

Merkur Slots, 53 Sydenham Road, London, SE26 5EY

Local Area Risk Assessment

Trading Name:	Merkur Slots
Premise	53 Sydenham Road, London, SE26 5EY
Local Authority:	London Borough of Lewisham
Premise Licence No:	New application
Operator Licence No:	000-003266-N-103444-029 (Merkur Slots UK Limited)
Company Details:	Merkur Slots UK, Second Floor Matrix House, North Fourth Street, Milton Keynes, MK9 1NJ
Name and Title of Assessor:	Amanda Kiernan – Head of Compliance
Date of Assessment:	28 th December 2023
Review Date:	On opening in conjunction with local staff

Local Area Profile Risk Factors

Local Risk Profile:	53 Sydenham Road, a former Santander Bank is located on the main road in Sydenham. The premises in the immediate area include convenience stores, coffee shops, restaurants, takeaways, banks, supermarkets, hair and beauty salons, betting shops, pawnbrokers, pharmacies and property agencies. Sydenham's commercial centre starts on Kirkdale near Cobbs Corner, continuing onto its high street, Sydenham Road. Sydenham has a distinct town centre with many independent shops, restaurants, cafes as well as chain stores and supermarkets. The premise sits within the Sydenham Ward Area. There is a significant level of social housing in the ward, with the principal housing providers being Hexagon Housing and Lewisham Homes.
Establishments of note:	Sydenham is an active community including local residents' groups, a thriving arts scene and a developing high street with many local shops and restaurants. There are a number of active and influential voluntary and community sector organisations in the ward, including the Sydenham Society, Sydenham Arts, The Grove Centre and James Ross Hunter Youth Support.
Adjoining premises:	53 Sydenham Road is located between Sydenham Household shop and Boots Pharmacy.
Crime statistics:	Sydenham Road is located within the Sydenham policing neighbourhood, under the Metropolitan Police Service force area. The most commonly reported crime types in the past 12 months were: Violence and sexual offences 26.9%, Anti-social behaviour 19.7%, Vehicle crime 12.3%, Other theft 9.2%, Burglary 8%, Criminal damage and arson 7.6%, Public order 6%, Drugs 3.3%, Shoplifting 1.9%, Robbery 1.7%, Bicycle theft 1.1%, Theft from the person 1.1%, Other crime 0.9%, Possession of weapons 0.4%. The crime rate in Sydenham is higher than the average crime rate across similar areas and similar to average for the Metropolitan Police force area. In October 2023 ,147 crimes were recorded within a half mile of the venue. The most commonly recorded crimes were: 33 Violence and sexual offences, 31 Anti-social behaviour, 17 Vehicle crime, 15 Public order. (<i>police.uk</i>)
Population:	48.8% of the area's population are male which is lower than the UK average of 49%. The majority of the population are in the age group 25-29 and the majority 57.2% are single. (<i>streetcheck.co.uk</i>)
Culture:	Sydenham Road can be considered more ethnically diverse than the UK average. As whole, the UK population claims itself as approximately 82.2% white, with residents of this area being 67% so. Other sizable ethnic groups in this area are: 8.9% Black African, 6.9% Mixed Ethnicity, 3.6% Other, 3.1% Black Caribbean, 2.4% Bangladeshi and 2.4% Chinese. (<i>streetcheck.co.uk</i>)
Unemployment:	4.4% of residents are unemployed. 70.7% of residents are economically active with 66.6% in employment. 29.3% of the economically inactive. 8.7% are retired, 7.8% are students, 2.9% look after home/family, 4.4% are long term sick or disabled. The majority of those employed work in Professional Occupations 20.5%. 17.6% are Managers, Directors and Senior Officials. (<i>streetcheck.co.uk</i>)
Deprivation:	In the latest Index of Multiple Deprivation (IMD) this area was ranked 16,395 out of 32,844 in England, where 1 was the most deprived and 32,844 the least. Overall deprivation in Sydenham is better than 49% of areas in England, Income deprivation is better than 48% of areas in England, Employment Deprivation is better than 62% of areas in England, Health Deprivation is better than 62% of areas in England, Education Deprivation is better than 60% of areas in England, Barriers to Services Deprivation is better than 34% of areas in England, Living Environment Deprivation is better than 21% of areas in England, Crime Deprivation is better than 25% of areas in England. (<i>UK local Area.com</i>)
Local Police:	Lewisham Police Station, 43 Lewisham High Street SE13 5JZ Metropolitan Police Services. The current police priorities in Sydenham, as highlighted on the https://www.police.uk/ website, are Violence with Injury offences, Violence Against Women and Girls; E-scooter use, particularly high speeds along residential roads and pavements which can be dangerous to pedestrians, continued begging outside supermarkets, drug use in parks and residential areas; Theft of tools from builders' vans, theft of number plates from vehicles and catalytic convertors.
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'. '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 Lewisham Council local authority Statement of Gambling Policy 2019–2022 (and draft 2023–2026), Part A to C (reference 10.2 for Bingo Centres) and Lewisham Council Borough Profile for Sydenham Ward 2022.

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
<p>Protecting children and other vulnerable people from being harmed or exploited by gambling</p>	<p>Unemployment: 4.4% of residents are unemployed. 70.7% of residents are economically active with 66.6% in employment. 29.3% of the economically inactive. 8.7% are retired, 7.8% are students, 2.9% look after home/family, 4.4% are long term sick or disabled. The majority of those employed work in Professional Occupations 20.5%. 17.6% are Managers, Directors and Senior Officials. (streetcheck.co.uk)</p> <p>Deprivation: In the latest Index of Multiple Deprivation (IMD) this area was ranked 16,395 out of 32,844 in England, where 1 was the most deprived and 32,844 the least. Overall deprivation in Sydenham is better than 49% of areas in England, Income deprivation is better than 48% of areas in England, Employment Deprivation is better than 62% of areas in England, Health Deprivation is better than 62% of areas in England, Education Deprivation is better than 60% of areas in England, Barriers to Services Deprivation is better than 34% of areas in England, Living Environment Deprivation is better than 21% of areas in England, Crime Deprivation is better than 25% of areas in England. (UK local Area.com)</p> <p>Schools and Education: Haseltine Primary School, Haseltine Road Bell Green, SE26 5AD Kelvin Grove Primary School, Kelvin Grove, Catford SE26 6BB Adamsrill Primary School, Sydenham, London SE26 4AQ Sydenham School, Dartmouth Rd, London SE26 4RD St. Bartholomew's Primary School, The Peak, Catford SE26 4LJ Forest Hill School, Dacres Road, London SE23 2XN Alexandra Junior School, Cator Road, Penge SE26 5DS</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 Sydenham Premise frontage will be of a style which obscures the interior with no advertising depicting images that may appeal to children.</p> <p>Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</p> <p>Merkur Slots operate a comprehensive Think 25 Policy, age verification checks are carried out and recorded, any person unable or unwilling to verify their age with appropriate ID will be told to leave, if they have managed to play machines, their staked money will be returned to them.</p> <p>Age verification test purchasing, and mystery shopper visits are frequently carried out by third party companies – ServeLegal and Store Checker. Age verification tests for 2023 pass rate of 89% is higher than the industry average, all venues receive 2 or 3 random test visits per year.</p>

	<p>St. Michael's Church Of England Primary School, Champion Road, London SE26 4HH Sydenham High School – Prep, 19 Westwood Hill, Catford SE26 6BL Brent Knoll School, Perry Rise, London SE23 2QU Eliot Bank Primary School, Thorpewood Avenue, Lewisham SE26 4BU St. Bartholomews Pre-school, St Bartholomew's Church Hall, London SE26 6QR Father Larkin Pre School, Coombe Road, Se SE26 6QW Elocution For Kids, 28 Jews Walk, London SE26 6PL T D Training Centre, 291 Regent House Business Centre Kirkdale, London SE26 4QD</p> <p>Community Centres and Youth Centres: Penge East Community Centre, 13 Station Road, SE20 7BE TNG Youth & Community Centre, 111 Wells Park Rd, SE26 6AD The Grove Centre Church, 2 Jews Walk, SE26 6PL</p> <p>Parks, play grounds and sports/leisure facilities: Sydenham Wells Park, 14 Taylor's Lane, London SE26 6LA Alexandra Recreation Ground, 11, Studland Road, Bromley SE26 5ND Mayow Park, Mayow Park Mayow Road, London SE26 4JA Home Park Adventure Playground, Winchfield Road, SE26 5TH The Gym Group London Sydenham, 74-78 Sydenham Road, London SE26 5QE PureGym London Sydenham, 291 Kirkdale, London SE26 4QD Shapers Sydenham, 10 Station Approach, Sydenham SE26 5EU</p> <p>Vulnerable and addiction support services: Humankind PCRS, 55 Dartmouth Rd, London SE23 3HN Supporting Hands Detox and Recovery Service, 21 Whateley Rd, London SE20 7NE James Ross Hunter Youth Support CIC, 111 Wells Park Road, SE26 6AD</p> <p><i>James Ross Hunter Youth Support - Our vision This non-profit organisation was launched in July 2014. Our aim is to encourage positive social values in youths and communities. We are currently based at TNG Youth and Community center at 111 Wells Park Road, Sydenham SE26 6AD.</i></p> <p><i>All our activities are community and family-based and are geared towards encouraging and creating positive social values in our young people. Without the community fundraising efforts and generous donations, we would not be able to create visual awareness through our yearly anti-knife crime poster competition, events, and projects.</i></p>	<p>Test purchase fails are reviewed within 48 hours by the Area Manager, this involves reviewing CCTV footage of the incident and implementing appropriate training or where necessary disciplinary action.</p> <p>All age verification checks are recorded on the IHL SMART Tablet AV App, this data is collated centrally and regularly reviewed by an independent team of compliance auditors.</p> <p>Results of age verification checks and third-party results are shared with the Gambling Commission.</p> <p>Proof of Age scheme in place with application forms available in the venue.</p> <p>The children and young persons gambling participation survey shows that the number of 11-16 years olds that say they have gambled on fruit machines of whatever kind in an arcade, pub or club is around 2%. Of those around a half to two-thirds do so legally on Category D fruit machines which are located in FECs or holiday parks, where any play will be of short duration (as families will be on a day trip or holiday), in venues which they can only access with their parents, and in premises licensed to offer Category Ds which are as a result tightly-regulated.</p> <p>We also know from a study by Professor David Forrest and Dr Ian McHale that whilst adolescents at the coast are more likely to participate in gambling activities than those that do not, they are no more likely to be problem gamblers than those that do not live at the coast. This is an important finding. Many people cite early exposure to gambling as a cause of later gambling problems. There is no evidence of a causal link. As David Forrest stated at conference in Toronto in 2012 'marginal gamblers induced to participation by ease of access do not appear prone to problem gambling and more children gambling does not carry through to more children being problem gamblers. Panic about arcades does not appear justified' https://www.gamblingcommission.gov.uk/PDF/Young-People-Gambling-Report-2019</p> <p>Vulnerability Training and guidance are given to Merkur Slots staff on vulnerability (the inability or limited ability of people to control their actions). This includes addictive gambling, mental health, alcohol or drugs issues.</p> <p>Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</p> <p>All staff complete on boarding and 6 monthly refresher training which includes Safeguarding Children and Vulnerable People and Customer Interaction. Staff are trained how to deal with vulnerable customers and how to make effective interactions, any difficult cases are referred to our compliance team for review and resolution.</p>
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	<p>The Hill, 45-47 Dartmouth Rd, London SE23 3HN</p> <p>Residential Areas: The area containing Sydenham Road consists predominantly of flats, which is common in inner cities, student neighbourhoods and poorer suburban settings. The area contains a higher-than-average level of rented housing (excluding social housing) – 67% of household spaces. This contrasts with the national average of just over 20%.</p> <p>Bus stops and other Transport links: Newlands Park (Stop G&H), London SE26 5EX Sydenham Overground Station, London SE26 5EU</p> <p>Locally Identified Premises: Sydenham Centre, 44A Sydenham Rd, London SE26 5QX</p> <p>Regular Festivals, Town Events and Mass Gatherings: SYDENHAM ARTS FESTIVAL in and around Sydenham for two weeks every July.</p> <p>James Ross Hunter Youth Support – event held throughout May <i>Volunteers are welcome to join us in making a difference of care in our communities. All of May is an awareness platform used to sensitised the public about the consequences' of carry knives and support victims voices. One minute silence is held on May 31st 11:00am in unity and schools and varied organisations are invited to develop a session of visual creation leading up to the 31st.</i></p>	<p>Responsible Committees. They take the opportunity to actively participate with these trade bodies, collaborating with other operators to promote responsible gambling initiatives including the development of an Accredited Gamcare training programme and the Machine Messaging trial and evaluation.</p> <p>The Gamcare Helpline Annual Statistics 2020 reported that calls received from people experiencing problems with their gambling were low in High Street Arcade Gaming Machines at 3% compared to Betting Shop Gaming Machines at 15%. The vast majority of calls were received from people within the on-line sector.</p> <p>Deprivation Whilst the premise may be near or in an area of relative deprivation, Merkur Slots takes the view that individual customers must be treated holistically, and the information provided in this document are designed to identify individuals that could potentially be at risk of gambling related harm</p> <p>Merkur Slots operates on the basis that its controls and best practice is always adopted therefore, it is not a question of degrees of vigilance being implemented in different areas.</p> <p>Homelessness Some premises are used by the homeless for warmth and company. Merkur Slots treats all customers with dignity and has a clear policy on begging.</p> <p>Staff are trained to deal with vulnerable people in a sympathetic manner, any difficult cases are referred to our compliance team for review and resolution.</p> <p>Staff are trained how to manage situations with homeless people seeking refuge.</p> <p>A line of contact will be created with local high-risk premises, homeless shelters, foodbanks to provide social responsibility information.</p> <p>MERKUR staff are aware of where rough sleepers sleep and beggars loiter in the local area and actively prevent them from entering the premise, including close monitoring of individuals spending coins/low level amounts on a frequent basis.</p> <p>Should loitering increase due to extended hours additional notices will be added about loitering without play not being tolerated.</p>
<p>Preventing gambling being a source of crime or disorder, being associated with crime and disorder or being used to support crime</p>	<p>Crime statistics: Sydenham Road is located within the Sydenham policing neighbourhood, under the Metropolitan Police Service force area. The most commonly reported crime types in the past 12 months were: Violence and sexual offences 26.9%, Anti-social behaviour 19.7%, Vehicle crime 12.3%, Other theft 9.2%, Burglary 8%, Criminal damage and arson 7.6%, Public order 6%, Drugs 3.3%,</p>	<p>Premise Security and violence in the workplace <i>Poor security control measures which may increase vulnerability to crime Failure to protect employee and customers from harm during the hours of late-night opening</i></p> <p>Merkur Slots Sydenham is subject to a separate security risk assessment, local factors are considered, and proportionate control measures/physical security measures are installed.</p>

<p>Shoplifting 1.9%, Robbery 1.7%, Bicycle theft 1.1%, Theft from the person 1.1%, Other crime 0.9%, Possession of weapons 0.4%. The crime rate in Sydenham is higher than the average crime rate across similar areas and similar to average for the Metropolitan Police force area. (<i>police.uk</i>)</p> <p>In October 2023 ,147 crimes were recorded within a half mile of the venue. The most commonly recorded crimes were: 33 Violence and sexual offences, 31 Anti-social behaviour, 17 Vehicle crime, 15 Public order. (<i>police.uk</i>)</p> <p>Local Police: Lewisham Police Station, 43 Lewisham High Street SE13 5JZ Metropolitan Police Services.</p> <p>The current police priorities in Sydenham, as highlighted on the https://www.police.uk/ website, are Violence with Injury offences, Violence Against Women and Girls; E-scooter use, particularly high speeds along residential roads and pavements which can be dangerous to pedestrians, continued begging outside supermarkets, drug use in parks and residential areas; Theft of tools from builders' vans, theft of number plates from vehicles and catalytic convertors.</p> <p>Public Houses and Alcohol Licensed Premise: The Dolphin, 121 Sydenham Rd, London SE26 5HB Golden Lion, 116 Sydenham Rd, London SE26 5JX The Alfred London, 178 Sydenham Rd, London SE26 5RP The Pub, 82 Newlands Park, London SE26 5NB The Pavilion, 325 Kirkdale, London SE26 4QB The Greyhound Sydenham, 313-315 Kirkdale, London SE26 4QB Fox and Hounds, 150 Kirkdale, London SE26 4BB The Bricklayers Arms, 189 Dartmouth Rd, London SE26 4QY Railway Tavern, Lower Sydenham, 401 Southend Ln, SE26 5BH Bridge House, Bridge House, 2 High St, London SE20 8RZ The Alexandra, 163 Parish Ln, London SE20 7JH The Crooked Billet, 99 High St, London SE20 7DT The Hill, 45-47 Dartmouth Rd, London SE23 3HN</p> <p>Pawnbrokers and Loan Shops: H&T Pawnbrokers, 37 Sydenham Rd, London SE26 5EX Captains Of London, 79 Sydenham Rd, London SE26 5UA H&T Pawnbrokers , 136 High St, London SE20 7EU</p> <p>Gambling premises: Admiral Casino, 3 COLMAN HOUSE, High St, London SE20 7EX William Hill, 93 Sydenham Rd, London SE26 5UA William Hill, 153 High St, London SE20 7DS William Hill, 195 Perry Vale, London SE23 2JF Paddy Power, 89 Sydenham Rd, London SE26 5UA Ladbrokes, 85 Sydenham Rd, London SE26 5UA</p>	<p>Merkur Slots Sydenham will be fitted with a HD CCTV system with coverage of all public areas including all entry and exits points, CCTV will be clearly advertised to customers with screens visible by staff when working in the service area. Ability to review CCTV remotely and provide footage to relevant parties when required.</p> <p>Floor layout will be designed to avoid blind spots to enable the active management and observation of customers entering and leaving the premises, from the central service area the entrances, machines and toilets can be observed, and staff will regularly patrol the gaming floor to supervise and interact with customers to identify underage or vulnerable persons.</p> <p>General Crime and Disorder <i>To identify aggressive customers to prevent crime and disorder</i> <i>Awareness of local crime issues in the local area</i></p> <p>We have reviewed the Police.UK hot-spot mapping for the local policing neighbourhood and are aware of the areas of Recorded Crime, Vulnerable People and Vulnerable Places and are very mindful of the potential damage associated with problem gambling. We will make every effort to liaise with local Police over reducing our involvement in any incident.</p> <p>Staff are trained to identify suspicious activity and have the ability to interrogate real-time machine data to identify criminal activity and fraudulent incidents which are logged and escalated where appropriate.</p> <p>All incidents are recorded on the IHL SMART Tablet Incident App inc. crime reference number where applicable.</p> <p>Staff are trained on how to deal with aggressive customers and situations which may also require police assistance.</p> <p>The company operate an internal security alert system and are registered with trade associations for crime bulletins (BACTA and Bingo 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 Sydenham will participate 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</p>
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	<p>Ladbroke's, 297 Southend Ln, London SE6 3ND Coral, 120, 122 Kirkdale, London SE26 4BB</p> <p>Residential Areas (impacted by Anti-Social Behaviour): Anti-social behaviour is the second, most commonly recorded crime type in Sydenham area. In October 2023, 28 anti-social incidents have been reported within half a mile of Sydenham Road, Lewisham, London, SE26 5EX. The most affected is around Queensthorpe Mews.</p>	<p>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 IHL SMART Tablet Incident App.</p> <p>Staff are trained to be extra vigilant where there is clear evidence of continued anti-social behaviour occurring in the vicinity and encourages a partnership approach with local authorities.</p> <p>Where short term risk is created by young people congregating nearby or attempting to enter the premise staff are trained to closely monitor the entrance. In extreme cases the maglock system would be deployed.</p> <p>Should there be an increase in people congregating outside the premise due to extended trading hours, appropriate signage will be displayed to deter people from loitering.</p> <p>Additional signage 'leave quietly' signage will be added to advise customers to respect local residents.</p> <p>Money Laundering <i>Failure to identify the occurrence to launder money on our premises (e.g., dyed stained notes, fake notes, foreign coins) and to adhere to reporting policies and procedures.</i></p> <p>Merkur Slots has a designated Anti Money Laundering Officer (AMLO), and AML polices with clear escalation and reporting processes.</p> <p>Where there are pawnbrokers and loan shops in the vicinity, staff are trained to monitor and record customer behaviour, spend and time spent gambling and customer interactions are used to assess customer source of funds/income where relevant, enhanced scrutiny will be implemented where concerns of criminal activity or association of are suspected. Any suspicious activities are reported to the nominated officer who will report to NCA where appropriate. IHL SMART Tablet AML App is used to record AML incidents with emails alerts sent directly to the AMLO.</p> <p>Security alerts and photos of suspects are shared with other operators. CCTV systems available for additional monitoring of activity and MARS (machine data capture system) provides individual transactions and fraud alerts for suspicious activity.</p> <p>Anti-fraud analysis on MARS (machine data capture system) identifies suspicious gaming activity.</p>
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Adequate staff will always be maintained and subject to regular review and risk assessment.

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

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

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

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

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

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

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

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

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

The premise and staff will be protected by a Staffguard security system, Maglock and intruder alarm will be installed.

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

		<p>Alcohol and Drugs Anti-social behaviour caused by alcohol is not tolerated within our premises and there are comprehensive security and reporting processes to escalate, report and deal with any issues as they arise. 'No Alcohol Allowed' signage on the door.</p> <p>Drug misuse is not tolerated within the premise and in locations where there is heightened risk, the toilets are locked with access monitored and controlled by the staff.</p> <p>Staff are aware to refuse access to any person who is or appears to be under the influence of alcohol or drugs, or adopting anti-social behaviour, any such incident will be logged on the IHL SMART Tablet Incident App and depending on severity will be reported to the police.</p> <p>Staff are trained to be extra vigilant where there is clear evidence of street drinking in the vicinity and encourages a partnership approach with local authorities.</p> <p>Maglock systems will be deployed during times of public houses closing.</p> <p>Money Lending Money lending is not tolerated within our premises.</p> <p>Suspicious of organised money lending by illegal money lenders are escalated to the audit compliance team and onwards to local authority money lending teams.</p> <p>Late Night Operation Maglock systems are often made available for staff to deploy at any point in time to protect against crime or disorder and are always deployed during times of public houses closing.</p> <p>Dedicated Regional Night Managers are employed to support venues with security incidents.</p> <p>Area Manager's operate a late-night rota system to ensure the 'late night contact number' is monitored so venues always have an Operational Manager to call upon for support with any issues during late night operation.</p> <p>The premise and staff are protected by a Staffguard security system, Maglock where available and intruder alarms are installed. Staffguard provides instant access to live security support and there are panic alarms giving direct contact with the Police.</p>
<p>Ensuring that gambling is conducted in a fair and open way</p>		<p>Gaming Machine and Supervision The premise operates under a Bingo Licence, with proprietary bingo equipment, and a range of category B3 (max stake £2/prize £500), C (max stake £1/prize £100) and D (max stake 10p/prize £5) machines (company average stake is 30/40p).</p>

		<p>Bingo is available by means of Bingo tablets offering a range of Bingo products and Live calling. Bingo Tablets are linked to Merkur venues and other operators across the country and allow customers to play Bingo including the National Game which is played twice per day in the venue when customer numbers are as low as one. Tablet systems now account for most of the bingo play in venues of all sizes.</p> <p>Customer Complaints <i>Failure to prevent customers complaints and disputes regarding gambling within our premises. Failure to resolve customer's complaints and disputes regarding our gambling premises.</i></p> <p>Merkur Slots operate a clear customer complaints policy both within venues and via a customer complaints link on the website. Complaints management policy in place for written, telephone and complaints received via the 'customer complaints' link on company website.</p> <p>The Company Code of Practice and Complaints and Disputes Policy will be displayed on the Customer Information Board at the entrance with leaflets available within the premise - ADR provider is IBAS.</p> <p>Complaints portal used to collate and manage responses. 4 stage complaints procedure with ADR entity Independent Betting Adjudication Service Ltd (IBAS) for unresolved complaints. Staff are trained and encouraged to use positive discretion to resolve customer complaints in venue.</p> <p>Marketing Merkur Slots promote responsible gambling and social responsibility throughout all marketing campaigns. Marketing and Promotional activity complies with LCCP, and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</p> <p>External windows will have digital marketing screens which will display safer gambling messages, No Under 18's allowed, Think 25, opening times and promotional activity.</p> <p>All marketing campaigns are reviewed for appropriateness before being launched. No advertising is used that depicts images that may appeal to children.</p>
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<p>Other</p>	<p>Places of worship and Religious Buildings: Our Lady & St. Philip Neri RC Church, Sydenham, 208 Sydenham Rd, London SE26 5SE Parish Church of Saint Michael and All Angels, 1A Trewsbury Rd, London SE26 5DP All Saints Church, Trewsbury Rd, London SE26 5DP Ministère de la parole de la réconciliation, 141 Newlands Park, London SE26 5PP Forest Hill Community Church, 17 Sydenham Rd, London SE26 5EX Beneficial Veracious Christ Church, 3 Peak Hill Ave, SE26 4LG St Bartholomew's Church, 4 Westwood Hill, London SE26 6QR The Grove Centre Church, 2 Jews Walk, London SE26 6PL Church of the Resurrection of Our Lord (RC), 165-169 Kirkdale, London SE26 4QL St Philip The Apostle C Of E Church, 11 Coombe Rd, SE26 6QW Holy Trinity Church Sydenham and Forest Hill, Trinity Path, London SE26 4EA Kingdom Hall of Jehovah's Witnesses, 173 Venner Rd, SE26 5HX Citizenship in Christ Fellowship, Premier Centre, Kangley Bridge Rd, London SE26 5AQ Potters House Sydenham, Wesley Hall, 211-213 Sydenham Rd, London SE26 5HF</p>	<p>Ethnicity and Local Area Demographic Merkur Slots does not discriminate on the ground of ethnic or social demographic.</p> <p>Local area profiles which detail deprivation, social, ethnic or population may be used as part of the risk assessment in relation to gambling related harm in conjunction with the company standard controls.</p> <p>Merkur Slots takes a holistic approach to customers and is aware that the Equality Act precludes the exclusion of any group for generalised reasons.</p> <p>Merkur Slots will participate with any local/town centre scheme and actively seek to support and be involved with any local initiatives targeted at reducing deprivation (crime/employment/health) and engage in the sharing of information.</p> <p>Training & Social Responsibility Merkur Slots take responsible gambling and social responsibility seriously, ensuring all staff are fully trained to carry out their roles in a responsible manner.</p> <p>Merkur Slots have attained Responsible Gambling Accreditation from the G4 Global Gambling Guidance Group.</p> <p>Merkur Slots work with YGAM (Young Gamers and Gamblers Education Trust) to deliver City and Guilds accredited training on vulnerable and gambling harm to all levels of management.</p> <p>There are two National Training Centres and a dedicated Learning and Development Team.</p> <p>Gamcare Accredited training completed by members of management.</p> <p>All staff complete on boarding and 6 monthly refresher training: The Essentials of Compliance, Safeguarding Children and Vulnerable People Age Verification and Customer Interaction.</p> <p>Staff are aware of the importance of social responsibility, trained to advise customers of gambling responsibly and identifying potential problem gamblers.</p> <p>Compliance and Social Responsibility Folder and Player Protection Framework containing policies and procedures is available to all staff. Venue Mangers review compliance logs monthly, Area Managers Bi monthly and Compliance Auditors annually.</p>
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Merkur Slots Sydenham Premise Layout

Premise level:	Merkur Slots Sydenham will be a ground floor premises.
Premise frontage:	Merkur Slots Sydenham will be a property will be 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 Sydenham floor layout will be of the design to avoid blind spots and enable supervision of entrances and machines from the central service area and staff will regularly patrol the gaming floor to supervise and interact with customers and identify underage or vulnerable persons.</p> <p>The central service area serves as the main support area for staff to manage the venue without having to leave the floor:</p> <ul style="list-style-type: none"> - TiTo machines with a central redemption change machine GeWeTe, the GeWeTe is fitted with a duress code facility and built in time delay. Staff do not carry cash floats and only management can open the gaming machines and change machines. - Beverage and snacks are provided from the service area - IHL SMART Tablet located on the service desk provides the facility to record age verification checks, customer interactions, incidents, self-exclusions, reinstatements, track and trace and general venue management checklists - The CCTV monitor on the central desk allows staff to view the exterior at all times.
Floor layout:	Merkur Slots Sydenham floor layout will be designed to avoid blind spots to enable the active management and observation of customers entering and leaving the premises, from the central service area the entrances, machines and toilet can be observed and staff will regularly patrol the gaming floor and interact with customers allowing identification of underage and vulnerable persons. 'Stay in Control' Posters and Leaflets will be located in prominent locations within the premise.
Machine Positions:	<p>Merkur Slots Sydenham will operate under a Bingo Licence, with proprietary bingo equipment, and a range of category B3 (max stake £2/prize £500), C (max stake £1/prize £100) and D (max stake 10p/prize £5) machines (company average stake is 30/40p).</p> <p>Bingo will be available by means of Tablets offering a range of Bingo products and Live calling. Bingo Tablets are linked to Merkur bingo venues and other operators across the country and allow customers to play Bingo including the National Game which is played twice per day in the venue when customer numbers are as low as one.</p>
Hidden Areas:	Merkur Slots Sydenham will be fitted with a HD CCTV system with coverage of all public areas including all entry and exits points, CCTV will be clearly advertised to customers with screens visible by employees when working in the service area.

Additional Comments

During the pre-application process the police were consulted with and provided the following response:

'The area of Sydenham in general has and will continue with the ASB and problems with a high level of Off-Licences that have grandfather rights. There are many estates with youth crime and gang problems, along with Street drinkers and lower level crimes, like Theft/shoplifting.'


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 Casino UK operate two premises within the London Borough of Lewisham: MERKUR Slots, 97-99 Lewisham High Street, London, SE13 6BA since 2012 and MERKUR Slots, 40 Deptford High Street, Deptford, London, SE8 4AF since 2021. None of our operational venues have been subject to review proceedings.

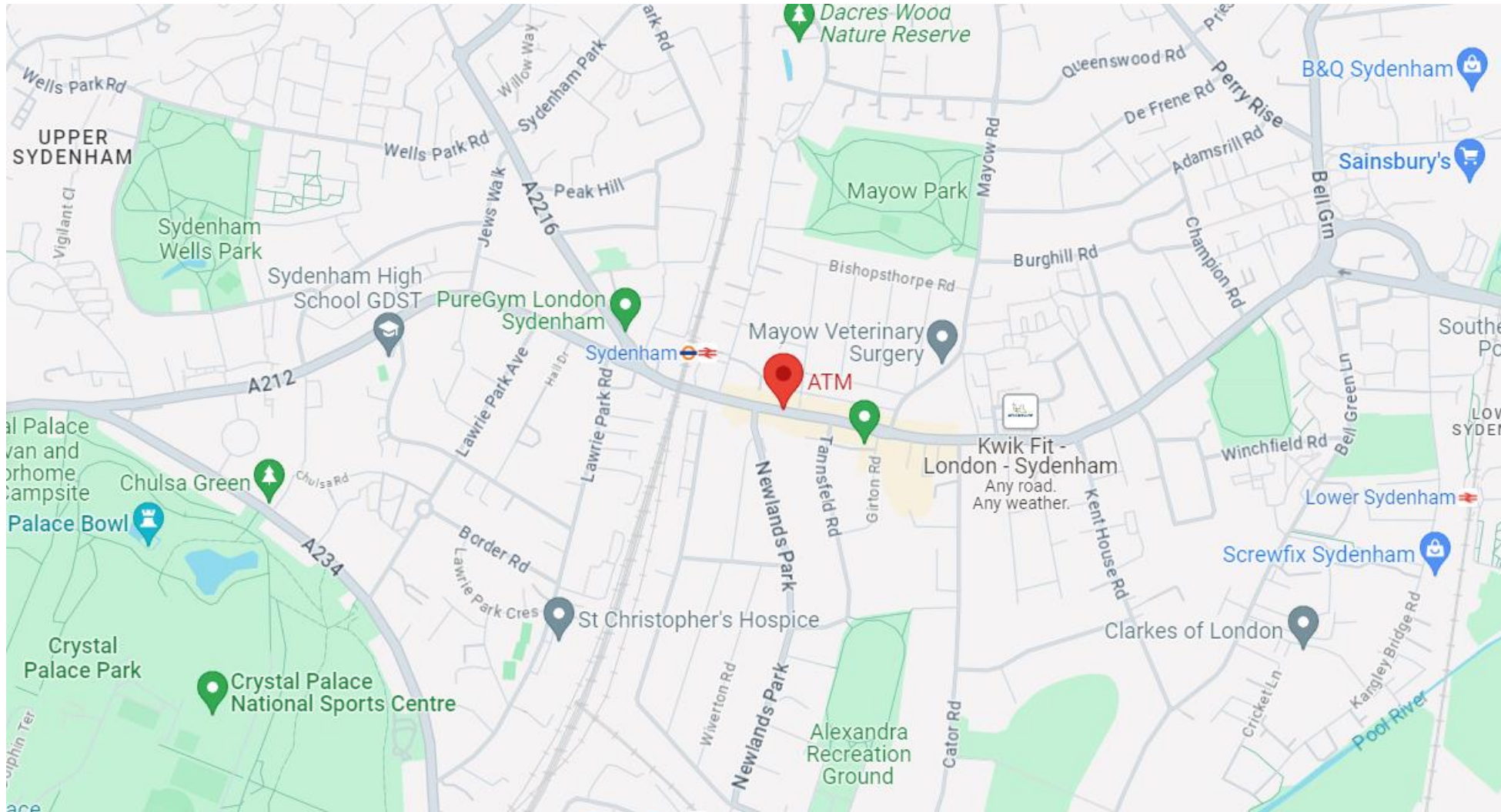
I am an IIA Qualified Internal Risk and Corporate Governance Auditor with over 25 years' experience working in risk-based customer facing environments within various industries. The last 11 years I have been working solely in the Gambling Industry (*Amanda Kiernan, Head of Compliance*).

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:	28 th December 2023

Merkur Slots, 53 Sydenham Road, London, SE26 5EY – map:



Merkur Slots, 53 Sydenham Road, London, SE26 5EY – Shop frontage example:

