - 4th September 2022



**Image A1**

21:52hrs

Merkur Slots 456 Holloway Road N7 6QA



**Image A2**

21:54hrs

Merkur Slots 456 Holloway Road N7 6QA

**Merkur Slots**  
Merkur Slots 456 Holloway Road N7 6QA  
3rd - 4th September 2022



**Image A3**

22:12hrs

Admiral Casino 3 Seven Sisters Road N7 6AJ



**Image A4**

22:12hrs

H & T Pawnbrokers 9 Seven Sisters Road N7 6AJ

**Merkur Slots**  
Merkur Slots 456 Holloway Road N7 6QA  
3rd - 4th September 2022



**Image A5**

22:12hrs

McDonalds 13-15 Seven Sisters Road N7 6AJ

**Image A6**

22:13hrs

Betfred 10-12 Seven Sisters Road N7 6AH

**Merkur Slots**  
Merkur Slots 456 Holloway Road N7 6QA  
3rd - 4th September 2022



**Image A7**

22:14hrs

The Enkel Arms 34 Seven Sisters Road N7 6AA



**Image A8**

22:15hrs

Paddy Power 42-44 Seven Sisters Road N7 6AA

**Merkur Slots**  
Merkur Slots 456 Holloway Road N7 6QA  
3rd - 4th September 2022



**Image A9**

22:16hrs

William Hill 37 Seven Sisters Road N7 6AX



**Image A10**

22:17hrs

Seven Sisters Road looking west

**Merkur Slots**  
Merkur Slots 456 Holloway Road N7 6QA  
3rd - 4th September 2022



**Image A11**

22:21hrs

Merkur Slots 456 Holloway Road



**Image A12**

22:21hrs

Holloway Road looking south



**Merkur Slots**  
Merkur Slots 456 Holloway Road N7 6QA  
3rd - 4th September 2022



**Image A13**

22:21hrs

Holloway Road looking north



**Image A14**

22:25hrs

Waitrose 366 Holloway Road j/w Tollington Road

**Merkur Slots**  
Merkur Slots 456 Holloway Road N7 6QA  
3rd - 4th September 2022



**Image A15**

22:27hrs

Shopping Arcade off Holloway Road leading to Morrisons Supermarket



**Image A16**

22:28hrs

Lidl 422-434 Holloway Road looking north

**Merkur Slots**  
Merkur Slots 456 Holloway Road N7 6QA  
3rd - 4th September 2022



**Image A17**

22:29hrs

Holloway Road looking north



**Image A18**

22:29hrs

Big Red 385 Holloway Road N7 0RY

**Merkur Slots**  
Merkur Slots 456 Holloway Road N7 6QA  
3rd - 4th September 2022



**Image A19**

22:31hrs

Odeon Lux Cinema 419 - 727 Holloway Road N7 6LJ



**Image A20**

22:32hrs

Holloway Road looking south

**Mercur Slots**  
Mercur Slots 456 Holloway Road N7 6QA  
3rd - 4th September 2022



**Image A21**

22:33hrs

Ladbrokes Bookmakers 502 Holloway Road N7 6JA



**Image A22**

22:34hrs

The Hercules Public House 504 Holloway Road N7 6JA

**Merkur Slots**  
Merkur Slots 456 Holloway Road N7 6QA  
3rd - 4th September 2022



**Image A23**

22:42hrs

Parkhurst Road looking east towards  
Holloway Road j/w Seven Sisters Road



**Image A24**

00:16hrs

Merkur Slots 456 Holloway Road

**Merkur Slots**  
Merkur Slots 456 Holloway Road N7 6QA  
3rd - 4th September 2022



**Image A25**

00:16hrs

Holloway Road looking north



**Image A26**

00:16hrs

Holloway Road looking south

**Merkur Slots**  
Merkur Slots 456 Holloway Road N7 6QA  
3rd - 4th September 2022



**Image A27**

00:19hrs

Looking towards Merkur Slots 456 Holloway Road



**Image A28**

00:21hrs

Seven Sisters Road looking east



**Merkur Slots**  
Merkur Slots 456 Holloway Road N7 6QA

3rd - 4th September 2022



**Image A29**

00:22hrs

Seven Sisters Road looking east



**Image A30**

02:41hrs

Parkhurst Road looking towards j/w Holloway Road and Seven Sisters Road.

**Merkur Slots**  
Merkur Slots 456 Holloway Road N7 6QA  
3rd - 4th September 2022



**Image A31**

02:42hrs

Merkur Slots 456 Holloway Road



**Image A32**

02:42hrs

Holloway Road looking south

**Merkur Slots**  
Merkur Slots 456 Holloway Road N7 6QA  
3rd - 4th September 2022



**Image A33**

02:42hrs

Holloway Road looking north



**Image A34**

02:44hrs

Seven Sisters Road looking west

**Merkur Slots**  
Merkur Slots 456 Holloway Road N7 6QA

3rd - 4th September 2022



**Image A35**

02:46hrs

Merkur Slots Holloway Road looking south



**Image A36**

03:15hrs

Toilet Check Sheet Merkur Slots Holloway Road

**Merkur Slots**  
Merkur Slots 456 Holloway Road N7 6QA  
3rd - 4th September 2022



**Image A37**

03:18hrs

Merkur Slots Holloway Road



**Image A38**

05:10hrs

Holloway Road looking north

**Merkur Slots**  
Merkur Slots 456 Holloway Road N7 6QA  
3rd - 4th September 2022



**Image A39**

05:10hrs

Holloway Road looking south towards Merkur Slots



**Image A40**

05:37hrs

Looking towards Merkur Slots 456 Holloway Road j/w  
Seven Sisters Road

**Merkur Slots**  
Merkur Slots 456 Holloway Road N7 6QA  
3rd - 4th September 2022



**Image A41**

05:38hrs

Merkur Slots 456 Holloway Road



**Image A42**

05:38hrs

Holloway Road looking north



## **Full Observation Report**

**Stuart Jenkins – Licensing Consultant  
Leveche Associates Limited**

### **Merkur Slots**

**146 High Street Hounslow Middlesex TW3 1LR**

#### **Executive Summary**

1. Observations were conducted on Merkur Slots premises at 146 High Street Hounslow Middlesex TW3 1LR and the surrounding area. The premises are situated in a parade of shops on the High Street in Hounslow Town Centre. The premises operates 24-hours a day 7-days a week.
2. One covert visit was made to the site and the surrounding area. The covert visit showed the premises to be well run with no issues. There were two other gaming premises with a similar business model to Merkur Slots in the area, Admiral Casino 192 High Street TW3 1HL and Royal Casino Slots 1-2 Cressys Corner, Lampton Road TW3 1HA.
3. From the observations, it is clear that Merkur Slots, operating 24-hours a day does not create anti-social behaviour or any other crime and disorder that would have a negative impact on nearby residents, the environment, local infrastructure, or wider local community.
4. Photographic images support these observations and the conclusions reached.

#### **Introduction**

5. We are instructed to conduct independent observations at Merkur Slots premises 146 High Street Hounslow Middlesex TW3 1HR and the surrounding area.



6. Merkur Slots UK operate the venue which has a 24-hour licence under the Gambling Act 2005.
7. The premises come under the jurisdiction of Hounslow Borough Council.

### **Personal – Stuart Jenkins**

8. I am a Director of Leveche Associates Limited, an independent company dealing with Licensing and Security in the Private Sector. I am a former Police Officer having retired from the Metropolitan Police after completion of over 30 years exemplary service.
9. Throughout my police career the majority of my service was spent on specialist units engaged on proactive operations :- 1993–1997 Central Territorial Support Group (TSG) - Level 1 Public Order, firearms officer and dedicated surveillance officer; 1997–1998 CO14 Clubs & Vice Unit – test purchase officer and street offences investigations; 1998-2000 Charing Cross Division on promotion – overt and covert licensing operations; 2000-2008 CO14 Clubs & Vice Unit – lead officer for the investigation of serious criminal offences within licensed premises across London, test purchase officer, Pan-London licensing tactical advisor, Licensing Policy Development and Implementation for the Metropolitan Police Service (MPS) and intelligence unit supervisor; 2008-2018 Marine Policing Unit (MPU) – licensing lead for the MPU; licensing tactical advisor Notting Hill Carnival, covert licensing operations and intelligence unit supervisor. Marine intelligence and accreditation lead for the Queens Diamond Jubilee River Pageant and intelligence lead for the London Olympics 2012.
10. I have worked as an Independent Consultant in the Licensing and Security Industry for the last 5 years.
11. I was a Home Office qualified Crime Prevention Design Advisor.
12. I am the holder of the BTEC Level 3 Certificate (Security Industry Authority) – Close Protection Operative in the Private Security Industry.
13. I am the holder of a Personal Licence under the Licensing Act 2003.

### **Observations**

14. Observations were carried out at Merkur Slots premises 146 High Street Hounslow Middlesex and the surrounding area between 21:00 hours on Thursday 25<sup>th</sup> August 2022 and 06:00 hours on Friday 26<sup>th</sup> August 2022.
15. The area felt safe with members of the public going about their business, working, shopping, and socialising.

16. The area is well lit and illuminated from street lighting and shop front lights. I had clear and unobstructed views throughout the observations.
17. During observations I concentrated on signs of criminality, begging, anti-social behaviour, vulnerable persons, other persons at risk and the general environment.
18. Merkur Slots is in a large parade of shops on the High Street in Hounslow Town Centre. There are shops and commercial businesses on either side of High Street. Many of these shops have residential properties above them – Image A1.
19. High Street generally runs east to west. Immediately outside the venue is a wide footpath and beyond that the restricted one-way road with a separate cycle lane. At the time of my visit the road was closed to vehicular traffic due to ongoing road works. During the observations there was no vehicular traffic and pedestrian traffic was varied – Image A2, A3.
20. East of and next to the premises is Table 11 142-144 High Street Hounslow TW3 1LR. To the west of and next to the premises is the Dental Surgery 148-150 High Street Hounslow TW3 1LR then empty shop premises at 152 High Street Hounslow TW3 1LR. Opposite the premises were Primark 165-169 High Street Hounslow TW3 1QL and Iceland Supermarket 147-161 High Street Hounslow TW3 1QL. Other shops line the High Street on both sides of the road.
21. The area of observations was from Laurence Road in the east and Bell Road in the west. This area is densely populated with many retail premises, that include supermarkets, mini supermarkets, small food shops, a pub, cafes, hairdressers, barbers, estate agents, slots casinos, bookmakers, restaurants, fast-food shops and pawn brokers which service the transient and residential population alike.
22. The area has a diverse community living together in a mixture of privately owned and rental accommodation.
23. High Street and the immediate area are well served by public transport with a variety of bus routes, taxis, underground and mainline trains. There was ample car parking available in a nearby pay and display car park and restricted parking in the side roads. These transport mediums allow the public to arrive and leave the area safely and quickly.
24. Hounslow East and Hounslow Central Underground Stations are nearby and Hounslow Mainline Station 12 minutes' walk (0.6 miles).
25. There are eight other gambling premises in the High Street Hounslow area, all of which close by 22:00 hours except Admiral Casino, Merkur Slots and Royal Casino Slots:
  - i. Admiral Casino Slots 192 High Street Hounslow TW3 1HL – Image A6.

- ii. Betfred 2-7 Montague Road Hounslow TW3 1LD – Image A12
- iii. Coral 208 High Street Hounslow TW3 1HE – Image A8
- iv. Paddy Power 162 High Street Hounslow TW3 1BQ – Image A5
- v. Paddy Power 295 High Street Hounslow TW3 1EF - Image A15
- vi. Ladbrokes 113 A & B High Street Hounslow TW3 1QT – Image A23
- vii. Merkur Slots 237-239 High Street Hounslow TW3 1EA – Image A19
- viii. Royal Casino Slots 1-2 Cressys Corner Lampton Rd TW3 1HA – Image A17

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

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

27. Admiral Casino and Royal Casino Slots have similar business models to Merkur Slots UK which operates 24-hours, 7-days a week.

28. There was one public house in the vicinity of the gaming premises – The Bell Public House 2 Staines Road Hounslow TW3 3JS. At the time of my visit it appeared to be well run and there were no issues – Image A16.

29. Throughout my observations in and around High Street I saw no begging taking place in the street, no street drinkers, vagrants, or drug dealing around the premises or the area.

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

## **Covert Observations**

### **Deployment**

31. I conducted covert observations from between 21:00 hours on Thursday 25<sup>th</sup> August 2022 and 06:00 hours on Friday 26<sup>th</sup> August 2022.

32. At 21:00 hours I arrived in the area of the Merkur Slots premises 146 High Street Hounslow and started observations by monitoring the venue and the immediate area around it.

33. At 21:26 hours McDonalds 200-202 High Street Hounslow was very busy. Delivery riders were parked on the road and footpaths outside McDonalds and other restaurants waiting to service fast food deliveries – Image A7.

34. There was a good volume of pedestrian traffic in and around the parade of shops and in High Street. At this time most of the shops and the Treaty Centre had closed. The bookmakers were still open but soon closed without any issues. After 22:00 hours the only premises open close to Merkur Slots were fast-food take aways, The Bell Public House, Admiral Casino, Royal Casino Slots and some restaurants. They were well run and had no issues – Image A9.

35. Between 22:00 hours and 01:00 hours a continuous flow of pedestrians walked past the venue transiting the area or visiting the 24-hour mini supermarkets and fast-food shops. McDonalds in High Street closed at 00:00 hours – Images A23, A24, A27, A28, A29, A30, A31, A32.
36. Between 01:00 hours and 02:47 hours pedestrian and traffic numbers reduced – Images A33, A34, A35.
37. Between 02:48 hours and 03.10 hours I conducted a covert visit to the Merkur Slots 146 High Street – Image A36.
38. At 02:48 hours I went to the entrance door which was closed. I saw that entry could be controlled by using a bell security entry system. On the glass of the door I saw signage stating no under 18's, CCTV in operation, no alcohol and that a time delay lock was in operation.
39. I pushed the door but it was locked. After a few seconds the door was opened by a male member of staff wearing smart clothing with an SIA door supervisor badge clearly displayed. He looked at me and I asked if I could come in to play the machines. He nodded and welcomed me into the premises.
40. Once inside I found myself in a large carpeted room on one level and there were gaming machines of various types throughout the premises.
41. On the left-hand side wall midway in the room there was a reception desk area. This area was used for the preparation of refreshments with a facility to make hot drinks.
42. As I approached the reception I saw there were two further members of staff, one female and one male who were dressed in smart corporate clothing. The female member of staff welcomed me to the venue and asked if I needed any assistance with choosing a machine to play. I stated I was fine.
43. I walked through the premises and saw there were two other customers in the venue. All were male aged between 35 years and 45 years. I found a machine and started to play it.
44. After a short period of time the female staff member approached me and asked if I would like a soft drink, water, coffee, tea or a snack. I asked if I could get an alcoholic drink and she stated they didn't sell alcohol but the non-alcoholic drinks they provided were free for customers. I accepted her offer of a coffee and after a couple of minutes, she brought the drink to me.
45. The staff member then left me to enjoy playing the machines. I was not pressurised or encouraged to spend money.
46. During my visit no other customers came into the venue. The hot and soft drinks were prepared at a reception desk area which was clean and tidy.

47. Whilst I was in the venue, I saw the staff cleaning, wiping down surfaces and completing a low-profile patrol checking on customers' needs and making sure they weren't underage or vulnerable. I felt safe, the staff were friendly, polite, informative and I found the premises clean and tidy.
48. Before leaving I used the toilets which were located on the left-hand side towards the back of the premises. I found them to be clean and tidy. The toilets were regularly checked as shown by the toilet check sheet and there were Gamcare leaflets available for customers to take away – Image A37, A38.
49. At no time during my observations did I see anyone hanging around the premises. Customers arriving went straight into the premises and customers leaving left the area straight away. I left the premises at 03:10 hours – Image A39.
50. Between 03:10 hours and 05:05 hours there was no vehicular traffic and low levels of pedestrian traffic – Images A40, A41, A42.
51. Customers visited the 24-hour premises throughout the night in small numbers without any incidents of crime and disorder or anti-social behaviour. This position remained unchanged during the course of my observations.
52. I remained in the area until 06:00 hours. Prior to my departure I obtained further images that show there was no problems, issues or anti-social behaviour in the area – Image A43, A44, A45, A46.

## Summary

53. I found Merkur Slots 146 High Street Hounslow to have a smart, well-lit, and professional looking frontage. The premises were carpeted, with music playing in the background and the atmosphere was relaxed and welcoming. At the time of my visit to the location, I saw no evidence of crime and disorder, anti-social behaviour, littering, street drinking, drug dealing, begging or groups of youths hanging around.
54. People entering these premises were vetted before being allowed stay to ensure drunken or other vulnerable people didn't gain access to the premises.
55. It is clear the presence of Merkur Slots in the High Street Hounslow 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 and that customers do not hang around outside the premises causing problems.
56. Merkur Slots UK takes safer gambling seriously. This can be evidenced with the use of safeguarding programs such as:
  - i. Merkur 360 Program - To achieve higher standards of player protection Merkur have worked with G4 Global Gambling Guidance Group, which

focuses on the provision of responsible gambling and has also implemented its own 360 responsible gambling program.

- ii. Think 25 Policy – Strict Over 18 Policy. All venues operate a Think 25 Policy whereby photographic ID is required to gain entry.
  - iii. In View Tools – Staying in control is a key part of messaging in the Merkur venues. Leafleting and posters such as BeGambleAware and GamCam, can be found in the venues main area and in private places such as toilets.
  - iv. Staff Training – Merkur Slots has developed a detailed training programme for all staff members including its own City and Guilds accredited training developed in partnership with YGAM and Betknowmore.
57. Leveche Associates Ltd have carried out covert visits on numerous Adult Gaming Centres that operate throughout the UK 24-hrs a day, 7-days a week. 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 don't attract or take advantage of juveniles or other vulnerable persons. The visits also established that Merkur Slots customers do not cause crime or anti-social behaviour.
58. At Merkur Slots premises the demographic is much older and doesn't attract young people or children. The environment is very different to a loud busy arcade, it is a low-key carpeted style lounge with no more than a handful of mature customers in at any one time.
59. 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.
60. In conclusion, from my visits it is my opinion Merkur Slots UK Limited are well run, and their operation significantly reduces the risk of crime and disorder and vulnerable people being taken advantage of and it is clear that the Merkur Slots premises do not impact on the environment, infrastructure, or local community.
61. I believe the facts in my report are honest and true. The opinions I have expressed are made in good faith and in my best judgement. The fee for this report is not conditional on the outcome of any future case, application or finding.

**Stuart Jenkins**  
**Licensing Consultant**  
**Leveche Associates Limited**  
**27/09/2022**



## **Appendix A**

Observation Images

25th -26th August 2022

### **Merkur Slots**

146 High Street

Hounslow

Middlesex

TW3 1LR

### **Leveche Associates Ltd**

Nightingale House

46-48 East Street

Epsom

Surrey KT17 1HQ

# Merkur Slots

146 High Street Hounslow Middlesex TW3 1LR  
25th - 26th August 2022



**Image A1**

21:19hrs

Merkur Slots 146 High Street Hounslow TW3 1LR



**Image A2**

21:19hrs

High Street Hounslow looking west



# Merkur Slots

146 High Street Hounslow Middlesex TW3 1LR  
25th - 26th August 2022



**Image A3**

21:20hrs

High Street Hounslow looking east



**Image A4**

21:20hrs

Table 11 Restaurant 142 -144 High Street  
Hounslow TW3 1LR

# Mercur Slots

146 High Street Hounslow Middlesex TW3 1LR  
25th - 26th August 2022



**Image A5**

21:22hrs

Paddy Power 162 High Street Hounslow TW3 1BQ



**Image A6**

21.25hrs

Admiral Casino Slots 192 High Street  
Hounslow TW3 1HL

## Mercur Slots

146 High Street Hounslow Middlesex TW3 1LR  
25th - 26th August 2022



**Image A7**

21:26hrs

McDonalds 200-202 High Street Hounslow TW3 1HE



**Image A8**

21:28hrs

Coral Bookmakers 208 High Street Hounslow TW3 1HE

# Merkur Slots

146 High Street Hounslow Middlesex TW3 1LR  
25th - 26th August 2022



25 Aug 2022 at 21:29:09  
Hounslow

**Image A9**

21:29hrs

Entrance to Treaty Centre High Street Hounslow



25 Aug 2022 at 21:31:09  
Hounslow

**Image A10**

21:31hrs

Holy Trinity Church High Street Hounslow

# Merkur Slots

146 High Street Hounslow Middlesex TW3 1LR  
25th - 26th August 2022



**Image A11**

21:32hrs

H&T Pawnbrokers 253 High Street Hounslow TW3 1EA



**Image A12**

21:32hrs

2 - 7 Montague Road Hounslow TW3 1LD

# Mercur Slots

146 High Street Hounslow Middlesex TW3 1LR  
25th - 26th August 2022



**Image A13**

21:34hrs

Market Place 281-287 High Street Hounslow TW3 1EF



**Image A14**

21:34hrs

High Street Hounslow looking east

## Mercur Slots

146 High Street Hounslow Middlesex TW3 1LR  
25th - 26th August 2022



**Image A15**

21:35hrs

Paddy Power 295 High Street Hounslow TW3 1EF



**Image A16**

21:36hrs

The Bell Public House  
2 Staines Road Hounslow TW3 3JS

# Mercur Slots

146 High Street Hounslow Middlesex TW3 1LR  
25th - 26th August 2022



**Image A17**

21:38hrs

Royal Casino Slots 1-2 Cressys Corner  
Lampton Road Hounslow TW3 1HA



**Image A18**

21:38hrs

Bath Road Hounslow looking west



# Merkur Slots

146 High Street Hounslow Middlesex TW3 1LR  
25th - 26th August 2022



**Image A19**

21:44 hrs

Merkur Slots 237 -239 High Street Hounslow TW3 1EA



**Image A20**

21:44hrs

Merkur Slots 237 -239 High Street Hounslow TW3 1EA

## Mercur Slots

146 High Street Hounslow Middlesex TW3 1LR  
25th - 26th August 2022



**Image A21**

21:54hrs

Cineworld Cinema Hounslow



**Image A22**

22:33hrs

High Street Hounslow looking west

# Merkur Slots

146 High Street Hounslow Middlesex TW3 1LR  
25th - 26th August 2022



25 Aug 2022 at 22:34:36  
Hounslow

**Image A23**

22:34hrs

Ladbrokes 113 A & B High Street Hounslow TW3 1QT



25 Aug 2022 at 22:37:26  
Hounslow

**Image A24**

22:37hrs

High Street Hounslow looking west  
towards Merkur Slots

## Mercur Slots

146 High Street Hounslow Middlesex TW3 1LR  
25th - 26th August 2022



**Image A25**

22:41hrs

Douglas Street j/w High Street Hounslow looking south



**Image A26**

00:30hrs

High Street Hounslow looking west

## Merkur Slots

146 High Street Hounslow Middlesex TW3 1LR  
25th - 26th August 2022



**Image A27**

00:33hrs

High Street Hounslow looking west



**Image A28**

00:34hrs

Merkur Slots 148 High Street Hounslow

## Mercur Slots

146 High Street Hounslow Middlesex TW3 1LR  
25th - 26th August 2022



26 Aug 2022 at 00:36:32  
Hounslow

**Image A29**

00:36hrs

High Street Hounslow looking west



26 Aug 2022 at 00:38:32  
Hounslow

**Image A30**

00:38hrs

High Street Hounslow looking west

## Mercur Slots

146 High Street Hounslow Middlesex TW3 1LR  
25th - 26th August 2022



**Image A31**

00:38hrs

McDonalds High Street Hounslow looking east



**Image A32**

00:41hrs

Mercur Slots 146 High Street Hounslow looking east

# Mercur Slots

146 High Street Hounslow Middlesex TW3 1LR  
25th - 26th August 2022



**Image A33**

02:43hrs

High Street Hounslow Looking west



**Image A34**

02:45hrs

Gio's Bar 113B High Street Hounslow 1QT



## Mercur Slots

146 High Street Hounslow Middlesex TW3 1LR  
25th - 26th August 2022



**Image A35**

02:46hrs

High Street Hounslow looking west



**Image A36**

02:47hrs

Mercur Slots 146 High Street Hounslow

# Merkur Slots

146 High Street Hounslow Middlesex TW3 1LR  
25th - 26th August 2022

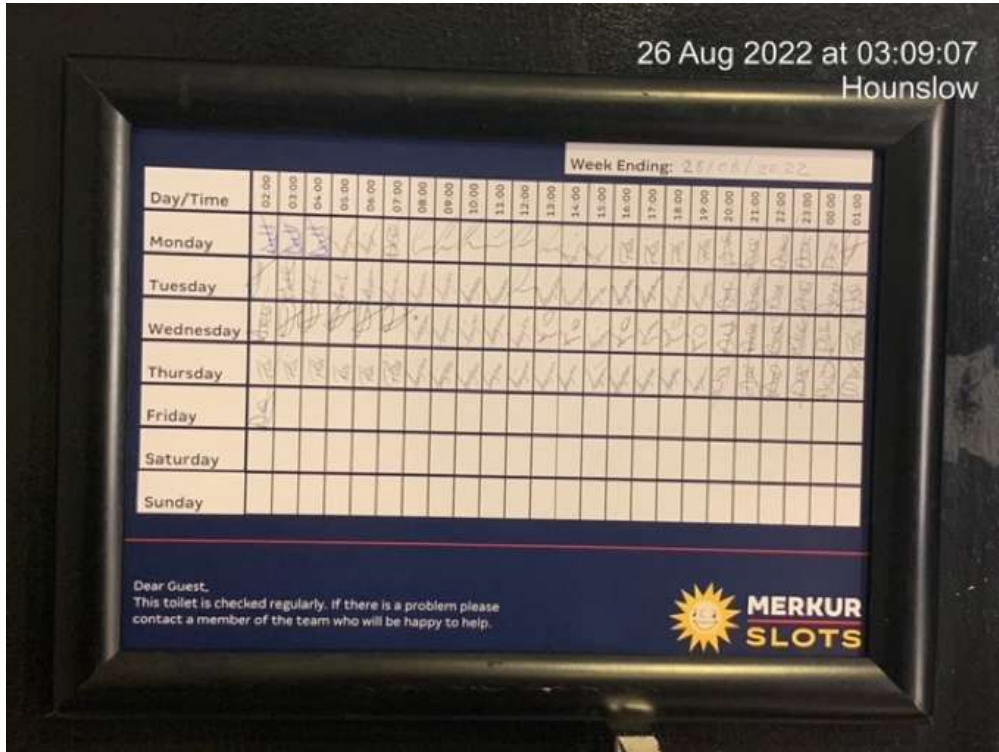


Image A37

03:09hrs

Toilet Check Sheet Merkur Slots 146 High Street Hounslow.

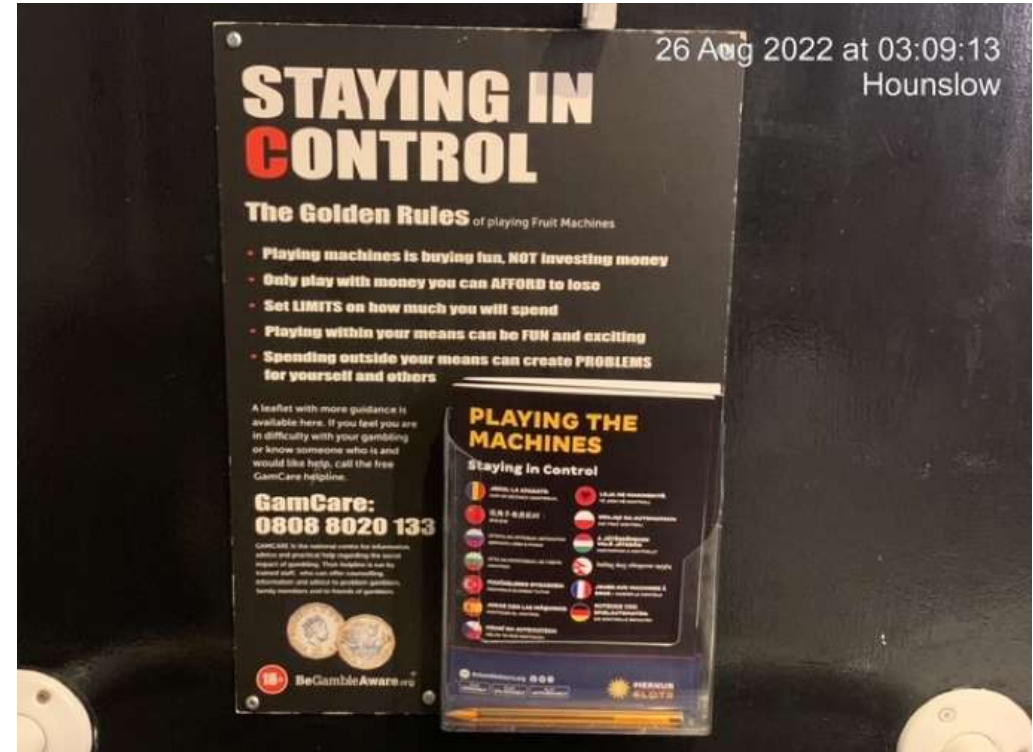


Image A38

03:09hrs

Staying in Control Poster and Gam Care Leaflets in Toilet

# Merkur Slots

146 High Street Hounslow Middlesex TW3 1LR  
25th - 26th August 2022



**Image A39**

03:10hrs

Merkur Slots 146 High Street Hounslow



**Image A40**

03:10hrs

High Street Hounslow looking west

## Mercur Slots

146 High Street Hounslow Middlesex TW3 1LR  
25th - 26th August 2022



**Image A41**

05:04hrs

High Street Hounslow looking west



**Image A42**

05:04hrs

High Street Hounslow looking east

## Merkur Slots

146 High Street Hounslow Middlesex TW3 1LR  
25th - 26th August 2022



**Image A43**

05:09hrs

Merkur Slots 146 High Street Hounslow



**Image A44**

05:12hrs

High Street Hounslow looking east

## Merkur Slots

146 High Street Hounslow Middlesex TW3 1LR  
25th - 26th August 2022



**Image A45**

05:12hrs

High Street Hounslow looking west



**Image A46**

05:14hrs

Merkur Slots 146 High Street Hounslow



## **Full Observation Report**

**Stuart Jenkins – Licensing Consultant**

**Leveche Associates Limited**

**Merkur Slots  
3 Central Parade Streatham High Road  
London SW16 1HT**

**Merkur Slots  
110 Streatham Hill  
London SW2 4RD**

### **Executive Summary**

1. Observations were conducted on Merkur Slots premises at 3 Central Parade Streatham High Road London SW16 1HT and 110 Streatham Hill London SW2 4RD and the surrounding area between 21:00 hours on Saturday 27<sup>th</sup> August 2022 and 06:15 hours Sunday 28<sup>th</sup> August 2022 and again at Merkur Slots 3 Central Parade Streatham High Road London SW16 1HT between 21:20 hours and 22:10 hours on Thursday 15<sup>th</sup> September 2022.
2. Covert visits were made to these sites and the surrounding areas. The observations showed the premises are situated on Streatham High Road and Streatham Hill respectively. Both premises are on the busy A23. The visits showed the premises to be well run with no issues on each occasion.
3. There is one other operator in the area with a similar business model to Merkur Slots which is Admiral Casino 119 Streatham High Road SW16 1HJ located opposite the Merkur Slots premises in Streatham High Road. Both Admiral Casino in Streatham High Road and Merkur Slots in Streatham Hill operate 24-hours a day. From the observations, it is clear that Merkur Slots operating 24-hours a day does not create anti-social behaviour, noise or any other crime and disorder and does not have a negative impact on nearby residents, the environment, local infrastructure, or wider local community.

## **Introduction**

4. I have been instructed to conduct independent observations on the Merkur Slots premises at 3 Central Parade Streatham High Road London SW16 1HT and 110 Streatham Hill London SW2 4RD and the surrounding areas. These premises are licenced under the Gaming Act 2005.
5. Merkur Slots in Streatham High Road is open 08:00 hours to 00:00 hours 7-days a week and the premises in Streatham Hill is open 24-hours a day 7-days a week.
6. The premises come under the jurisdiction of Lambeth Council.

## **Personal – Stuart Jenkins**

7. I am a former Police Officer having retired from the Metropolitan Police after completion of over 30 years exemplary service.
8. Throughout my police career the majority of my service was spent on specialist units engaged on proactive operations :- 1993–1997 Central Territorial Support Group (TSG) - Level 1 Public Order, firearms officer and dedicated surveillance officer; 1997–1998 CO14 Clubs & Vice Unit – test purchase officer and street offences investigations; 1998-2000 Charing Cross Division on promotion – overt and covert licensing operations; 2000-2008 CO14 Clubs & Vice Unit – lead officer for the investigation of serious criminal offences within licensed premises across London, test purchase officer, Pan-London licensing tactical advisor, Licensing Policy Development and Implementation for the Metropolitan Police Service (MPS) and intelligence unit supervisor; 2008-2018 Marine Policing Unit (MPU) – licensing lead for the MPU; licensing tactical advisor Notting Hill Carnival, covert licensing operations and intelligence unit supervisor. Marine intelligence and accreditation lead for the Queens Diamond Jubilee River Pageant and intelligence lead for the London Olympics 2012.
9. I have worked as an Independent Consultant in the Licensing and Security Industry for the last 5 years.
10. I was a Home Office qualified Crime Prevention Design Advisor.
11. I am the holder of the BTEC Level 3 Certificate (Security Industry Authority) – Close Protection Operative in the Private Security Industry.
12. I am the holder of a Personal Licence under the Licensing Act 2003.

## **Observations**

13. I carried out my observations of Merkur Slots premises at 3 Central Parade Streatham High Road London SW16 1HT and 110 Streatham Hill London SW2 4RD and the surrounding area between 21:00 hours on Saturday 27<sup>th</sup> August 2022 and 06:15 hours Sunday 28<sup>th</sup> August 2022, and again at Merkur Slots 3 Central



Parade Streatham High Road London SW16 1HT between 21:20 hours and 22:05 hours on Thursday 15<sup>th</sup> September 2022 - Images A1, A2, B1, C3.

14. The area felt safe with members of the public going about their business, working, shopping, and socialising.
15. The area is well lit and illuminated from street lighting and shop front lights. I had clear and unobstructed views throughout the observations.
16. During observations I concentrated on the pedestrian footfall, signs of criminality, begging, anti-social behaviour including any additional noise, vulnerable persons, other persons at risk and the general environment.
17. Both premises are located on busy high streets on the main A23 leading into Central London. Many of these shops have residential properties above them.
18. Streatham High Road and Streatham Hill generally run north to south.
19. My initial observations centred around the Merkur Slots on Streatham High Road. The premises are situated within a parade of shops on a busy high street. Immediately outside the venue is a footpath and then the A23 road itself. Two-way vehicular and pedestrian traffic can pass the venue in either direction. During the observations vehicular and pedestrian traffic was constant but varied.
20. North of and next to the premises is the Creamery & Coffee, 2 Central Parade Streatham High Road SW16 1HT. To the south of and next to the premises is Galaxy Cut Price Brands 4 Central Parade Streatham High Road. Other retail premises, shops and restaurants line the rest of Streatham High Road – Image A3.
21. The area of observations was from Pendennis Road in the north and Gleneldon Street in the south. This area is densely populated with many retail premises, that include supermarkets, mini supermarkets, small food shops, pubs, cafes, bookmakers, restaurants, clothing shops and fast-food shops which service the transient and residential population alike.
22. The area has a diverse community living together in a mixture of privately owned and rental accommodation.
23. Streatham High Road is well served by public transport with a variety of day bus routes, taxis, and the nearby train station of Streatham Hill. There was restricted parking in the side roads. These transport mediums allow the public to arrive and leave the area safely and quickly.
24. There are three other gambling premises in the Streatham High Road area of observations:
  - i. Paddy Power Bookmakers 115 Streatham High Road SW16 1HJ – Image A5.
  - ii. William Hill Bookmakers 250 Streatham High Road SW16 1HS – Image A8.

iii. Admiral Casino 119 Streatham High Road SW16 1HJ – Image A4.

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

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

26. Admiral Casino 119 Streatham High Road SW16 1HJ has a similar business model to Merkur Slots and operates 24-hours a day 7-days a week. The bookmakers all closed by 22:00 hours.

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

- i. Pratts & Payne Beer Hall 103 Streatham High Road SW16 which is advertised as operating Monday to Thursday 12:00 hours to 23:00 hours, Friday and Saturday 12:00 hours to 00:00 hours and Sunday 11:00 hours to 22:00 hours – Image A7.
- ii. The Holland Tringham (Wetherspoons) Public House 107-109 Streatham High Road SW16 1HJ which is advertised as operating Sunday to Thursday 08:00 hours to 00:00 hours and Friday and Saturday 08:00 hours to 01:00 hours – Image A6.
- iii. The White Lion 232 Streatham High Road SW16 1BB which is advertised as closed Monday, Tuesday and Wednesday and operating Thursday 17:00 hours to 23:00 hours, Friday and Saturday 17:00 hours to 00:30 hours and Sunday 13:00 hours to 00:00 hours – Image A9.

28. After 02:00 hours my observations centred around the Merkur Slots on Streatham Hill. The premises are within the old Streatham Hill Theatre and are situated on the busy A23 which at that point has a three-lane carriageway either side of a central island. Immediately outside the venue is a footpath and then the A23 road itself. Two-way vehicular and pedestrian traffic can pass the venue in either direction. During the observations vehicular and pedestrian traffic was constant but varied.

29. North of and next to the premises is the Raymondo Studios 108 Streatham Hill SW2 4RD. To the south of and next to the premises is the junction with Barrhill Road and then Domino's Pizza 114 -116 Streatham Hill SW2 4RS. Other retail premises, shops and restaurants line the rest of Streatham Hill.

30. The area of observations was from Wyatt Park Road in the north and Ardwell Road in the south. This area is densely populated with many retail premises, that include supermarkets, mini supermarkets, small food shops, pubs, cafes, bookmakers, restaurants, clothing shops, and fast-food shops which service the transient and residential population alike.

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

32. Streatham Hill is well served by public transport with a variety of bus routes, taxis, and the nearby train station of Streatham Hill. There was restricted parking in the side roads. These transport mediums allow the public to arrive and leave the area safely and quickly.
33. There are two other gambling premises in the Streatham High Road area of observations, all of which close by 22:00 hours:
  - i. Betfred Bookmakers 132-134 Streatham Hill SW2 4RS – Image B3
  - ii. Ladbrokes Bookmakers 79-81 Streatham Hill SW2 4UB – Image B4
34. There were no other premises with a similar business model to Merkur Slots in the area of observations.
35. During the observations I saw no illegal activity or anti-social behaviour taking place.
36. Throughout my observations in and around Streatham High Road and Streatham Hill I saw no begging taking place in the street, no street drinkers or drug dealing around the premises or the area.
37. Photographic images of what was seen during the observations were taken to support my findings and are documented in Appendices A, B and C.

## **Covert Observations**

### **Deployment One**

38. I conducted my covert observations from 21:00 hours on Saturday 27<sup>th</sup> August 2022 and 06:15 hours on Sunday 28<sup>th</sup> August 2022.
39. At 21:00 hours I arrived in the area of the Merkur Slots premises 3 Central Parade Streatham High Road London SW16 1HT and started my observations by monitoring the venue, the immediate area around it and the pedestrian footfall.
40. Pedestrian and vehicular traffic passing the premises was constant throughout my observations but varied dependent on the time of night. Most of the shops had closed when I arrived.
41. Between 22:00 hours and 02:00 hours a continuous flow of pedestrians walked past the venue transiting the area or visiting restaurants and late-night takeaway shops. During this time there were no groups of youths hanging around the premises or in the nearby streets. Pedestrians and vehicles made their way along Streatham High Road with purpose. At 00:00 hours Merkur Slots Streatham High Road closed without any issues – Images A10, A11, A12, A13, A14.

42. Throughout my continuing observations I recorded further photographic images that demonstrate there was no anti-social behaviour in the vicinity of the Merkur Slots premises – Images A18, A19, A20.
43. At 02:00 hours I moved my location to concentrate my observations on Merkur Slots 110 Streatham Hill SW2 4RD.
44. At 02:15 hours I arrived in the area of the Merkur Slots Streatham Hill and started my observations by monitoring the venue, the immediate area around it and the pedestrian footfall – Image B1, B2.
45. Between 02:32 hours and 03:03 hours I conducted a covert visit to the Merkur Slots 110 Streatham Hill SW2 4RD.
46. The front display of the premises was clean, well maintained and looked professional. The signage was clear and bright.
47. At 02:32 hours I went to the entrance door which was closed. I saw that entry was controlled by a bell security entry system. On the glass of the door, I saw signage stating no under 18's, CCTV in operation, no alcohol and that a time delay lock was in operation – Image B5.
48. I pushed the door, but it was locked. I pressed the entry button and after a few seconds the door was opened by a male member of staff and I entered.
49. I found myself in a long corridor and followed the male member of staff into the main gaming area. On entering this area, I saw a reception area where refreshments were also prepared. At the reception desk was another male member of staff. Both members of staff were wearing smart corporate clothing.
50. At that point I saw the first member of staff, who let me into the premises was a security guard and had an SIA registration badge displayed.
51. The room was deep and opened out into a large area left and right. I saw there was a wide variety of gaming machines throughout this single room.
52. On seeing me the second member of staff approached and welcomed me to the premises. He asked if I had been to this Merkur Slots premises previously and I said I had. He then asked me if I needed any help with the gaming machines or choosing one to play. I stated I was fine and chose a machine towards the middle of the premises on the back wall.
53. Whilst I was playing the machine the second member of staff asked if I would like a soft drink, water, coffee, tea or a snack. I asked if I could get an alcoholic drink and he explained the premises weren't licensed for alcohol but the non-alcoholic drinks they provided were free for customers. I accepted his offer of a coffee.
54. After a couple of minutes, the staff member brought over my coffee and stated if I needed any help to ask him or his colleague.

55. There were eight other customers in the venue at the time of my visit. There four females and four males aged between 27 and 60 years. During my visit no other customer came into the venue.
56. The hot and soft drinks were prepared at a reception desk area which was clean and tidy.
57. Whilst I was in the venue, I saw the staff cleaning, wiping down surfaces and completing a low-profile patrol checking on customers' needs and making sure they weren't underage or vulnerable. I felt safe, I was not pressurised to use the machines or to spend money. The staff were friendly, polite, informative and I found the premises clean and tidy.
58. Before leaving I used the toilets which were clean and tidy and located away from the main room along another corridor. The toilets were regularly checked as shown by the toilet check sheet and there were Gamcare leaflets available for customers to take away – Image B6, B7.
59. At no time during my observations did I see anyone hanging around the premises. Customers arriving went straight into the premises and customers leaving left the area straight away. I left the premises at 03:02 hours – Image B8.
60. Local Authority Street Cleaning vehicles and buses operated throughout the night.
61. Throughout my continuing observations I recorded further photographic images that demonstrate there was no anti-social behaviour in the vicinity of the Merkur Slots premises – Images B9, B10, B11, B12, B13, B14.
62. I remained in the area until 06:15 hours when I concluded my observations.

## **Deployment Two**

63. I conducted my covert observations from between 21:20 hours to 22:10 hours on Thursday 15<sup>th</sup> September 2022.
64. At 21:20 hours I arrived in the area of Merkur Slots 3 Central Parade Streatham High Road London SW16 1HT and started my observations by monitoring the venue and the immediate area around it – Image C1, C2.
65. Pedestrian and vehicular traffic passing the premises was varied as is typical with Streatham High Road seven days a week.
66. Between 21:35 hours and 22:00 hours I conducted a covert visit to the Merkur Slots 3 Central Parade Streatham High Road SW16 1HT.
67. At 21:35 hours I went to the entrance door which was closed. I saw that entry was controlled by a bell security entry system. On the glass of the door, I saw signage

stating no under 18's, CCTV in operation, no alcohol and that a time delay lock was in operation – Image C3.

68. I pushed the door and entered the premises. In front of me I saw a board with the premises policies, rules and licences on display. I passed the policies board and entered the main area. I saw it was on one level which was carpeted and there were gaming machines of various types throughout.
69. Halfway down on the lefthand wall was a reception where refreshments were prepared. As I approached the reception, I saw a female member of staff wearing smart corporate clothing. She appeared to be engaged in preparing drinks.
70. At the time of my visit there were four other customers in the venue. Three male and one female aged between 30 years and 50 years.
71. I found a gaming machine just beyond the reception desk on the left-hand wall. The staff left me to enjoy playing the machine.
72. Whilst I was playing the machine I engaged the female member of staff in conversation and she asked if I would like a soft drink, water, coffee, tea or a snack. I asked if I could get an alcoholic drink and she explained the premises weren't licensed for alcohol but the non-alcoholic drinks they provided were free for customers. I accepted her offer of a coffee.
73. After a couple of minutes, the staff member brought over my coffee and stated if I needed any help to ask her.
74. I then saw a male member of staff come out of a staff door at the back of the premises and come to the reception. The female member of staff then went through the staff door and out of sight leaving the male managing the shop floor.
75. Whilst I was in the venue, I saw the staff cleaning, wiping down surfaces and completing a low-profile patrol checking on customers' needs and making sure they weren't underage or vulnerable. I felt safe, I was not pressurised to use the machines or to spend money. The staff were friendly, polite, informative and I found the premises clean and tidy.
76. Before leaving I used the toilets which were clean and tidy. The toilets were regularly checked as shown by the toilet check sheet and there were Gamcare leaflets available for customers to take away – Image C4, C5.
77. At no time during my observations did I see anyone hanging around the premises. Customers arriving went straight into the premises and customers leaving left the area straight away. I left the premises at 22:00 hours.
78. Throughout my continuing observations I recorded further photographic images that demonstrate there was no anti-social behaviour in the vicinity of the Merkur Slots premises – Images C7, C8.
79. I remained in the area until 22:10 hours when I concluded my observations.

## Summary

80. I found Merkur Slots in Streatham High Road and Streatham Hill to have smart, well-lit, and professional looking frontage. The premises were carpeted, with music playing in the background and the atmosphere was relaxed and welcoming.
81. At the time of my visits to the location, I saw no evidence of crime and disorder, anti-social behaviour, excessive noise, littering, street drinking, drug dealing, begging or groups of youths hanging around.
82. People entering these premises were vetted before being allowed admission or immediately upon entry to ensure drunken or other vulnerable people didn't gain access to the premises.
83. It is clear the presence of Merkur Slots in Streatham High Road and Streatham Hill 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.
84. Merkur Slots UK takes safer gambling seriously. This can be evidenced with the use of safeguarding programs such as:
- i. Merkur 360 Program - To achieve higher standards of player protection Merkur have worked with G4 Global Gambling Guidance Group, which focuses on the provision of responsible gambling and has also implemented its own 360 responsible gambling program.
  - ii. Think 25 Policy – Strict Over 18 Policy. All venues operate a Think 25 Policy whereby photographic ID is required to gain entry.
  - iii. In View Tools – Staying in control is a key part of messaging in the Merkur venues. Leafleting and posters such as BeGambleAware and GamCam, can be found in the venues main area and in private places such as toilets.
  - iv. Staff Training – Merkur Slots has developed a detailed training programme for all staff members including its own City and Guilds accredited training developed in partnership with YGAM and Betknowmore.
85. From my visits to many Merkur Slots Premises, I have found professional and attentive staff managing them. The premises are well run and there are clearly defined systems in place to ensure the premises operate in support of the gambling objectives and don't attract or take advantage of juveniles or other vulnerable persons.
86. The demographic is much older and doesn't attract young people or children. The environment is very different to a loud busy arcade, it is a low-key carpeted style lounge with no more than a handful of mature customers in at any one time.

87. 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.

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

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

**Stuart Jenkins**  
**Licensing Consultant**  
**Leveche Associates Limited**  
**18/09/2022**





## **Appendix A**

Observation Images

27th - 28th August 2022

### **Merkur Slots**

3 Central Parade  
Streatham High Road  
SW16 1HT

### **Leveche Associates Ltd**

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

# Merkur Slots

3 Central Parade Streatham High Road SW16 1HT  
27th - 28th August 2022



Image A1

21:13hrs

Merkur Slots 3 Central Parade Streatham SW16 1HT



Image A2

21:13hrs

Merkur Slots 3 Central Parade Streatham High Road  
looking south

# Merkur Slots

3 Central Parade Streatham High Road SW16 1HT  
27th - 28th August 2022



27 Aug 2022 at 21:14:18  
Lambeth

**Image A3**

21:14hrs

H&T Pawnbrokers 254 Streatham High Road SW16 1HT



27 Aug 2022 at 21:15:55  
Lambeth

**Image A4**

21:15hrs

Admiral Casino 119 Streatham High Road SW16 1HJ

## Mercur Slots

3 Central Parade Streatham High Road SW16 1HT  
27th - 28th August 2022



**Image A5**

21:16hrs

Paddy Power 115 Streatham High Road SW16 1HJ



**Image A6**

21:16hrs

The Holland Tringham (Wetherspoon) PH  
107-109 Streatham High Road SW16 1HJ

# Merkur Slots

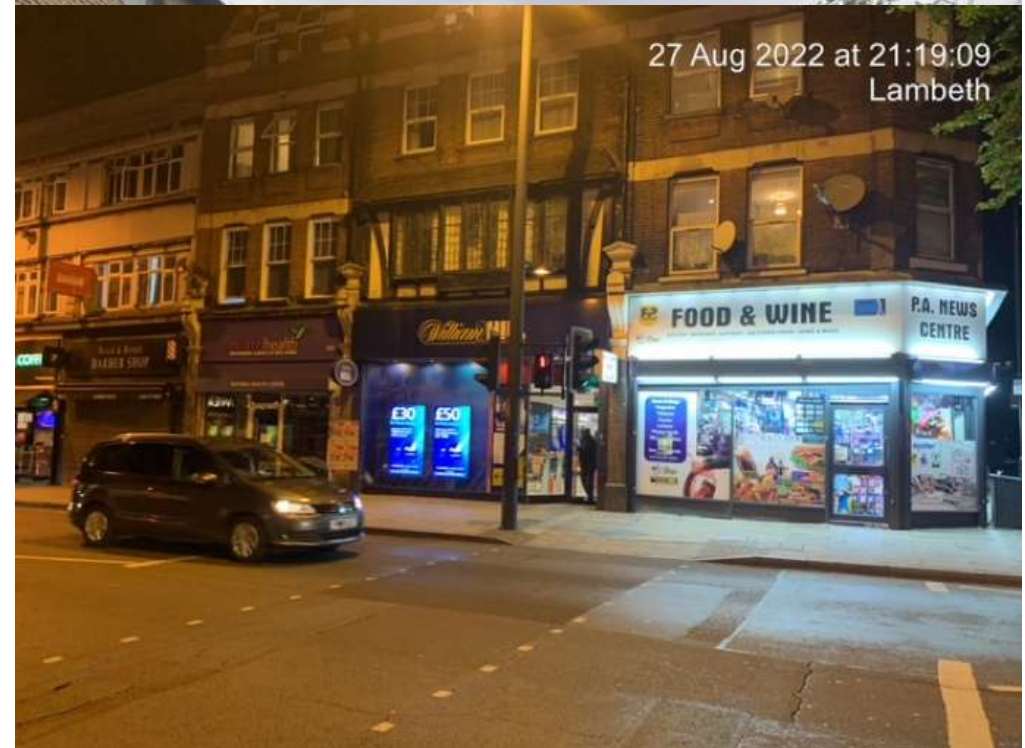
3 Central Parade Streatham High Road SW16 1HT  
27th - 28th August 2022



**Image A7**

21:17hrs

Pratts & Payne Bar 103 Streatham High Road SW16 1HJ



**Image A8**

21:19hrs

William Hill Bookmakers  
250 Streatham High Road SW16 1HS

# Merkur Slots

3 Central Parade Streatham High Road SW16 1HT  
27th - 28th August 2022



**Image A9**

21:22hrs

The White Lion 232 Streatham High Road SW16 1BB



**Image A10**

23:26hrs

Merkur Slots 3 Central Parade  
High Road Streatham

# Mercur Slots

3 Central Parade Streatham High Road SW16 1HT  
27th - 28th August 2022



Image A11

23:26hrs

Mercur Slots 3 Central Parade Streatham High Road



Image A12

23:27hrs

Streatham High Road looking south

## Mercur Slots

3 Central Parade Streatham High Road SW16 1HT  
27th - 28th August 2022



**Image A13**

23:27hrs

Streatham High Road looking north



**Image A14**

23:28hrs

Streatham High Road looking north



## Merkur Slots

3 Central Parade Streatham High Road SW16 1HT  
27th - 28th August 2022



**Image A15**

01:52hrs

Streatham High Road looking south



**Image A16**

01:53hrs

Streatham High Road looking north

# Merkur Slots

3 Central Parade Streatham High Road SW16 1HT  
27th - 28th August 2022



**Image A17**

01:53hrs

The White Lion Streatham High Road



**Image A18**

01:59hrs

Merkur Slots 3 Central Parade Streatham High Road

# Mercur Slots

3 Central Parade Streatham High Road SW16 1HT  
27th - 28th August 2022



**Image A19**

01:59hrs

Streatham High Road looking south



**Image A20**

01:59hrs

Streatham High Road looking north



## **Appendix B**

Observation Images  
28th August 2022

### **Merkur Slots**

110 Streatham Hill  
London  
SW2 4TD

### **Leveche Associates Ltd**

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

# Merkur Slots

110 Streatham Hill London SW2 4TD  
28th August 2022



**Image B1**

02:21hrs

Merkur Slots 110 Streatham Hill London SW2 4TD



**Image B2**

02:22hrs

Streatham Hill looking north

# Mercur Slots

110 Streatham Hill London SW2 4TD  
28th August 2022



**Image B3**

02:23hrs

Betfred 132 - 134 Streatham Hill SW2 4RS



**Image B4**

02:28hrs

Ladbrokes 79 - 81 Streatham Hill SW2 4UB

# Merkur Slots

110 Streatham Hill London SW2 4TD  
28th August 2022



**Image B5**

02:30hrs

Merkur Slots 110 Streatham Hill SW2 4TD



**Image B6**

03:00hrs

Toilet Check Sheet  
Merkur Slots 110 Streatham Hill SW2 4TD

# Merkur Slots

110 Streatham Hill London SW2 4TD  
28th August 2022



28 Aug 2022 at 03:01:26  
London  
London

Image B7

03:01hrs

Staying in Control Literature in Toilets  
Merkur Slots Streatham Hill



28 Aug 2022 at 03:03:51  
Lambeth

Image B8

03:03hrs

Merkur Slots 110 Streatham Hill SW2 4TD



# Merkur Slots

110 Streatham Hill London SW2 4TD  
28th August 2022



**Image B9**

04:59hrs

Merkur Slots 110 Streatham Hill SW2 4TD



**Image B10**

04:59hrs

Streatham Hill looking north

# Mercur Slots

110 Streatham Hill London SW2 4TD  
28th August 2022



**Image B11**

05:00hrs

Streatham Hill looking south



**Image B12**

06:03hrs

Streatham Hill looking north

# Merkur Slots

110 Streatham Hill London SW2 4TD  
28th August 2022



**Image B13**

06:03hrs

Streatham Hill looking south



**Image B14**

06:08hrs

Merkur Slots 110 Streatham Hill SW2 4TD



## **Appendix C**

Observation Images  
15th September 2022

### **Merkur Slots**

3 Central Parade  
Streatham High Road  
SW16 1HT

### **Leveche Associates Ltd**

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

**Merkur Slots**  
3 Central Parade Streatham High Road SW16 1HT  
15th September 2022



**Image C1**

21:33hrs

Streatham High Road looking south



**Image C2**

21:34hrs

Streatham High Road looking north

15th September 2022



**Image C3**

21:34hrs

Merkur Slots 3 Central Parade Streatham SW16 1HT



**Image C4**

21:58hrs

Staying in Control Literature - Gamcare Leaflets

**Merkur Slots**  
 3 Central Parade Streatham High Road SW16 1HT  
 15th September 2022



**Image C5**

21:58hrs

Toilet Check Sheet  
 Merkur Slots Streatham High Road



**Image C6**

22:01hrs

Merkur Slots 3 Central Parade

**Merkur Slots**  
3 Central Parade Streatham High Road SW16 1HT  
15th September 2022



**Image C7**

22:01hrs

Streatham High Road looking south



**Image C8**

22:01hrs

Streatham High Road looking north





## **Full Observation Report**

**Stuart Jenkins – Licensing Consultant**

**Leveche Associates Limited**

**Merkur Slots Cashino**

**69 Tottenham Court Road London W1T 2HA**

### **Executive Summary**

1. Observations were conducted on Merkur Slots Cashino 69 Tottenham Court Road London W1T 2HA and the surrounding area between 20:30 hours on Wednesday 17<sup>th</sup> August 2022 and 06:00 hours on Thursday 18<sup>th</sup> August 2022 and between 00:05 hours and 00:20 hours on Friday 16<sup>th</sup> September 2022.
2. Two covert visits were made to the site and the surrounding area. The observations showed the premises are situated on Tottenham Court Road near Godge Street Underground Station and are open 24-hours a day 7-days a week. The visits showed the premises to be well run with no issues on both occasions.
3. There are no other gaming premises with a similar operation to Merkur Slots in the immediate area. From the observations, it is clear that Merkur Slots operating 24-hours a day does not create anti-social behaviour, noise or any other crime and disorder and does not have a negative impact on nearby residents, the environment, local infrastructure, or wider local community.

### **Introduction**

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

5. The premises has a 24-hour licence under the Gaming Act 2005 and is open 24-hours a day 7-days a week.
6. The premises come under the jurisdiction of Camden Council in the London Borough of Camden.

### **Personal – Stuart Jenkins**

7. I am a former Police Officer having retired from the Metropolitan Police after completion of over 30 years exemplary service.
8. Throughout my police career the majority of my service was spent on specialist units engaged on proactive operations :- 1993–1997 Central Territorial Support Group (TSG) - Level 1 Public Order, firearms officer and dedicated surveillance officer; 1997–1998 CO14 Clubs & Vice Unit – test purchase officer and street offences investigations; 1998-2000 Charing Cross Division on promotion – overt and covert licensing operations; 2000-2008 CO14 Clubs & Vice Unit – lead officer for the investigation of serious criminal offences within licensed premises across London, test purchase officer, Pan-London licensing tactical advisor, Licensing Policy Development and Implementation for the Metropolitan Police Service (MPS) and intelligence unit supervisor; 2008-2018 Marine Policing Unit (MPU) – licensing lead for the MPU; licensing tactical advisor Notting Hill Carnival, covert licensing operations and intelligence unit supervisor. Marine intelligence and accreditation lead for the Queens Diamond Jubilee River Pageant and intelligence lead for the London Olympics 2012.
9. I have worked as an Independent Consultant in the Licensing and Security Industry for the last 5 years.
10. I was a Home Office qualified Crime Prevention Design Advisor.
11. I am the holder of the BTEC Level 3 Certificate (Security Industry Authority) – Close Protection Operative in the Private Security Industry.
12. I am the holder of a Personal Licence under the Licensing Act 2003.

### **Observations**

13. I carried out my observations of Merkur Slots Cashino 69 Tottenham Court Road W1 2HA and the surrounding area between 20:30 hours on Wednesday 17<sup>th</sup> August 2022 and 06:00 hours on Thursday 18<sup>th</sup> August 2022 and between 00:05 hours and 00:20 hours on Friday 16<sup>th</sup> September 2022.
14. The area felt safe with members of the public going about their business, working, shopping, and socialising.
15. The area is well lit and illuminated from street lighting and shop front lights. I had clear and unobstructed views throughout the observations.

16. During observations I concentrated on the pedestrian footfall, signs of criminality, begging, anti-social behaviour including any additional noise, vulnerable persons, other persons at risk and the general environment.
17. The premises are located on a busy high street within a parade of shops in the heart of London. Mainstream shops line both sides of Tottenham Court Road. Many of these shops have residential properties above them – Image A1.
18. Tottenham Court Road generally runs north to south. Immediately outside the venue is a wide footpath and then the road itself. Two-way vehicular and pedestrian traffic can pass the venue in either direction. During the observations vehicular and pedestrian traffic was varied.
19. North of and next to the premises is the entrance to Xen-Do Martial Arts Centre which shares the same postal address of 69 Tottenham Court Road and building as Merkur Slots Cashino. Next to the Martial Arts Centre entrance is CEX Entertainment Exchange 70 Tottenham Court Road and then Kentucky Fried Chicken 71 Tottenham Court Road. To the south of and next to the premises is Dianetics & Scientology Life Improvement Centre 68 Tottenham Court Road. Other retail premises, shops and restaurants line the rest of Tottenham Court Road.
20. The area of observations was from Warren Street in the north and Store Street in the south. This area is densely populated with many retail premises, that include small food shops, pubs, cafes, bookmakers, restaurants, fast-food shops, and furniture stores which service the transient and residential population alike.
21. The area has a diverse community living together in a mixture of privately owned and rental accommodation.
22. Tottenham Court Road is well served by public transport with a variety of bus routes, taxis, hire bikes and the nearby underground train stations of Goodge Street and Warren Street. There was ample car parking available in a nearby pay and display car park and restricted parking in the side roads. These transport mediums allow the public to arrive and leave the area safely and quickly.
23. Bus Stops are nearby and opposite Merkur Slots Cashino with the Marylebone Mainline and Underground Station in Melcombe Place NW1 6JJ, a 12-minute walk (1.8 miles).
24. There are two other gambling premises in the Tottenham Court Road area of observations, all of which close by 22:00 hours:
  - i. Betfred Bookmakers 116 Tottenham Court Road W1T 5AJ
  - ii. Coral Bookmakers 75 Warren Street NW1 3AD
25. These premises can be divided into two main types:
  - i. Betting premises not licensed to serve alcohol.
  - ii. Gaming premises – Adult Gaming Centres (AGC) and Bingo Premises not licensed to serve alcohol.

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

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

- i. Rising Sun Public House 46 Tottenham Court Road W1T 2EL which is advertised as operating Monday to Thursday 11:00 hours to 00:00 hours, Friday and Saturday 11:00 hours to 01:00 hours, and Sunday 11:00 hours to 22:30 hours – Image A14.
- ii. The Court Public House 108A Tottenham Court Road W1T 5AA which is advertised as operating Sunday to Wednesday 12:00 hours to 00:00 hours, and Thursday, Friday and Saturday 12:00 hours to 01:00 hours – Image A25.
- iii. Fitzrovia Belle Bar & Hotel 174 Tottenham Court Road W1T 7NT which is advertised as operating Monday to Sunday 07:00 hours to 00:00 hours – Image A26.
- iv. TCR 183 Tottenham Court Road W1T 7PE which is advertised as operating Monday to Wednesday 12:00 hours to 00:00 hours, and Thursday, Friday and Saturday 12:00 hours to 01:00 hours and Sunday 12:00 hours to 22:30 hours – Image A27.

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

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

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

## **Covert Observations**

### **Deployment One**

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

32. At 20:30 hours I arrived in the area of the Merkur Slots Cashino premises 69 Tottenham Court Road and started my observations by monitoring the venue, the immediate area around it and the pedestrian footfall.
33. Pedestrian and vehicular traffic passing the premises was constant throughout my observations but varied dependent on the time of the day. Most of the shops had closed when I arrived. The bookmakers were still open but soon closed without any issues.
34. Between 22:00 hours and 03:00 hours a continuous flow of pedestrians walked past the venue transiting the area or visiting restaurants and late-night takeaway shops. During this time there were no groups of youths hanging around the premises or in the nearby streets. Pedestrians and vehicles made their way along Tottenham Court Road with purpose. Delivery riders were parked on the road and footpaths outside fast food shops whilst servicing fast food deliveries.
35. Between 03:14 hours and 03:32 hours I conducted a covert visit to the Merkur Slots Cashino 69 Tottenham Court Road – Image A32.
36. The front display of the premises above the liveried shop glass front had been removed and was clearly being refurbished. Even though the signage was removed the shop front was clean, well maintained and looked professional.
37. At 03:14 hours I went to the entrance door which was closed. I saw that entry could be controlled by using a bell security entry system. On the glass of the door, I saw signage stating no under 18's, CCTV in operation, no alcohol and that a time delay lock was in operation.
38. I pushed the door and entered the premises. I saw to my left a board with the premises policies, rules and licences on display. I passed the policies board and entered the main area. I saw it was on two levels which were carpeted and there were gaming machines of various types throughout the premises.
39. Halfway down the right-hand wall was a reception area where refreshments were also prepared. At the reception desk were two male members of staff who were both wearing smart corporate clothing. After the reception desk there was an upper level with further gaming machines.
40. On seeing me one of the members of staff approached and welcomed me to the premises. He asked if I had been to this Merkur Slots premises previously and I said I had. He then asked me if I needed any help with the gaming machines or choosing one to play. I stated I was fine and chose a machine towards the middle of the premises.
41. Whilst I was playing the machine he asked if I would like a soft drink, water, coffee, tea or a snack. I asked if I could get an alcoholic drink and he explained the premises weren't licensed for alcohol but the non-alcoholic drinks they provided were free for customers. I accepted his offer of a coffee.

42. After a couple of minutes, the staff member brought over my coffee and stated if I needed any help to ask him or his colleague.
43. The staff member then left me to enjoy playing the machines. I was not pressurised or encouraged to spend money.
44. There were six other customers in the venue at the time of my visit. All six were male and aged between 27 and 45 years. During my visit one other customer came into the venue.
45. The hot and soft drinks were prepared at a reception desk area which was clean and tidy.
46. Whilst I was in the venue, I saw the staff cleaning, wiping down surfaces and completing a low-profile patrol checking on customers' needs and making sure they weren't underage or vulnerable. I felt safe, I was not pressurised to use the machines or to spend vast sums of money. The staff were friendly, polite, informative and I found the premises clean and tidy.
47. Before leaving I used the toilets which were clean and tidy and located in the basement area. The toilets were regularly checked as shown by the toilet check sheet and there were Gamcare leaflets available for customers to take away – Image A33, A34.
48. At no time during my observations did I see anyone hanging around the premises. Customers arriving went straight into the premises and customers leaving left the area straight away. I left the premises at 03:32 hours – Image A35.
49. Local Authority Street Cleaning vehicles and buses operated throughout the night.
50. Throughout my continuing observations I recorded further photographic images that demonstrate there was no anti-social behaviour in the vicinity of the Merkur Slots premises – Image A36, A37, A38, A39, A40, A41, A42, A43, A44.
51. I remained in the area until 06:00 hours when I concluded my observations.

## **Deployment Two**

52. I conducted my covert observations from between 00:05 hours and 00:20 hours on Friday 16<sup>th</sup> September 2022.
53. At 00:05 hours I arrived in the area of the Merkur Slots Cashino premises 69 Tottenham Court Road and started my observations by monitoring the venue and the immediate area around it – Image B1.
54. I saw that since my visit new signage had been installed above the glass shop front saying 'Merkur Cashino'. Pedestrian and vehicular traffic passing the

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

55. Between 00:06 hours and 00:17 hours I conducted a covert visit to the Merkur Slots Cashino 69 Tottenham Court Road – Image B2, B17.
56. At 00:06 hours I went to the entrance door which was closed. The time delay lock was in operation. I pressed the entry button and after a few seconds the door was opened by a male member of staff and I entered. I saw to my left the board with the premises policies, rules and licences on display. I passed the policies board and entered the main area. The layout of the premises was as I have previously described.
57. As I followed the staff member through the premises he asked if I would like a soft drink, water, coffee, tea or a snack. I politely declined his offer.
58. I saw on the upper level another male member of staff monitoring customers. Both members of staff were dressed in smart corporate clothing.
59. At the time of my visit there were three other customers in the venue. They were all male, aged between 30 years and 40 years.
60. I found a gaming machine towards the back of the premises on the upper level. The staff left me to enjoy playing the machines. I was not pressurised or encouraged to spend money.
61. Whilst I was in the venue, I saw the staff cleaning, wiping down surfaces and completing a low-profile patrol checking on customers' needs and making sure they weren't underage or vulnerable. I felt safe, I was not pressurised to use the machines or to spend money. The staff were friendly, polite, informative and I found the premises clean and tidy.
62. At no time during my observations did I see anyone hanging around the premises. Customers arriving went straight into the premises and customers leaving left the area straight away. I left the premises at 00:17 hours.

## **Summary**

63. I found Merkur Slots Cashino in Tottenham Court Road to have a smart, well-lit, and professional looking frontage. The premises were carpeted, with music playing in the background and the atmosphere was relaxed and welcoming.
64. At the time of my visits to the location, I saw no evidence of crime and disorder, anti-social behaviour, excessive noise, littering, street drinking, drug dealing, begging or groups of youths hanging around. There were, however, homeless people sleeping rough, but this wasn't anywhere near the Merkur Slots Cashino premises.

65. People entering these premises were vetted before entering or immediately upon entry to ensure drunken or other vulnerable people didn't gain access to the premises.
66. It is clear the presence of Merkur Slots in Tottenham Court Road does not lead to or result in people, who have been on a night out, staying in the area any longer than they had planned to.
67. Merkur Slots UK takes safer gambling seriously. This can be evidenced with the use of safeguarding programs such as:
- i. Merkur 360 Program - To achieve higher standards of player protection Merkur have worked with G4 Global Gambling Guidance Group, which focuses on the provision of responsible gambling and has also implemented its own 360 responsible gambling program.
  - ii. Think 25 Policy – Strict Over 18 Policy. All venues operate a Think 25 Policy whereby photographic ID is required to gain entry.
  - iii. In View Tools – Staying in control is a key part of messaging in the Merkur venues. Leafleting and posters such as BeGambleAware and GamCam, can be found in the venues main area and in private places such as toilets.
  - iv. Staff Training – Merkur Slots has developed a detailed training programme for all staff members including its own City and Guilds accredited training developed in partnership with YGAM and Betknowmore.
68. From my visits to many Merkur Slots Premises, I have found professional and attentive staff managing them. The premises are well run and there are clearly defined systems in place to ensure the premises operate in support of the gambling objectives and don't attract or take advantage of juveniles or other vulnerable persons.
69. The demographic is much older and doesn't attract young people or children. The environment is very different to a loud busy arcade, it is a low-key carpeted style lounge with no more than a handful of mature customers in at any one time.
70. Merkur Slots UK and their premises operate in support of the principles of Secured by Design, the company recommended by the Chief Officers of UK Police Forces for Crime Prevention standards.
71. In conclusion, from my visits it is my opinion Merkur Slots UK Limited are well run, and their operation significantly reduces the risk of crime and disorder and vulnerable people being taken advantage of.
72. From my observations it is clear that the Merkur Slots premises do not impact on the environment, infrastructure, or local community.



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

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



## **Appendix A**

Observation Images

17th - 18th August 2022

### **Merkur Slots Cashino**

69 Tottenham Court Road  
London  
W1T 2HA

### **Leveche Associates Ltd**

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

**Merkur Slots Cashino**  
69 Tottenham Court Road London W1T 2HA

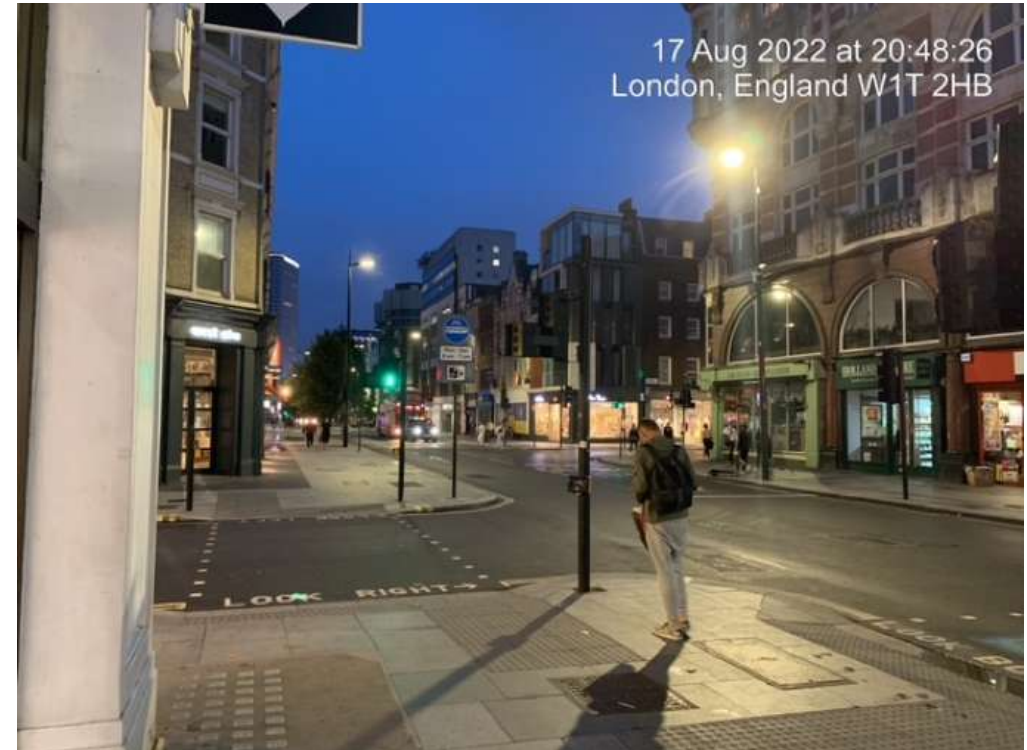
17th - 18th August 2022



**Image A1**

20:48hrs

Merkur Slots Cashino  
69 Tottenham Court Road W1T 2HA



**Image A2**

20:48hrs

Tottenham Court Road looking south

**Merkur Slots Cashino**  
69 Tottenham Court Road London W1T 2HA

17th - 18th August 2022



17 Aug 2022 at 20:48:32  
London, England W1T 2HB



17 Aug 2022 at 20:51:23  
London, England W1T 2EU

**Image A3**

20:48hrs

Tottenham Court Road looking north

**Image A4**

20:51hrs

Tottenham Court Road j/w Chenies Street looking north

**Merkur Slots Casino**  
69 Tottenham Court Road London W1T 2HA

17th - 18th August 2022



**Image A5**

20:51hrs

Tottenham Court Road looking north



**Image A6**

20:52hrs

Tottenham Court Road j/w Goodge Street looking west

**Merkur Slots Cashino**  
69 Tottenham Court Road London W1T 2HA

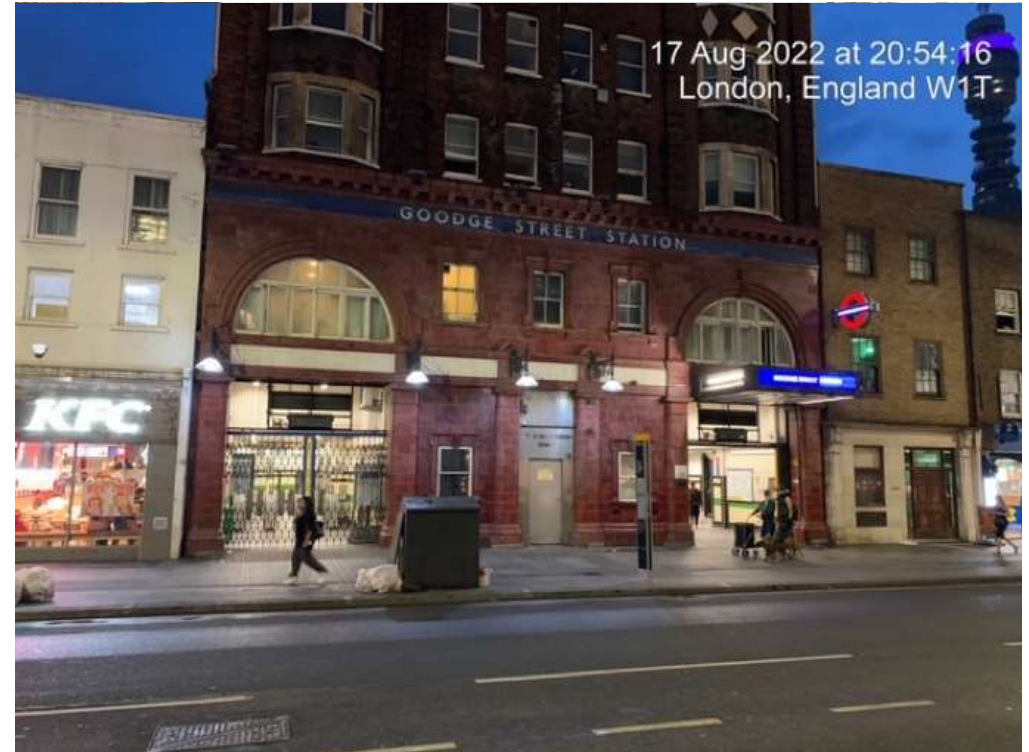
17th - 18th August 2022



**Image A7**

20:53hrs

Merkur Slots Cashino  
69 Tottenham Court Road W1T 2HA



**Image A8**

20:54hrs

Goodge Street Underground Station  
Tottenham Court Road

**Merkur Slots Cashino**  
69 Tottenham Court Road London W1T 2HA

17th - 18th August 2022



**Image A9**

20:54hrs

Whitfield Gardens Tottenham Court Road  
j/w Tottenham Street



**Image A10**

20:55hrs

Heals Furniture Store  
196 Tottenham Court Road

**Merkur Slots Casino**  
69 Tottenham Court Road London W1T 2HA

17th - 18th August 2022



17 Aug 2022 at 21:00:33  
London, England W1T 7NH



17 Aug 2022 at 21:02:35  
London, England NW1 2BU

**Image A11**

21:00hrs

Betfred 116 Tottenham Court Road W1T 5AJ

**Image A12**

21:02hrs

Warren Street Underground Station  
Tottenham Court Road



**Merkur Slots Cashino**  
69 Tottenham Court Road London W1T 2HA

17th - 18th August 2022



**Image A13**

21:23hrs

Tottenham Court Road j/w Store Street looking north



**Image A14**

21:23hrs

Rising Sun Public House  
46 Tottenham Court Road W1T 2EL

**Merkur Slots Cashino**  
69 Tottenham Court Road London W1T 2HA

17th - 18th August 2022



**Image A15**

22:32hrs

Merkur Slots Cashino Tottenham Court Road



**Image A16**

22:33hrs

Tottenham Court Road looking south

17th - 18th August 2022



**Image A17**

22:33hrs

Tottenham Court Road looking north



**Image A18**

22:34hrs

Whitfield Gardens Tottenham Court Road  
j/w Tottenham Street

17th - 18th August 2022



**Image A19**

23:54hrs

Tottenham Court Road looking south



**Image A20**

23:54hrs

Whitfield Gardens Tottenham Court Road  
j/w Tottenham Street

**Merkur Slots Cashino**  
69 Tottenham Court Road London W1T 2HA

17th - 18th August 2022



**Image A21**

23:54hrs

Goodge Street Unground Station  
Tottenham Court Road



**Image A22**

23:55hrs

Merkur Slots Cashino Tottenham Court Road

17th - 18th August 2022



**Image A23**

23:55hrs

Tottenham Court Road looking south



**Image A24**

00:12hrs

Coral Bookmakers 75 Warren Street NW1 3AD

17th - 18th August 2022



**Image A25**

00:16hrs

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



**Image A26**

00:17hrs

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

**Merkur Slots Casino**  
69 Tottenham Court Road London W1T 2HA

17th - 18th August 2022



**Image A27**

00:18hrs

TCR Bar 183 Tottenham Court Road W1T 7PE



**Image A28**

00:22hrs

Pa Station 76 Tottenham Court Road W1T 2HG



17th - 18th August 2022



**Image A29**

03:10hrs

Tottenham Court Road looking north



**Image A30**

03:12hrs

Whitfield Gardens Tottenham Court Road  
j/w Tottenham Street

**Merkur Slots Cashino**  
69 Tottenham Court Road London W1T 2HA

17th - 18th August 2022



**Image A31**

03:12hrs

Tottenham Court Road looking south



**Image A32**

03:13hrs

Merkur Slots Cashino Tottenham Court Road

17th - 18th August 2022



Image A33

03:24hrs

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



Image A34

03:25hrs

Toilet Check Sheet Merkur Slots Cashino  
Tottenham Court Road

**Merkur Slots Cashino**  
69 Tottenham Court Road London W1T 2HA

17th - 18th August 2022



**Image A35**

03:32hrs

Merkur Slots Cashino Tottenham Court Road



**Image A36**

03:36hrs

Godge Street Underground Station  
Tottenham Court Road

17th - 18th August 2022



**Image A37**

03:37hrs

Tottenham Court Road looking north



**Image A38**

03:37hrs

Tottenham Court Road looking south

17th - 18th August 2022



**Image A39**

03:39hrs

Tottenham Court Road looking south



**Image A40**

05:51hrs

Tottenham Court Road looking north

**Merkur Slots Cashino**  
69 Tottenham Court Road London W1T 2HA

17th - 18th August 2022



**Image A41**

05:52hrs

Tottenham Court Road looking south



**Image A42**

05:54hrs

Merkur Slots Cashino Tottenham Court Road

17th - 18th August 2022



**Image A43**

05:57hrs

Goedge Street Underground Station  
Tottenham Court Road



**Image A44**

05:58hrs

Whitfield Gardens Tottenham Court Road  
j/w Tottenham Street



## **Appendix B**

Observation Images

16th September 2022

### **Mercur Slots Cashino**

69 Tottenham Court Road  
London  
W1T 2HA

### **Leveche Associates Ltd**

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



**Merkur Slots Cashino**  
69 Tottenham Court Road London W1T 2HA

16th September 2022



**Image B1**

00:06hrs

Merkur Slots Cashino  
69 Tottenham Court Road W1T 2HA



**Image B2**

00:06hrs

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

**Merkur Slots Cashino**  
69 Tottenham Court Road London W1T 2HA

16th September 2022



**Image B3**

00:17hrs

Merkur Slots Cashino  
69 Tottenham Court Road W1T 2HA



**Image B4**

00:17hrs

Tottenham Court Road looking north



## **Full Observation Report**

**Stuart Jenkins – Licensing Consultant**  
**Leveche Associates Limited**

### **Merkur Slots**

**403 – 405 Green Street Upton Park Plaistow E13 9AU**

#### **Executive Summary**

1. Observations were conducted on Merkur Slots premises at 403-405 Green Street Upton Park Plaistow E13 9AU and the surrounding area. The premises are situated in a parade of shops and located on the B167. The premises operates 24-hours a day 7-days a week.
2. One covert visit was made to the site and the surrounding area. The covert visit showed the premises to be well run with no issues. There was one other gaming premises with a similar business model to Merkur Slots in the area, Game Nation 353 Green Street E13 9AR which is open 24-hours a day 7-days a week.
3. From the observations, it is clear that Merkur Slots, operating 24-hours a day does not create anti-social behaviour or any other crime and disorder that would have a negative impact on nearby residents, the environment, local infrastructure, or wider local community.
4. Photographic images support these observations and the conclusions reached.

#### **Introduction**

5. We are instructed to conduct independent observations at Merkur Slots premises 403-405 Green Street Upton Park Plaistow E13 9AU and the surrounding area.
6. Merkur Slots UK operate the venue which has a 24-hour licence under the Gambling Act 2005.

7. The premises come under the jurisdiction of Newham Borough Council.

### **Personal – Stuart Jenkins**

8. I am a Director of Leveche Associates Limited, an independent company dealing with Licensing and Security in the Private Sector. I am a former Police Officer having retired from the Metropolitan Police after completion of over 30 years exemplary service.
9. Throughout my police career the majority of my service was spent on specialist units engaged on proactive operations :- 1993–1997 Central Territorial Support Group (TSG) - Level 1 Public Order, firearms officer and dedicated surveillance officer; 1997–1998 CO14 Clubs & Vice Unit – test purchase officer and street offences investigations; 1998-2000 Charing Cross Division on promotion – overt and covert licensing operations; 2000-2008 CO14 Clubs & Vice Unit – lead officer for the investigation of serious criminal offences within licensed premises across London, test purchase officer, Pan-London licensing tactical advisor, Licensing Policy Development and Implementation for the Metropolitan Police Service (MPS) and intelligence unit supervisor; 2008-2018 Marine Policing Unit (MPU) – licensing lead for the MPU; licensing tactical advisor Notting Hill Carnival, covert licensing operations and intelligence unit supervisor. Marine intelligence and accreditation lead for the Queens Diamond Jubilee River Pageant and intelligence lead for the London Olympics 2012.
10. I have worked as an Independent Consultant in the Licensing and Security Industry for the last 5 years.
11. I was a Home Office qualified Crime Prevention Design Advisor.
12. I am the holder of the BTEC Level 3 Certificate (Security Industry Authority) – Close Protection Operative in the Private Security Industry.
13. I am the holder of a Personal Licence under the Licensing Act 2003.

### **Observations**

14. Observations were carried out at Merkur Slots premises 403-405 Green Street Upton Park Plaistow E13 9AU and the surrounding area between 21:00 hours on Thursday 8<sup>th</sup> September 2022 and 06:10 hours on Friday 9<sup>th</sup> September 2022.
15. The area felt safe with members of the public going about their business, working, shopping, and socialising.
16. The area is well lit and illuminated from street lighting and shop front lights. I had clear and unobstructed views throughout the observations.

17. During observations I concentrated on signs of criminality, begging, anti-social behaviour, vulnerable persons, other persons at risk and the general environment.
18. Merkur Slots is in a large parade of shops on the busy B167 junction with Redclyffe Road. There are shops and commercial businesses on either side of Green Street including the Queen Street Market which is on the opposite side of the road and to the north of the premises. Many of these shops have residential properties above them – Image A1, A5.
19. Green Street generally runs north to south. Immediately outside the venue is a wide footpath and beyond that the road. Two-way vehicular and pedestrian traffic can pass the venue in either direction. During the observations vehicular and pedestrian traffic was varied – Image A2, A3.
20. North of and next to the premises is W & W Handmade Shoes 401 Green Street E13 9AU. To the south of and next to the premises is the junction with Redclyffe Road and then Blossom & Brownes Sycamore 407 Green Street E13 9AU. Other shops line Green Street on both sides of the road.
21. The area of observations was from Plashet Grove in the north and Tudor Road in the south. This area is densely populated with many retail premises, that include supermarkets, mini supermarkets, small food shops, a pub, cafes, hairdressers, estate agents, slots casinos, bookmakers, restaurants and fast-food which service the transient and residential population alike.
22. The area has a diverse community living together in a mixture of privately owned and rental accommodation.
23. Green Street is well served by public transport with a variety of bus routes, underground trains and taxis. There was ample car parking available in a nearby pay and display car park and restricted parking in the side roads. These transport mediums allow the public to arrive and leave the area safely and quickly.
24. Bus Stops are located a short distance away at near the junction with Redclyffe Road and opposite Merkur Slots with the Upton Park Underground Station 100 metres to the north – Image A6.
25. There are four other gambling premises in the Upton Park area, all of which close by 22:00 hours except Game Nation Casino:
  - i. Ladbrokes Bookmakers 365 Green Street E13 9AR – Image A8
  - ii. Paddy Power Bookmakers 351 Green Street E13 9AR – Image A7
  - iii. Paddy Power Bookmakers 297 Green Street E13 9AR – Image A9
  - iv. Game Nation 353 Green Street E13 9AR - Image A7
26. These premises can be divided into two main types:
  - i. Betting premises not licensed to serve alcohol

- ii. Gaming premises – Adult Gaming Centres (AGC) and Bingo Premises not licensed to serve alcohol
27. Game Nation has a similar business model to Merkur Slots UK which operates 24-hours 7-days a week – Image A7.
28. There is one public house in the vicinity of the gaming premises called The Queens Public House 410 Green Street E13 9JJ which is advertised as operating Monday to Thursday 11:00 hours to 23:00 hours, Friday to Saturday 11:00 hours to 01:00 hours and Sunday 12:00 hours to 23:30 hours. At the time of my visit, it appeared to be well run and there were no issues.
29. Throughout my observations in and around Green Street I saw no begging taking place in the street, no street drinkers, vagrants, or drug dealing around the premises or the area.
30. Photographic images of what was seen during the observations were taken to support my findings and are documented in Appendix A.

## **Covert Observations**

### **Deployment**

31. I conducted covert observations from between 21:00 hours on Thursday 8<sup>th</sup> September 2022 and 06:10 hours on Friday 9<sup>th</sup> September 2022.
32. At 21:00 hours I arrived in the area of the Merkur Slots premises 403 - 405 Green Street and started observations by monitoring the venue and the immediate area around it.
33. There was a good volume of pedestrian traffic in and around the Merkur Slots premises, most of the shops had closed when I arrived. The bookmakers were still open but soon closed without any issues. After 22:00 hours the only premises open close to Merkur Slots were fast-food takeaway restaurants like Papa's Chicken / Pizza 337 Green Street E13 9AU which was advertised as being open from 09:00 hours to 05:30 hours on a Thursday. They were well run and had no issues.
34. Between 22:00 hours and 23:00 hours a continuous flow of pedestrians walked past the venue transiting the area or visiting the 24-hour mini supermarkets. Delivery riders were parked on the road and footpaths waiting to service fast food deliveries – Images A10 and A11.
35. Between 23:30 hours and 02:20 hours pedestrian and traffic numbers reduced – Images A15, A16, A17, A18, A19, A20, A21, A22, A23, A24, A25, A26, A27, A28, A29, A30, A31, A32, A33.
36. Between 02:31 hours and 03:00 hours I conducted a covert visit to the Merkur Slots 403-405 Green Street E13 9AU – Image A34.

37. At 02:31 hours I went to the entrance door which was closed. I saw that entry could be controlled by using a bell security entry system. On the glass of the door I saw signage stating no under 18's, CCTV in operation, no alcohol and that a time delay lock was in operation.
38. I pushed the door and entered the premises. Immediately in front of me I saw a board with the premises policies, rules and licences on display. I passed the policies board and entered the main area. I saw it was on one level which was carpeted and there were gaming machines of various types throughout the premises.
39. Further into the premises on the right-hand wall was a reception area where refreshments were prepared. At the reception desk were two male members of staff who were both wearing smart corporate clothing.
40. One of the male members of staff approached me and welcomed me to the premises. He asked if I had been to this Merkur Slots premises before and I said I had.
41. The male staff member then asked me if I needed any help with the gaming machines or choosing one to play. I stated I was fine and chose a machine.
42. Once at the machines the same staff member approached me and asked if I would like a soft drink, water, coffee, tea or a snack. I asked if I could get an alcoholic drink and he explained the premises weren't licensed for alcohol but the non-alcoholic drinks they provided were free for customers. I accepted his offer of a coffee.
43. After a couple of minutes, the male staff member brought over my coffee and stated if I needed any help to ask him or his colleague.
44. The staff member then left me to enjoy playing the machines. I was not pressurised or encouraged to spend money.
45. There were four other customers in the venue at the time of my visit. All four were male and aged between 28 and 50 years. During my visit one other customer came into the venue.
46. The hot and soft drinks were prepared at a reception desk area which was clean and tidy.
47. Whilst I was in the venue, I saw the staff cleaning, wiping down surfaces and completing a low-profile patrol checking on customers' needs and making sure they weren't underage or vulnerable. I felt safe, the staff were friendly, polite, informative and I found the premises clean and tidy.
48. Before leaving I used the toilets which were clean and tidy. The toilets were regularly checked as shown by the toilet check sheet and there were Gamcare leaflets available for customers to take away – Image A35, A36.



49. At no time during my observations did I see anyone hanging around the premises. Customers arriving went straight into the premises and customers leaving left the area straight away. I left the premises at 03:00 hours – Image A37.
50. Between 03:00 hours and 05:00 hours pedestrian traffic was varied with customers visiting the Takeaway Restaurant until it closed without incident. Traffic using Green Street was constant, but the numbers of vehicles did vary.
51. The remaining premises open operated 24-hours a day and customers frequented them throughout the night in small numbers without any incidents of crime and disorder or anti-social behaviour. This position remained unchanged until 05:00 hours.
52. At around 05:00 hours shop traders started to arrive to prepare and open their premises ready for the day ahead – Images A38, A39, A40.
53. I remained in the area until 06:10 hours. Prior to my departure I obtained further images that show there was no problems, issues or anti-social behaviour in the area – Image A41, A42, A43, A44.

## Summary

54. I found Merkur Slots Green Street Upton Park to have a smart, well-lit, and professional looking frontage. External CCTV cameras were mounted on the front, righthand side wall and rear of the building. There was good security lighting at the front and rear of the premises with bright street lightening illuminating the right-hand side of the premises.
55. The premises were carpeted, with music playing in the background and the atmosphere was relaxed and welcoming. At the time of my visits to the location, I saw no evidence of crime and disorder, anti-social behaviour, littering, street drinking, drug dealing, begging or groups of youths hanging around.
56. People entering these premises were vetted before being allowed stay to ensure drunken or other vulnerable people didn't gain access to the premises.
57. It is clear the presence of Merkur Slots in Green Street 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 and that customers do not hang around outside the premises causing problems.
58. Merkur Slots UK takes safer gambling seriously. This can be evidenced with the use of safeguarding programs such as:
  - i. Merkur 360 Program - To achieve higher standards of player protection Merkur have worked with G4 Global Gambling Guidance Group, which focuses on the provision of responsible gambling and has also implemented its own 360 responsible gambling program.

- ii. Think 25 Policy – Strict Over 18 Policy. All venues operate a Think 25 Policy whereby photographic ID is required to gain entry.
  - iii. In View Tools – Staying in control is a key part of messaging in the Merkur venues. Leafleting and posters such as BeGambleAware and GamCam, can be found in the venues main area and in private places such as toilets.
  - iv. Staff Training – Merkur Slots has developed a detailed training programme for all staff members including its own City and Guilds accredited training developed in partnership with YGAM and Betknowmore.
59. Leveche Associates Ltd have carried out covert visits on numerous Adult Gaming Centres that operate throughout the UK 24-hours a day, 7-days a week. 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 don't attract or take advantage of juveniles or other vulnerable persons. The visits also established that Merkur Slots customers do not cause crime or anti-social behaviour.
60. At Merkur Slots premises the demographic is much older and doesn't attract young people or children. The environment is very different to a loud busy arcade, it is a low-key carpeted style lounge with no more than a handful of mature customers in at any one time.
61. 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.
62. In conclusion, from my visits it is my opinion Merkur Slots UK Limited are well run, and their operation significantly reduces the risk of crime and disorder and vulnerable people being taken advantage of. It is clear that the Merkur Slots premises do not impact on the environment, infrastructure, or local community.
63. I believe the facts in my report are honest and true. The opinions I have expressed are made in good faith and in my best judgement. The fee for this report is not conditional on the outcome of any future case, application or finding.

**Stuart Jenkins**  
**Licensing Consultant**  
**Leveche Associates Limited**  
**16/09/2022**



## **Appendix A**

Observation Images

8th-9th September 2022

### **Mercur Slots**

403 - 405 Green Street

Upton Park

Plaistow

E13 9AU

### **Leveche Associates Ltd**

Nightingale House

46-48 East Street

Epsom

Surrey KT17 1HQ

**Merkur Slots**  
403 - 405 Green Street Upton Park Plaistow E13 9AU  
8th - 9th September 2022



**Image A1**

21:03hrs

Merkur Slots  
403-405 Green Street Upton Park E13 9AU



**Image A2**

21:03hrs

Green Street Upton Park looking south

**Merkur Slots**  
403 - 405 Green Street Upton Park Plaistow E13 9AU  
8th - 9th September 2022



**Image A3**

21:04hrs

Green Street Upton Park looking north

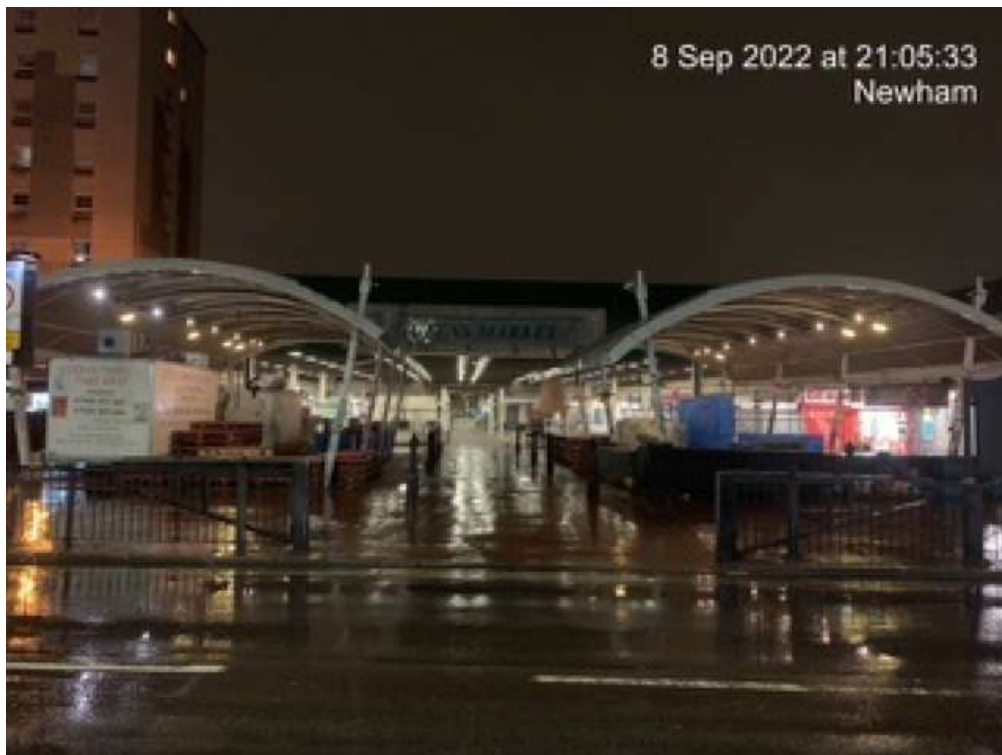


**Image A4**

21:04hrs

The Queens Public House  
410 Green Street E13 9JJ

**Mercur Slots**  
403 - 405 Green Street Upton Park Plaistow, E13 9AU  
8th - 9th September 2022



**Image A5**

21:05hrs

Queens Market Green Street E13 9BA



**Image A6**

21:06hrs

Upton Park Underground Station  
Green Street E13 9AP

**Mercur Slots**  
403 - 405 Green Street Upton Park Plaistow E13 9AU  
8th - 9th September 2022



**Image A7**  
21:08hrs  
Paddy Power Bookmakers



**Image A8**  
21:09hrs  
Ladbrokes 305 Green Street

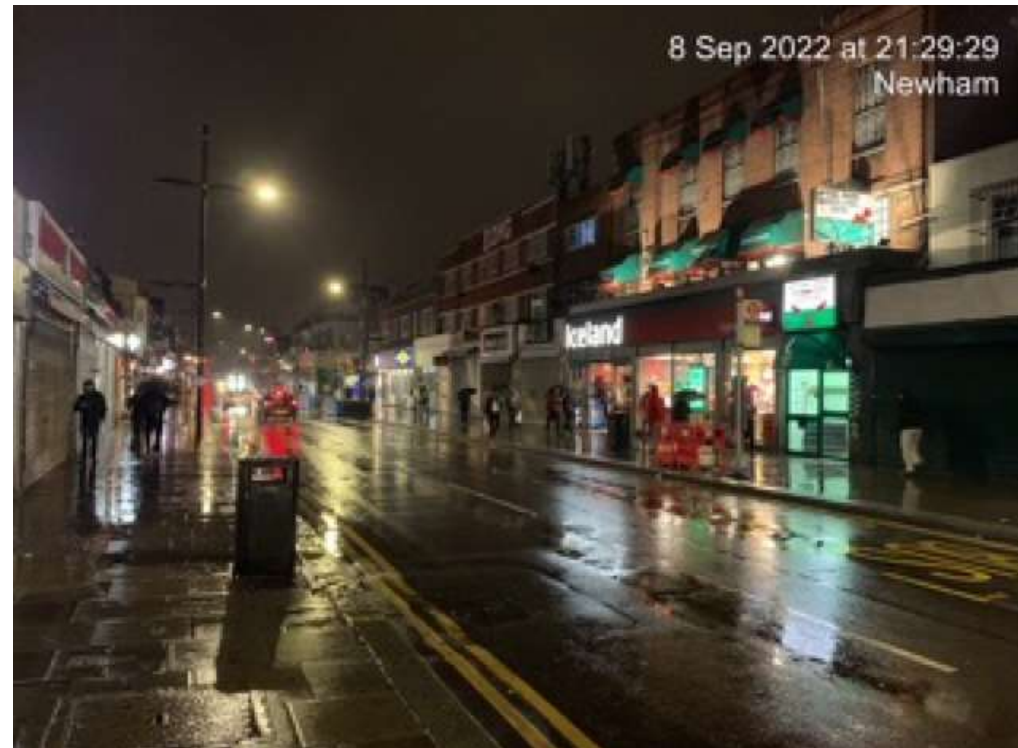
**Merkur Slots**  
403 - 405 Green Street Upton Park Plaistow E13 9AU  
8th - 9th September 2022



**Image A9**

21:10hrs

Paddy Power Bookmakers  
297 Green Street j/w Plashet Grove



**Image A10**

21:29hrs

Green Street Upton Park looking south



**Merkur Slots**  
403 - 405 Green Street Upton Park Plaistow E13 9AU  
8th - 9th September 2022



**Image A11**

21:35hrs

Side / rear view Merkur Slots Redclyffe Road



**Image A12**

23:26hrs

Green Street Upton Park looking south

**Merkur Slots**  
403 - 405 Green Street Upton Park Plaistow E13 9AU  
8th - 9th September 2022



**Image A13**

23:27hrs

Merkur Slots Green Street Upton Park



**Image A14**

23:28hrs

Front Aspect Merkur Slots  
Green Street Upton Park

**Mercur Slots**  
403 - 405 Green Street Upton Park Plaistow E13 9AU  
8th - 9th September 2022



**Image A15**

23:30hrs

Green Street Upton Park looking south



**Image A16**

23:30hrs

Green Street Upton Park looking north

**Merkur Slots**

403 - 405 Green Street Upton Park Plaistow E13 9AU

8th - 9th September 2022



**Image A17**

23:31hrs

Ladbrokes 365 Green Street Upton Park



**Image A18**

23:32hrs

Green Street Upton Park looking north

**Merkur Slots**  
403 - 405 Green Street Upton Park Plaistow E13 9AU  
8th - 9th September 2022



**Image A19**

23:36hrs

Merkur Slots Green Street Upton Park



**Image A20**

23:37hrs

Side Aspect Merkur Slots Green Street Upton Park

**Merkur Slots**  
403 - 405 Green Street Upton Park Plaistow E13 9AU  
8th - 9th September 2022



**Image A21**

23:58hrs

Rear Aspect Merkur Slots Upton Park



**Image A22**

02:03hrs

Green Street Upton Park looking north

**Merkur Slots**  
403 - 405 Green Street Upton Park Plaistow E13 9AU  
8th - 9th September 2022



**Image A23**

02:05hrs

Green Street Upton Park looking south



**Image A24**

02:06hrs

Merkur Slots Green Street Upton Park

**Merkur Slots**

403 - 405 Green Street Upton Park Plaistow E13 9AU

8th - 9th September 2022



**Image A25**

02:07hrs

Green Street Upton Park looking north



**Image A26**

02:08hrs

Queens Market Green Street Upton Park



**Merkur Slots**  
403 - 405 Green Street Upton Park Plaistow E13 9AU  
8th - 9th September 2022



**Image A27**

02:08hrs

Papa's 337 Green Street E13 9AU



**Image A28**

02:09hrs

Upton Park Underground Station  
Green Street looking north

# Merkur Slots

403 - 405 Green Street Upton Park Plaistow E13 9AU

8th - 9th September 2022



**Image A29**

02:11hrs

Game Nation 353 Green Street E13 9AR



**Image A30**

02:13hrs

H&T Pawnbrokers 342 Green Street E13 9AP

**Merkur Slots**  
403 - 405 Green Street Upton Park Plaistow E13 9AU  
8th - 9th September 2022



**Image A31**

02:17hrs

Green Street Upton Park looking south



**Image A32**

02:17hrs

Green Street looking south towards  
Upton Park Underground Station

**Merkur Slots**  
403 - 405 Green Street Upton Park Plaistow E13 9AU  
8th - 9th September 2022



**Image A33**

02:18hrs

Upton Park Underground Station Green Street



**Image A34**

02:30hrs

Merkur Slots Green Street Upton Park

**Merkur Slots**  
403 - 405 Green Street Upton Park Plaistow E13 9AU  
8th - 9th September 2022



**Image A35**

02:58hrs

Toilet Check Sheet Merkur Slots Green Street



**Image A36**

02:58hrs

Staying in Control Gam Care Literature  
Merkur Slots Green Street

**Merkur Slots**  
403 - 405 Green Street Upton Park Plaistow E13 9AU  
8th - 9th September 2022



**Image A37**

03:01hrs

Rear and Side Aspect of Merkur Slots Upton Park



**Image A38**

04:47hrs

Green Street Upton Park looking south

**Merkur Slots**  
403 - 405 Green Street Upton Park Plaistow E13 9AU  
8th - 9th September 2022



**Image A39**

04:53hrs

Merkur Slots Green Street Upton Park



**Image A40**

04:54hrs

Shopping Area and Shops opposite  
Merkur Slots Green Street

**Merkur Slots**  
403 - 405 Green Street Upton Park Plaistow E13 9AU  
8th - 9th September 2022



**Image A41**

06:00hrs

Rear / side aspect Merkur Slots Upton Park



**Image A42**

06:01hrs

Green Street Upton Park looking north



**Merkur Slots**  
403 - 405 Green Street Upton Park Plaistow E13 9AU  
8th - 9th September 2022



**Image A43**

06:01hrs

Merkur Slots Green Street Upton Park



**Image A44**

06:01hrs

Green Street Upton Park looking south



## **Full Observation Report**

**Stuart Jenkins – Licensing Consultant  
Leveche Associates Limited**

### **Merkur Slots**

**91 High Road Wood Green N22 6BB**

#### **Executive Summary**

1. Observations were conducted on Merkur Slots premises at 91 High Road Wood Green London N22 6BB and the surrounding area. The premises are situated in a parade of shops and located on the A105. The premises operates 24-hours a day 7-days a week.
2. One covert visit was made to the site and the surrounding area. The covert visit showed the premises to be well run with no issues. There were four other gaming premises with a similar business model to Merkur Slots in the area namely: Game Nation, Little Vegas and the two Admiral Casinos.
3. From the observations, it is clear that Merkur Slots, operating 24-hours a day does not create anti-social behaviour or any other crime and disorder that would have a negative impact on nearby residents, the environment, local infrastructure, or wider local community.
4. Photographic images support these observations and the conclusions reached.

#### **Introduction**

5. We are instructed to conduct independent observations at Merkur Slots premises 91 High Road Wood Green London N22 6BB and the surrounding area.

6. Merkur Slots UK operate the venue which has a 24-hour licence under the Gambling Act 2005.
7. The premises come under the jurisdiction of Haringey Borough Council.

### **Personal – Stuart Jenkins**

8. I am a Director of Leveche Associates Limited, an independent company dealing with Licensing and Security in the Private Sector. I am a former Police Officer having retired from the Metropolitan Police after completion of over 30 years exemplary service.
9. Throughout my police career the majority of my service was spent on specialist units engaged on proactive operations :- 1993–1997 Central Territorial Support Group (TSG) - Level 1 Public Order, firearms officer and dedicated surveillance officer; 1997–1998 CO14 Clubs & Vice Unit – test purchase officer and street offences investigations; 1998-2000 Charing Cross Division on promotion – overt and covert licensing operations; 2000-2008 CO14 Clubs & Vice Unit – lead officer for the investigation of serious criminal offences within licensed premises across London, test purchase officer, Pan-London licensing tactical advisor, Licensing Policy Development and Implementation for the Metropolitan Police Service (MPS) and intelligence unit supervisor; 2008-2018 Marine Policing Unit (MPU) – licensing lead for the MPU; licensing tactical advisor Notting Hill Carnival, covert licensing operations and intelligence unit supervisor. Marine intelligence and accreditation lead for the Queens Diamond Jubilee River Pageant and intelligence lead for the London Olympics 2012.
10. I have worked as an Independent Consultant in the Licensing and Security Industry for the last 5 years.
11. I was a Home Office qualified Crime Prevention Design Advisor.
12. I am the holder of the BTEC Level 3 Certificate (Security Industry Authority) – Close Protection Operative in the Private Security Industry.
13. I am the holder of a Personal Licence under the Licensing Act 2003.

### **Observations**

14. Observations were carried out at Merkur Slots premises 91 High Road Wood Green N22 6BB and the surrounding area between 21:00 hours on Friday 26<sup>th</sup> August 2022 and 06:00 hours on Saturday 27<sup>th</sup> August 2022.
15. The area felt safe with members of the public going about their business, working, shopping, and socialising.

16. The area is well lit and illuminated from street lighting and shop front lights. I had clear and unobstructed views throughout the observations.
17. During observations I concentrated on signs of criminality, begging, anti-social behaviour, vulnerable persons, other persons at risk and the general environment.
18. Merkur Slots is in a large parade of shops on the busy A105. There are shops and commercial businesses on either side of High Road. Many of these shops have residential properties above them – Image A1, A5.
19. High Road generally runs north to south. Immediately outside the venue is a wide footpath and beyond that the road. Two-way vehicular and pedestrian traffic can pass the venue in either direction. During the observations vehicular and pedestrian traffic was varied – Image A2, A3.
20. North of and next to the premises is Hide & Seek 93 High Road Wood Green then Herb China 95 High Road Wood Green and McDonalds Restaurant 97-101 High Road Wood Green. To the south of and next to the premises is Ozan Jewellery Shop 89 High Road Wood Green. Other shops line High Road on both sides of the road.
21. The area of observations was from Gladstone Avenue in the north and Turnpike Lane in the south. This area is densely populated with many retail premises, that include mini supermarkets, small food shops, a pub, cafes, hairdressers, estate agents, slots casinos, bookmakers, restaurants and fast-food shops which service the transient and residential population alike.
22. The area has a diverse community living together in a mixture of privately owned and rental accommodation.
23. High Road is well served by public transport with a variety of bus routes, taxis, underground and mainline trains. There was ample car parking available in a nearby pay and display car park and restricted parking in the side roads. These transport mediums allow the public to arrive and leave the area safely and quickly.
24. Bus Stops are located opposite Merkur Slots with the Turnpike Underground Station 5 minutes walk (0.3 miles) and Hornsey Mainline Station 13 minutes walk (0.7 miles) – Image A6.
25. There are nine other gambling premises in the Upton Park area, all of which close by 22:00 hours except Game Nation Casino, Little Vegas and the two Admiral Casinos:
  - i. Admiral Casino Slots 9 High Road Wood Green N22 6BH – Image A13.
  - ii. Admiral Casino Slots 117 High Road Wood Green N22 6BB – Image A16.
  - iii. Betfred 64 High Road Wood Green N22 6HK – Image A7.
  - iv. Paddy Power 33 High Road Wood Green N22 6BH – Image A15.

- v. Game Nation 49 High Road Wood Green N22 6BH - Image A8.
- vi. Ladbrokes 13 High Road Wood Green N22 6BH – Image A12.
- vii. Ladbrokes 12 The Broadway High Road N22 6DS – Image A19.
- viii. Little Vegas 17 High Road Wood Green N22 6BH – Image A11.
- ix. William Hill The Broadway High Road Wood Green N22 6DS – Image A18.

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

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

27. Game Nation, Little Vegas and the two Admiral Casinos have similar business models to Merkur Slots UK which operates 24-hours 7-days a week – Images A8, A11, A13, A16.

28. There were no public houses in the vicinity of the gaming premises but there were late night restaurants and diners. At the time of my visit, it appeared to be well run and there were no issues.

29. Throughout my observations in and around High Road I saw no begging taking place in the street, no street drinkers, vagrants, or drug dealing around the premises or the area.

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

## **Covert Observations**

### **Deployment**

31. I conducted covert observations from between 21:00 hours on Friday 26<sup>th</sup> August 2022 and 06:00 hours on Saturday 27<sup>th</sup> August 2022.

32. At 21:00 hours I arrived in the area of the Merkur Slots premises 91 High Road Wood Green and started observations by monitoring the venue and the immediate area around it.

33. There was a good volume of pedestrian traffic in and around the parade of shops and the whole road. At this time most of the shops had closed. The bookmakers were still open but soon closed without any issues. After 22:00 hours the only premises open close to Merkur Slots were fast-food take away and restaurants. They were well run and had no issues.

34. Between 22:00 hours and 01:00 hours a continuous flow of pedestrians walked past the venue transiting the area or visiting the 24-hour mini supermarkets. Delivery riders were parked on the road and footpaths waiting to service fast food deliveries – Images A16, A17, A18, A19, A20, A21, A22, A23, A24, A25, A26, A27.

35. Between 01:00 hours and 04:03 hours pedestrian and vehicular numbers reduced – Images A28, A29.
36. Between 04:06 hours and 04:35 hours I conducted a covert visit to the Merkur Slots 91 High Road Wood Green – Image A30.
37. At 04:06 hours I went to the entrance door which was closed. I saw that entry could be controlled by using a bell security entry system. On the glass of the door I saw signage stating no under 18's, CCTV in operation, no alcohol and that a time delay lock was in operation.
38. I pushed the door and entered the premises. Immediately in front of me I saw a screen board. As I walked past it I saw on the back of it were the premises policies, rules and licences on display. I passed the policies board and entered the main area. I saw it was on one level and carpeted.
39. As I moved into the premises I saw that there a series of gaming machines of various types throughout. On the left-hand side and further into the premises was the staff reception desk area. This area was also used for the preparation of refreshments with a facility to make hot drinks.
40. As I approached the reception area I was greeted by a male member of staff who was dressed in smart corporate clothing. He asked if I needed any assistance with choosing a machine to play, I stated I was fine.
41. I walked through the premises and saw there were six other customers in the venue. All were male aged between 27 years and 45 years.
42. I found a machine and started to play it. Whilst seated I noticed there was a second male member of staff in the venue who was smartly dressed in corporate clothing.
43. After a short period of time the first staff member approached me and asked if I would like a soft drink, water, coffee, tea or a snack. I asked if I could get an alcoholic drink and he stated they didn't sell alcohol but the non-alcoholic drinks they provided were free for customers. I accepted his offer of a coffee which was brought to me a few minutes later.
44. The staff member then left me to enjoy playing the machines. I was not pressurised or encouraged to spend money.
- e 45. During my visit on other customer came into the venue. The hot and soft drinks were prepared at a reception desk area which was clean and tidy.
46. Whilst I was in the venue, I saw the staff cleaning, wiping down surfaces and completing a low-profile patrol checking on customers' needs and making sure they weren't underage or vulnerable. I felt safe, the staff were friendly, polite, informative and I found the premises clean and tidy.

47. Before leaving I used the toilets which were clean and tidy. The toilets were regularly checked as shown by the toilet check sheet and there were Gamcare leaflets available for customers to take away – Image A31, A32.
48. At no time during my observations did I see anyone hanging around the premises. Customers arriving went straight in and customers leaving left the area straight away. I left the premises at 04:35 hours – Image A33.
49. Between 04:40 hours and 05:00 hours pedestrian traffic was varied with customers visiting the takeaway restaurants that were open 24-hours a day. Traffic using High Road was constant, but the numbers of vehicles did vary. At this time market stall workers started to set up for the day ahead – Image A34.
50. Customers visited the 24-hour premises throughout the night in small numbers without any incidents of crime and disorder or anti-social behaviour. This position remained unchanged until 06:00 hours.
51. I remained in the area until 06:10 hours. Prior to my departure I obtained further images that show there was no problems, issues or anti-social behaviour in the area – Image A35, A36, A37, A38.

## Summary

52. I found Merkur Slots 91 High Road Wood Green to have a smart, well-lit, and professional looking frontage. The premises were carpeted, with music playing in the background and the atmosphere was relaxed and welcoming. At the time of my visit to the location, I saw no evidence of crime and disorder, anti-social behaviour, littering, street drinking, drug dealing, begging or groups of youths hanging around.
53. People entering these premises were vetted before being allowed stay to ensure drunken or other vulnerable people didn't gain access to the premises.
54. It is clear the presence of Merkur Slots in High Road Wood Green 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 and that customers do not hang around outside the premises causing problems.
55. Merkur Slots UK takes safer gambling seriously. This can be evidenced with the use of safeguarding programs such as:
  - i. Merkur 360 Program - To achieve higher standards of player protection Merkur have worked with G4 Global Gambling Guidance Group, which focuses on the provision of responsible gambling and has also implemented its own 360 responsible gambling program.
  - ii. Think 25 Policy – Strict Over 18 Policy. All venues operate a Think 25 Policy whereby photographic ID is required to gain entry.

- iii. In View Tools – Staying in control is a key part of messaging in the Merkur venues. Leafleting and posters such as BeGambleAware and GamCam, can be found in the venues main area and in private places such as toilets.
  - iv. Staff Training – Merkur Slots has developed a detailed training programme for all staff members including its own City and Guilds accredited training developed in partnership with YGAM and Betknowmore.
56. Leveche Associates Ltd have carried out covert visits on numerous Adult Gaming Centres that operate throughout the UK 24-hrs a day, 7-days a week. 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 don't attract or take advantage of juveniles or other vulnerable persons. The visits also established that Merkur Slots customers do not cause crime or anti-social behaviour.
57. At Merkur Slots premises the demographic is much older and doesn't attract young people or children. The environment is very different to a loud busy arcade, it is a low-key carpeted style lounge with no more than a handful of mature customers in at any one time.
58. 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.
59. In conclusion, from my visits it is my opinion Merkur Slots UK Limited are well run and their operation significantly reduces the risk of crime and disorder and vulnerable people being taken advantage of. It is clear that the Merkur Slots premises do not impact on the environment, infrastructure, or local community.
60. I believe the facts in my report are honest and true. The opinions I have expressed are made in good faith and in my best judgement. The fee for this report is not conditional on the outcome of any future case, application or finding.

**Stuart Jenkins**  
**Licensing Consultant**  
**Leveche Associates Limited**  
**26/09/2022**





## **Appendix A**

Observation Images

26th - 27th August 2022

### **Merkur Slots**

91 High Road  
Wood Green  
London  
N22 6BB

### **Leveche Associates Ltd**

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

# Merkur Slots

91 High Road Wood Green London N22 6BB  
26th - 27th August 2022



**Image A1**

21:06hrs

Merkur Slots  
91 High Road Wood Green London N22 6BB



**Image A2**

21:07hrs

Merkur Slots  
91 High Road Wood Green London N22 6BB

# Mercur Slots

91 High Road Wood Green London N22 6BB  
26th - 27th August 2022



26 Aug 2022 at 21:14:26  
Haringey



26 Aug 2022 at 21:14:43  
Haringey

**Image A3**

21:14hrs

High Road Wood Green looking north

**Image A4**

21:14hrs

High Road Wood Green looking south

# Merkur Slots

91 High Road Wood Green London N22 6BB  
26th - 27th August 2022



**Image A5**

21:15hrs

High Road Wood Green looking north



**Image A6**

21:15hrs

High Road opposite Merkur Slots looking north

# Mercur Slots

91 High Road Wood Green London N22 6BB  
26th - 27th August 2022



**Image A7**

21:17hrs

Betfred 64 High Road Wood Green N22 6HL



**Image A8**

21:20hrs

Game Nation 49 High Road Wood Green N22 6BH

## Mercur Slots

91 High Road Wood Green London N22 6BB  
26th - 27th August 2022



**Image A9**

21:21hrs

High Road Wood Green looking south



**Image A10**

21:21hrs

High Road Wood Green looking south

# Mercur Slots

91 High Road Wood Green London N22 6BB  
26th - 27th August 2022



**Image A11**

21:22hrs

Little Vegas 17 High Road Wood Green N22 6BH



**Image A12**

21:23hrs

Ladbrokes 13 High Road Wood Green N22 6BH

## Mercur Slots

91 High Road Wood Green London N22 6BB  
26th - 27th August 2022



**Image A13**

21:23hrs

Admiral Casino Slots  
9 High Road Wood Green N22 6BH



**Image A14**

21:24hrs

High Road Wood Green j/w Turnpike Lane



# Mercur Slots

91 High Road Wood Green London N22 6BB  
26th - 27th August 2022



**Image A15**

21:26hrs

Paddy Power 33 High Road Wood Green N22 6BH



**Image A16**

22:29hrs

Admiral Casino Slots  
117 High Road Wood Green N22 6BB

# Mercur Slots

91 High Road Wood Green London N22 6BB  
26th - 27th August 2022



**Image A17**

22:35hrs

High Road Wood Green looking north



**Image A18**

22:38hrs

William Hill The Broadway  
High Road Wood Green N22 6DS

# Mercur Slots

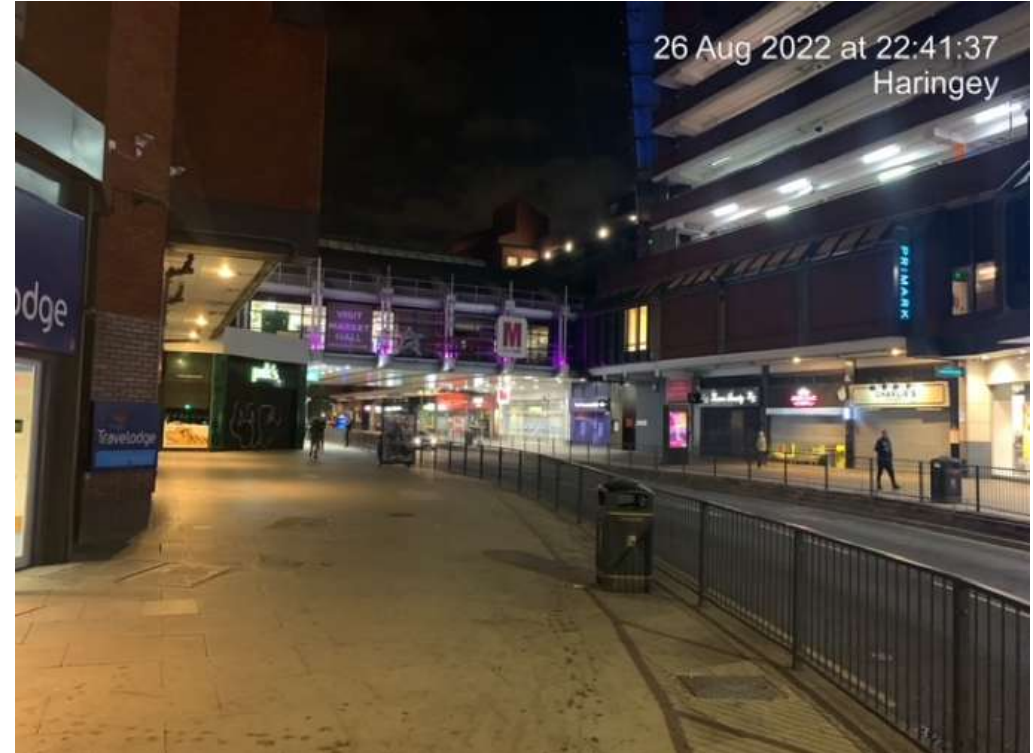
91 High Road Wood Green London N22 6BB  
26th - 27th August 2022



**Image A19**

22.38hrs

Ladbrokes12 The Broadway  
High Road Wood Green N22 6DS



**Image A20**

22:41hrs

Looking south towards The Mall  
Shopping Centre High Road

# Merkur Slots

91 High Road Wood Green London N22 6BB  
26th - 27th August 2022



**Image A21**

22:42hrs

High Road Wood Green looking north



**Image A22**

23:47hrs

McDonalds  
97 - 101 High Road Wood Green N22 6BB

## Merkur Slots

91 High Road Wood Green London N22 6BB  
26th - 27th August 2022



**Image A23**

22:48hrs

Merkur Slots 91 High Road Wood Green



**Image A24**

00:31hrs

High Road Wood Green looking north

## Merkur Slots

91 High Road Wood Green London N22 6BB  
26th - 27th August 2022



**Image A25**

00:31hrs

High Road Wood Green looking south



**Image A26**

00:32hrs

Merkur Slots 91 High Road Wood Green

## Mercur Slots

91 High Road Wood Green London N22 6BB  
26th - 27th August 2022



**Image A27**

00:33hrs

High Road Wood Green looking south



**Image A28**

04:03hrs

High Street Wood Green

# Merkur Slots

91 High Road Wood Green London N22 6BB  
26th - 27th August 2022



**Image A29**

04:03hrs

High Road Wood Green looking north



**Image A30**

04:05hrs

Merkur Slots 91 High Road Wood Green



# Merkur Slots

91 High Road Wood Green London N22 6BB  
26th - 27th August 2022



Image A31

04:31hrs

Staying In Control Poster in Toilets



Image A32

04:32hrs

Toilet Check List Merkur Slots High Road Wood Green

## Merkur Slots

91 High Road Wood Green London N22 6BB  
26th - 27th August 2022



**Image A33**

04:37hrs

Merkur Slots High Road Wood Green



**Image A34**

04:38hrs

High Road Wood Green looking north

# Mercur Slots

91 High Road Wood Green London N22 6BB  
26th - 27th August 2022



**Image A35**

05:53hrs

High Road Wood Green looking south



**Image A36**

05:53hrs

High Road Wood Green looking north

# Merkur Slots

91 High Road Wood Green London N22 6BB  
26th - 27th August 2022



**Image A37**

05:54hrs

Merkur Slots 91 High Road Wood Green



**Image A38**

05:54hrs

McDonalds High Road Wood Green