

MERKUR SLOTS, 265 NEASDEN LANE, LONDON

LICENSING SUB-COMMITTEE HEARING – 22 APRIL 2025

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Merkur Slots, Neasden – Agreed Conditions with Police and Licensing

1. *A comprehensive CCTV system shall be installed and maintained on the premises as required by the Metropolitan Police Licensing Team. CCTV should cover the following:*
 - a) *All entry and exit points to and from the premises enabling frontal identification of every person entering under any light conditions*
 - b) *The areas of the premises to which the public have access (excluding toilets)*
 - c) *Gaming machines and the counter area*
2. *The CCTV shall continue to record activities 24 hour a day for 31 days.*
3. *CCTV shall be made available for the police viewing at any time with minimum delays when requested.*
4. *The premises shall display notices near the entrance of the venue stating that CCTV is in operation.*
5. *A monitor shall be placed inside the premises above the front door showing CCTV images of customers entering exiting the premises.*
6. *A member of staff trained in the use of the CCTV system shall be available at the premise at all times that the premises are open for trading.*
7. *The CCTV system shall display on any recordings the correct date and time of the recording.*
8. *An incident log shall be kept for the premises and made available on request to an authorised officer of the Council or the Police which will record the following;*
 - a) *All crimes reported to the venue;*
 - b) *Any complaints received regarding crime and disorder;*
 - c) *Any incidents of disorder;*
 - d) *Any faults in the CCTV system; and*
 - e) *Any visit by a relevant authority or emergency service.*
 - f) *Details of any person(s) banned from the premises.*
9. *A Challenge 25 proof of age scheme shall be operated at the premises where the only acceptable forms of identification are recognised photographic identification cards, such as a driving licence, passport or proof of age card with the PASS Hologram.*

10. *The Licensee shall maintain a 'Challenge 25 Refusals' register at the premises. The register shall be produced to the police or licensing authority forthwith on request.*
11. *Prominent signage and notices advertising the Challenge 25 will be displayed showing the operation of such policy.*
12. *Third party testing on age restricted sales systems purchasing shall take at least twice a year and the results shall be provided to the Licensing Authority upon request.*
13. *A magnetic locking device, commonly referred to as a Maglock, will be installed and maintained on the main entrance/exit to the premises and will be available for use at all times.*
14. *The licensee shall install and maintain an intruder alarm on the premises.*
15. *The premises shall install and maintain a panic button behind the service counter.*
16. *The licensee's Staff Guard system shall be installed and maintained at the premises, which allows direct communication with a central monitoring station permitting audio and CCTV communication.*
17. *There shall be no pre-planned single staffing at the premises from 20:00 until closing. In the event of any instances of pre-planned single staffing, details of this will be recorded centrally and retained on a log which will be provided to the police or licensing authority on request.*
18. *The requirement for door staff shall be risk assessed and cognisance taken of police advice.*
19. *The Licensee shall implement a policy of banning any customers who engage in crime or disorder within or outside the premises.*
20. *The licensee will refuse entry to customers who appear to be under the influence of alcohol or drugs.*
21. *The licensee shall ensure that all seating within the premises are either secured to the floor or are weighted to prevent lifting.*
22. *Toilet doors remain locked and access is permitted by staff members.*

23. *The licensee will ensure that customer toilets are checked every hour for evidence of drug taking. Toilet checks are to be documents stating the time and member of staff who made the checks.*
24. *The Licensee shall take all reasonable steps to prevent street drinking of alcohol directly outside the premises and to ban from the premises those who do so.*
25. *The Licensee shall place a notice visible from the exterior of the premises stating that customers drinking alcohol outside the premises is not permitted and those who do so will be banned from the premises.*
26. *Signs to be displayed alerting customers to the following;*
- a) No alcohol*
 - b) No smoking*
 - c) No persons under 18 Years*
 - d) Persons will be prosecuted for causing criminal damage*
 - e) Prominent GamCare documentation will be displayed at the premises*
27. *The licensee shall:*
- a) provide training on the specific local risks to the licensing objectives that have been identified for these premises as part of the staff induction training programme.*
 - b) periodically provide refresher training to all of its staff working at these premises on the specific local risks to the licensing objectives.*
 - c) Participation in this training shall be formally recorded on each member of staffs training records which, if requested will be presented to the Licensing Authority as soon as practicable.*
28. *New and seasonal staff must attend induction training and receive refresher training every six months.*

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

SKELETON ARGUMENT ON BEHALF OF APPLICANT

Introduction

1. This is an application by Merkur Slots UK Limited (“the applicant”) for a bingo premises licence.
2. Merkur Slots is the largest operator of such premises in the UK, with some 290 premises, principally in town and city centres.
3. It has been granted licences in every single premises it has applied for.
4. There are representations from 3 Councilors, and 4 other local people. In response to their concerns, the applicant has:
 - a. filed a substantial bundle setting out in detail how the applicant promotes the licensing objectives, and responding to the matters raised;
 - b. proposed a list of 28 conditions to promote the licensing objectives.
5. The representations are taken seriously. In order to do justice to them and respond adequately, it has been necessary to file extensive evidential and other material to show how the applicant promotes the licensing objectives, and the high standards to which it holds itself. The purpose of this skeleton argument is to help the Sub-Committee navigate the material by setting out some of the background to the application, explaining the legal context under the Gambling Act 2005, and making brief submissions dealing with the written representations.
6. In considering the application, the Committee may be particularly assisted by looking at the following documents:
 - Witness statements:
 - Amanda Kiernan, Head of Compliance (page 19-26)
 - Steve Ambrose, Operations Director (page 27-29)

- Nigel Davis, Head of Product (page 30-31)
- Observation reports re Merkur Premises by Leveche Associates (page 107-176)
- Legal obligations to promote licensing objectives:
 - Gambling Commission's Licence Conditions and Codes of Practice applicable to non-remote bingo licenses (page ... 177-223)
 - Mandatory and default conditions attaching to bingo premises licences (page 236-237)
 - The individual conditions proposed (page 3-5)
- Operational standards (page 53-54)

Background

8. The applicant is part of the Merkur group, which is one of the most experienced providers of gaming premises on the high street across the UK, including adult gaming centres and bingo premises. Players in high street bingo premises access bingo games through the use of tablets, which are increasingly replacing paper bingo cards as provided in large, flat-floor bingo clubs.
9. As one would expect, the applicant and its sister companies have detailed systems for compliance with the law and promotion of the licensing objectives, which they *implement* through staff training and management programmes, and *supervise* through area and national management oversight and independent audit.
10. Bingo premises are subject to a high degree of regulation in order to support the licensing objectives, including the following:
 - Premises and their management and operation are subject to the Gambling Commission's extensive Licence Conditions and Codes of Practice applicable to non-remote bingo operating licences.
 - Premises licences are subject to mandatory and default conditions set by the Secretary of State with the approval of Parliament.
 - The number of machines, the way they operate and their stake and prize limits, are strictly regulated through the Gambling Act 2005 (by Parliament), regulations (by the Secretary of State) and technical standards (by the Gambling Commission). For example, at least 80% of the machines in bingo premises have the same stake and prize limits as pub fruit machines, with 20% governed by the same limits as other high street gambling establishment (AGCs and betting offices).
 - Individual premises are sometimes subject to additional premises licence conditions. In this case, the applicant has offered 28 further conditions.

The nature of high street bingo premises

11. Gambling on the high street in Great Britain is dominated by betting offices, both numerically and in terms of environmental impact. As to numbers, betting offices outnumber bingo premises 9:1 (5.995 v 650¹). As to impact, betting offices can bring with them certain social issues. Hence, when an application is made for a bingo premises licence, it is sometimes feared that it will bring with it the same kind of issues as can arise at high street betting offices.
12. In fact, in terms of local impact, high street bingo premises in general and the applicant's in particular are materially different from betting offices:

On arrival

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

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

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

¹ Gambling Commission industry statistics.

Exterior appearance

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

Upon entry

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

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

Interior Appearance

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

Participation

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

Protection of vulnerable people from being harmed or exploited by gambling

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

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

Protection of children from being harmed or exploited by gambling

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

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

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

Security

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

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

The Law

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

In exercising their functions under this Part, a licensing authority shall aim to permit the use of premises for gambling in so far as the authority thinks it:

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

17. The gambling licensing objectives are:

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

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

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

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

20. The following points should be noted:

- a) The section 153 test is mandatory: "*a licensing authority shall*"
- b) The obligation to "*aim to permit*" where (a) – (d) are satisfied is described by the Gambling Commission as "*the licensing authority's primary obligation.*"

- c) The leading textbook ‘Paterson’s Licensing Acts’ explains that the expression “aim to permit *the use* of premises for gambling” -

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

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

As the Gambling Commission’s Guidance says:

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

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

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

- e. Conditions should only be added where it is necessary to do so, and even then, such conditions need to be proportionate to the circumstances requiring a response, relevant, directly related, fair and reasonable. (Conditions include any conditions limiting hours to less than the default hours set by Parliament.)
- f. The following considerations are legally irrelevant to the determination of an application for a premises licence (see Gambling Commission Guidance):
- i. Nuisance.
 - ii. A dislike of gambling.
 - iii. A general notion that it is undesirable to allow gambling premises in an area.
 - iv. Moral or ethical objections to gambling.

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

21. It is therefore necessary to consider:

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

The Representations

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

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

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

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

The Evidence

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

Prevention of crime and disorder:

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

Protection of children and vulnerable persons:

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

Sufficiency of staffing:

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

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

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

- There was no evidence that the Merkur Slots premises negatively impacted the local environment, infrastructure, or community.
 - No excessive noise, anti-social behaviour, or other public nuisance issues were observed in the vicinity of the premises.
 - Venues had a relaxed, low-key atmosphere with only small numbers of customers at any time.
 - Customers arrived and left in an orderly manner without congregating or causing disturbances outside.
 - A 24-hour operation did not lead to noise complaints or anti-social behaviour in the surrounding area.
26. In summary, the observations provide consistent evidence that Merkur Slots operates responsibly in accordance with the gambling objectives and does not adversely affect the surrounding area in terms of crime, underage gambling, public nuisance, or anti-social behaviour.
27. The essential findings in respect of each of the eight locations are the same from premises to premises. For reference, two representative reports (with photographs) are at pages 107 – 176.

The applicant's submissions on the principal areas of concern

Problem gambling

28. A recurring concern is that some people who engage in gambling experience gambling-related harms. That is undoubtedly correct, which is why the licensing objectives include the protection of vulnerable people from being harmed or exploited by gambling; why the system of regulation imposes extensive obligations on operators to mitigate against such harm; and why, in the case of the applicant, it prioritises player protection, as extensively explained in the evidence served.
29. The question is not whether there is a potential for gambling-related harm locally but whether it has been demonstrated *by evidence* that a grant would harm or exploit vulnerable people in a way which cannot be protected by licence conditions.

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

Children and gambling

31. The applicant's experience is that under 18-year-olds do not tend even to *try* to enter its premises. They are not seaside arcades, and youngsters in Merkur licensed premises would 'stick out like a sore thumb'. If they were to enter, they would quickly be identified and challenged.
32. Merkur's venues are subject to 3 external age tests per year with a compliance rate of over 94% for the last 3 years, compared with other leisure and gambling sectors that sit around 80%. However, no failure is acceptable. If there is a failure on test purchasing, action is taken immediately, including staff retraining, as necessary. The applicant operates 290 premises: it has never been suggested that underage gambling is a concern in any of them. This is despite many of its premises being near or next to premises attractive to children such as fast food outlets, or close to schools and bus stops.

Crime and disorder

33. As stated above, the applicant's premises do not suffer significant crime and disorder. This is a function of the premises' management, customer demographics, levels of customer usage and security measures. Furthermore, the applicant has extensive experience of operating in town and city centres with high levels of crime and anti-social behaviour. It also carries out security risk assessments before opening and periodically thereafter to ensure that its security measures (including staffing levels) are sufficient and responsive to local issues.
34. In order further to mitigate the risk of crime and disorder, the applicant has offered additional conditions, including:
- a) the installation and maintenance of CCTV (conditions 1- 6);
 - b) staff training (conditions 27 and 28), including in issues related to the local area;
 - c) no pre-planned single staffing after 8 p.m. until closing (condition 17);
 - d) reasonable steps must be taken to prevent crime or disorder, nuisance and/or drinking outside the premises, supplemented by banning notices (conditions 24 and 25);
 - e) a 'maglock' to be installed and maintained, which must be available for use at all times (condition 13);
 - f) 'Staff Guard' to be installed/maintained, allowing direct contact with a central monitoring station by audio and CCTV communication (condition 16);
 - g) third party age restricted testing (condition 12);

Conclusion

35. In conclusion:

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

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

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

Gerald Gouriet KC

**Francis Taylor Building
Inner Temple**

7 April 2025

LICENSING SUB - COMMITTEE HEARING – 24 MARCH 2025
WITNESS STATEMENT – AMANDA KIERNAN

1. I am Head of Compliance for MERKUR Slots UK Limited.
2. I am a Chartered Institute of Internal Auditors (IIA) Qualified Internal Risk and Corporate Governance Auditor with over 25 years' experience working in risk-based customer facing environments within various industries, including High Street Retail and Optical Health.
3. In 2011 I started working in the Gambling Industry occupying the role of Internal Audit Manager for Praesepe (the parent company of MERKUR Slots UK Limited), responsible for all internal and external audit policies and procedures. During 2018 a merger of the Audit and Compliance departments created the role of Head of Compliance, I now hold this position and am responsible for Internal Audit, Risk/Fraud Management and the Regulatory Compliance of the MERKUR organisation.

Overview

4. MERKUR is a leading national operator of bingo premises. The company operates a national estate of over 220 licensed bingo, adult gaming centre and family entertainment centre premises. Over 140 of MERKUR's premises operate with a 24-hour premises licence.
5. The business of MERKUR Slots premises is a mixture of bingo (played on electronic tablets) and gaming machines. Unlike betting offices, there is no ongoing entertainment such as a sporting event, and there are no communal places for groups of customers to gather. Our premises do not experience significant peaks and troughs of customers in the way betting offices do. Customer numbers are almost always in single figures. Customers do not gather outside our premises, as they do outside some betting offices. We do not cause problems to our residential or business neighbours, some of whom have commented that our control measures and external CCTV have helped *reduce* problems in the street.
6. All MERKUR's bingo premises are adult only and operate a strict Think 25 policy. Age verification procedures are embedded in Company training platforms and responsible gambling policies. Random age verification test purchasing and mystery shopper visits are carried out by third party companies (Serve Legal and Store Checker) and test results can be provided to the Licensing Authority upon request. MERKUR prides itself on its high standard of venue compliance and test purchase success rates nationally.
7. MERKUR Slots customer demographics show an average age over 30. Our products are not designed for children, and do not appeal to them due to their ambience, the nature of our gaming services and customer demographics. This is consistently seen across the whole of our licensed estate.

Responsible authorities

8. We always liaise with responsible authorities when making new applications and maintain a relationship with them during the currency of any licence granted.
9. A teams call was held with the Licensing Authority and Police officer on the 9th October 2024 to discuss the proposed application and operation, and a number of conditions were offered to the officers via email.
10. On 20th January, 28 safeguarding conditions were agreed with the Licensing Authority and Police and both their representations were withdrawn.
11. No response was received from any other responsible authority, nor did any other responsible authority submit an objection to the application.
12. No concerns were raised by the Child Protection Team and the Gambling Commission regarding MERKUR's bingo premises licence proposal, and neither submitted an objection to the application.

Gambling Commission

13. MERKUR has authority to provide bingo facilities through the grant of an Operating Licence issued by the Gambling Commission, which has approved the measures which MERKUR has put in place to ensure that it implements effective player protection, anti-money laundering procedures and security procedures; and trades responsibly in accordance with gambling legislation, the Licensing Objectives and the Gambling Commission's Licence Conditions and Codes of Practice ("LCCP").
14. MERKUR is subject to Gambling Commission inspection, ensuring that its training and compliance policies and procedures comply with the LCCP attached to the Company's Operating Licence.
15. MERKUR was selected by the Gambling Commission as one of the first top 40 licensees to prepare an annual assurance statement due to its size and scale of operation. Annual Assurance Statements enable a comprehensive review of the business, completed at Board level, involving consideration of the effectiveness of the Company's governance and risk management arrangements designed to facilitate positive consumer protection, address gambling-related harm and assess crime prevention measures. This process ensures that the highest standards are implemented across the Company's estate from Board through to premises level.

Staff training

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

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

17. As part of MERKUR's continuing commitment to high standards of staff training and compliance, the Company engaged the services of the charities YGAM (Young Gamers & Gamblers Education Trust) and Betknowmore to assist with the development and provision of additional Safer Gambling training and resources for venue and area managers. This training has been designed to complement our existing face-to-face training, is City and Guilds accredited and has been delivered to over 200 venue and area managers to date.
18. In addition, a series of focus groups has been held over the past 2 years, with both high street gaming and pub customers, with the participants being selected on the basis of being regular users of MERKUR Slots or pub machines. The aim of the project was to provide MERKUR with a snapshot of the business through the eyes of the customer. Focused on the key areas of customer engagement, product and service and understanding customer spending and gaming habits.
19. All staff training takes on board local area characteristics, as identified in the company's Local Area Risk Assessment, consultations with responsible authorities and any representations made. MERKUR understands that local risk assessment and staff training is a live matter, which is regularly re-assessed and adapted to any emerging or changing risks in the locations in which it operates. MERKUR is committed to partnership working and will always engage with local Betwatch, Pubwatch, or similar schemes to share best practice and local knowledge of venue operation or identified risks, whether or not they strictly relate to gambling premises.

Operation

20. The premises will be managed by an experienced venue manager, who will in turn be supported by a complement of staff who will all have received the comprehensive level of training appropriate to their specific role.
21. MERKUR Slots staff members are not restricted to counter positions that may be found in other licensed venues, such as betting premises. Our staff are actively encouraged to move throughout the premises and proactively engage with all customers, particularly on entry, not only to implement our Think 25 policy, but to build customer relationships and ensure effective identification of potentially vulnerable individuals.
22. The MERKUR Slots premises layout has been developed to facilitate customer observation and all staff members provide regular sweeps of the premises to ensure positive engagement with our customers and facilitate continuous observation and customer interaction.
23. Staff numbers and premises operation are regularly risk assessed, incorporating monitoring of premises operation, internal compliance audits completed by our field-based compliance team, evaluation of customer numbers and feedback from responsible authorities and interested parties. These measures ensure that premises are able to quickly adapt to any emerging risk or local concern.

24. Staff numbers and rotas are continuously reviewed to adapt to customer numbers, and cognisance is taken of police advice.
25. All MERKUR premises operate extensive CCTV throughout customer facing areas and also external areas to assist with monitoring customer behaviour and that of other individuals in the immediate vicinity of the premises. CCTV displays are appropriately situated to ensure that all customer areas are monitored.
26. Staff actively monitor and manage the area immediately outside their premises and record any incidents should they occur. Reporting lines are set up with local police teams to ensure that any potential local issues are identified and addressed.

Compliance

27. MERKUR has appointed a dedicated team of compliance auditors that work independently of its Operations Team to continually assess premises' compliance with the governing legislative standards and Company Policy and Procedure. Copies of our Policies and Procedures have been provided as part of our hearing bundle.
28. The Company conducts a compliance audit in each venue annually. These audits cover -
 - a. Regulatory Compliance, Customer Interaction, Incidents, Self-exclusion breaches and Age Verification.
 - b. Testing of staff on their level of knowledge and understanding of all relevant criteria. (Venues may be re-visited and any additional training needs addressed.)

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

29. In August 2020, Praesepe Limited, MERKUR's parent Company, and MERKUR's brand premises obtained G4 Global Gambling Guidance Group accreditation, which can be seen in the supporting documents. G4 is a group of international experts in the field of problem gambling and responsible gambling and accreditation is awarded to responsible operators. Audit reports identified that *'Customer care is of an exemplary standard in all MERKUR Venues, regulatory compliance policies and procedures are excellent...and provide a strong foundation for consistent approaches to Responsible Gambling across the (Company's) estate'*.
30. In February 2022 and again in 2023, MERKUR were subject to the G4 follow up audits, when it retained its accreditation status. The auditor commended the senior management training regarding gambling harm and social responsibility, noted that MERKUR's Safer Gambling ethics *"shine through as priority"* and *"customer care is a strong focus of the business"*. The auditor further noted that staff loyalty, enthusiasm and knowledge were all of a high standard.
31. MERKUR has been praised by one of the country's leading safer gambling and gaming experts for 'championing innovation' in social responsibility. Lee Willows,

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

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

Local issues

33. Representations to the application have been received from a number of local residents and councillors. They highlight a number of issues such as increase of crime and problem gambling in the area. The objections express concerns that a new bingo premises may exacerbate those problems currently already in existence in the area.
34. MERKUR is an experienced operator with a proven history of operating premises in challenging areas. Incidents of anti-social behaviour are rare, and if they occur, they are quickly and effectively dealt with. MERKUR'S track record is exemplary.
35. As I have mentioned in the “overview’ section above, MERKUR premises do not experience the kind of difficulties sometimes experienced by betting offices in terms of crime, disorder and nuisance, due to our different clientele, customer numbers, product, layout and management. In summary –
 - a. We do not find groups of people loitering outside our premises smoking or creating a disturbance, as is frequently the case with pubs or clubs. As confirmed by the extensive *Leveche* covert operations, our customers arrive, play the machines and leave.
 - b. Similarly, by contrast with betting offices, there is no ongoing entertainment such as a sporting event and no communal places for crowds to gather. Our premises do not experience significant peaks and troughs of customers.
 - c. Our customer numbers are almost always in single figures. I believe this to be a significant explanation of why we do not cause a nuisance to our neighbours.
 - d. In general, it is rare for our venues to attract customers leaving alcohol licensed venues or fast-food venues, as the entertainment offering is significantly different. MERKUR's late night operation appeals to shift workers and employees of the late-night economy and our detailed policies, procedures and safeguards are designed to ensure that premises operation remains safe and secure for both staff and our customers.
 - e. MERKUR Slots premises do not play any music above background level, and in addition due to the low footfall of customers at any one time, are rarely a cause of neighbourhood nuisance.
36. MERKUR has considered local police crime statistics and the premises location along with the Council's Statement of Licensing Principles under the Gambling Act

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

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

Problem gambling

39. The company incorporates accredited Social Responsibility and Interaction training for its premises management teams.
40. MERKUR ensures that all staff continue to promote responsible gambling through customer behaviour observation and interaction. As part of this process, customer play, duration and spend is monitored and customer interactions are triggered to ensure play remains responsible.
41. Following a customer interaction, customers may be offered a variety of self-help measures to control and monitor spend and time spent gambling, time outs, information regarding gambling support services and self-exclusion. For customers deemed to be at risk who do not agree to self-exclusion we reserve the right to bar customers, should the need arise. Staff members are provided detailed training to ensure that interaction is completed in a sensitive manner whilst ensuring that the Company's policies and procedures are effectively implemented.
42. MERKUR has also undergone Gambling Commission inspection. It ensures that its training and compliance policies and procedures comply with the LCCP attached to the Company's Operating Licence.
43. Examples of some of MERKUR's responsible gambling information have been provided in the supporting documents.

Premises Operation

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

Alcohol policy

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

46. All MERKUR Slots venues operate a strict zero tolerance drugs policy and refuse service to individuals who are deemed to be under the influence of alcohol. The company's extensive training, which incorporates Gamcare approved social responsibility and customer interaction tools, are designed to ensure minimal conflict and successful implementation of our strict policies.
47. In our experience, supported by *Leveche* covert observations, incidents of customers attempting to enter our venues whilst intoxicated or attempting to consume alcohol within our venues remains low across the Company's licensed estate, regardless of premises location.

Marketing and window displays

48. MERKUR operates a strict marketing and promotional guidelines policy, which has been developed in accordance with the LCCP and the Advertising Standards Authority's Committee of Advertising Practice (CAP) and Broadcast Committee of Advertising Practice (BCAP) Codes. A copy of the Company's Marketing Code of Practice and sample window displays can be seen in the supporting documents.
49. Venue window displays are designed having regard to premises' location, particularly in busy high street areas where children and young persons may pass by. Direct line of sight into premises is blocked by appropriate window displays and barriers adjacent to entrances, which minimise exposure of underage individuals to ambient gambling.
50. MERKUR does not operate VIP membership schemes.
51. All MERKUR's bingo premises are adult only and operate a strict Think 25 policy. Age verification procedures are embedded in Company training platforms and responsible gambling policies. Age verification test purchasing and mystery shopper visits are frequently carried out by third party companies (Serve Legal and Store Checker) and test results can be provided to the Licensing Authority upon request. MERKUR prides itself on its high standard of venue compliance and its test purchase success rates nationally.
52. All our venues operate a policy of no pre-planned single staffing after 8pm.

Conclusions

53. The business of MERKUR is the provision of safe and pleasant gaming environments. It remains crucial to the business that customers feel safe and welcome in MERKUR Slots premises. This principle is fundamental to Company management strategy from head office to premises level. It is a principle which as a company we have achieved in all of our venues, which provide safe, welcoming and congenial environments for our customers.
54. In the rare case that issues do arise, the resources and commitment are in place to ensure that they are speedily resolved. For obvious reasons, MERKUR does not wish to run licensed venues which cause regulatory issues, and the Company devotes a great deal of time and resources to ensuring that there are none.
55. In my experience a good manager and their team will know regular customers well and new customers will always attract raised awareness.

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

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

Date: 14 March 2025

LICENSING SUB - COMMITTEE HEARING – 24 MARCH 2025

SUPPLEMENTAL STATEMENT – STEVE AMBROSE

1. I am the Operations Director for Merkur having held this position since December 2016 responsible for all day-to-day operations across our estate of Adult Gaming Centres, High Street Bingo premises, Bingo Halls and Casino.
2. I am a Director of the Bingo Trade Association "The Bingo Association" and a member of the Gaming Council of the Amusement Trade Association "BACTA" covering High Street Gaming Centres across Great Britain.
3. I started in the Gaming Industry in 1992 and have held a multitude of positions ranging from Customer Service Assistant right up to my present position of Operations Director, this experience has enabled me to gain an understanding of the complexities of operating in gaming businesses both big and small, in rural and city centre locations.
4. Through my years of working in the gambling industry I can state categorically that it is rare for Merkur Slots UK Limited's venues, and specifically its high street bingo premises, to be associated with crime and disorder, anti-social behaviour or local nuisance.
5. Whilst I appreciate this may be different to perceived risks that may be associated with other licensed gambling venues, such as betting premises, I believe this reflects the type of gaming operated by Merkur and its customer demographic, which is approximately 50% female with an average age of over 30.
6. Due to the nature of the gaming services provided at our high street bingo venues, customers do not congregate outside our venues, unlike betting premises that may show sporting events over long periods of time. In our high street venues, there is no 'event' taking place.
7. Across the high street bingo estate, average customer numbers at any one time remain relatively low, in single figures, and customer numbers above 5 at any one time, would be considered a busy period.
8. Customer numbers do not vary significantly throughout the hours of premises operation and due to the relatively low numbers, later hours of operation are often sought, with the majority of Merkur premises operating into the early hours. Later hours of opening appeal to shift workers and employees of the late-night economy and Merkur Slots policies, procedures, safeguards, and security measures are designed to ensure that premises operate securely and safely at all hours of operation.
9. We operate premises throughout the UK in busy high street locations that have a high footfall of Children and Young persons. Due to the nature of our gambling premises, customer demographic and presentation of our venues on the high street, we do not see a significant number of underage individuals seeking to gain access to our premises regardless of location. In our experience, Merkur's product does not appeal to the younger generation.
10. Merkur's Think 25 policy and its implementation are effective tools ensuring that our venues operate responsibly. By strictly controlling our marketing and advertising and limiting line of site into venues, individuals that pass by our venues are not exposed to ambient gambling, which may be visible in other operator's venues, such as some betting premises and public houses that provide gaming machines.
11. All our venues operate CCTV throughout, which is designed to not only assist with monitoring all customer facing areas but to cover the area immediately in front of our venues, which provides additional security in the high street areas in which we operate.

10. Our venue teams seek to form genuine relationships with local police, town centre groups, support services and Betwatch or Pubwatch schemes should they be available. Our staff are proud of the areas in which they live and work and do not wish to see any level of anti-social behaviour.
11. We set out to provide a comfortable and convivial atmosphere. Our premises are carpeted, well-appointed and spotlessly clean. Our staff are smart and friendly. They are not positioned behind a counter, but are present on the trading floor, circulating and interacting with customers and offering tea and snacks.
12. Staff levels are continually risk assessed to ensure that sufficient numbers are maintained not only to enable effective premises management but also to ensure that customers can be continually monitored and assisted where necessary. As part of our commitment to working with local authorities, we will always liaise with local police licensing teams to ensure that where local police concerns are identified, sufficient staff members are on site during premises hours of operation.
13. Customer monitoring, interaction and any incidents including implementation of our Think 25 policy are recorded on electronic IHL tablets. This technology enables all recording to be logged whilst staff are present in customer facing areas and it is rare for staff to be called away to back office areas during their shifts. IHL tablets are linked through a central system so that Merkur Slots UK Limited's independent audit team can regularly monitor all records.
14. The Company's audit department collates and evaluates monthly reports on venue operations and management to allow continued assessment of operational compliance, including monitoring self-exclusions, under-age checks and any untoward behaviour. The monitoring process allows venues to adapt to any emerging risks and staff training requirements.
15. Our venues operate a ticket in ticket out system, which minimises the need for cash handling on site during opening hours.
16. Machine emptying is only carried out when customer numbers are low and security systems implemented, which include activating the premises maglock and ensuring sufficient staff remain on duty.
17. Merkur Slots UK Limited's venues also operate time delay safes where keys are stored. All cash is retained within the GeWeTe change machine on the venue floor.
18. Venues are equipped with our staff guard system. The system allows direct communication with a central monitoring station through audio and CCTV. The central monitoring station would then contact the relevant emergency services in case of incident.
19. The entrance to all venues are fitted with a magnetic door locking system. This allows staff members working to manage the entrants to the venue when in use.
20. The use of door supervision at any premises is decided on a risk assessment basis based on a multitude of factors per premises, with cognisance always taken of local Police and Licensing knowledge and advice.
21. Following the consultation period, 28 safeguarding conditions were agreed with the Police and Licensing Team, which alleviated their concerns and led to the withdrawal of their representations. These conditions include CCTV, Challenge 25, Maglock, no pre-planned single staffing post 20:00, StaffGuard, panic buttons, door supervision risk assessment, incident reporting and extensive staff training.
22. We have considered the local concerns raised by the Interested Parties and believe that should the Committee members be minded to grant the new premises licence as all perceived operational risks and fears should have been effectively addressed.

23. In our local area risk assessment we have identified local organisations that provide support services to local vulnerable individuals. Merkur is committed to working in partnership with local authorities and any organisations identified to discuss local concerns, ensuring that local risks are identified and incorporated into our risk assessment and management training.
24. All of these features mean that our premises provide safe and congenial environments and do not impact on their localities. In my experience, while concerns are sometimes expressed by local residents and authorities with regard to theoretical risks and the potential impact when applications are made, such concerns vanish once premises begin to operate as permitted.

Mr Steve Ambrose, Operations Director, Merkur Slots UK Limited

Date: 14 March 2025

LICENSING SUB-COMMITTEE HEARING – 28 MARCH 2025

SUPPLEMENTAL STATEMENT – NIGEL DAVIS

1. I am the Head of Gaming Machines for Merkur, and have held this position since 2010, and have continual service for the company since leaving school in 1980 some 44 Years' Service.
2. During this time, I have held various roles, including Venue Manager, Area Manager, Group Technical Service Manager this experience has given me great depth of knowledge of our Business, and the industry as a whole.
3. I am the Midlands Chairman of the Amusement Trade Association BACTA, and sit on various Committees. I take a very active role withing the Machines Committee of the Bingo Association. I have held a Gambling Commission PML since 2007, when they first came into force.
4. Merkur Slots UK Limited operates over 220 'High Street Bingo' premises, bingo clubs and Adult Gaming Centres throughout Great Britain.
5. The development of High Street Bingo has occurred because customers are becoming less interested in attending large, sub-regional bingo halls and increasingly wish to play bingo with a portable electronic terminal rather than marking numbers off a card. Accordingly, the High Street Bingo model has evolved, with a customer offer of live and automated bingo played on terminals, as well as on paper, with gaming machines in accordance with the permission provided by a bingo premises licence. The Gambling Commission is fully aware of the presentation of bingo in our high street premises.
6. In our premises, customers can move around with the bingo terminal, choosing to play while standing or in seating provided around the premises.
7. Customers have an opportunity to play non-remote bingo in the traditional way on paper bingo cards, and on tablets (including being linked to a national game) and to play machines, the limits for which are set by law.
8. As for gaming machines, the governing legislation provides strict limits on the types of machines that may be made available in bingo premises, which is the same as that permitted in licensed Adult Gaming Centres.
9. High Street Bingo premises operate a combination of category B3 and C gaming terminals with stakes ranging from 10p through to £2.
10. Only 20% of the gaming machines provided may be category B3s. The remainder, being the category C & D gaming machines, have the same stake and prize levels as those offered in pubs.
11. The bingo tablets are a multi-purpose device offering live linked Bingo Games, Bingo Variant Games and participation in the National Bingo Game, which is played twice daily.
12. The bingo tablets provide both remote and non-remote bingo, with remote bingo being the linked games operated by WiFi within the licensed premises.
13. Further details of the gaming content provided on the bingo tablets has been provided in the supporting documentation.

14. All Merkur Slots UK Limited premises are sufficiently staffed to ensure effective implementation of the Company's Think 25 policy and all staff are fully trained on the three Licensing Objectives under the Gambling Act 2005, with particular focus on the protection of vulnerable persons from being harmed or exploited by gambling. Full written details of the training and the Company's operating procedures have been provided in the hearing bundle.
15. As stated above, electronic bingo is a natural evolution of 'traditional bingo' and has been operated nationally for many years since the inception of the Gambling Act 2005 and is approved and understood by the Gambling Commission.
16. The LCCP also require that the internal and/or external presentation of the premises are such that a customer can reasonably be expected to recognise that the premises are licensed for the purposes of providing bingo facilities. We comply with this requirement by a notice on the façade of the premises, which states prominently "bingo played here", and by a similar notice inside the premises.
17. Our bingo offer is the same as it is in all of our high street bingo premises across the country. It is simply an extra offer to our customers, which is long established and has given rise to no regulatory concerns of the Gambling Commission. We have no evidence that the provision of electronic bingo is harmful to any of the licensing objectives.

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

Date: 14 March 2025

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

Local Area Risk Assessment

Trading Name:	Merkur Slots
Premise	265 Neasden Lane, Neasden, NW10 1QG
Local Authority:	London Borough of Brent Council
Premise Licence No:	New application
Operator Licence No:	000-003266-N-103444-031 (Merkur Slots UK Limited)
Company Details:	Merkur Slots UK, Matrix House, North Fourth Street, Milton Keynes MK9 1NJ
Name and Title of Assessor:	Ewelina Lesner – Internal Compliance Auditor, Amanda Kiernan – Head of Compliance
Date of Assessment:	22/11/2024
Review Date:	Upon opening in conjunction with local staff

Local Area Profile Risk Factors

Local Risk Profile:	Merkur Slots is located on Neasden Lane, a busy local parade. Nearby occupiers are predominately local independent Barber and Coffee Shops with a handful of national occupiers which include Tesco, Costa, Subway, KFC, and Paddy Power. Directly outside the premise there is a bus stop and phone boxes, the bus routes may well attract children and young person's travelling to places of education. Birse Crescent is to the right of the premise, this road leads into residential areas of houses and flats, there are residential flats above the premise with a private access road running behind the properties. There are garages/storage units in an access road behind the properties on the other side of Birse Crescent.
Establishments of note:	The nearest fast food restaurant is KFC at 286 Neasden Ln, NW10 1QG which may attract children and young persons to congregate in groups. Tiffy Tom's pub is located within 1 minutes' walk away, this pub reopened in 2023 under new management, previously operating as Sal's Bar the licence was revoked in 2021 due to multiple reports of crime and disorder. St Catherines Church Foodbank is located less than 3 minutes' walk from the Merkur Slots premise, the foodbank operates every Tuesday between 5:30pm to 6:30pm and provides lunches on the 1 st and 3 rd Saturday of every month between 12:30 to 1:30pm. The Brent Foodbank located at St Mary's Church End, Neasden Lane, NW10 2TS, distributes food on Tuesdays and Thursdays 12:30 to 15:00pm. Addiction Treatment rehab provide support for gambling and alcohol addiction in the Neasden NW10 area - https://www.addictiontreatmentrehab.co.uk/london/neasden
Adjoining premises:	The premises is a corner unit located next to a charity shop 'Peaceful Solutions' to the left and Birse Crescent to the right. Residential flats are above the premise.
Crime statistics:	Annual total crime rate in local area is 128 per thousand population. This can be rated as 5 out of 10 or medium crime level compared to other local areas in England and Wales. Annual total crime rate in Brent is 89 per thousand population, which can be rated as 4 out of 10 or low crime level compared to other local authority districts in England and Wales. Below are annual crime rates by crime type. Figures represent the number of crimes of a certain type per thousand population. Violence and sexual offences 47.8, Other theft 17.3, Anti-social behaviour 11.4, Burglary 10.8, Vehicle crime 10.2, Public order 8.37, Drugs 6.58, Criminal damage and arson 4.78, Robbery 2.99, Theft from the person 2.99, Shoplifting 2.39, Other crime 1.2, Bicycle theft 0.598, Possession of weapons 0.598. (crystalroof.co.uk)
Population:	Residents of these neighbourhoods include sizable numbers identifying with ethnicities originating outside Europe, particularly in Africa or Bangladesh. The proportion of residents identifying as White, Indian or Pakistani is well below the London average. Neighbourhood age profiles are skewed towards younger adults, and above average numbers of families have children. Rates of use of English at home are below average. Marriage rates are low, and levels of separation or divorce are above average. (crystalroof.co.uk)
Culture:	The main ethnic group is Black African, representing 25% of the population. On average, 8% of the population in London belong to the Black African ethnic group. The following ethnic groups have proportions higher than the average for the London: Other Asian: 8% (London average: 5%), Black African: 25% (London average: 8%), Arab: 20% (London average: 1.6%). Conversely, the following ethnic groups have a proportion lower than the average for London: White British: 7% (London average: 37%), Other, White: 10% (London average: 15%), Indian: 2.9% (London average: 7%), Bangladeshi: 0.6% (London average: 4%). The main religion is Muslim, representing 49% of the population. On average, 15% of the population in London belong to the Muslim religion. Conversely, the following religions have a proportion lower than the average for London: Hindu: 2.3% (London average: 5%), Jewish: 0% (London average: 1.7%), Sikh: 0% (London average: 1.6%), No Religion: 9% (London average: 27%), Religion Not Stated: 4% (London average: 7%). (crystalroof.co.uk)
Unemployment:	Full-Time Employee 12.6%, Part-Time Employee (defined as 30 hours or less per week) 16%, Self Employed 13.6%, Unemployed 5.4%, Full-Time Student (with or without job) 11.7%, Retired 13%, Looking After Home or Family 16.7%, Long-Term Sick or Disabled 5.4%, Other 5.6%. Employment is in caring, leisure, other service occupations, sales and customer service, or process, plant, and machine operation. Part time working and full-time student study are common. Levels of unemployment are slightly above average. (streetcheck.co.uk) (crystalroof.co.uk)
Deprivation:	Index of Multiple Deprivation - 8/10. This is used to characterise the deprivation levels of the neighbourhoods. It takes into account the following domains: Income Deprivation Domain - 8/10, Employment Deprivation Domain - 6/10, Education, Skills and Training Deprivation Domain - 6/10, Health Deprivation and Disability Domain - 2/10, Crime Domain - 10/10, Barriers to Housing and Services Domain - 10/10, Living Environment Deprivation Domain - 9/10, Income Deprivation Affecting Children Index (IDACI) - 8/10, Income Deprivation Affecting Older People Index (IDAOPI) - 8/10. (crystalroof.co.uk)

Local Police:	Neasden Lane, NW10 1QG is within the Dollis Hill policing neighbourhood, under the Metropolitan Police force area. Wembley Police Station, 603 Harrow Road, HA0 2HH. Current policing priorities are to reduce drug dealing, street drinking and ASB in Neasden Town Centre; reduce crime and fear of violence around Neasden Tube Station and to reduce residential burglaries in the west section of the ward. (<i>police.uk</i>)
Age Verification:	Age verification test purchasing, and mystery shopper visits are frequently carried out by third party companies - ServeLegal and Store Checker. All venues receive 2 or 3 random test visits per year.
Independent Security Reviews	MERKUR Slots UK appointed Leveche Associates Ltd to conduct independent covert visits on numerous AGC/Bingo venues that operate throughout the UK 24-hrs, 7 days a week including six venues in and around the London area. Key comments from the reports include: 'Visits to these premises established that they are well run and that there are clearly defined systems in place to ensure the premises operate in support of the gambling objectives and do not attract or take advantage of juveniles or other vulnerable persons. The visits also established that MERKUR Slots customer do not cause crime or anti-social behaviour.' 'MERKUR Slots UK and their premises operate in support of the principles of Secured by Design, the company recommended by the Chief Officers of UK Police Forces for Crime Prevention standards'. 'The presence of MERKUR Slots does not lead to or result in people, who have been on a night out, staying in the area any longer than they had planned to'.

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

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

Localised Risks to the Licensing Objectives

This Local Area Risk assessment takes into consideration Brent Council local authority Statement of Gambling Principles 2022-2025, reference section 8.5 for Bingo Premises and Brent Council Borough Profile.

Environmental Factors

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

Licensing Objectives	Local Risks	Control Measures
Protecting children and other vulnerable people from being harmed or exploited by gambling	<p>Unemployment Full-Time Employee 12.6%, Part-Time Employee (defined as 30 hours or less per week) 16%, Self Employed 13.6%, Unemployed 5.4%, Full-Time Student (with or without job) 11.7%, Retired 13%, Looking After Home or Family 16.7%, Long-Term Sick or Disabled 5.4%, Other 5.6%. Employment is in caring, leisure, other service occupations, sales and customer service, or process, plant, and machine operation. Part time working and full-time student study are common. Levels of unemployment are slightly above average. (<i>streetcheck.co.uk</i>) (<i>crystalroof.co.uk</i>)</p> <p>Deprivation Index of Multiple Deprivation – 8/10. This is used to characterise the deprivation levels of the neighbourhoods. It takes into account the following domains: Income Deprivation Domain – 8/10, Employment Deprivation Domain – 6/10, Education, Skills and Training Deprivation Domain – 6/10, Health Deprivation and Disability Domain – 2/10, Crime Domain – 10/10, Barriers to Housing and Services Domain – 10/10, Living Environment Deprivation Domain – 9/10, Income Deprivation Affecting Children Index (IDACI) – 8/10, Income Deprivation Affecting Older People Index (IDAOPI) – 8/10. (<i>crystalroof.co.uk</i>)</p> <p>Schools and Education Wykeham Primary School, Aboyne Rd, , NW10 0EX Neasden Montessori School, 4 Tanfield Ave, NW2 7RX Braintcroft Primary School, Warren Rd, NW2 7LL The Crest Academy, Crest Rd, NW2 7SN</p>	<p>Age Verification <i>Ensuring Under 18's do not have access to licensed premises</i></p> <p>All Merkur Slots venues are strictly adult only (over 18's only).</p> <p>Gambling is an age restricted product and Merkur Slots operates a 'Think 25' policy.</p> <p>Age verification is embedded in training platforms and responsible gambling policies.</p> <p>Over 18's notices are displayed on the entrance.</p> <p>Think 25 advertising is prominently displayed throughout the premise.</p> <p>Merkur Slots Neasden Premise frontage is of a style which obscures the interior with no advertising depicting images that may appeal to children.</p> <p>Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</p> <p>Merkur Slots operate a comprehensive Think 25 Policy, age verification checks are carried out and recorded, any person unable or unwilling to verify their age with appropriate ID will be told to leave, if they have managed to play machines, their staked money will be returned to them.</p>

	<p>The Crest Boys Academy, 80 Crest Rd, NW2 7LX Menorah Girls School, 105 Brook Rd, NW2 7BZ Alnour Arabic School & Tuition Centre, 3 Coombe Rd, NW10 0EB Poplar Grove School, Poplar Grove, Wembley HA9 9DB St Margaret Clitherow RC Primary School, Quainton St, NW10 0BG Our Lady of Grace Junior School, Dollis Hill Ln, NW2 6HS Northview Junior and Infant School, Northview Cres, NW10 1RD North Brent School, 12 Neasden Ln, NW10 2TF Mitchell Brook Primary School, Bridge Rd, NW10 9DG Neasden Tutors, Neasden, NW10 0DY Lead After School Club, 484 Neasden Ln N, Greater, NW10 0DG AlflyCademy, 10B Lansdowne Grove, NW10 1PR College of North West London, Denzil Rd, Dudden Hill Ln, NW10 2XD</p> <p>Community Centres and Youth Centres Kingfisher Community Centre, Crest Rd, NW2 7LG Community Hire – Crest, Crest Rd, NW2 7SN Prajapati Hall, 519 N Circular Rd., NW2 7QG Neasden Advice Ltd, 306 Neasden Ln, NW10 0AD Learie Constantine Centre, 43–47 Dudden Hill Ln, NW10 2ET SWAGAT Hall, 19 Dudden Hill Ln, NW10 2ET Brent District Scouts, Scout Approach, Village Way, NW10 0LH 27th Willesden Scouts, Village Way, NW10 0NE 37th Willesden Scouts, r, o, 121 Randall Ave, NW2 7SX</p> <p>Parks, playgrounds and sports/leisure facilities Neasden Recreation Ground, NW2 7TE Welsh Harp Open Space, NW9 7NB Gladstone Park Pond, Gladstone Park Gardens, NW2 Rose Garden, Brook Road Dudden Hill, NW2 6HU Gladstone Park, 52 Mulgrave Rd, NW10 1JG Gladstone Park, South, 91 Kendal Rd, NW10 1JE Gladstone Park Children's Playground, NW2 6GR playing area (Recreation Ground neasden), NW2 7QH Childrens Play Area, NW10 9EE Gibbons Recreation Ground, NW10 9BX</p> <p>Vulnerable and addiction support services Citizens Advice Brent, 270–272 High Rd, NW10 2EY Neasden Advice Ltd, 306 Neasden Ln, NW10 0AD Launch It Neasden, 60 Neasden Ln, NW10 2UW</p> <p>Addiction Treatment rehab provide support for gambling and alcohol addiction in the Neasden NW10 area – https://www.addictiontreatmentrehab.co.uk/london/neasden</p>	<p>Age verification test purchasing, and mystery shopper visits are frequently carried out by 3rd party companies – Check Policy and Store Checker.</p> <p>Test purchase fails are reviewed within 48 hours by the Area Manager, this involves reviewing CCTV footage of the incident and implementing appropriate training or where necessary disciplinary action.</p> <p>All age verification checks are recorded on the SMART Tablet AV App, this data is collated centrally and regularly reviewed by an independent team of compliance auditors.</p> <p>Results of age verification checks and third-party results are shared with the Gambling Commission.</p> <p>Proof of Age scheme in place with application forms available in the venue.</p> <p>The children and young persons gambling participation survey shows that the number of 11–16 years olds that say they have gambled on fruit machines of whatever kind in an arcade, pub or club is around 2%. Of those around a half to two-thirds do so legally on Category D fruit machines which are located in FECs or holiday parks, where any play will be of short duration (as families will be on a day trip or holiday), in venues which they can only access with their parents, and in premises licensed to offer Category Ds which are as a result tightly-regulated.</p> <p>We also know from a study by Professor David Forrest and Dr Ian McHale that whilst adolescents at the coast are more likely to participate in gambling activities than those that do not, they are no more likely to be problem gamblers than those that do not live at the coast. This is an important finding. Many people cite early exposure to gambling as a cause of later gambling problems. There is no evidence of a causal link. As David Forrest stated at conference in Toronto in 2012 ‘marginal gamblers induced to participation by ease of access do not appear prone to problem gambling and more children gambling does not carry through to more children being problem gamblers. Panic about arcades does not appear justified’ https://www.gamblingcommission.gov.uk/PDF/Young-People-Gambling-Report-2019</p> <p>Vulnerability Training and guidance are given to Merkur Slots staff on vulnerability (the inability or limited ability of people to control their actions). This includes addictive gambling, mental health, alcohol or drugs issues.</p> <p>Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</p> <p>All staff complete on boarding and 6 monthly refresher training which includes Safeguarding Children and Vulnerable People and Customer Interaction.</p>
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	<p>Homeless shelters and food banks Open Soulz, 7 Forty Ln, Wembley HA9 9EA Brent Foodbank, Vestry Hall, 21 Neasden Ln, NW10 2TS St Catherines Church, Neasden Lane, Neasden, NW10 1QB</p> <p>St Catherines Church Foodbank is located less than 3 minutes' walk from the Merkur Slots premise, the foodbank operates every Tuesday between 5:30pm to 6:30pm and provides lunches on the 1st and 3rd Saturday of every month between 12:30 to 1:30pm. The Brent Foodbank located at St Mary's Church End, Neasden Lane, NW10 2TS, distributes food on Tuesdays and Thursdays 12:30 to 15:00pm.</p> <p>Pawnbrokers and Loan Shops No pawnbrokers or loan shops within 1 mile of venue.</p> <p>Medical Centres, Care Homes and Mental Health facilities E&J Bio UK Ltd, 305 Neasden Ln, NW10 1QR Neasden Medical Centre, 21 Tanfield Ave, NW2 7SA St. Georges Medical Centre, St Georges Medical Centre, Park Hill House, 9 Dollis Hill Ln, NW2 6JH Gladstone Medical Centre, 5 Dollis Hill Ln, NW2 6JH Simply Bright, Dental Surgery, 1 Dollis Hill Ln, NW2 6JH Brent Ambulance Station, Unit 2, Falcon Park Industrial Estate, Neasden Ln, NW10 1RZ Medical Diagnosis Ltd, 12 Great Central Way, NW10 0UR Brentfield Medical Centre, 10 Kingfisher Way, NW10 8TF Church End Medical Centre, 66 Mayo Rd, NW10 9HP Tudor House Medical Centre, 1 Chalkhill Rd, HA9 9DS Crest Medical Centre, 157 Crest Rd, , NW2 7NA Voyage Care: 16 Balnacraig Avenue, 16 Balnacraig Ave, NW10 1TH Randall Care Homes, 80 Randall Ave, NW2 7SS Jude House, 92 Randall Ave, NW2 7SU Arran Court, Press Rd, NW10 0EE Ogilvy Court Care Home - DMP Healthcare, 13-23 The Dr, HA9 9EF Tudor Gardens Care Home, 31 Tudor Gardens, NW9 8RL Franklyn Lodge, 8 Forty Ln, HA9 9EB Spring Lake Care Home Ltd, Forty Ln, HA9 9EU MHA Riverview Lodge - Dementia Care Home, Birchen Grove, NW9 8SE Roberts Court, 19 Neasden Ln, W10 2RS Inspired Coaching & Therapy, 1 Verney St, NW10 0AY EXPERT THERAPY, 54 Randall Ave, NW2 7ST</p> <p>Gambling premises Merkur Slots, 304 Neasden Ln, Neasden, NW10 0AD Admiral Casino, 251 Neasden Lane, Neasden, NW10 1QG Coral, 310 Neasden Lane, NW10 0AD Coral, 29 Blackbird Hill, NW9 8RS Paddy Power, 328A Neasden Lane, NW10 0EP Jennings Bet, Neasden, NW10 1QG</p>	<p>Staff are trained how to deal with vulnerable customers and how to make effective interactions, any difficult cases are referred to our compliance team for review and resolution.</p> <p>Merkur Slots take 'know your customer' seriously including affordability checks, engaging with customer on products to enabled an informed choice and take a risk-based approach to harm minimization.</p> <p>Customer Interaction Merkur Slots provide comprehensive customer interaction training, instruction and supporting policies to all staff in this area (via training platforms, training centres and Compliance Manual).</p> <p>Staff are provided with the training to enable them to provide guidance on safer and responsible gambling.</p> <p>Staff are trained on conducting effective customer interactions, identifying behavioural changes and how to identify and interact with players who exhibit signs of developing problems with their gambling.</p> <p>Staff are trained to monitor and record customer behaviour, spend and time spent gambling and customer interactions are used to assess customer source of funds/income where relevant.</p> <p>Customer interactions may result in the customer being guided to gambling support services such as Gamcare encouraged to use a self-help tool to assist them with managing their gambling behaviour, such as Self-Exclusion.</p> <p>Customer interactions may result in the customer being guided to gambling support services such as Gamcare encouraged to use a self-help tool to assist them with managing their gambling behaviour, such as Self-Exclusion.</p> <p>Whilst most customers can enjoy and manage their gambling, Merkur Slots recognises it has a duty of care to those who struggle to manage their gambling and may be experiencing harm from gambling. Accordingly, we provide a self-exclusion facility for those customers that wish to request an exclusion for a fixed period, which is for a minimum of not less than 6 months, nor more than 12 months, with the customer, on request, having the option to extend one or more periods for a further 6 months. During the exclusion process the person is guided towards gambling support services.</p> <p>Merkur Slots are members of both the Bingo Association and BACTA industry self-exclusion schemes which adhere to the below LCCP codes: LCCP 3.5 – Self-exclusion 3.5.1 – Self-exclusion – non remote SR code 3.5.2 – Self-exclusion non-remote ordinary code 3.5.6 – multi-operator non-remote SR code 3.5.7 – multi-operator non-remote ordinary code</p> <p>Once a person has entered the self-exclusion scheme their image will appear on the Smart Tablet exclusion carousel. Staff are required to view the carousel at the start of every shift to ensure they are aware of any new</p>
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		<p>Machines at 15%. The vast majority of calls were received from people within the on-line sector.</p> <p>Deprivation Whilst the premise may be near or in an area of relative deprivation, Merkur Slots takes the view that individual customers must be treated holistically, and the information provided in this document are designed to identify individuals that could potentially be at risk of gambling related harm</p> <p>Merkur Slots operates on the basis that its controls and best practice is always adopted therefore, it is not a question of degrees of vigilance being implemented in different areas.</p> <p>Homelessness Some premises are used by the homeless for warmth and company. Merkur Slots treats all customers with dignity and has a clear policy on begging.</p> <p>Staff are trained to deal with vulnerable people in a sympathetic manner, any difficult cases are referred to our compliance team for review and resolution.</p> <p>Staff are trained how to manage situations with homeless people seeking refuge. A line of contact is created with local high-risk premises, homeless shelters, foodbanks to provide social responsibility information.</p> <p>MERKUR staff are aware of where rough sleepers sleep and beggars loiter in the local area and actively prevent them from entering the premise, including close monitoring of individuals spending coins/low level amounts on a frequent basis.</p> <p>Should loitering increase due to extended hours additional notices will be added about loitering without play not being tolerated.</p>
Preventing gambling being a source of crime or disorder, being associated with crime and disorder or being used to support crime	<p>Crime statistics Annual total crime rate in local area is 128 per thousand population. This can be rated as 5 out of 10 or medium crime level compared to other local areas in England and Wales. Annual total crime rate in Brent is 89 per thousand population, which can be rated as 4 out of 10 or low crime level compared to other local authority districts in England and Wales. Below are annual crime rates by crime type. Figures represent the number of crimes of a certain type per thousand population. Violence and sexual offences 47.8, Other theft 17.3, Anti-social behaviour 11.4, Burglary 10.8, Vehicle crime 10.2, Public order 8.37, Drugs 6.58, Criminal damage and arson 4.78, Robbery 2.99, Theft from the person 2.99, Shoplifting 2.39, Other crime 1.2, Bicycle theft 0.598, Possession of weapons 0.598. (<i>crystalroof.co.uk</i>)</p> <p>Local Police Neasden Lane, NW10 1QG is within the Dollis Hill policing neighborhood, under the Metropolitan Police force area. Wembley</p>	<p>Premise Security and violence in the workplace <i>Poor security control measures which may increase vulnerability to crime</i> <i>Failure to protect employee and customers from harm during the hours of late-night opening</i></p> <p>Merkur Slots Neasden is subject to a separate security risk assessment, local factors are considered, and proportionate control measures/physical security measures are installed.</p> <p>Merkur Slots Neasden is fitted with a HD CCTV system with coverage of all public areas including all entry and exits points, CCTV is clearly advertised to customers with screens visible by staff when working in the service area. Ability to review CCTV remotely and provide footage to relevant parties when required.</p> <p>Floor layout is designed to avoid blind spots to enable the active management and observation of customers entering and leaving the premises, from the central service area the entrances, machines and toilets</p>

	<p>Police Station, 603 Harrow Road, HA0 2HH. Current policing priorities are to reduce drug dealing, street drinking and ASB in Neasden Town Centre; reduce crime and fear of violence around Neasden Tube Station and to reduce residential burglaries in the west section of the ward. <i>(Police.uk)</i></p> <p>Public Houses and Alcohol Licensed Premise Greenes, 362-364 Neasden Ln N, NW10 0BT Katie's Bar (Neasden), 350 Neasden Ln, NW10 0AD Venue 295, 295 Neasden Ln, NW10 1QR Sal's Bar, 249 Neasden Ln, NW10 1QG TIFFTY TOMS, 249A Neasden Ln, NW10 1QG Ox & Gate, 341 Oxgate Ln, NW2 7HS Moloney's London, 429 High Rd, NW10 2JN Tony's Bar London, 356-360 High Rd, NW10 2EG Family Restaurant, 236 Neasden Ln, NW10 0AA Sham Rose Restaurant and Cafe, 281 Neasden Ln, NW10 1QJ</p> <p>Pawnbrokers and Loan Shops No pawnbrokers or loan shops within 1 mile of venue.</p> <p>Gambling premises Merkur Slots, 304 Neasden Ln, Neasden, NW10 0AD Admiral Casino, 251 Neasden Lane, Neasden, NW10 1QG Coral, 310 Neasden Lane, NW10 0AD Coral, 29 Blackbird Hill, NW9 8RS Paddy Power, 328A Neasden Lane, NW10 0EP Jennings Bet, Neasden, NW10 1QG</p>	<p>can be observed and staff regularly patrol the gaming floor to supervise and interact with customers to identify underage or vulnerable persons.</p> <p>General Crime and Disorder <i>To identify aggressive customers to prevent crime and disorder</i> <i>Awareness of local crime issues in the local area</i></p> <p>We have reviewed the Police.UK hot-spot mapping for the local policing neighbourhood and are aware of the areas of Recorded Crime, Vulnerable People and Vulnerable Places and are very mindful of the potential damage associated with problem gambling. We will make every effort to liaise with local Police over reducing our involvement in any incident.</p> <p>Staff are trained to identify suspicious activity and have the ability to interrogate real-time machine data to identify criminal activity and fraudulent incidents which are logged and escalated where appropriate.</p> <p>All incidents are recorded on the SMART Tablet Incident App inc. crime reference number where applicable. Staff are trained on how to deal with aggressive customers and situations which may also require police assistance.</p> <p>The company operate an internal security alert system and are registered with trade associations for crime bulletins (BACTA and Association).</p> <p>Machine data is captured in real-time and full secure cash reconciliation is completed on a weekly basis, the machine exceptions are monitored by a centrally based income protection team and all exceptional cash losses are investigated by the internal audit compliance team.</p> <p>Merkur Slots Neasden participates with any local/town centre scheme and actively seek to support and be involved with any local initiatives targeted at reducing crime and/or disorder and will engage in the sharing of information with other businesses to support the local community.</p> <p>Anti-social behaviour outside the premise Whilst Public Nuisance is not a Licensing Objective and the Gambling Commission has made clear that 'disorder' means serious disorder, Merkur Slots recognise that public nuisance can escalate in certain circumstances and as a corporate citizen, it has a responsibility to work in partnership with local residents and authorities to reduce environmental impacts.</p> <p>Staff are aware to monitor the outside of the premise and surrounding area for anti-social behaviour and take appropriate steps within reason to minimise the risks. The CCTV monitor on the central desk allows staff to view the exterior at all times.</p> <p>Incidents of anti-social behaviour are recorded on the SMART Tablet Incident App.</p>
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		<p>Staff are trained to be extra vigilant where there is clear evidence of street drinking in the vicinity and encourages a partnership approach with local authorities.</p> <p>Maglock systems is deployed during times of public houses closing.</p> <p>Money Lending Money lending is not tolerated within our premises.</p> <p>Suspensions of organised money lending by illegal money lenders are escalated to the audit compliance team and onwards to local authority money lending teams.</p> <p>Late Night Operation Dedicated Regional Night Managers are employed to support venues with security incidents.</p> <p>Area Manager's operate late night rota system to ensure the 'late night contact number' is monitored so venues always have an Operational Manager to call upon for support with any issues during late night operation. The premise and staff are protected by Staffguard security system and intruder alarms are installed. Staffguard provides instant access to live security support and there are panic alarms giving direct contact with the Police.</p>
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<p>Ensuring that gambling is conducted in a fair and open way</p>		<p>Gaming Machine and Supervision The premise operates under a Bingo Licence, with proprietary bingo equipment, and a range of category B3 (max stake £2/prize £500), C (max stake £1/prize £100) and D (max stake 10p/prize £5) machines (company average stake is 30/40p).</p> <p>Bingo is available by means of Bingo tablets offering a range of Bingo products and Live calling. Bingo Tablets are linked to Merkur venues and other operators across the country and allow customers to play Bingo including the National Game which is played twice per day in the venue when customer numbers are as low as one. Tablet systems now account for most of the bingo play in venues of all sizes.</p> <p>Customer Complaints <i>Failure to prevent customers complaints and disputes regarding gambling within our premises. Failure to resolve customer's complaints and disputes regarding our gambling premises.</i></p> <p>Merkur Slots operate a clear customer complaints policy both within venues and via a customer complaints link on the website. Complaints management policy in place for written, telephone and complaints received via the 'customer complaints' link on company website.</p> <p>The Company Code of Practice and Complaints and Disputes Policy are displayed on the Customer Information Board at the entrance with leaflets available within the premise – ADR provider is IBAS.</p> <p>Complaints portal used to collate and manage responses. 4 stage complaints procedure with ADR entity Independent Betting Adjudication Service Ltd (IBAS) for unresolved complaints. Staff are trained and encouraged to use positive discretion to resolve customer complaints in venue.</p> <p>Marketing Merkur Slots promote responsible gambling and social responsibility throughout all marketing campaigns. Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</p> <p>External windows have digital marketing screens which display safer gambling messages, No Under 18's allowed, Think 25, opening times and promotional activity.</p> <p>All marketing campaigns are reviewed for appropriateness before being launched. No advertising is used that depicts images that may appeal to children.</p>
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Other	<p>Places of worship and Religious Buildings</p> <p>Alpha & Omega Christian Fellowship Outreach Ministries, Wykeham Family Centre, Annesley Cl, NW10 OES</p> <p>Neasden Methodist Church, 331 Neasden Ln N, NW10 OAF</p> <p>Islamic Cultural Centre (Neasden), 259 Neasden Ln, NW10 1QG</p> <p>St Catherine's Church, Neasden Ln, NW10 1QB</p> <p>Christ Temple, 2 Clifford Way, NW10 1AN</p> <p>WISPM Women Welfare London, 23 Baskerville Gardens, Dog lane, NW10 1PF</p> <p>Kamara Youths, Neasden Ln, NW10 1QB</p> <p>LoveWorld North West London (Christ Embassy), Crest Academy, Crest Rd, NW2 7LY</p> <p>The Oasis Church Neasden, Crest Road, NW2 7LG</p> <p>St Mary's, Willesden, Neasden Ln, NW10 2TS</p> <p>BAPS Shri Swaminarayan Mandir, London, Pramukh Swami Rd, NW10 8HW</p> <p>English Martyrs Roman Catholic Church, Chalkhill Rd, Wembley HA9 9EW</p> <p>St. Francis of Assisi Church, Cullingworth Rd, NW10 1NR</p>	<p>Ethnicity and Local Area Demographic</p> <p>Merkur Slots does not discriminate on the ground of ethnic or social demographic.</p> <p>Local area profiles which detail deprivation, social, ethnic or population may be used as part of the risk assessment in relation to gambling related harm in conjunction with the company standard controls.</p> <p>Merkur Slots takes a holistic approach to customers and is aware that the Equality Act precludes the exclusion of any group for generalised reasons.</p> <p>Merkur Slots participate with any local/town centre scheme and actively seek to support and be involved with any local initiatives targeted at reducing deprivation (crime/employment/health) and engage in the sharing of information.</p> <p>Training & Social Responsibility</p> <p>Merkur Slots take responsible gambling and social responsibility seriously, ensuring all staff are fully trained to carry out their roles in a responsible manner.</p> <p>Merkur Slots have attained Responsible Gambling Accreditation from the G4 Global Gambling Guidance Group.</p> <p>Merkur Slots work with YGAM (Young Gamers and Gamblers Education Trust) to deliver City and Guilds accredited training on vulnerable and gambling harm to all levels of management.</p> <p>Merkur Casino has a dedicated Learning and Development Team and a Safer Gambling team that deliver face to face social responsibility training.</p> <p>Gamcare Accredited training completed by members of management.</p> <p>All staff complete on boarding and 6 monthly refresher training: The Essentials of Compliance, Safeguarding Children and Vulnerable People Age Verification and Customer Interaction.</p> <p>Staff are aware of the importance of social responsibility, trained to advise customers of gambling responsibly and identifying potential problem gamblers.</p> <p>Compliance and Social Responsibility Folder and Player Protection Framework containing policies and procedures is available to all staff. Venue Mangers review compliance logs monthly, Area Managers Bi monthly and Compliance Auditors annually.</p>
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Merkur Slots Neasden Premise Layout

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


Additional Comments

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

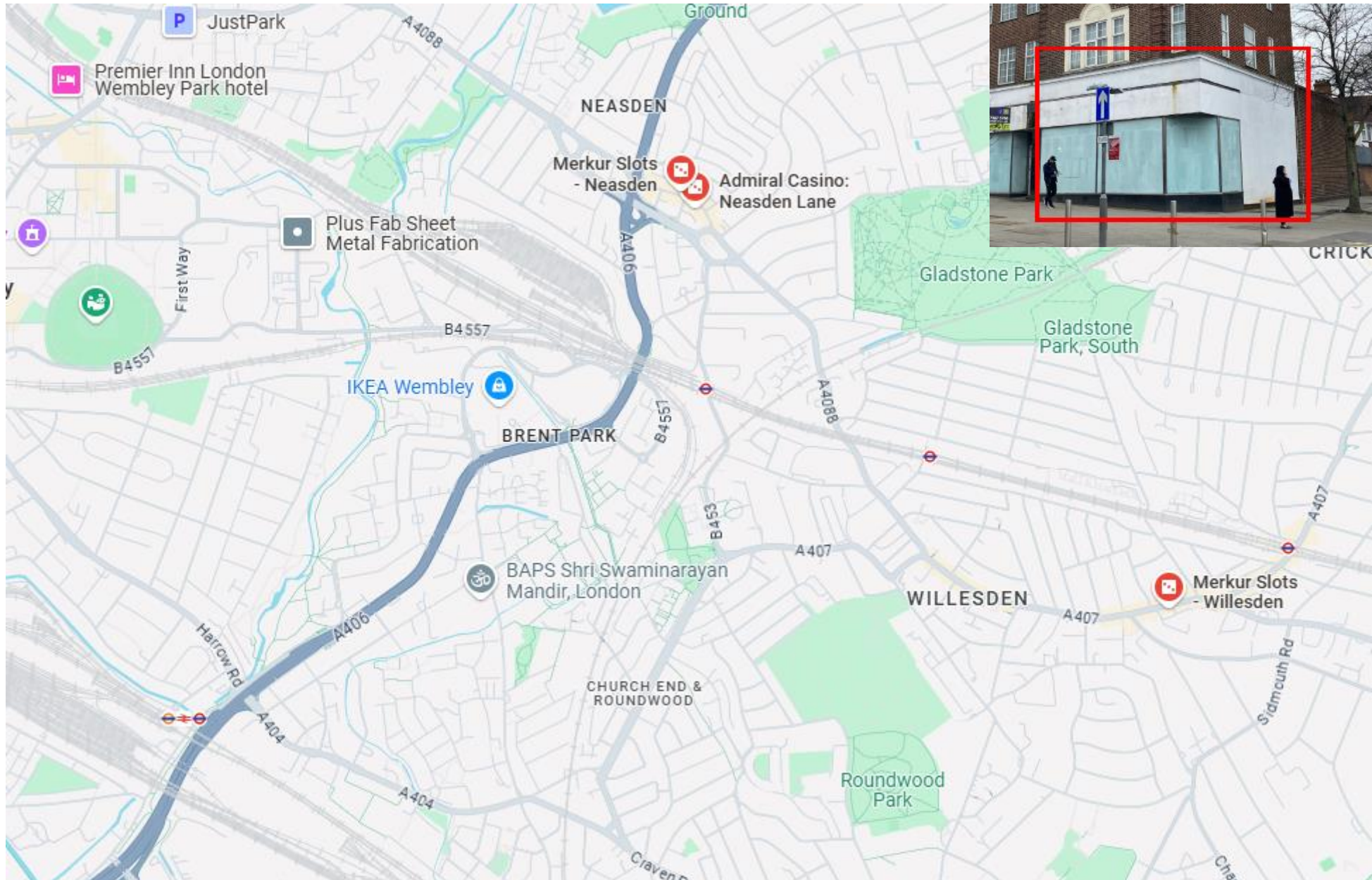
MERKUR Slots UK have operated other premises within the local authority area at 304 Neasden Lane, NW10 0AD since 2007, 478 High Road, Wembley, HA9 7BH since 2007 and 51-55 High Road, Willesden, NW10 2SU since 2021. None of our operational venues have been subject to review proceedings.

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

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

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

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



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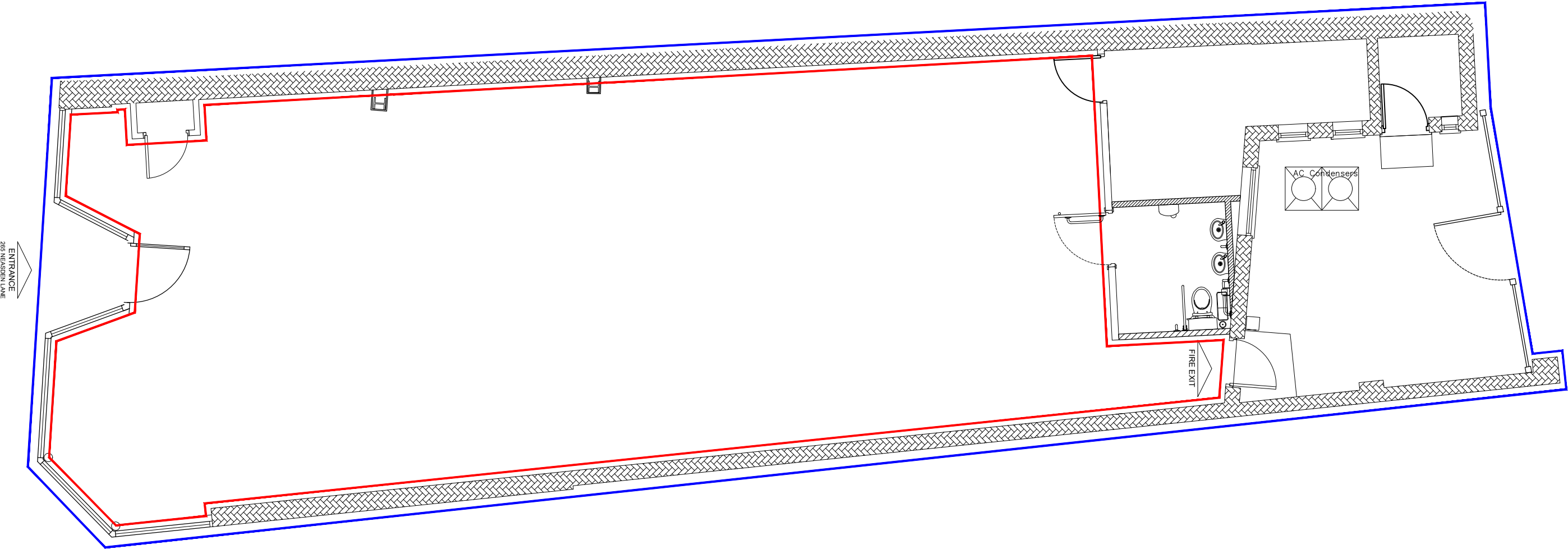
Merkur Slots, 265 Neadens Lane, Neasden, NW10 1QG:



Merkur Slots – example premise frontage



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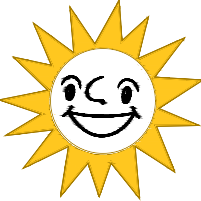


LICENSE PLAN LEGEND	
LINE TYPE	LINE TYPE DESCRIPTION
—	AREA IN WHICH FACILITIES WILL BE PROVIDED FOR GAMING.
—	EXTENT OF PREMISES
GAMBLING ACT 2005 LICENSING PLAN Anything shown on this plan, which is not required by The Gambling Act 2005 (Premises Licences and Provisional Statements) Regulation 2007 is for illustrative purposes only, and does not form part of the premises licence.	

REVISIONS REV 00:

FIT OUT TYPE LICENCING
PROJECT MERKUR SLOTS 265 NEASDEN LANE NEASDEN NW10 1QG
DESCRIPTION PROPOSED LICENCE PLAN <div>51</div>

REFERENCE DRAWINGS	
SCALE 1:75	
DRAWN BY LR	
DATE 11/10/24	
DRAWING No. 905-PL-106	REVISION 00




MERKUR
SLOTS

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PLEASE NOTE: SPACERS ARE NOT GAMING MACHINES



REVISIONS REV 00:	FIT OUT TYPE LICENCING		REFERENCE DRAWINGS		<div></div> <div>COPYRIGHT IS RESERVED BY MERKUR CASINO UK AND IS ISSUED ON THE CONDITION THAT IT IS NOT COPIED OR DISCLOSED BY OR TO ANY UNAUTHORISED PERSONS WITHOUT PRIOR CONSENT FROM MERKUR CASINO UK.</div>
	PROJECT MERKUR SLOTS 265 NEASDEN LANE NEASDEN NW10 1QG		SCALE 1:75		
			DRAWN BY MG		
			DATE 13/11/24		
	DESCRIPTION PROPOSED MACHINE PLAN <div>52</div>		DRAWING No. 905-PL-105	REVISION 00	

Merkur Slots UK Limited

Operational Standards

THE LICENSING OBJECTIVES UNDER THE GAMBLING ACT 2005

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

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

- Merkur Slots UK Limited is aware that it must notify the Gambling Commission should we suspect that offences under the Gambling Act 2005 are being committed.
- Merkur Slots UK Limited complies with the Commission's advice on the Proceeds of Crime Act 2002.
- Merkur Slots UK Limited has completed its own Business Anti-money laundering risk assessment, local area risk assessments and implements anti-money laundering policies and procedures.
- If we suspect anyone of using our premises for the furtherance of criminal activity (for instance drug dealing, using counterfeit money, selling suspected stolen property and criminal damage) we will contact the police immediately, report to our Head of Compliance and record the instance in the AML and Incidents modules of the electronic Smart Tablet system.
- All Merkur Slots UK Limited premises operate digital CCTV and customer areas are supervised.
- Merkur Slots UK operates a group-wide Security Alert system where incidents are shared instantly with all licenced premises. We have an internal Fraud Measures Team that respond to and investigate incidents. As a BACTA member, we receive nationwide Security Alerts, which are circulated via the Security Alert system to all licenced premises.
- All Merkur Slots UK premises provide a static alarm system which is also supported by Staff Guard, a nationwide security company that offers 24hr support via a monitoring centre with fully trained operatives who advise on difficult situations and escalate appropriately.
- Merkur Slots UK Limited has an extensive security, audit and money laundering team monitoring employees and customer activity.
- All Merkur Slots UK employees complete six-monthly refresher training which covers this licencing objective; anti-money laundering policies and procedures; and guidance on the Proceeds of Crime Act 2002.
- Merkur Slots UK operate a robust late night working policy, which is fully supported by a fulltime Night Manager.
- Merkur Slots UK does not operate a single-manning policy between 10pm and close, however, should an emergency occur a 'locked door' and 'keep in touch' policy is implemented.

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

- Our gaming rules are prominently displayed in each of our licensed premises.
- Our employees have a full understanding of machine gaming rules.

Merkur Slots UK Limited

Operational Standards

- We encourage customer-facing employees to use positive discretion to resolve customer issues at a local level, where possible.
- Our Customer Complaints procedure is displayed prominently in every venue. Where customer disputes cannot be resolved satisfactorily, we refer all potential disputes to our appointed Alternate Dispute Resolution provider (IBAS).
- All venue managers complete a comprehensive 13 week induction programme prior to taking on responsibility of their own venue and team.
- All licensed premises employees receive induction and six-monthly refresher training during their employment to ensure that potential issues can be addressed at the earliest opportunity.

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

- All our licensed premises are strictly adult only and we provide appropriate notification on entry, on all marketing material and throughout our premises.
- We operate a Think 25 policy as standard and all employees are trained to request a photographic form of identity if they suspect that a customer is under age. All challenges are recorded on our Smart Tablet system under Age Verification Checks and ServeLegal are our third-party independent partner for compliance testing. Test results are reported to the Gambling Commission.
- All licensed premise employees receive induction and six-monthly refresher training during their employment on social responsibility and safeguarding children and vulnerable people, with a particular focus on the prevention of harm.
- We prominently display information throughout our licensed premises on responsible gambling and provide details of organisations that can provide support and guidance such as BeGambleAware.
- Socially Responsible messaging is implemented on B3 and Category C digital machines.
- All licensed premise employees are trained to identify potential at risk customers and conduct effective interactions. Customer interactions are recorded on the Interactions module on the electronic Smart Tablet and reviewed centrally by the Compliance team.
- Merkur Slots UK have a Safer Gambling Team dedicated to supporting venues with meeting this licensing objective and their socially responsible requirements.
- We implement a self-exclusion policy throughout our licensed premises and operate a Smart Tablet system for recording self-exclusions, reinstatements, and breaches. We are also members of the Bingo Association Multi-Operator Self-exclusion Scheme.
- The layout of our premises is designed to facilitate customer supervision by employees.
- We provide an annual donation in support of research, prevention, and treatment (RPT) of problem gambling.

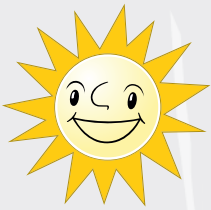
All three licensing objectives are embedded at all levels within the organisation via training both online and face to face, during Operational meetings, Business Bulletin communications, Compliance/Audit visits, Safer Gambling Workshops and Annual Conferences.

WORKING TOGETHER



Accredited by the Global
Gambling Guidance Group

THE MERKUR FAMILY



PART OF THE MERKUR GROUP

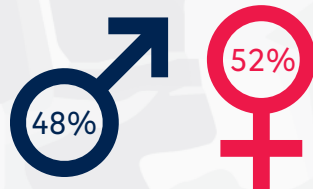
A Strong Partner For More Than 60 Years



MERKUR
CASINO

MERKUR Casino UK is a subsidiary of the family run MERKUR Group who are based in Espelkamp (Germany). Over the last 60 years the group has grown to operate more than 700 venues across Europe under the MERKUR Brand. Millions of enthusiastic guests at home and abroad know our logo. The laughing MERKUR Sun is a guarantor for the best entertainment.

MERKUR Casino UK employs over 2,000 people in over 220 High Street gaming centres.



52% of employees are female
48% of employees are male



MERKUR
SLOTS

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

MYTHBUSTERS

We Are Not Betting Shops

MERKUR Casino UK is one of the UK's largest operators of High Street Adult Gaming Centres (AGCs) and High Street bingo venues. AGCs are often, unfortunately, put into the same category as betting shops. This is because there is a widespread misunderstanding of how AGCs operate and who our customers are. We want to address these misconceptions and demonstrate that a new AGC on your local high street is a good thing. Public concerns surrounding betting shops were largely due to the presence of Fixed Odds Betting Terminals (FOBTs). Our venues do not offer these types of machines. Our machines offer low stakes ranging from 10p to a maximum of £2, plus a variety of bingo products are also available. These machines have been around for many, many years.

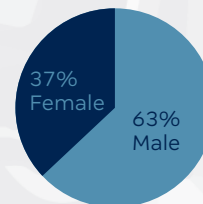


Our AGCs are where people come to spend their spare change, have a game of bingo and enjoy their favourite pastime in convenient locations.

The market on the high street has evolved with venues now providing electronic bingo tablets.



Our machines operate at low stakes.



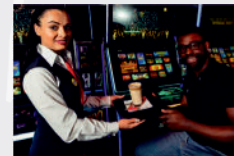
Our venues appeal to all ages with our membership gender database split of 63% male & 37% female.



Our teams remain with the customers on the venue floor rather than behind a counter.

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

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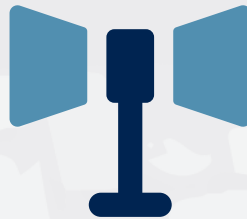
OUR OPERATION

We Are Not Noisy Neighbours

Whilst we sit within the leisure sector, noise levels are very low and limited from our venues. We currently operate 24 hours in over 150 venues.



Our machines generate low levels of noise.



We do not have tannoy systems that you find in seaside amusement centres.



We only play background music like at any other high street shop.



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



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



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



Think 25 Messaging



Players in Venue



RESPONSIBILITY IS THE FOUNDATION OF OUR BUSINESS

We Are Not A Problem

Being a responsible operator is high priority across the MERKUR group and in the UK, MERKUR Casino is always looking at ways to adhere to the three licensing objectives as technology and customer behaviour changes.

GAMBLING COMMISSION

MERKUR Casino is regulated by the Gambling Commission and Licensing Authorities

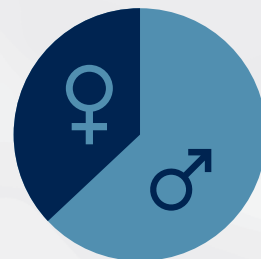


We do not sell or serve alcohol in our venues. We provide complimentary refreshments, teas and coffees, to customers. Our staff will not allow anyone into the premises who appears to be intoxicated.



Our venues operate a Think 25 policy whereby any persons who look under 25 have to produce a form of photo ID.

Our venues appeal to all ages with our membership gender database split of 63% Male / 37% Female



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

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SOCIAL RESPONSIBILITY MEASURES IN PLACE



In Venue

Operationally we have a number of measures in place to protect our customers. Throughout the business MERKUR Casino also has a number of socially responsible gambling tools, and management and training initiatives that include:



All staff complete on-boarding and six-monthly refresher training on “The Essentials of Compliance and Social Responsibility” and “Safeguarding Children and Vulnerable People”.



Dedicated Learning & Development Team and National training centres.

SMARThub tablet in every venue for the recording of customer interactions, self-exclusions, incidents and alerts.



All data is centrally reviewed and evaluated by an independent Audit/Compliance team.



Six monthly compliance audits to help identify training needs in venue.

Local Area Risk Assessments are updated annually to identify any changes in the local area.



Our Category B3 machines support safer gambling by having time and limit settings available to customers.

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Compliance



Training Centre

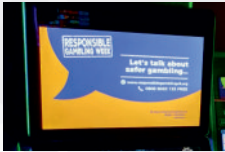


Online Training





Machine Messaging



Customer Interaction Training



SOCIAL RESPONSIBILITY MEASURES IN PLACE

All Levels

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



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



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



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

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



- Senior Manager representation from MERKUR Group.
- Member of the National Council.
- Head of Compliance is Vice Chair of the Social Responsibility Committee.



- Operations Director and Head of Compliance are Directors
- Head of Compliance is a member of the Safer Gambling Committee.

BENEFITS TO THE HIGH STREET



Benefits for your High Street include:



Over 90% of new MERKUR Slots venues occupy former vacant units.



Investment from £100,000 to £250,000 in long-standing vacant venues.



Linked trips with other shops helping to support other businesses.



Local jobs for between 6 and 12 people depending on the hours of operation.



Increased footfall to the High Street.



We provide an important natural surveillance on the high street, particularly late into the evenings.

COMMUNITY & CHARITY

MERKUR Initiative

Supporting Local Charities and Good Causes



Amongst other charities, some of your donations have helped:



MERKUR Casino UK has raised in excess of
£1.4 million for good causes since 2005

Please contact us

For press enquiries:

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Second Floor

Matrix House

North Fourth Street

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63
MK9 1NJ

phone 01908 351200

email info@merkur-casino.com



MERKUR
CASINO

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

LCCP 3.4.1 – Premises-based customer interaction

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

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

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

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

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

Customer interaction consists of the following 3 parts:

PROCEDURE

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

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

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

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

Conversations that have been had with a customer, are not just to be recorded at the point that signs of Gambling Harm have been observed, they should be a record of the customer's journey with MERKUR as part of Customer Service rounds.

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

The above 3 parts may include the following:

- Members of staff are trained as part of their 3-month induction process in the understanding of, and the strict adherence to this policy and accompanying logs.
- In addition to induction training, Safer Gambling Interaction and Evaluation, workshops are held with all senior management, managers, and supervisors within the Slots venues, to ensure they are fully aware of their responsibility in the monitoring and evaluation of Interaction/Conversations which take place in the venue.
- All Customer Interaction/Conversations must be logged on the Smart Tablet and are evaluated by a member of management with additional information or follow up conversation requested should it be felt insufficient information has been recorded.
- Recording a 'general' conversation that has taken place with a customer, in the course of an employee's normal customer Service role, will enable future monitoring and Interaction/Conversations to take place with any customer who starts to show a change in behaviour – whether this is visit frequency, pattern of play or length of time spent in the venue etc.
- For Machine players, machine hosts are trained to observe behaviour and have an Interaction/Conversation with customers where they observe changes in usual behaviour or signs of Gambling Harm.
- All employees are aware of those customers that are frequent visitors or deemed to be regular players. That monitoring and interaction needs to take place with these customers during their visits. An interaction may lead to the Duty Manager having to intervene or take appropriate action, possibly using the Machine Administration Reconciliation System (MARS), which provides the data to review the spend/play on most machines, for those customers deemed to be potentially at risk. Appropriate action would then be taken on a player-by-player basis.

- Behaviors that may be a result of a customer suffering from Gambling Harm may include intense mood swings, aggression, hysteria, remorse, excessive ATM use, excessive time and money spent, damage to property, violence, or the threat of violence to staff or other customers.
- Employees are aware of where customers can be directed for confidential advice should they be approached by them for help or when they identify signs of gambling harm. This includes the Staying in Control information leaflet which includes GamCare Helpline.
- Employees are trained to guide customers through the process of self-exclusion if they consider a customer is at risk and/or where a customer requests self-exclusion information, this will be fully explained, and T&Cs provided to the customer.
- The Duty Manager may consider refusing service or barring the customer from the premises and, in extreme situations involving aggressive behaviour, contact police for assistance. Any interaction that results in an incident of this type, whether police attend or not must be recorded on the SMART Incident App on Smart tablet.
- If the customer refuses such information and continues to behave in a manner which could reasonably be considered to be disruptive or puts employees or other customers in potential danger, the Duty Manager will implement the Company's procedures for dealing with antisocial situations.

Whilst most customers can enjoy and manage their gambling, MERKUR Slots recognises it has a duty of care to those who struggle to manage their gambling and may be experiencing harm from gambling. Accordingly, we provide a self-exclusion facility for those customers that wish to request an exclusion for a fixed period, which is for a minimum of not less than 6 months, nor more than 12 months, with the customer, on request, having the option to extend one or more periods for a further 6 months each.

LCCP 3.5 – Self-exclusion

- 3.5.1 – Self-exclusion – non remote SR code
- 3.5.2 – Self-exclusion non-remote ordinary code
- 3.5.6 – multi-operator non-remote SR code
- 3.5.7 – multi-operator non-remote ordinary code

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

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

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

PROCEDURE – Using the Smart Exclusion Tablet

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

Self-exclusion is sector specific: –

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

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

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

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

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

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

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

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

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

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

Please note on the photo gallery,

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

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

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

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

SELF EXCLUSION PROCEDURE FLOWCHART

Self-exclusion breach



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

Self-exclusion extension



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

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



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

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

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

TABLET - STAFF TRAINING

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

First Name: **dummy**

Last Name: **test**

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

Smart Tablet malfunction

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

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

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

POLICY

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

LCCP 5.1 Rewards and Bonuses

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

COMPLIANCE

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

We adopt the general principles that our advertising is:

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

Specifically, we ensure that:

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

MARKETING AND PROMOTION

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

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

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

PROCEDURE

All Marketing and Promotions must be compliant.

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

- Operations Director
- Head of Compliance
- Marketing Director

MARKETING CODE OF PRACTICE

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

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

LEGAL - DECENT - HONEST - TRUTHFUL

1. All our advertising and promotions must be legally compliant and **MUST NOT** be misleading or indecent.
2. All our advertising and promotions must be socially responsible and **NOT** promote gambling for financial gain.
3. All our advertising and promotions must be **TRANSPARENT** and clearly state the offer and any requirements or conditions applied to obtaining it.
4. Any terms or conditions related to the offer, including offer end dates **MUST BE** displayed clearly at the point-of-sale and/or on any related printed literature or publicity materials.
5. Any printed literature, display or point-of-sale material **MUST** contain the company's approved compliance baseline (see example below) which includes the over 18 symbol and Gamble Responsibly statement alongside your business name, brand/logo.
6. Advertising and promotions **MUST NOT** be targeted at, or exploit children, or those vulnerable to gambling. The law states :
Advertisements and Promotions should not be specifically and intentionally targeted towards people under the age of 18 through the selection of media, style of presentation, content or context in which they appear. All advertisers and gambling operators should already be aware that it is an offence under Section 46 of the Gambling Act 2005 to invite a child or young person to gamble.
7. The use of models, photographic images or illustrations in advertising or promotions must look a minimum of 25 years of age.
8. **DO NOT** make purchase a condition of entry into a draw or raffle – buying a 'chance' of winning is a lottery, so always state **NO PURCHASE NECESSARY** (even if for charitable causes).
9. **DO NOT** present offers which reward extended play or incentivise disproportionate stake levels.
10. **ALWAYS** communicate offers clearly in grammatically correct English, avoiding slang, expletives or abusive text. Avoid anything customers could perceive as offensive or discriminatory and remember the 4 key code words:

**GUARANTEED JACKPOT
WINS FOR EVERYONE!**

**PLAY THIS AND
DOUBLE YOUR MONEY!**

**YOU WILL WIN
A FORTUNE!**
NO TERMS AND CONDITIONS

**BEST BEFORE
END**

**OVER 18
ONLY**

THINK

**FREE TO
ENTER?**

**PLAY LONGER
WIN MORE**

LEGAL - DECENT - HONEST - TRUTHFUL

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

18+ BeGambleAware.org

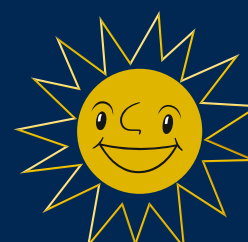


**PLAY
SENSIBLY**

**PLAY
ENJOYABLY**

**PLAY
AFFORDABLY**

75



**MERKUR
SLOTS**

Responsible Gambling Messaging

MERKUR have always
adopted Think 25?

MERKUR implemented 'multi-lingual' Staying in
Control leaflets and posters

All digital B3 and Cat C
machines have RG messaging

Responsible Gambling Messaging

Machine Set Your Limits

Gamcare QR code integrated into
machine and venue signage

Safer Gambling Week

INTRODUCTION

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

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

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

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

MONEY LAUNDERING DEFINITION

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

MONEY LAUNDERING POLICY

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

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

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

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

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

DISCLOSURE PROCEDURE

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

All incidents should be reported to your line Manager.

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

CASH HANDLING

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

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

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

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

WHAT CAUSES AGGRESSION AND VIOLENCE?

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

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

WHAT ARE SOME OF THE CAUSES OF VIOLENCE?

There are two aspects to consider:

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

IDENTIFYING AN AGGRESSIVE OR VIOLENT PERSON

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

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

PROCEDURE

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

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

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

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

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

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

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

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

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

PREVENTING EMPLOYEES FROM BEING ABUSED

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

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

DE-ESCALATION TRAINING

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

Day 1 – Induction

Level 7

Level 6

Level 5

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

Training

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

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

First impressions count

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

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

Preparation

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

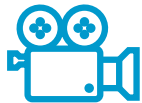
Housekeeping

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

Introduction to Workday/Litmos

New employees:

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



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



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



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



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

Venue Tour

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

Use the following check list to assist you:

Fire safety

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

Compliance

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

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



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

Team Structure

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

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

Workday App

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

- Workday App
- Docusign
- Authenticator

Check In/Out – Part 1

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

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

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

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



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

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

Scheduling

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

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



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



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

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

Standards & Expectations

Talk through our brand values, and the 5 pillars.



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

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

- Time keeping
- Sickness

Uniforms & Appearance



You are a 'Brand Ambassador' for our Company.

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

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

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

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

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

Appearance of Employees

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

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



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



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

Compliance Essentials – Equality & Diversity



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

Smoking & Vaping

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



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

Introduction to the shop floor

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

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

Fire Safety – Part 1

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

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



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

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

End of day review

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

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

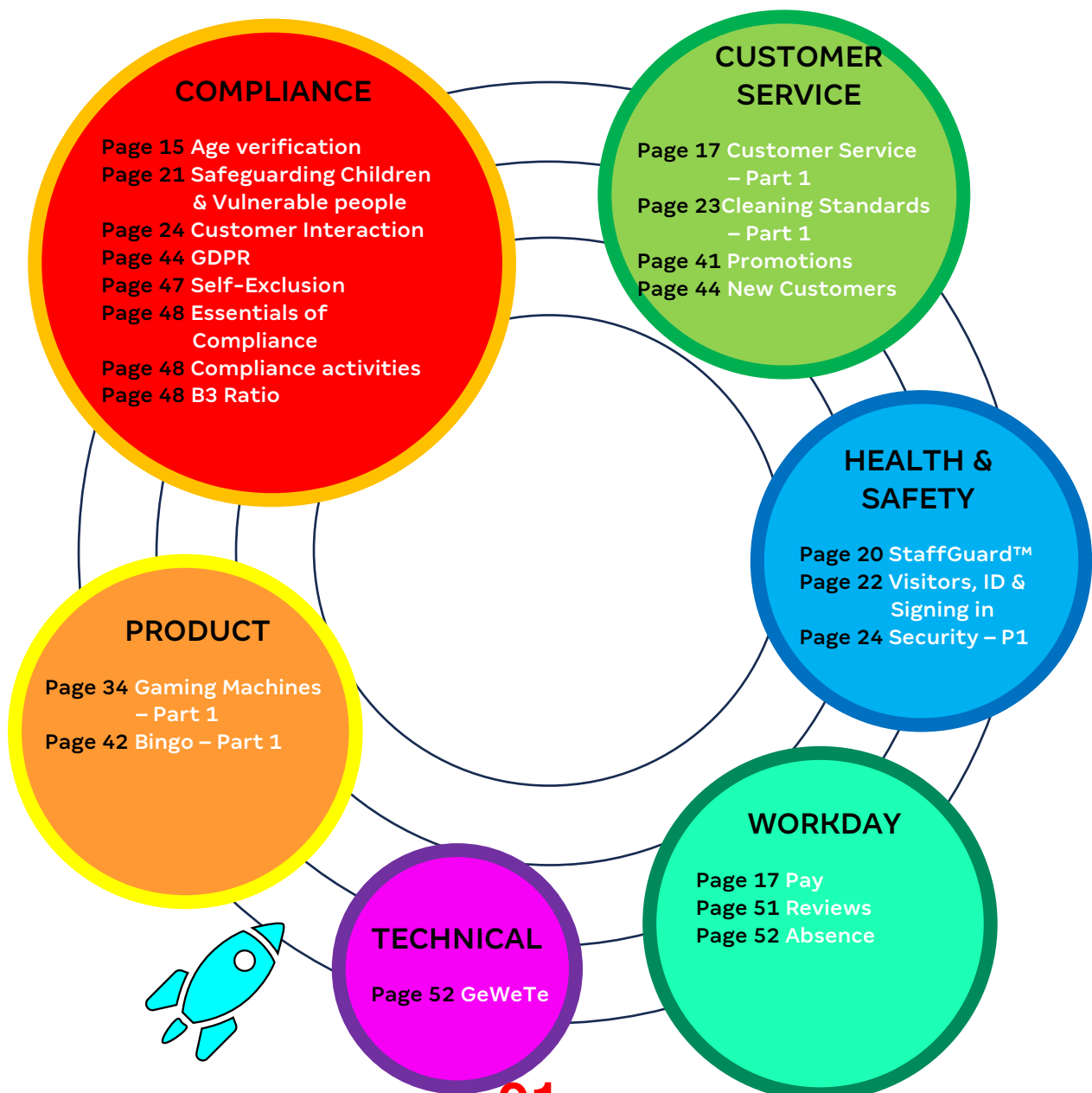
From ‘**Introduction to the shop floor,**’ please review what your trainee observed, whilst shadowing.

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

Learning Map – Week 1

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

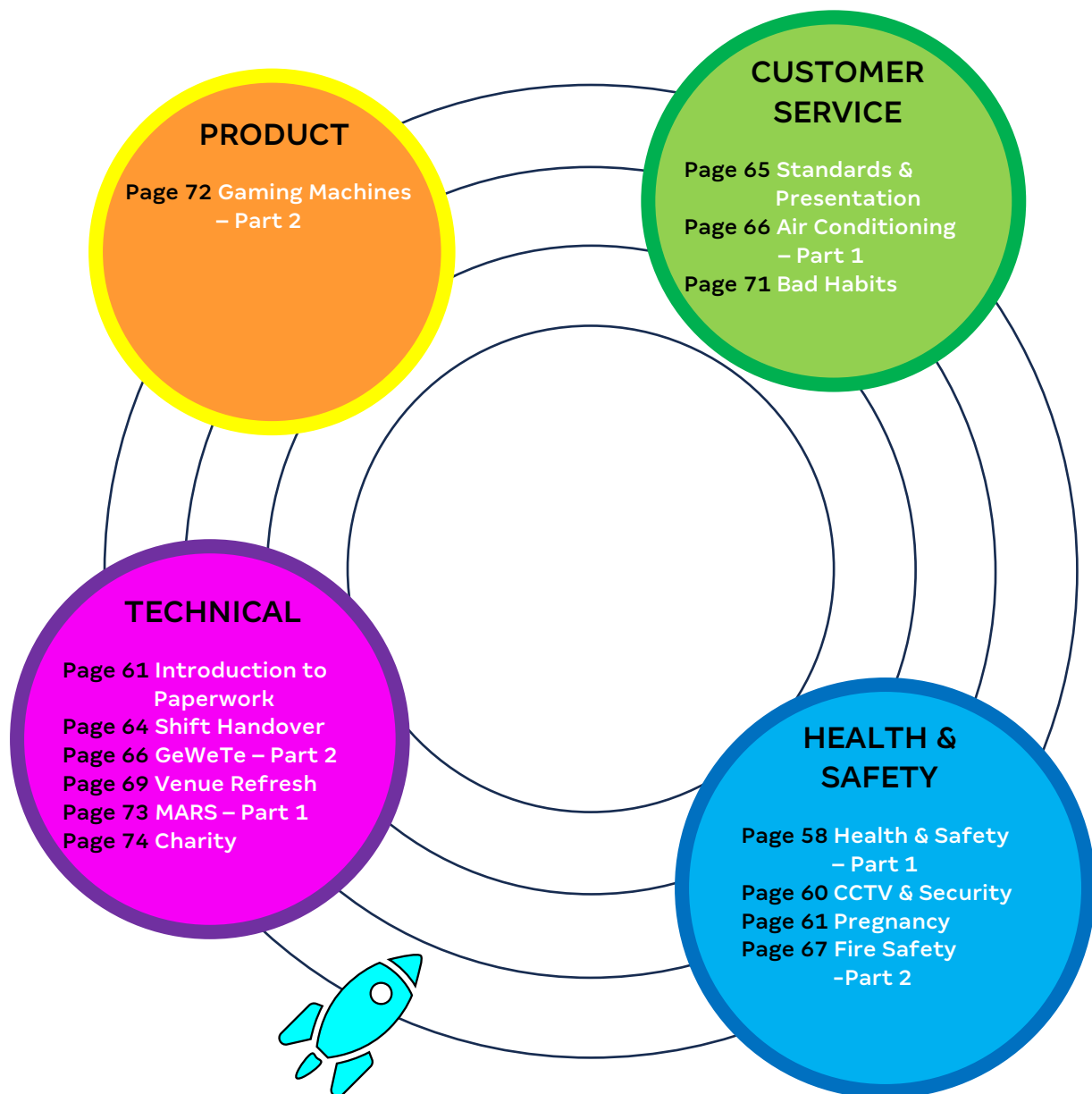
For more comprehensive information on the order to train each section, please refer to **Page 6 – How to train each week**, from the 'How to use the Management Guide to Training'.



Learning Map – Week 2

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

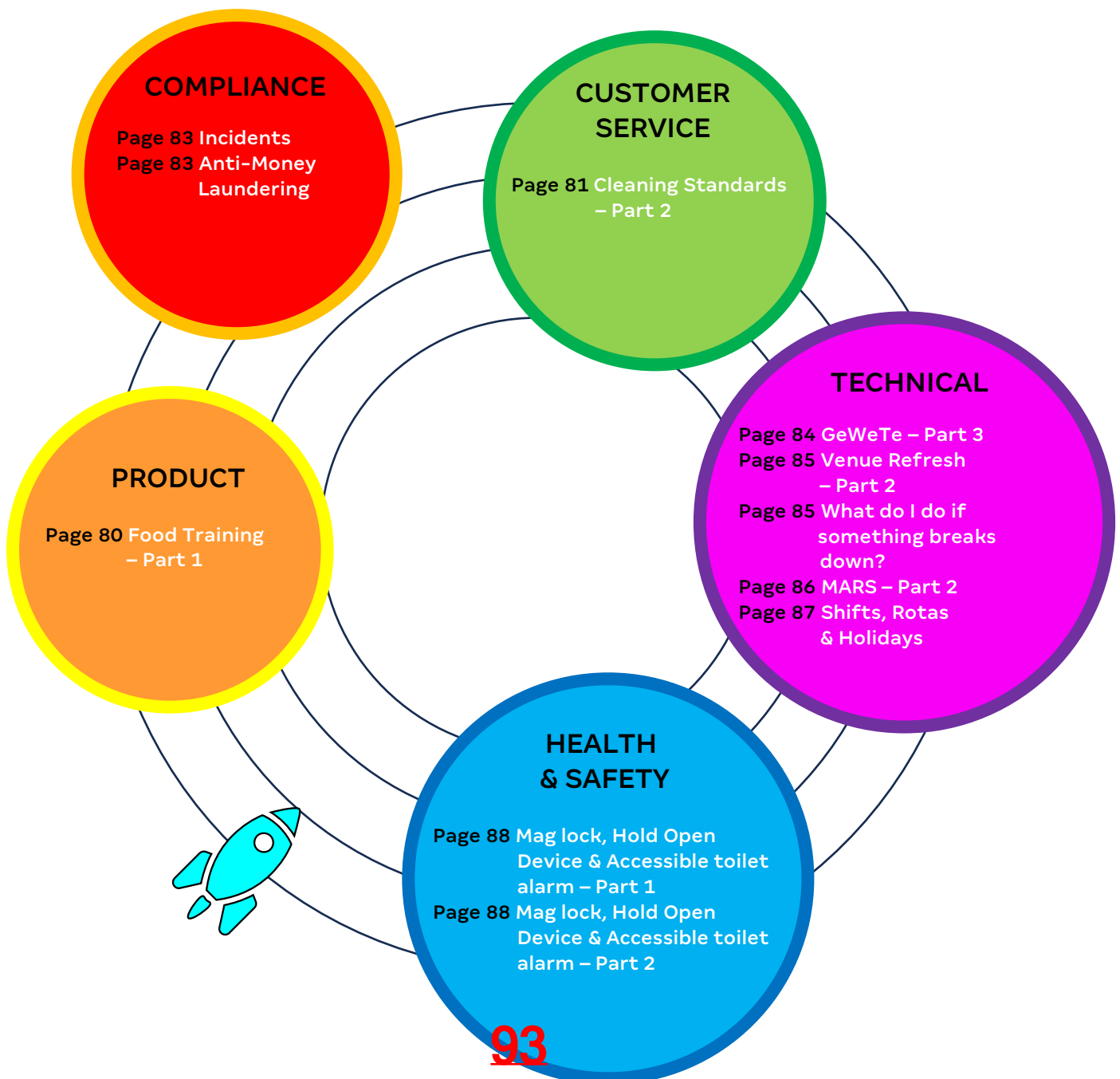
For more comprehensive information on the order to train each section, please refer to **Page 6 – How to train each week**, from the 'How to use the Management Guide to Training'.



Learning Map – Week 3

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

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

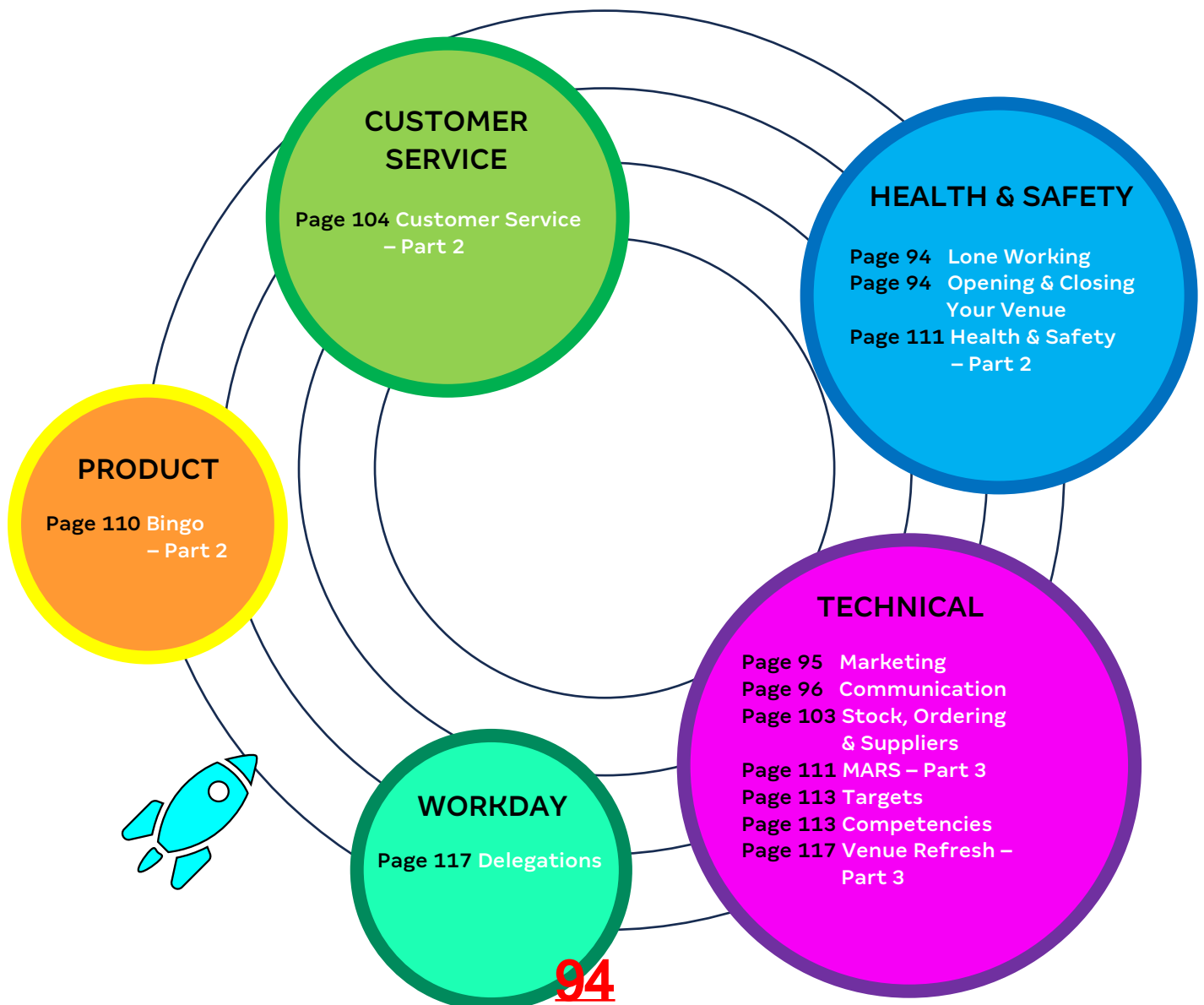


Week 4 Guide

Learning Map – Week 4

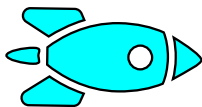
You must explore all the planets orbiting the MERKUR sun. When you land on a planet you must train the subject to the best of your ability, using your experience and wealth of knowledge. You do not have to train everything on the planet in one go; you can re-visit it. You must land on every planet, but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

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



Week 5 Guide

Learning Map – Week 5

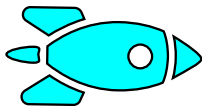


TECHNICAL

Page 123 Pre-Collection
Page 124 The Collection
– Part 1
Page 128 Handpays, Cash
Claims & Tito

Week 6 Guide

Learning Map – Week 6

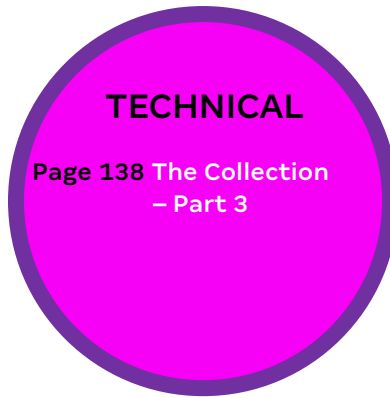
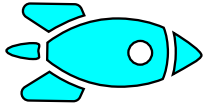


TECHNICAL

Page 133 The Collection
– Part 2

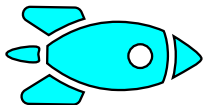
Week 7 Guide

Learning Map – Week 7



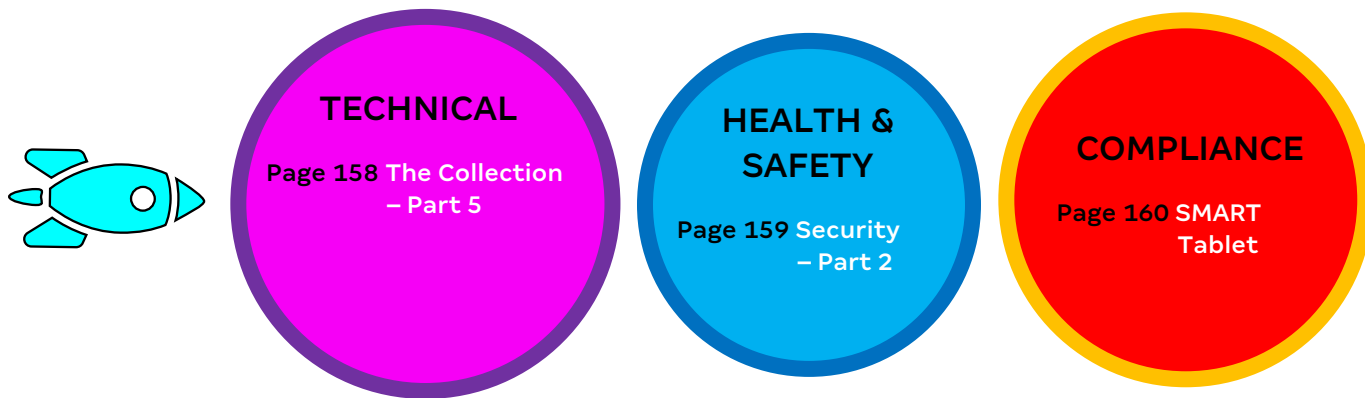
Week 8 Guide

Learning Map – Week 8



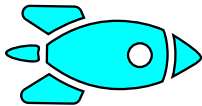
Week 9 Guide

Learning Map – Week 9



Week 10 Guide

Learning Map – Week 10



TECHNICAL

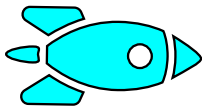
Page 167 The Collection
– Part 6

COMPLIANCE

Page 167 Audits

Week 11 Guide

Learning Map – Week 11



TECHNICAL

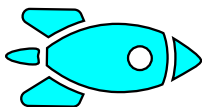
Page 171 The Collection
– Part 7

CUSTOMER SERVICE

Page 171 Mystery
Shoppers

Week 12 Guide

Learning Map – Week 12



TECHNICAL

Page 175 The Collection
– Part 8

CUSTOMER SERVICE

Page 175 WOW
Factor

ROADMAP TO SUCCESS

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

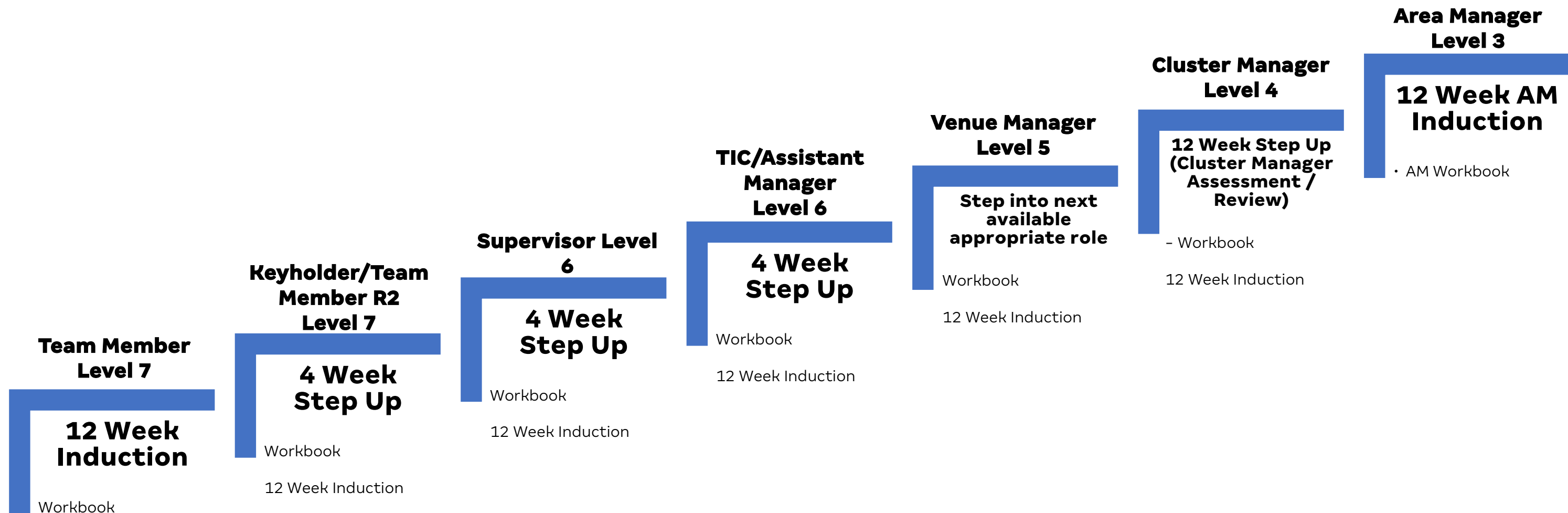
You will be able to identify where you are in your journey and what is the expectation within your role. If you have an interest in progressing further the roadmap will highlight what the expectation at the next level is, and how you can achieve this.

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

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

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

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



You must attain the competency of the previous step before progressing	Team Member	Keyholder	Supervisor	Assistant Manager/TIC	Venue Manager	Cluster Manager	Area Manager
INITIAL TRAINING PERIOD	Weeks 1– 12 Venue Manager – Responsible for Sign off Workbook	4 Weeks Venue Manager – Responsible for Sign off	4 Weeks Area Manager/Cluster Manager – Responsible for sign off	4 Weeks Area Manager/Cluster Manager – Responsible for sign off	Step into Next available role Area Manager/Cluster Manager – Responsible for sign off	12 Weeks Area Manager/Operations Director – Responsible for sign off	12 Weeks Operations Director – Responsible for sign off
BEHAVIOURS	<p>Team Member can demonstrate and apply the following:</p> <ul style="list-style-type: none"> To promote the Company in a positive manner when dealing with internal and external customers. Assisting customers with queries, pay outs and any other issues that may arise. Own and resolve problems escalating where appropriate and in accordance with the complaints policy. To manage the customer journey through the WOOOOOOOW Factor. To follow all relevant company policies and procedures ensuring safety and security processes are adhered to. assist with pre- collection/midweek collection procedures as directed if required. Complete company paperwork and accounting as per company policies. To ensure the venue is compliant following all relevant policies and procedures outlined in the Compliance Manual. To carry out any other reasonable duties as required, undertake additional or alternative duties related to you position as directed from time to time by your line manager. Keep up to date with changes to the business using relevant systems (Meetings/MyMERKUR/Litmos/Workday etc). 	<p>Keyholder can demonstrate and apply the following:</p> <ul style="list-style-type: none"> To ensure that customer service is carried out in line with the company standards owning and resolving any problem. Ensure that customer complaints are dealt with as quickly as possible. Responsible for understanding and ensuring compliance with internal Responsible Gambling policies and UK Gambling Commission Licence Codes of Conduct and Practice (LCCP). Organise team when working in the capacity of the keyholder to ensure all tasks are completed to the company standard. To ensure that all machines in venue are playable, reporting any machines faults on MARS. 	<p>Supervisor can demonstrate and apply the following:</p> <ul style="list-style-type: none"> Establish and maintain customer service standards, positive experience on behalf of the company and maximise income wherever possible. To ensure that all employees perform to required personal and company standards promoting teamwork to enhance business opportunities. Ensure that all daily/weekly/periodical administration is completed at the correct time and to the required standard. Retain completed administration in line with company policy and legal requirements. Standards are maintained at a high level and that all housekeeping standards are adhered to. To monitor competitor activity, report as appropriate and recommend action where required. 	<p>Assistant Managers can demonstrate and apply the following:</p> <ul style="list-style-type: none"> Support the VM or Cluster/Area Manager in operating the venue. Leads by example ensuring the team understands how to deliver excellent customer service. Aware of the company audit requirements and ensure the team are implementing daily. Support VM in managing the team. Play an active role in team briefings as and when required as well as attend Area meetings as required. Create schedules and support the VM, in manning the venue. To support the VM in achieving KPI's and audits. Review employee training in line with company policy. Effectively manage the machine arcade alongside the team to maximise revenue opportunities. 	<p>Venue Managers demonstrate and apply the following:</p> <ul style="list-style-type: none"> To undertake team briefings as and when required as well as attend Area meetings as required. To conduct regular, random checks of floats, keys etc on all employees, taking appropriate action where necessary. Complete schedules to support the needs of the business, in line with the company policy. To achieve KPI's and audits. Ensure employee training is completed in line with launches, refreshed and in line with company policy. To implement appropriate marketing/promotional activities to maximise revenue opportunities. To monitor and analyse machine income levels and recommend appropriate action to maximise revenue. 	<p>Cluster Managers demonstrate and apply the following:</p> <ul style="list-style-type: none"> Support the Area reporting in to the Area Manager. Responsibility of a Cluster of venues with the VMs reporting into the Cluster Manager. To monitor and analyse Area performance and recommend appropriate action to maximise revenue opportunities through regular KPI meetings. 	<p>Area Managers demonstrate and apply the following:</p> <ul style="list-style-type: none"> Review Area activity in relation to promotional activity and customer journey to improve performance. Work collaboratively with other functions in the operation to deliver the best customer experience and results. To monitor and analyse Area performance and recommend appropriate action to maximise revenue opportunities through regular KPI meetings. Attend and present at Sales Meetings highlighting area performance and future plans. Hold regular Area Meetings to discuss performance and share best practice through the team. To conduct regular Audit checks and take appropriate action where necessary

	Team Member	Keyholder	Supervisor	Assistant Manager/TIC	Venue Manager	Cluster Manager	Area Manager
TECHNICAL SKILLS	<ul style="list-style-type: none"> To ensure that the venue housekeeping is of the highest possible standards at all times. To routinely clean all AGC equipment both before and during trading hours to ensure customers receive a high standard of presentation of equipment at all times. To acquire and maintain a high level of machine knowledge both product and technical. To report machine faults in line with company procedures using the relevant escalation process. To report machine faults in line with company procedures using the relevant escalation process. 	<ul style="list-style-type: none"> Responsible for completing the venue refresh following all company security procedures. Responsible for refilling and maintaining the float level of the venue GeWeTE and ATM following all company security procedures. Responsible for completing MS9 Float Check ensuring all sections are completed accurately. Ensure all paperwork is completed accurately as well as declared on MARS. To take full responsibility for the opening, trading, and closure of the venue in the absence of a Venue Manager/Supervisor. Ensure the venue is set up to the required standard. Understand the implication of the bingo equipment failing and how to manually run a game in venue. Knows how to use the bingo equipment and follow the process to run a manual bingo game. 	<ul style="list-style-type: none"> To ensure venue cash collections are carried out in a timely and accurate manner, in accordance with Company procedures. Investigate any exceptions, promptly taking remedial action, as necessary. To assist in security investigations, as necessary. To deal with the day-to-day problems arising from employees within the venue. To respond to alarm activation's and take appropriate action. To ensure at all times safety of all employees together with those members of the public visiting the venue. 	<ul style="list-style-type: none"> Effectively manage a team to ensure all company monies is secured and reconciled weekly following all relevant company security procedures. Investigate any exceptions, promptly taking appropriate remedial action, as necessary. To ensure a good working environment is established, in order to obtain the maximum commitment and productivity of employees. To be actively involved in the recruitment of employees, ensuring that all applications are dealt with in a timely manner and in accordance with current legislation and company policy. 	<ul style="list-style-type: none"> To ensure that all newly recruited employees receive a full induction on commencement and are trained in all aspects of venue operation and are booked onto relevant courses to support customer service and product knowledge. To undertake team briefings as and when required ensuring that records are made and maintained. To deal with any instances of poor performance, misconduct or gross misconduct ensuring appropriate action is taken, this includes referral the Cluster/Area Manager. Complete performance reviews in line with company policy. To hold regular assessments of security procedures in liaison with the Cluster/Area Manager and where appropriate, identify potential weakness/threats. 	<ul style="list-style-type: none"> Support the Area Manager. Have responsibility of multiple sites reporting back into the Area Manager. To conduct regular Audit checks and take appropriate action where necessary. 	<ul style="list-style-type: none"> Prioritisation of key tasks within the Area. Respond to complex complaints and appropriately action responses. Analyse Mars system and have a clear knowledge on how to track performance data and formulate plans alongside the Cluster/VM to maximise profits. Manage disciplinary/appeals/grievance procedures. Apply the requirements of PML.

	Team Member	Keyholder	Supervisor	Assistant Manager/TIC	Venue Manager	Cluster Manager	Area Manager
ASSIGNED E-LEARNING	<ul style="list-style-type: none"> • Workday Training Course • Complaint Handling • Compliance Essentials – Equality & Diversity 1.0 (UK) • Age Verification • Safeguarding Children & Vulnerable People • GDPR Essentials • Essentials of Compliance • Leading Learning – Health & Safety at Work 1.0 • Manual Handling 3.0 • Fire Safety Awareness 3.0 (UK) • Food Safety and Hygiene – Allergen Awareness 3.0 (UK) • Food Safety and Hygiene – Catering Level 2 3.0 (UK) • Lone Working • Communicating Effectively 3.0 • Barriers to Communication Success – Part 1 2.0 	<ul style="list-style-type: none"> • See Previous 	<ul style="list-style-type: none"> • Relevant Workday Training Courses • Right to Work 	<ul style="list-style-type: none"> • Relevant Workday Training Courses • Food Safety and Hygiene – Allergen Awareness 4.0 (UK) • Food Safety and Hygiene – Supervisors Level 3 3.0 (UK) 	<ul style="list-style-type: none"> • Relevant Workday Training Courses 	<ul style="list-style-type: none"> • Relevant Workday Training Courses 	<ul style="list-style-type: none"> • Relevant Workday Training Courses
AVAILABLE TRAINING RESOURCES	<ul style="list-style-type: none"> • Back to Basics Resource Pack • Understanding Our Customers Resource Pack 	<ul style="list-style-type: none"> • See Previous 	<ul style="list-style-type: none"> • Management Essentials (3 Day Course) 	<ul style="list-style-type: none"> • Investigatory Training (1 Day Course) 	<ul style="list-style-type: none"> • Disciplinary Training (1 Day Course) 	<ul style="list-style-type: none"> • Finance • Coaching • Situational Leadership • Marketing • Delegation/Time Management • Audit • Compliance/Complaint Handling/PML 	<ul style="list-style-type: none"> • IML Level 5
POTENTIAL TRAINING RESOURCES	<ul style="list-style-type: none"> • Techniques to Handle Conflict and Escalation 	<ul style="list-style-type: none"> • See Previous 	<ul style="list-style-type: none"> • Mars • Train the Trainer • Feedback – Correcting Performance 	<ul style="list-style-type: none"> • Commercial Awareness • Coaching 	<ul style="list-style-type: none"> • Reviews • Store Checker 		<ul style="list-style-type: none"> • Goal Setting/ SMART Objectives • Finance • Presentation Skills • Leadership and Vision • Influencing

	Team Member	Keyholder	Supervisor	Assistant Manager/TIC	Venue Manager	Cluster Manager	Area Manager
COMPETENCIES E LEARNING	<ul style="list-style-type: none"> Customer Communications 1.0 Be assertive the right way 3.0 Leading Learning - Customer Service Excellence 1.0 Communication and Social Skills - Receiving Feedback 2.0 Customer Service Success 2.0 Leading Learning - Self-Confidence 1.0 Career Goals - Finding Purpose in Your Career 3.0 How to Behave at Work Parties - Social Media 3.0 (Global) How to Behave at Work Parties - Drugs and Alcohol 3.0 (Global) Stress Management - Taking Care of Yourself 1.0 How to Behave at Work Parties - Sexual Harassment 3.0 (Global) 	<ul style="list-style-type: none"> See Previous 	<ul style="list-style-type: none"> Clarify Team Expectations 1.0 Innovation 1.0 Be a Change Leader 1.0 Culture Series – Be the Change (For Non-Managers) 1.0 Communicating Effectively 3.0 Feedback and Non-Verbal Communication 1.0 Speaking and Listening 1.0 Communication Styles in CX 1.0 Leading Learning - Fraud Awareness 1.0 Emotional Intelligence 3.0 How to Influence 2.0 Reducing Stress Through Time Management 1.0 Preparing for Tasks Effectively 2.0 Leading Learning - Time Management Tips 1.0 Leading Learning - Productivity and Time Management 1.0 Team Working Excellence 3.0 	See Previous	<ul style="list-style-type: none"> Performance - Goal Setting 1.0 SMART Objectives 3.0 Adapting to Change 1.0 Introduction to Critical Thinking 1.0 Critical Thinking - Evaluating Arguments and Evidence 1.0 Communication Skills all Managers Must Master 2.0 Communication Styles and Emotional Intelligence 2.0 Scalable Customer Relationships 1.0 Motivating Your People and Being a Positive Role Model 2.0 Excellence in Customer Service 2.0 Feedback and Service 1.0 Coaching Skills 4.0 Constructive Feedback 3.0 Creating and Maintaining the Culture of Your Organization 1.0 	<ul style="list-style-type: none"> Setting Sound Goals 1.0 Leadership Suite - Strategy and Pragmatism 1.0 Leading Learning - The Customer Journey 1.0 Leading Learning - Successful Networking 1.0 Personal Development - Networking 2.0 	<ul style="list-style-type: none"> Organizational Strategy 1.0 Utilizing Power and Influence Effectively 1.0 Using Power and Influence Ethically 1.0 Inspirational Leadership 3.0 Handling Conflict and Negotiation Ethically What Makes a Great Place to Work 1.0 Leading Learning - Negotiating Cross Culturally 1.0 Leading Learning - Virtual Negotiation and Influence 1.0 Leading Learning - Negotiation and Influence 1.0 Claim or Create Value in Negotiations 1.0 Master the Art of Negotiating 2.0 Managing the Negotiators' Dilemma 2.0 Negotiation and Influencing People 3.0 Understanding Successful Negotiation 1.0

	Team Member	Keyholder	Supervisor	Assistant Manager/TIC	Venue Manager	Cluster Manager	Area Manager
COMPETENCIES E LEARNING (Continued)			<ul style="list-style-type: none">• Leadership Suite - The Accidental Manager 1.0• A Motivators Toolkit 2.0• Employee Motivation - Job Dimensions 1.0		<ul style="list-style-type: none">• Managing Teams• Be Likeable 2.0• Time Management for Managers 1.0• Essential Time Management Tools 1.0• Time Management 2.0• Tools and Knowledge for Successful Plans 1.0• Productivity and Time Management 3.0• Hire Team-Oriented Employees 1.0• Being an Inclusive Leader 1.0• Why Teamwork Works 1.0• Leadership Suite - Managing Different Personalities 1.0• Key Tools and Knowledge for Team Leading 1.0• Become an Effective Leader - Part One 2.0• Become an Effective Leader - Part Two 2.0• The Team and its Members 1.0• Diversity and Inclusion in Teamwork 2.0		

	Team Member	Keyholder	Supervisor	Assistant Manager/TIC	Venue Manager	Cluster Manager	Area Manager
STEP UP LEARNINGS	•	<ul style="list-style-type: none"> • Culture Series – Doing What's Right 1.0 • Culture Series – Setting An Example (For Non-managers) 1.0 • Decision Making Excellence 4.0 	<ul style="list-style-type: none"> • Leadership and Management – Dealing with Difficult Staff 2.0 • Culture Series – Be the Change (For Non-Managers) • Five Tips for New Managers and Supervisors 1.0 • Demystifying Management 1.0 • Introduction to Managing Employee Performance 1.0 • Management Skills - What Does it Take? 1.0 • Leadership Suite - Impostor Syndrome in New Managers 1.0 • Leadership Suite - Peer to leader 	<ul style="list-style-type: none"> • Transitioning to Management – The First Year • Leadership and Management – Coaching Others 2.0 • How to Delegate Effectively 2.0 (US) • Types of Management Styles in an Organization 1.0 • Put On Your Managers Hat • Culture Series – Start the Change (For Managers) • Model the Way 1.0 • Motivation and Job Performance 1.0 	<ul style="list-style-type: none"> • Developing Management Skills 2.0 • Top 10 Mistakes of Managers 1.0 • Active Listening • Flexible Working • Leadership Suite - Trust Building and Empathy • Business Budgeting 1.0 	<ul style="list-style-type: none"> • Leadership versus Management 2.0 • Evolution of Management 1.0 	

INTERNATIONAL CERTIFICATE OF ACCREDITATION



GLOBAL GAMBLING GUIDANCE GROUP

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

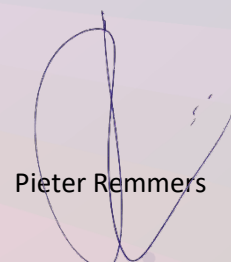
Merkur Casino UK

Audit date(s):
30 October - 3 November

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

On behalf of the G4 Foundation:


Jeffrey Derevensky


Pieter Remmers

Vincit qui se vincit

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INTERNATIONAL RESPONSIBLE GAMING ACCREDITATION SYSTEM

Full Observation Report

Stuart Jenkins – Licensing Consultant

Leveche Associates Limited

Merkur Slots

182-184 Edgware Road London W2 2DS

Executive Summary

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

Introduction

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

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

Personal – Stuart Jenkins

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

Observations

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

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

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

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

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

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

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

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

Covert Observations

Deployment One

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

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

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

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

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

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

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

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

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

Deployment Two

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

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

Summary

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

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

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

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

Appendix A

Observation Images

1st – 2nd September 2022

Merkur Slots

182-184 Edgware Road

London

W2 2DS

Leveche Associates Ltd

Nightingale House

46-48 East Street

Epsom

Surrey KT17 1 HQ

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

Merkur Slots
Merkur 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

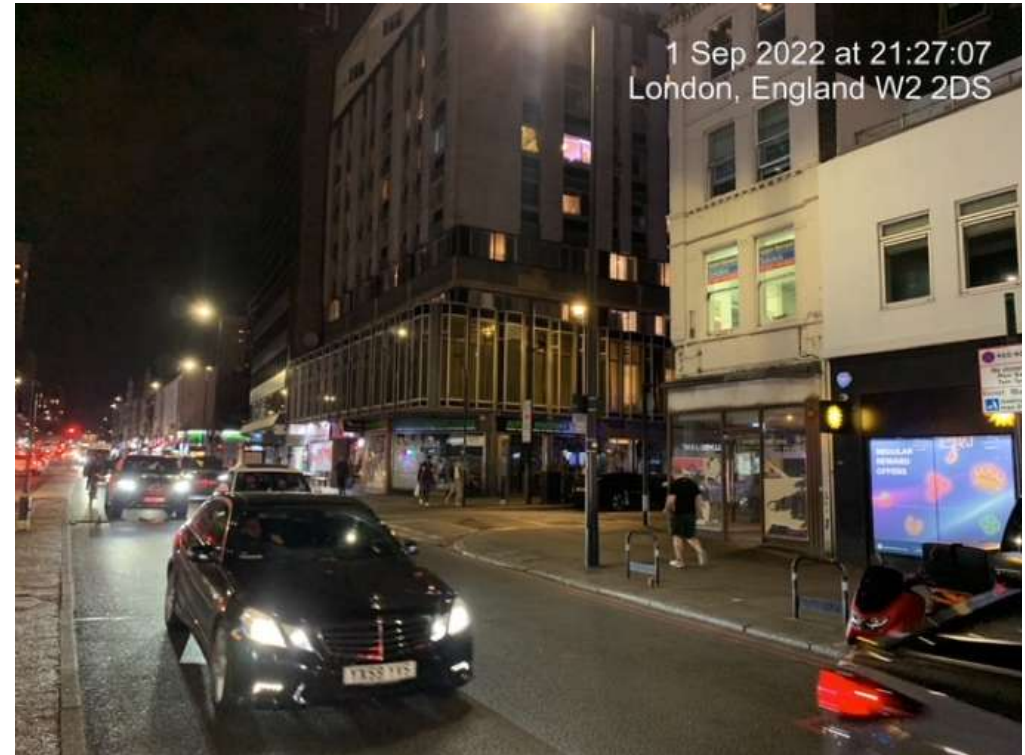


Image A6

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

120

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

121

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

122

Merkur Slots

Merkur 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

123

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

125

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

126

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

127

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

128

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

129

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

130

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

132

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

133

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

134

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

135

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

Stuart Jenkins – Licensing Consultant

Leveche Associates Limited

Merkur Slots Cashino

69 Tottenham Court Road London W1T 2HA

Executive Summary

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

Introduction

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

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

Personal – Stuart Jenkins

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

Observations

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

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

26. There are no other operators with a similar business model to Merkur Slots Cashino that operates 24-hours a day 7-days a week in the area of observations – Images A2, A3, A4, A5, A6, A7, A8, A9, A10, A11, A12 and A13.
27. There are four public houses in the observation area:
- i. Rising Sun Public House 46 Tottenham Court Road W1T 2EL which is advertised as operating Monday to Thursday 11:00 hours to 00:00 hours, Friday and Saturday 11:00 hours to 01:00 hours, and Sunday 11:00 hours to 22:30 hours – Image A14.
 - ii. The Court Public House 108A Tottenham Court Road W1T 5AA which is advertised as operating Sunday to Wednesday 12:00 hours to 00:00 hours, and Thursday, Friday and Saturday 12:00 hours to 01:00 hours – Image A25.
 - iii. Fitzrovia Belle Bar & Hotel 174 Tottenham Court Road W1T 7NT which is advertised as operating Monday to Sunday 07:00 hours to 00:00 hours – Image A26.
 - iv. TCR 183 Tottenham Court Road W1T 7PE which is advertised as operating Monday to Wednesday 12:00 hours to 00:00 hours, and Thursday, Friday and Saturday 12:00 hours to 01:00 hours and Sunday 12:00 hours to 22:30 hours – Image A27.
28. North of the premises is Whitfield Gardens at the junction with Tottenham Street, an open space with gardens and seating for public use. During the observations I saw no illegal activity or anti-social behaviour taking place – Image A30.
29. Throughout my observations in and around Tottenham Court Road I saw no begging taking place in the street, no street drinkers or drug dealing around the premises or the area. However, I did see people who are living on the street encamped, some in tents, underneath the canopy of Heals Furniture Store 196 Tottenham Court Road W1T 7LQ. This is a daily occurrence with members of the local homeless community sheltering overnight at Heals – Image A10, A39, A40, A41, A42, A43 and A44..
30. Photographic images of what was seen during the observations were taken to support my findings and are documented in Appendices A and B.

Covert Observations

Deployment One

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

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

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

Deployment Two

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

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

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

Summary

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

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

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

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

Appendix A

Observation Images
17th – 18th August 2022

Merkur Slots Cashino

69 Tottenham Court Road
London
W1T 2HA

Leveche Associates Ltd

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

Image A1

20:48hrs

Merkur Slots Cashino
69 Tottenham Court Road W1T 2HA

Image A2

20:48hrs

Tottenham Court Road looking south

17th - 18th August 2022



Image A3

20:48hrs

Tottenham Court Road looking north



Image A4

20:51hrs

Tottenham Court Road j/w Chenies Street looking north

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

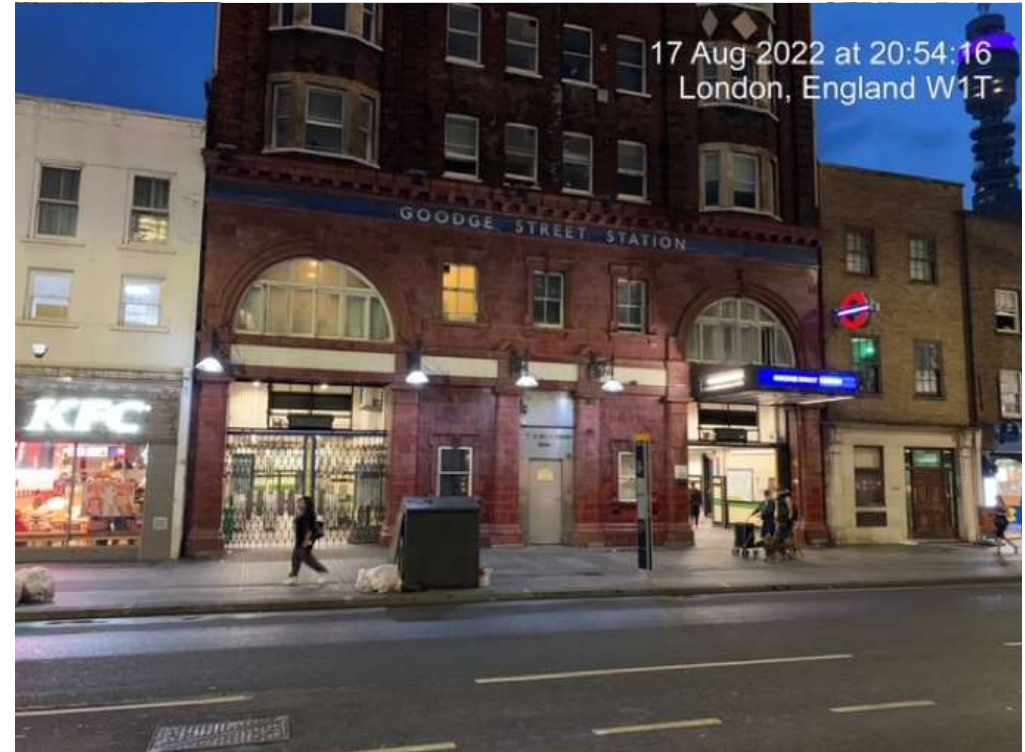


Image A8

20:54hrs

Goodge Street Underground Station
Tottenham Court Road

Merkur Slots Cashino
69 Tottenham Court Road London W1T 2HA

17th - 18th August 2022



17 Aug 2022 at 20:54:54
London, England W1T

Image A9

20:54hrs

Whitfield Gardens Tottenham Court Road
j/w Tottenham Street



17 Aug 2022 at 20:55:23
London, England W1T 7AA

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



Image A11

21:00hrs

Betfred 116 Tottenham Court Road W1T 5AJ



Image A12

21:02hrs

Warren Street Underground Station
Tottenham Court Road

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

Merkur Slots Cashino
69 Tottenham Court Road London W1T 2HA
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

Merkur Slots Cashino
69 Tottenham Court Road London W1T 2HA
17th - 18th August 2022



Image A23

23:55hrs

Tottenham Court Road looking south



Image A24

00:12hrs

Coral Bookmakers 75 Warren Street NW1 3AD

Image A25

00:16hrs

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

Image A26

00:17hrs

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

Image A27

00:18hrs

TCR Bar 183 Tottenham Court Road W1T 7PE

Image A28

00:22hrs

Pa Station 76 Tottenham Court Road W1T 2HG

Image A29

03:10hrs

Tottenham Court Road looking north

Image A30

03:12hrs

Whitfield Gardens Tottenham Court Road
j/w Tottenham Street

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

Image A35

03:32hrs

Merkur Slots Cashino Tottenham Court Road

Image A36

03:36hrs

Goode Street Underground Station
Tottenham Court Road

Image A37

03:37hrs

Tottenham Court Road looking north

Image A38

03:37hrs

Tottenham Court Road looking south

Image A39

03:39hrs

Tottenham Court Road looking south

Image A40

05:51hrs

Tottenham Court Road looking north

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

Goodge 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

Merkur Slots Cashino

69 Tottenham Court Road
London
W1T 2HA

Leveche Associates Ltd

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



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

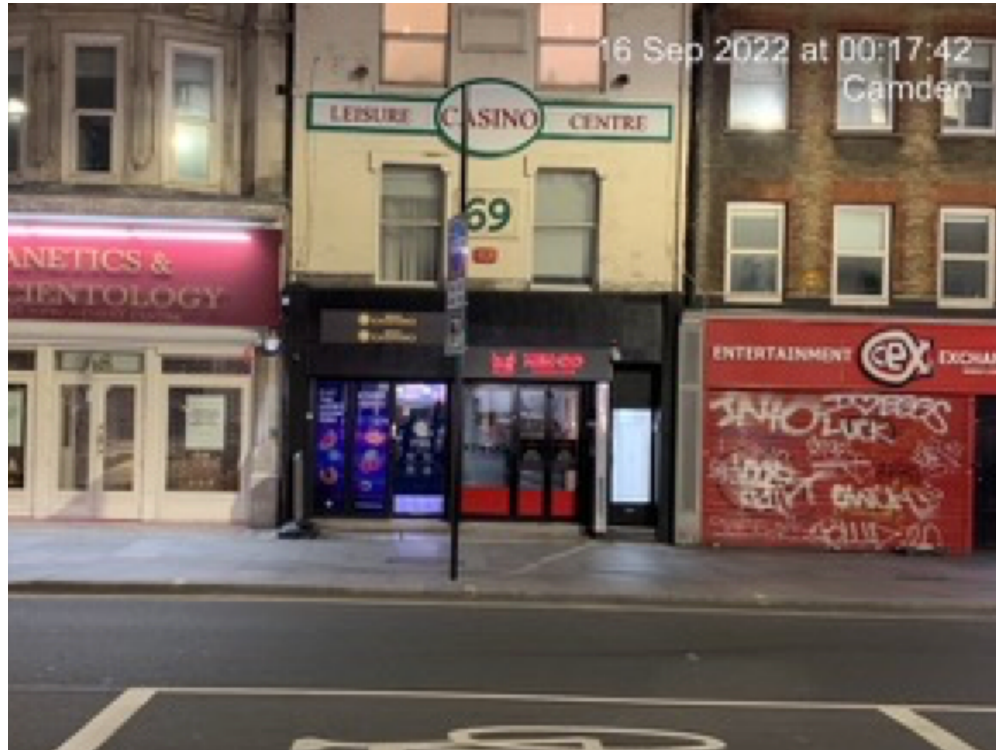


Image B3

00:17hrs

Merkur Slots Cashino
69 Tottenham Court Road W1T 2HA



Image B4

00:17hrs

Tottenham Court Road looking north

1.1.3 - Responsibility for third parties – remote

Social responsibility code

Applies to:

All remote licences.

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

2.1.2 - Anti-money laundering – other than casino

Ordinary code

Applies to:

All licences except casino licences.

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

3.1.1 - Combating problem gambling

Social responsibility code

Applies to:

All licences.

1. Licensees must have and put into effect policies and procedures intended to promote socially responsible gambling including the specific policies and procedures required by the provisions of section 3 of this code.
2. Licensees must make an annual financial contribution to one or more organisation(s) which are approved by the Gambling Commission, and which between them deliver or support research into the prevention and treatment of gambling-related harms, harm prevention approaches and treatment for those harmed by gambling.

3.2.5 - Bingo and FEC SR code

Social responsibility code

Applies to:

All non-remote bingo and family entertainment centre licences.

1. Licensees must have and put into effect policies and procedures designed to prevent underage gambling, and monitor the effectiveness of these.
2. This must include procedures for:
 - a. checking the age of apparently underage customers
 - b. refusing entry to any adult-only areas to anyone unable to produce an acceptable form of identification
 - c. taking action when there are unlawful attempts to enter the adult-only areas.
3. Licensees must ensure that their policies and procedures take account of the structure and layout of their gambling premises.
4. Licensees must not permit children or young people to gamble in the adults-only areas of premises to which they have access. If there is a 'no under-18s' premises policy, licensees must pay particular attention to the procedures they use at the entrance to the premises to check customers' ages.
5. Licensees must take all reasonable steps to ensure that all staff understand their responsibilities for preventing underage gambling. This must include appropriate training which must cover:
 - a. all relevant prohibitions against inviting children or young persons to gamble on age-restricted products or to enter age-restricted areas;
 - b. the legal requirements on returning stakes and not paying prizes to underage customers; and
 - c. procedures for challenging any adult who may be complicit in allowing a child or young person to gamble.
6. Licensees must only accept identification which:
 - a. contains a photograph from which the individual can be identified
 - b. states the individual's date of birth
 - c. is valid
 - d. is legible and has no visible signs of tampering or reproduction.
7. All licensees must conduct test purchasing or take part in collective test purchasing programmes, as a means of providing reasonable assurance that they have effective policies and procedures to prevent underage gambling, and must provide their test purchase results to the Commission, in such a form or manner as the Commission may from time to time specify.

Read additional [guidance on the information requirements](#) contained within this section.

3.2.6 - Bingo and FEC ordinary code

Ordinary code

Applies to:

All non-remote bingo and family entertainment centre licences.

1. The Commission considers acceptable forms of identification to include: any identification carrying the PASS logo (for example Citizencard or Validate); a military identification card; a driving licence (including a provisional licence) with photocard; or a passport.
2. Licensees should require a person who appears to relevant staff to be under the age of 25 to be asked to produce proof of age, either at the point of entry to the gambling area or as soon as it comes to the attention of staff that they wish to access gambling facilities.
3. Licensees should have procedures for dealing with cases where an adult knowingly or recklessly allows a child or young person to gamble. These procedures might include refusing to allow the adult to continue to gamble, removing them from the premises, and reporting the incident to the police or local authorities, or taking action where forged identification is produced.
4. Procedures should be put into effect for dealing with cases where a child or young person repeatedly attempts to gamble on their premises, including oral warnings, reporting the offence to the Gambling Commission¹ and the police, and making available information on problem gambling to the child or young person concerned.
5. Where it is likely that customers' young or otherwise vulnerable children will be left unattended on or adjacent to their premises, licensees should consider reminding customers of their parental responsibilities and assess whether there is a need to develop procedures for minimising the risk to such children.
6. In providing training to staff on their responsibilities for preventing underage gambling, licensees should have, as a minimum, policies for induction training and refresher training.

Read additional [guidance on the information requirements](#) contained within this section.

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

3.3.1 - Responsible gambling information

Social responsibility code

Applies to:

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

1. Licensees must make information readily available to their customers on how to gamble responsibly and how to access information about, and help in respect of, problem gambling.
2. The information must cover:
 - a. any measures provided by the licensee to help individuals monitor or control their gambling, such as restricting the duration of a gambling session or the amount of money they can spend
 - b. timers or other forms of reminders or 'reality checks' where available
 - c. self-exclusion options
 - d. information about the availability of further help or advice.
3. The information must be directed to all customers whether or not licensees also make available material which is directed specifically at customers who may be 'problem gamblers'.
4. For gambling premises, information must be available in all areas where gambling facilities are provided and adjacent to ATMs. Information must be displayed prominently using methods appropriate to the size and layout of the premises. These methods may include the use of posters, the provision of information on gambling products, or the use of screens or other facilities in the gambling premises. Information must also be available in a form that may be taken away and may also be made available through the use of links to be accessed online or using smart technology. Licensees must take all reasonable steps to ensure that this information is also readily accessible in locations which enable the customer to obtain it discreetly.

3.3.2 - Foreign languages

Ordinary code

Applies to:

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

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

3.3.4 - Remote time-out facility

Social responsibility code

Applies to:

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

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

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

3.4.1 - Premises-based customer interaction

Social responsibility code

Applies to:

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

1. Licensees must interact with customers in a way which minimises the risk of customers experiencing harms associated with gambling. This must include:
 - a. identifying customers who may be at risk of or experiencing harms associated with gambling.
 - b. interacting with customers who may be at risk of or experiencing harms associated with gambling.
 - c. understanding the impact of the interaction on the customer, and the effectiveness of the Licensee's actions and approach.
2. Licensees must take into account the Commission's guidance on customer interaction.

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

Social responsibility code

Applies to:

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

1. Licensees must have and put into effect procedures for self-exclusion and take all reasonable steps to refuse service or to otherwise prevent an individual who has entered a self-exclusion agreement from participating in gambling.
2. Licensees must, as soon as practicable, take all reasonable steps to prevent any marketing material being sent to a self-excluded customer.
3. Licensees must take steps to remove the name and details of a self-excluded individual from any marketing databases used by the company or group (or otherwise flag that person as an individual to whom marketing material must not be sent), within two days of receiving the completed self-exclusion notification.
4. This covers any marketing material relating to gambling, or other activities that take place on the premises where gambling may take place. However, it would not extend to blanket marketing which is targeted at a particular geographical area and where the excluded individual would not knowingly be included.
5. Licensees must close any customer accounts of an individual who has entered a self-exclusion agreement and return any funds held in the customer account. It is not sufficient merely to prevent an individual from withdrawing funds from their customer account whilst still accepting wagers from them. Where the giving of credit is permitted, the licensee may retain details of the amount owed to them by the individual, although the account must not be active.
6. Licensees must put into effect procedures designed to ensure that an individual who has self-excluded cannot gain access to gambling. These procedures must include:
 - a. a register of those excluded with appropriate records (name, address, other details, and any membership or account details that may be held by the operator);
 - b. photo identification (except where the Licensee can reasonably satisfy themselves that in the circumstances in which they provide facilities for gambling an alternative means of identification is at least as effective) and a signature;
 - c. staff training to ensure that staff are able to administer effectively the systems; and
 - d. the removal of those persons found in the gambling area or attempting to gamble from the premises.
7. Licensees must ensure that their procedures for preventing access to gambling by self-excluded individuals take account of the structure and layout of the gambling premises.
8. Licensees must, when administering the self-exclusion agreement, signpost the individual to counselling and support services.

3.5.2 - Self-exclusion – non-remote ordinary code

Ordinary code

Applies to:

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

1. Self-exclusion procedures should require individuals to take positive action in order to self-exclude. This can be a signature on a self-exclusion form.
2. Individuals should be able to self-exclude without having to enter gambling premises.
3. Before an individual self-excludes, licensees should provide or make available sufficient information about what the consequences of self-exclusion are.
4. Licensees should take all reasonable steps to extend the self-exclusion to premises of the same type owned by the operator in the customer's local area. In setting the bounds of that area licensees may take into account the customer's address (if known to them), anything else known to them about the distance the customer ordinarily travels to gamble and any specific request the customer may make.
5. Licensees should encourage the customer to consider extending their self-exclusion to other licensees' gambling premises in the customer's local area.
6. Customers should be given the opportunity to discuss self-exclusion in private, where possible.
7. Licensees should take steps to ensure that:
 - a. the minimum self-exclusion period offered is of a duration of not less than 6 nor more than 12 months
 - b. any self-exclusion may, on request, be extended for one or more further periods of at least 6 months each
 - c. a customer who has decided to enter a self-exclusion agreement is given the opportunity to do so immediately without any cooling-off period. However, if the customer wishes to consider the self-exclusion further (for example to discuss with problem gambling groups), the customer may return at a later date to enter into self-exclusion
 - d. at the end of the period chosen by the customer, the self-exclusion remains in place for a further 6 months, unless the customer takes positive action in order to gamble again
 - e. where a customer chooses not to renew the self-exclusion, and makes a positive request to begin gambling again during the 6 month period following the end of their initial self-exclusion, the customer is given one day to cool off before being allowed access to gambling facilities. The contact must be made via telephone or in person
 - f. notwithstanding the expiry of the period of self-exclusion chosen by a customer, no marketing material should be sent to them unless and until they have asked for or agreed to accept such material.
8. The licensee should retain the records relating to a self-exclusion agreement at least for the length of the self-exclusion agreement plus a further 6 months.
9. Please note that the Commission does not require the licensee to carry out any particular assessment or make any judgement as to whether the previously self-excluded individual should again be permitted access to gambling. The requirement to take positive action in person or over the phone is purely to a) check that the customer has considered the decision to access gambling again and allow them to consider the implications; and b) implement the one day cooling-off period and explain why this has been put in place.
10. Licensees should have, and put into effect, policies and procedures which recognise, seek to guard against and otherwise address, the fact that some individuals who have self-excluded

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

11. Licensees should have effective systems in place to inform all venue staff of self-excluded individuals who have recently attempted to breach a self-exclusion in that venue, and the licensees neighbouring venues.
12. In providing training to staff on their responsibilities for self-exclusion, licensees should have, as a minimum, policies for induction training and refresher training.

6.1.1 - Complaints and disputes

Social responsibility code

Applies to:

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

1. Licensees must put into effect appropriate policies and procedures for accepting and handling customer complaints and disputes in a timely, fair, open and transparent manner.
2. Licensees must ensure that they have arrangements in place for customers to be able to refer any dispute to an ADR entity in a timely manner if not resolved to the customer's satisfaction by use of their complaints procedure within eight weeks of receiving the complaint, and where the customer cooperates with the complaints process in a timely manner.
3. The services of any such ADR entity must be free of charge to the customer.
4. Licensees must not use or introduce terms which restrict, or purport to restrict, the customer's right to bring proceedings against the licensee in any court of competent jurisdiction. Such terms may, however, provide for a resolution of a dispute agreed by the customer (arrived at with the assistance of the ADR entity) to be binding on both parties.
5. Licensees' complaints handling policies and procedures must include procedures to provide customers with clear and accessible information on how to make a complaint, the complaint procedures, timescales for responding, and escalation procedures.
6. Licensees must ensure that complaints policies and procedures are implemented effectively, kept under review and revised appropriately to ensure that they remain effective, and take into account any applicable learning or guidance published by the Gambling Commission from time to time.
7. Licensees should keep records of customer complaints and disputes and make them available to the Commission on request.

In this Code, 'ADR entity' means

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

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

Read additional [guidance on the information requirements](#) contained within this section.

7.1.2 - Responsible gambling information for staff

Social responsibility code

Applies to:

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

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

8.1.1 - Ordinary code

Ordinary code

Applies to:

All licences.

1. As stated earlier in this code, the Commission expects licensees to work with the Commission in an open and cooperative way and to inform the Commission of any matters that the Commission would reasonably need to be aware of in exercising its regulatory functions. These include in particular matters that will have a material impact on the licensee's business or on the licensee's ability to conduct licensed activities compliantly and consistently with the licensing objectives.
2. Thus, licensees should notify the Commission, or ensure that the Commission is notified, as soon as reasonably practicable and in such form and manner as the Commission may from time to time specify¹, of any matters which in their view could have a material impact on their business or affect compliance. The Commission would, in particular, expect to be notified of the occurrence of any of the following events in so far as not already notified in accordance with the conditions attached to the licensee's licence²:
 - a. any material change in the licensee's structure or the operation of its business
 - b. any material change in managerial responsibilities or governance arrangements
 - c. any report from an internal or external auditor expressing, or giving rise to, concerns about material shortcomings in the management control or oversight of any aspect of the licensee's business related to the provision of gambling facilities.

Read additional [guidance on the information requirements](#) contained within this section.

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

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

9.1.2 - Bingo

Social responsibility code

Applies to:

All non-remote bingo operating licences.

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

10.1.1 - Assessing local risk

Social responsibility code

Applies to:

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

1. Licensees must assess the local risks to the licensing objectives posed by the provision of gambling facilities at each of their premises, and have policies, procedures and control measures to mitigate those risks. In making risk assessments, licensees must take into account relevant matters identified in the licensing authority's statement of licensing policy¹.
2. Licensees must review (and update as necessary) their local risk assessments:
 - a. to take account of significant changes in local circumstances, including those identified in a licensing authority's statement of licensing policy;
 - b. when there are significant changes at a licensee's premises that may affect their mitigation of local risks;
 - c. when applying for a variation of a premises licence; and
 - d. in any case, undertake a local risk assessment when applying for a new premises licence.

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

10.1.2 - Sharing local risk assessments

Ordinary code

Applies to:

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

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

Other provisions and legislation

- 4.7** Conditions on premises licences should relate only to gambling, as considered appropriate in light of the principles to be applied by licensing authorities under s.153 of the Act. Accordingly, if the Commission's [Licence Conditions and Codes of Practice](#) (LCCP) or other legislation places particular responsibilities or restrictions on an employer or the operator of premises, it is not necessary or appropriate to impose similar conditions on a premises licence issued in accordance with the Act.
- 4.8** Similarly, where other legislation confers powers on inspection and enforcement agencies in relation to separate activities or concerns, the Act does not affect the continued use of such powers, for example, the powers of an environmental health officer in respect of statutory nuisance under the Environmental Protection Act 1990.

Licensing authority decisions

- 4.9** S.153 provides that licensing authorities shall aim to permit the use of premises for gambling in so far as they think it is:
- in accordance with any relevant code of practice under s.24
 - in accordance with any relevant guidance issued by the Commission under s.25
 - reasonably consistent with the licensing objectives (subject to a and b above)
 - in accordance with the licensing authority's statement of licensing policy (statement of policy) (subject to a to c above).
- 4.10** Therefore, a licensing authority has no discretion in exercising its functions under Part 8 of the Act, to grant a premises licence where that would mean taking a course which it did not think accorded with the Guidance contained in this document, any relevant Commission code of practice the licensing authority's own statement of policy or were reasonably consistent with the licensing objectives.

Delegations

- 4.11** The decision making powers of licensing authorities may be delegated, as set out in s.154 of the Act for England and Wales and s.155 for Scotland. Decisions that are delegated to a licensing committee, may be further delegated to a sub-committee, which may then arrange for the decision to be taken by an officer of the authority.
- 4.12** It is open to licensing committees to choose not to delegate decisions. An important consideration in determining whether any particular decision should be delegated will be whether delegation might give rise to a risk of judicial review challenge, particularly on the basis of appearance of bias.
- 4.13** The tables at Appendix G set out a summary of licensing authority delegations permitted under the Act for England and Wales, and for Scotland.

Part 5: Principles to be applied by licensing authorities

Licensing objectives

- 5.1** In exercising their functions under the Act, particularly in relation to premises licences, temporary use notices and some permits, licensing authorities must have regard to the licensing objectives set out in s.1 of the Act, namely:
- preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime
 - ensuring that gambling is conducted in a fair and open way
 - protecting children and other vulnerable persons from being harmed or exploited by gambling.
- 5.2** It is expected that the licensing authority will have set out their approach to regulation in their statement of policy, having taken into account local circumstances. This is dealt with in more detail at Part 6.
- Objective 1 : Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime**
- 5.3** Among other matters, licensing authorities may need to consider the location of premises in the context of this licensing objective. For example, in considering an application for a premises licence or permit that is in an area noted for particular problems with disorder, organised criminal activity etc, the licensing authority should think about what, if any, controls might be appropriate to prevent those premises being associated with or used to support crime. That might include conditions on the premises licence, such as a requirement for door supervisors. The requirement for conditions might be determined by the operator's own risk assessment or the local area profile carried out by the licensing authority, as detailed in Part 6.
- 5.4** A licensing authority will need to consider questions raised by the location of gambling premises when:
- formulating its statement of licensing policy
 - receiving relevant representations to an application
 - dealing with applications as a responsible authority in its own right
 - considering applications before it.
- 5.5** In the context of gambling premises licences, licensing authorities should generally consider disorder as activity that is more serious and disruptive than mere nuisance. Factors to consider in determining whether a disturbance was serious enough to constitute disorder would include whether police assistance was required and how threatening the behaviour was to those who could see or hear it. There is not a clear line between nuisance and disorder and the licensing authority should take the views of its lawyers before determining what action to take in circumstances in which disorder may be a factor.
- 5.6** Regulatory issues arising from the prevention of disorder are likely to focus almost exclusively on premises licensing, rather than on operating licences. However, if there are persistent or serious disorder problems that an operator could or should do more to prevent, the licensing authority should bring this to the attention of the Commission so that it can consider the continuing suitability of the operator to hold an operating licence.
- 5.7** Of course, licensing authorities are experienced in making judgements in relation to the suitability of premises, particularly those for which they have responsibilities under the Licensing Act 2003 / Licensing (Scotland) Act 2005, in which context they have wider powers to also take into account measures to prevent nuisance.

- 5.8** In relation to preventing disorder, licensing authorities have the ability under s.169 of the Act to attach additional conditions to premises licences, and are entitled to include a requirement for door supervision, as provided for in s.178 of the Act. If a person employed on door supervision would be required to hold a licence issued by the Security Industry Authority (SIA), that requirement will have force as though it were a condition on the premises licence. Further information on conditions on premises licences can be found in Part 9 of this Guidance.
- 5.9** There are a number of voluntary initiatives that the gambling industry participates in to address issues such as underage access, staff safety and security. These change from time to time and licensing authorities are advised to check with local operators, for example when conducting inspections, as to which (if any) scheme the operator is a part of. Further information can often be found on the website of industry trade associations⁵.
- 5.10** Licensing authorities do not need to investigate the suitability of an applicant for a premises licence, including in relation to crime. The issue of suitability will already have been considered by the Commission, because any applicant (except occupiers of tracks who do not propose to offer gambling themselves) will have to hold an operating licence from the Commission before the premises licence can be issued. However, if the licensing authority receives information during the course of considering a premises licence application or at any other time, that causes it to question the suitability of the applicant to hold an operating licence, these concerns should be brought to the attention of the Commission without delay.

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

- 5.11** Generally the Commission would not expect licensing authorities to find themselves dealing with issues of fairness and openness frequently. Fairness and openness is likely to be a matter for either the way specific gambling products are provided and therefore subject to the operating licence, or will be in relation to the suitability and actions of an individual and therefore subject to the personal licence. However, if licensing authorities suspect that gambling is not being conducted in a fair and open way this should be brought to the attention of the Commission so that it can consider the continuing suitability of the operator to hold an operating licence or of an individual to hold a personal licence.
- 5.12** In relation to the licensing of tracks, the licensing authority's role will be different from other premises in that track owners will not necessarily have an operating licence. In those circumstances the premises licence may need to contain conditions to ensure that the environment in which betting takes place is suitable. Further information can be found in Part 20 of this Guidance.

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

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

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

- 5.14** Where a licensing authority considers the structure or layout of premises to be an inhibition or potential inhibition to satisfying this licensing objective, the licensee should consider what changes are required to ensure the risk is mitigated. Such changes might include the positioning of staff or CCTV, the use of floor-walkers and the relocation of the staff counter to enable direct line of sight. Licensing authorities will need to consider the proportionality of changes to the physical layout in relation to other measures that could be put in place.
- 5.15** If the operator fails to satisfy the licensing authority that the risks are sufficiently mitigated, it may be appropriate to conduct a review of the premises licence.
- 5.16** In relation to casinos, the Commission has issued a code of practice on access to casino premises by children and young persons, as provided for by s.176 of the Act. The code of practice is available as part of the [Licence Conditions and Codes of Practice](#) (LCCP) In accordance with s.176 of the Act, adherence to the code will be a condition of the premises licence. Further information can be found in Parts 9 and 17 of this Guidance.
- 5.17** The Act does not seek to prohibit particular groups of adults from gambling in the same way that it prohibits children. The Commission does not seek to define 'vulnerable persons' but it does, for regulatory purposes, assume that this group includes people who gamble more than they want to, people who gamble beyond their means and people who may not be able to make informed or balanced decisions about gambling due to, for example, mental health, a learning disability or substance misuse relating to alcohol or drugs.
- 5.18** Licensing authorities need to consider, in relation to particular premises, whether any special considerations apply in relation to the protection of vulnerable persons. This could be a local risk that is reflected in the licensing authority's statement of policy. Any such considerations need to be balanced against the authority's objective to aim to permit the use of premises for gambling.

S.153 principles

- 5.19** S.153 of the Act provides that, in exercising its functions under Part 8 of the Act, a licensing authority shall aim to permit the use of premises for gambling in so far as it thinks it is:
- in accordance with any relevant code of practice under s.24 (ie the LCCP)
 - in accordance with any relevant guidance issued by the Commission under s.25 (ie this Guidance)
 - reasonably consistent with the licensing objectives (subject to a and b above), and
 - in accordance with the licensing authority's statement of licensing policy (subject to a to c above).
- 5.20** Whilst there is a presumption in favour of permitting the relevant premises to be used for gambling, the licensing authority may not do so unless satisfied that such use would be in accordance with this Guidance, any relevant Commission code of practice, its own statement of policy, and the licensing objectives.
- 5.21** In the unlikely event that a licensing authority perceives a conflict between a provision of a Commission code of practice or this Guidance, and its own statement of policy or view as to the application of the licensing objectives, the structure of s.153 makes it clear that the Commission's codes and this Guidance take precedence.

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

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

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

Codes of Practice

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

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

Good practice in regulation

5.27 Under the Legislative and Regulatory Reform Act 2006, any person exercising a specified regulatory function has a legal duty to have regard to the statutory principles of good regulation⁶ in the exercise of the function. These provide that regulatory activities should be carried out in a way which is transparent, accountable, proportionate, and consistent and should be targeted only at cases in which action is needed. The Commission has regard to these principles in relation to its responsibilities and also has regard to the requirements of the Regulators' Code⁷. The purpose of the Code is to promote efficient and effective approaches to regulatory inspection and enforcement which improve regulatory outcomes without imposing unnecessary burdens on business.

5.28 The statutory principles of good regulation and the Regulators' Code also apply to local authorities, who are under a statutory duty to have regard to them when fulfilling their regulatory functions under the Act⁸.

⁶ Legislative and Regulatory Reform Act 2006, section 21

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

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

- 5.29 Guidance produced by the Better Regulation Delivery Office seeks to assist local authorities in interpreting the requirements of the Regulators' Code, for example in developing their Compliance and Enforcement Policy⁹, and in delivering risk-based regulation in relation to age restrictions¹⁰.

Human Rights Act 1998

- 5.30 The Secretary of State has certified that the Act is compatible with the European Convention on Human Rights. In considering applications, and taking enforcement action under the Act, licensing authorities should bear in mind that they are subject to the Human Rights Act 1998 and in particular:
- Article 1, Protocol 1 – peaceful enjoyment of possessions. A licence is considered a possession in law and people should not be deprived of their possessions except in the public interest
 - Article 6 – right to a fair hearing
 - Article 8 – respect for private and family life. In particular, removal or restriction of a licence may affect a person's private life
 - Article 10 – right to freedom of expression.

Other considerations

- 5.31 Licensing authorities should not turn down applications for premises licences where relevant objections can be dealt with through the use of conditions.
- 5.32 In determining applications for premises licences and permits, a licensing authority may request as much information as it requires to satisfy itself that all the requirements set out at s.153 of the Act are met.
- 5.33 Where concerns remain, licensing authorities may choose to attach conditions to the premises licence. Further details are provided in Part 9.
- 5.34 Licensing authorities should be aware that other considerations such as moral or ethical objections to gambling are not a valid reason to reject applications for premises licences. In deciding to reject an application, a licensing authority should rely on reasons that demonstrate that the licensing objectives are not being, or are unlikely to be, met, and such objections do not relate to the licensing objectives. An authority's decision cannot be based on dislike of gambling, or a general notion that it is undesirable to allow gambling premises in an area (with the exception of the casino resolution powers).

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

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

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

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

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

Representations

- 7.52** In dealing with an application, licensing authorities are obliged to consider representations from two categories of person, referred to in the Act as ‘responsible authorities’ and ‘interested parties’. Representations from other parties are inadmissible. Further information on these categories can be found in Part 8 of this Guidance.
- 7.53** Having determined that the representation is admissible, the licensing authority must consider its relevance. Only representations that relate to the licensing objectives, or that raise issues under the licensing authority’s statement of policy, or the Commission’s Guidance or Codes of Practice, are likely to be relevant.
- 7.54** The licensing authority will also need to consider if representations are ‘frivolous’ or ‘vexatious’. This is a question of fact and licensing authorities are advised to seek help from their legal advisers in interpreting these phrases although relevant considerations may include:
- who is making the representation, and whether there is a history of making representations that are not relevant
 - whether it raises a ‘relevant’ issue
 - whether it raises issues specifically to do with the premises that are the subject of the application.
- 7.55** The Commission does not routinely make representations on premises licence applications. However, the fact that the Commission has not made a representation on a particular premises licence application should not be taken as indicating the Commission’s approval of that application. Exceptionally, where an application for a premises licence, or the operation of a current premises licence, raises matters of wider or national significance, the Commission will consider making representations or requesting a review.

Making a decision

- 7.56** As explained earlier, the licensing authority’s primary obligation under s.153(1) is to permit the use of premises in so far as it thinks that to do so is:
- a. in accordance with any relevant code of practice issued by the Commission
 - b. in accordance with any relevant guidance issued by the Commission
 - c. reasonably consistent with the licensing objectives (subject to a. and b. above), and
 - d. in accordance with the licensing authority’s statement of licensing policy (statement of policy) (subject to a. to c. above).

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

- 9.28** Licensing authorities should make decisions on conditions on a case-by-case basis, and in the context of the principles of s.153. They must aim to permit the use of premises for gambling and so should not attach conditions that limit their use except where it is necessary in accordance with the licensing objectives, the Commission's codes of practice and this Guidance, or their own statement of policy. Conversely, licensing authorities should not turn down applications for premises licences where relevant objections can be dealt with through the use of conditions.
- 9.29** Licensing authority statements of policy will need to consider the local circumstances which might give rise to the need for conditions. Where there are specific risks associated with a particular locality, the licensing authority might decide to attach conditions to the premises licence to mitigate those risks. For example, local issues associated with a high crime rate may put a premises at risk of not being consistent with the licensing objectives, and specific conditions may be necessary to address the risk.
- 9.30** Where there are risks associated with a specific premises or class or premises, the licensing authority may consider it necessary to attach conditions to the licence to address those risks, taking account of the local circumstances.
- 9.31** Conditions imposed by the licensing authority must be proportionate to the circumstances which they are seeking to address. In particular, licensing authorities should ensure that the premises licence conditions are:
- relevant to the need to make the proposed building suitable as a gambling facility
 - directly related to the premises (including the locality and any identified local risks) and the type of licence applied for
 - fairly and reasonably related to the scale and type of premises
 - reasonable in all other respects.

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

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

Hansard Extract

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

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

Column Number: 012

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

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

"The licensing objectives set out in Clause 1 of the Bill do not address potential problems of nuisance arising in the street outside gambling premises. This is particularly likely late at night and when alcohol has been consumed. While the Environmental Protection Act 1990 places a duty on local authorities to deal with statutory nuisances arising from the premises itself, and to investigate residents' complaints, it is not possible to use this legislation to deal with street nuisance, even where the problem is directly attributable to a particular venue."

Use of the Environmental Protection Act for such matters is therefore not possible. The LGA goes on to say:

"This omission will seriously hamper the ability of councils to ensure effective management of the environment around gambling premises and provides residents with little scope to make representations should street nuisance occur. The LGA believes that a new licensing objective of the prevention of public nuisance should be added to Clause 1."

Column Number: 037

The Minister for Sport and Tourism *Mr Richard Caborn, addressing the amendment*

Some gambling premises (casinos and bingo clubs) are allowed to serve alcohol to their customers, and the Bill will not stop that happening. Their entitlement does not spring from gambling laws: as one or two of my hon. Friends have said, it comes from the licensing law itself. Casinos and bingo clubs in England and Wales get their entitlement from the Licensing Act 1964. However, by the time the Bill is on the statute book, the Licensing Act 2003 will have come into force. The equivalent licensing laws govern casinos and bingo clubs in Scotland. The 2003 Act includes the prevention of public nuisance as a licensing objective, understandably so given the unfortunate connection between excess alcohol intake and bad behaviour. That was referred to by a number of hon. Members this morning.

The relevant risks associated with licensing of pubs, bars and other premises on which alcohol is sold include noise and antisocial conduct, particularly at night. That has been referred to in connection with Guildford. Accordingly, it will be open to licensing authorities, when considering applications for casinos and bingo halls to be licensed premises under the 2003 Act, to take account of the public-nuisance risk just as they do when considering any other application. If any casino were to put its alcohol licence at risk by allowing public nuisance, it would almost certainly put its continued existence and its licence at risk. Therefore, it is unnecessary in the case of casinos and bingo clubs to duplicate provisions that are already in licensing law.

There is no intention of allowing other gambling premises, such as betting shops and machine arcades, to sell alcohol, and there is no reason to apply to them a nuisance test over and above the

law on noise and other nuisance. There is no well-established association between betting and nuisance of the sort that unfortunately exists between alcohol and nuisance. We do not believe that there is any reason to single out betting shops for special treatment in contrast to grocery shops, newsagents or any other shop.

There are provisions in the general criminal and civil law on the control of public nuisance. If they are not thought to be adequate, I am not expressing a Government view on this, the solution is to strengthen the general law, not to adopt specific measures for gambling premises on the basis of no

Column Number: 038

evidence of need. In practice, all licensed gambling premises are more likely to conduct themselves responsibly than the general run of premises, if only because they will have to satisfy not just the local licensing authority concerning their present licence, but the powerful gambling commission in relation to their operating licence.

Amendment No. 1 would be regulatory overkill. The official Opposition, who continually badger us about red tape and over-regulation, should reflect on their amendments in the light of my explanation. Amendment No. 1 would only reinforce the apprehension in the gambling industry that local authorities will be over-zealous in regulating premises, and I do not believe that those fears are well grounded. It would impact significantly on the matters that could be taken into account by local authorities and would go beyond what is reasonable. I cannot advise the Committee to accept it.

<https://publications.parliament.uk/pa/cm200304/cmstand/b/st041109/pm/41109s02.htm>
<https://publications.parliament.uk/pa/cm200304/cmstand/b/st041109/am/41109s03.htm>

⁶ Standing Committee B, Thursday, 2nd December 2004 (Afternoon) Col 359.

Determination of application

[5.158]

In determining an application the licensing authority must hold a hearing¹ if:

- representations have been made by an interested party or responsible authority and have not been withdrawn;
- the authority intend to use their discretion under s 169(1) to attach a condition to a licence; or
- the authority intend to use their discretion under s 169 to exclude a default condition (ie a condition automatically attached to the licence under s 168 unless excluded by the authority in its discretion)².

A hearing may, however, be dispensed with if the applicant and any interested party or responsible authority who have made representations consents to this course³, or the authority think that the representations are vexatious or frivolous or will certainly not influence their determination of the application⁴. If the authority do propose to dispense with a hearing on these latter grounds they must as soon as is reasonably practicable notify the person who made the representations⁵, presumably to enable him to seek a remedy by way of judicial review if so advised.

Where the applicant for the premises licence is an applicant for an operating licence⁶ the authority cannot determine the application until the relevant operating licence has been issued⁷.

On considering an application for a premises licence (whether at a hearing or not) the licensing authority must either grant it or reject it⁸. In making that determination the licensing authority will be subject to the provisions of s 153 which sets out the principles to be applied by the authority in exercising all their functions under Part 8 GA 2005 (ie including, but not limited to, the grant or refusal of an application for a premises licence). Section 153(1) provides as follows:

"In exercising their functions under this Part a licensing authority shall aim to permit the use of premises for gambling in so far as the authority think it—

- (a) in accordance with any relevant code of practice under s 24,
- (b) in accordance with any relevant guidance issued by the Commission under s 25,
- (c) reasonably consistent with the licensing objectives (subject to paras (a) and (b)), and
- (d) in accordance with the statement published by the authority under s 349 (subject to paras (a) to (c))."

The subsection starts by imposing a general duty on the authority to 'aim to permit the use of premises for gambling' and then sets out a series of four factors which may, in any individual case, qualify or override the general duty. The first point to note is that the provision imposes a duty on the licensing authority: it must, subject to the qualifying factors, aim to permit the use of premises for gambling. What is the scope of this duty? It is suggested that there are two elements: first, it creates a presumption in favour of granting the premises licence since it is only if the licence is granted that the premises may lawfully be used for gambling. But the duty seems to go further than that. The verb 'to aim' is defined by the *OED*⁹ as meaning: '5. To calculate one's course with a view to arriving (at a point); to direct one's course, to make it one's object to attain. Hence fig To have it as an object, to endeavour earnestly'. The *Shorter OED*¹⁰ defines it as: '3. Direct one's course, make it one's object to attain, intend, try'. A person who 'aims' to achieve a result will usually take active steps to bring it about. The provision appears to place a duty upon the licensing authority to exercise their powers so far as is lawfully possible to achieve a position in which they can grant the premises licence and thus permit the premises to be used for gambling. The most obvious way in which the authority will be able to exercise their powers in this way will be by an imaginative use of their power to frame and impose conditions (see para 5.159 below) so as to overcome objections to the application which might, in the absence of suitable conditions, lead to the application being rejected. No doubt the authority could also, in a case where a licence application gave rise to issues which could not be addressed by suitably drafted conditions, seek to consider with the applicant whether amendments to the application might overcome the objections and enable it to be granted. However, it is also necessary to recognise that the language of s 153(1) stops short of being mandatory; 'aim to permit' provides a strong steer to look favourably on an application, but no more.

As to the list of qualifying factors, these are set out in s 153(1)(a)–(d). Section 153(1)(a) qualifies the duty to aim to permit use of premises for gambling to the extent that such use must be in accordance with any relevant code of practice issued by the Gambling Commission under s 24. That section requires the Gambling Commission to issue codes of practice about the manner in which facilities for gambling are to be provided (whether by the holder of a licence or by another person). In issuing a code of practice the Gambling Commission will be subject to a duty under s 22 to promote the licensing objectives. Accordingly any code of practice should be consistent with those objectives. Section 153(1)(b) qualifies the licensing authority's duty to aim to permit the use of premises for gambling to the extent that such use must be in accordance with any relevant guidance issued by the Gambling

Commission under s 25. This section requires the Gambling Commission to issue guidance to local authorities¹¹ as to the manner in which they are to exercise their functions under the Act and the principles that they should apply in exercising those functions. Again the effect of s 22 is that in issuing such guidance the Commission will be under a duty to promote the licensing objectives, so again such guidance should be consistent with those objectives. The effect of all this is that any code of practice and any guidance to local authorities ought to promote the licensing objectives and no inconsistencies between the two should arise. On that basis codes of practice and guidance are placed (by s 153(1)(a) and (b)) as enjoying equal importance at the top of the hierarchy of factors set out in s 153(1)(a)-(d).

Next comes s 153(1)(c): this provides that the duty of the licensing authority to aim to permit the use of premises for gambling is qualified to the extent that such use must be reasonably consistent with the licensing objectives, but it goes on to provide that this condition is 'subject to paras (a) and (b)'. In principle there should, of course, be no conflict between (a) and (b) (which will both reflect the Gambling Commission's duty to promote the licensing objectives) and (c) (which will reflect the licensing authority's view of what the licensing objectives require). However the effect of the legislation appears to be that should there be any conflict between the two then the guidance set out in codes of practice or guidance emanating from the Gambling Commission will 'trump' any factors which the licensing authority themselves would otherwise have taken into account as relevant to the licensing objectives under s 153(1)(c).

Finally, s 153(1)(d) provides that the duty of a licensing authority to aim to permit the use of premises for gambling is qualified to the extent that such use must be in accordance with the authority's own statement issued under s 349. In preparing that statement the authority are not themselves expressly required to have regard to the licensing objectives, but they are obliged to have regard to guidance issued by the Gambling Commission under s 25 and such guidance deals, amongst other things, with the formulation by the authority of their licensing policy (see para AM5.6655). Since the s 25 guidance must itself promote the licensing objectives the effect should be that the authority's licensing policy will itself be consistent with those objectives so that it should not conflict with any code of practice or guidance issued by the Commission nor with the licensing objectives themselves. However, s 153(1)(d) provides that consideration of the licensing authority's own policy is 'subject to paras (a) to (c)' which appears to mean that in the case of an inconsistency a relevant Commission code of practice, relevant guidance or the licensing objectives themselves would 'trump' the authority's licensing policy.

In determining the application the authority may not have regard to the expected demand for the facilities which it is proposed to provide¹², nor may they have regard to the question whether or not the proposal is likely to be granted planning permission or building regulation approval¹³. Where the authority have resolved under s 166 not to issue casino premises licences an application for such a licence will, of course, necessarily fail and be rejected¹⁴.

Where the application is granted the authority must as soon as reasonably practicable give notice of the grant in the form prescribed to the applicant, the Commission, any person who made representations, the chief officer of police for any area in which the premises are wholly or partly situated and HMRC¹⁵ and must issue the licence to the applicant and must give him a summary of the terms and conditions in the prescribed form. If they have attached a condition to the licence under s 169(1)(a) or have excluded a default condition¹⁶ they must give their reasons¹⁷. If representations were made by an interested party or a responsible authority they must give their response to the representations¹⁸.

Where the application is rejected the authority must as soon as reasonably practicable give notice of the rejection in the form prescribed to the applicant and to the same parties as are entitled to be notified of a grant¹⁸. The notice must give the authority's reasons for rejecting the application¹⁹.

¹ As to procedure at hearings in relation to applications see SI 2007/173.

² GA 2005, s 162. See further para 5.159 below.

³ GA 2005, s 162.

⁴ GA 2005, s 162(3).

⁵ GA 2005, s 162(4).

⁶ Ie under GA 2005, s 159(3)(b).

⁷ GA 2005, s 163(2).

⁸ GA 2005, s 163(1).

⁹ *The Oxford English Dictionary* (2nd edn, 1989).

¹⁰ (5th Edn, OUP).

SCHEDULE 2

Regulations 10 and 11

Conditions attaching to bingo premises licences

PART 1

Mandatory conditions attaching to bingo premises licences

1. A notice stating that no person under the age of 18 years is permitted to play bingo on the premises shall be displayed in a prominent place at every entrance to the premises.

2. No customer shall be able to enter the premises directly from any other premises in respect of which one of the following permissions has effect—

- (a) a casino premises licence;
- (b) an adult gaming centre premises licence;
- (c) a betting premises licence other than a track premises licence; and

3.—(1) This paragraph shall apply where children or young persons or both are permitted by the licence holder to enter the premises, and Category B or C gaming machines are made available for use on the premises.

(2) Any area of the premises to which category B and C gaming machines are located—

- (a) shall be separated from the rest of the premises by a physical barrier which is effective to prevent access other than by an entrance designed for the purpose;
- (b) shall be supervised at all times to ensure children or young persons or both do not enter the area; and
- (c) shall be arranged in such a way that ensures all parts of the area can be observed by the persons mentioned in sub-paragraph (3).

(3) The reference to supervision in this paragraph means supervision by—

- (a) one or more persons whose responsibilities include ensuring children or young persons or both do not enter the area; or
- (b) closed circuit television which is monitored by one or more persons whose responsibilities include ensuring that children or young persons or both do not enter the area.

(4) A notice stating that no person under the age of 18 years is permitted to enter the area shall be displayed in a prominent place at the entrance to any area of the premises in which Category B or C gaming machines are made available for use.

4.—(1) In the case of a charge for admission to the premises, a notice of that charge shall be displayed in a prominent place at the principal entrance to the premises.

(2) In the case of any other charges in respect of gaming, a notice setting out the information in sub-paragraph (3) shall be displayed at the main point where payment for the charge is to be made.

(3) The notice in sub-paragraph (2) shall include the following information—

- (a) the cost (in money) of each game card (or set of game cards) payable by an individual in respect of a game of bingo;
- (b) in respect of each game card (or set of game cards) referred to in paragraph (a) the amount that will be charged by way of a participation fee for entitlement to participate in that game; and

- (c) a statement to the effect that all or part of the participation fee may be waived at the discretion of the person charging it.
 - (4) The notice may be displayed in electronic form.
 - (5) A reference in this paragraph to a charge in respect of gaming does not include an amount paid for an opportunity to win one or more prizes in gaming to which section 288 of the 2005 Act (meaning of “prize gaming”) applies.
- 5.—**(1) The rules of each type of game that is available to be played the premises other than games played on gaming machines shall be made available to customers within the premises.
- (2) The condition in sub-paragraph (1) may be satisfied by—
- (a) displaying a sign setting out the rules,
 - (b) making available leaflets or other written material containing the rules, or
 - (c) running an audio-visual guide to the rules prior to any bingo game being commenced.
- 6.** Any ATM made available for use on the premises shall be located in a place that requires any customer who wishes to use it to cease gambling in order to do so.

PART 2

Default conditions attaching to bingo premises licences

- 1.** Subject to paragraph 2, no facilities for gambling shall be provided on the premises between the hours of midnight and 9am.
- 2.** The condition in paragraph 1 shall not apply to making gaming machines available for use.